

Statement of Consultation
Sustainable Transport SPD
March 2013



The Sustainable Transport Supplementary Planning Document (SPD) was produced in line with Regulations 12 and 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is a requirement of these regulations that a Statement of Consultation is produced to set out how the Sustainable Transport SPD has been prepared.

The Statement of Consultation sets out:

- i. Who the Council consulted when preparing the SPD
- ii. A summary of the main issues raised
- iii. How those issues have been addressed in the revised SPD

How was the SPD developed?

The Sustainable Transport SPD was prepared following the adoption of the LDF Core Strategy in April 2012. Officers from Strategic Planning prepared initial drafts and these were reviewed and amended with the assistance of Development Management and Neighbourhood Engineering colleagues.

Who did the Council consult and how?

An initial stakeholder consultation took place in mid July and August 2012, which was a targeted consultation to assist the initial drafting for the first consultation. Amendments were then made (and the document edited and renumbered) to produce a draft for public consultation which took place between 12 November and 21 December 2012.

The consultees for the first consultation are listed in Appendix 1 and the issues they raised are presented in Appendix 2. These were then incorporated into a revised draft which was published for public consultation and the list of consultees for this stage is presented in Appendix 3. The responses gained from this stage, and some further submissions by stakeholders who had already responded, are presented as Appendix 4.

Further amendment of the document was then undertaken as a result of these responses and the final SPD is to be submitted for adoption by the Council. Some drafting and format alterations were undertaken between the stakeholders' and public consultation drafts, so certain paragraph and section references in Appendix 2 cannot be referenced directly in the public consultation draft.

Consultees were informed of the consultations by letter and email, while the draft SPD for public consultation was published on the Council's website, and paper copies were made available for public viewing in public libraries and at the Council's Information and Advice Centre.

Summary

A variety of issues was raised by consultees, but no consistent themes emerged, other than overall support for the guidance and promotion of sustainable transport.

Specific issues were raised in the initial consultation regarding cycle parking provision and standards, and amendments were made for the public consultation draft. Transport for London (TfL) noted issues regarding parking standards and the strategic walking and cycle networks, and amendments were made for the public consultation draft.

With regard to the public consultation, many of the issues raised were beyond the scope of the SPD, as indicated in Appendix 4.

Appendix 1: Stakeholders Consulted by the Council in the Preparation of the Supplementary Planning Document

Age Concern Kingston	Kingston Primary Care Trust	Pro-active South London
Atkins Global	Kingston Street Pastors	Radar
Chamber Planning & Transport sub-committee	Kingston University	Ramblers
Chessington District Residents Association	Kingston Wheelers	Richmond and Kingston Accessible Transport (RaKAT)
Chessington World of Adventures	Licensed Taxi Driver Association	Road Haulage Association
CTC South London	Living Streets	Royal Parks
Disabled Ramblers	London Borough of Merton	Save the World Club (Anthony Grover)
Elmbridge Borough Council	London Borough of Richmond	South London Business
English Heritage	London Borough of Sutton	South London Freight and Road Partnership
EnhanceAble	London Borough of Wandsworth	South London Partnership
Environment Agency	London Councils	South London Sustainable Transport Group
Epsom & Ewell Borough Council	London Cyclists	South West Trains
Freight Transport Association	London Fire and Emergency Planning Authority	Southborough Residents Association
Greater London Authority	London Fire Brigade	Surrey County Council
Highways Agency	London First	Sustrans London
Kingston Association for the Blind	Malden Rushett Residents Association	Talking Newspaper
Kingston Centre for Independent Living	Metropolitan Police	Tesco
Kingston Chamber of Commerce	Mind in Kingston	Thames Water
Kingston College	Mole Valley	Transition Town Kingston
Kingston Cyclists	Natural England	Transport for London
Kingston Fire Brigade	Network Rail	TTR
Kingston First	Pearsonmaddin	Walk England
		ZIPCAR

Appendix 2: Stakeholder consultation responses

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment	RBK response/ amendment to SPD
1	Highways Agency (Patrick Blake)		1	General	No comment	None
2	Kingston Cyclists (Jon Fray)		2	General	We believe that the Cycle Parking section 2.11 is important and should not be removed. Typically cycle parking is an after-thought for a developer and architect and therefore the clearer the requirement and explanation of the reason for good cycle parking, the better. Specifically the mention of 'Sheffield' and 'Camden' stands in Table 3 is helpful because so many developers provide sub-standard cycle parking.	No amendment required
			3	Travel; Plans	The section on Travel Plan Measures should be retained.	
			4	Para 2.11.5 Table 3	It would be helpful to identify that long-stay cycle parking should be away from street-view while being under casual or formal surveillance from within the development. The reason is that there have been developments where non-residents or non-site users can see bikes parked and can target them but they are not over-looked from within. E.g. the Tempest House/ Canbury Park Road development where cycle parking is on the periphery of a large site. Also, the extensive cycle parking for the Rotunda behind the development is practically unused because there is no surveillance, it is not within a	Agreed/Add to Table 3 following para. 2.11.5: <i>'For long-stay cycle parking fully-secure cycle parking should be provided. This could be by providing cycle parking within an outbuilding, secured area or within a purpose built cycle cage or compound. Alternatively individual cycle lockers could be used. <u>To ensure safety and security, where practical facilities should not be visible</u></i>

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment	RBK response/ amendment to SPD
					restricted secure compound and it is inconvenient for users.	<i>from the street and should be in locations with high levels of passive surveillance.'</i>
3	Kingston Talking Newspaper (Brian Gaff)		5	General	I happen to know that Dial a Rides current new VW bus fleet has issues with some of the width restrictions used in Kingston.	SPD set outs transport related requirements for development proposals; not appropriate for the SPD to identify highway network upgrades. Standards for vehicle access widths based on the Manual for Streets and best practice/ No amendment Subsidisation of taxi fares is outside the scope of the SPD/No amendment Provision of shops is outside the scope of the SPD/No amendment
			6	General	You also find that people with disabilities living in the areas of poor public transport links like south of the borough across the other side of the A3 from the rest, tend to find that subsidisation of taxis etc is hardly worth having due to the costs.	
			7	General	In Chessington, it would be quite nice to have more shops, but as it's considered poor access we probably won't get them	
4	London Borough of Merton (Chris Chowns)		8	General	The approach taken in Merton has been to adopt a slightly more pragmatic/ flexible Permit Free approach. Whilst not preventing the council or developers from specifying car free development. This approach has been generally successful in accommodating reduced levels of parking in areas of good PTAL (4 and above), but still protecting residents by restricting access to on-street parking permits. I note that item 2.8.13 effectively supports this concept already, but you may find formalising the practice helpful.	As noted, para. 2.8.13 supports this approach/No amendment 'Permit-Free' and' car-free' are regarded as two different things
			9	General	Could we call it Permit Free instead of Car Free Development?	

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment	RBK response/ amendment to SPD
			10	Paras 2.8.12/ 2.8.18	Potential for PTAL inconsistency – For clarity it may be better to simplify advice by allowing car free development for PTAL 4 and over. This approach would also be consistent with Merton’s practice. It is a bit confusing to say the Council will accept lower car park provision in PTALs 4-6, but only car free in PTALs 5-6. It seems appropriate to also consider car free in PTALs 4-6. This would make the document easier to understand (consistency within the document); and would align with Merton’s thresholds for car free (permit free development) of PTALs 4-6. Merton would like to see this consistency across boroughs.	requiring specific approaches/No amendment required. After further consideration, specifically for car-free proposals with PTALs 4-6, amendments agreed to provide consistency/ Amend paragraph 2.8.12 as follows: <i>“Car free developments will not normally be considered on sites with a PTALS rating of lower than 5 4. In all cases car free developments must be located within a Controlled Parking Zone (CPZ) and a sufficient distance from any area not covered by a CPZ to deter users of the site from parking in CPZ free areas.....”</i>
			11	General	Confused as to whether the SPD is ‘requiring’ car free development in PTALs 5&6 or just specifying requirements if developers proposed car free developments.	Do not agree with the implication that ‘car-free’ is required/No amendment required
			12	Page 16	It may be worth clarifying that the monitoring fee for Travel Plans is a one-off payment and not an ongoing annual payment.	Agree there is some confusion/ Amend paragraph 2.4.8 as follows: <i>“.....The Council will also secure a Travel Plan monitoring fee to meet the Council’s costs of assessing the submitted</i>

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			13	Para 2.7.3	This statement could in effect require virtually all new development to provide a parking management plan – this could be very onerous on your resources. Not sure whether this was your intention. Suggest that criterion (a) of paragraph 2.7.3 is removed, to reduce this burden.	<i>monitoring reports and supporting the site occupier to make any amendments necessary. The monitoring fees are <u>a one-off payment and are set out in Table 2, which has been extracted from the borough's Planning Obligations SPD.....</u>"</i> Not considered that criterion (a) will create a burden for Council resources/ No amendment Section included to assist potential developers/No amendment
			14	Section 2.13	The points/requirements in the Electric Vehicle Section (2.13) are from the London Land and Transport SPG. Suggest these points are removed in favour of just providing a link to this document, in case the SPG changes and the points become outdated.	Summary of thresholds in Appendix is seen as helpful to potential developers/No amendment
			15	Appendix 1	Duplication of the body of SPD. The points from Appendix 1 should be removed from the body of the SPD and should only be in Appendix 1.	
5	London Fire and Emergency Planning Authority (LFEPA) (Dron and Wright)		16	General	The following policies are supported by the LFEPA: <ul style="list-style-type: none"> The reduction of congestion levels, increase in the share of sustainable modes of transport, the improvement of safety of the transport network, the improvement of air 	No amendment required

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment	RBK response/ amendment to SPD
					<p>quality and the reduction in CO2 emissions.</p> <ul style="list-style-type: none"> The reduction of the risk of obstructive parking. 	
6	Metropolitan Police (Justin Bennett)		17	General	The Police have nothing to add or comment on except to say that you may want to include a reference to Manual for Streets 2 in Section 2.14.	Reference Manual for Streets 2 and provide a link in Appendix 13 of the SPD.
7	Natural England (Jamie Robert Melvin)		18		No comments	No amendment required.
8	Pro-active South London (Christine Double)		19	General	Pro-Active South London is pleased to see such a strong reference to walking and cycling networks in the SPD. We are keen to ensure that this is included and strengthened if possible to include consideration of those who are running/jogging as a form of travel (and improved health and well being).	Support appreciated. Measures to encourage walking/cycling are beyond the scope of SPD (see Core Strategy etc)/No amendment
			20	General	We would like the document to include storage as well as parking of bikes and the inclusion of access to changing facilities and toilets where possible - perhaps opening access in public buildings with these facilities and also access to water fountains.	SPD includes cycle parking standards and design standards for cycle parking, showering and locker facilities (see Section 2.11)/No amendment
			21	General	We welcome the emphasis on safety and would like robust reference to bike lanes, signage and lighting. We would like proper consideration of potholes and repair of roads close to the pavement as these can cause a significant hazard for cyclist.	Support welcomed but much of this comment is outside the scope of SPD/No amendment
			22	Travel	Where possible we would like to see an	Please refer to Section 2.4 of

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				Plan	integrated travel plan where the transfer from one mode of travel to another has been fully considered.	SPD/No amendment
9	Transport & Travel Research Ltd		23	General	<p>I wanted to take the opportunity to reinforce the requirement for Construction Logistics Plans. This is a topic that we've been working on in some detail with LB Croydon and TfL over the past 12 months or so in the context of preparing CLP support documents for their Opportunity Area Planning Framework.</p> <p>The result is that there is a significant amount of extra guidance material that has been produced that goes into a fair bit more detail than the original TfL documents that you refer to in the draft SPD. I know that Croydon are keen to spread knowledge of this guidance as widely as possible, and as a result the work has been promoted both through the South London Air Quality Group (which I believe Kingston does not attend) and also the South London Freight Group which Paul Dearman attends on behalf of LB Kingston. I believe that TfL is interested in picking up the Croydon work and disseminating it further – I'm sure those I've copied in to this message will let us know if I'm wrong – and the question appears to be around what is the best mechanism to achieve this. In the meantime, if you do wish to refer to our latest, more detailed CLP guidance then please get back in touch with me and Clive Simmonds and I'm sure we can provide you with what you need.</p>	<p>Paragraph 2.6.4 of the SPD will be amended to include reference to and a link to the Construction Logistics Plans guidance document when:</p> <ul style="list-style-type: none"> a) The document is fully endorsed by Transport for London; and, b) The document is available on the internet free of charge.
10	Transport for London		24	General	Transport for London (TfL) is supportive of the aspirations set out in the Sustainable Travel SPD,	

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment	RBK response/ amendment to SPD
	(Joanna Kesson)		25	Paras 2.8.8/ 2.8.9	<p>including aims to: protect and enhance bus services and facilities; promote cycling and improve cycling facilities; locate high trip generating development in areas with high public transport accessibility levels; safeguard land for transport; support car club networks in new development; and install electric vehicle charging points in accordance with London Plan standards.</p> <p>TfL would urge the borough to support London Plan parking standards, and discourage the provision of additional parking spaces in town centres. TfL does not accept the assertion in section 2.8.8 that additional parking may be considered if a shortage of parking in the area is perceived to be 'constraining economic growth', unless this can be justified beyond reasonable doubt.</p>	<p>Amend paragraph 2.8.8 as follows: <i>For non-residential development located in town centres, as noted in Policy 6.13 of the London Plan, with regard to identified issues of vitality and viability and the need to regenerate such centres_it can be demonstrated a shortage of parking is constraining economic growth.</i></p> <p>Amend paragraph 2.8.9 as follows: <i>Development proposals should still be in accordance with other policies in the Development Plan and other guidance in this SPD. Robust, credible evidence will be required to demonstrate that points (a) to (c) above apply to the development proposal.</i></p>
			26	Para	The SPD mentions the borough strategic walking	Amend bullet point 6 of

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			28	Para 2.15.4	Although signage to improve pedestrian and cyclist way finding is mentioned in section 2.15.4(h), this should not be limited to onsite signage for large developments. Pedestrian signage to and from development on walking routes to key local facilities such as shopping, education and public transport should be considered and provided for in all significant developments (e.g. those that require a full transport assessment). TfL would encourage the adoption of Legible London within the borough and the borough should be actively seeking developer contributions to fund its expansion.	Amend bullet point under paragraph 2.15.4 as follows: <i>For development proposals that require Transport Assessments, developers should undertake walking audits of the site and surrounding pedestrian environment to ensure it is suitable for its intended use. Particularly to ensure there are direct, secure, accessible and pleasant walking routes to surrounding public transport stops and stations. Please note it is recommended that the Pedestrian Environment Review System (PERS) is used to assess the condition/quality of the walking environment.</i> Add the following bullet point to table in Appendix 2 (Transport Assessment and Statement Template), under the heading 'Baseline Information': <i>Condition and quality of the surrounding cycling and walking environment. Please note it is recommended that the Pedestrian Environment Review System (PERS) is used to assess the condition/quality of the surrounding walking environment.</i> Agree that a reference to

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			29	Section 2.11	Cycle parking requirements (section 2.11) must be in addition to any pool or hire bike provision that may be available locally or on site. The latter cannot be considered a substitute for the provision of secure cycle parking in accordance with London Plan standards.	<p>development proposals improving off-site signage should be added to the SPD/ Amend table under paragraph 2.15.4 as follows: <i>Ensure that development on the site protects or enhances the quality, safety and security of walking and cycling routes adjoining the site, such as avoiding or removing blind corners, hiding spots and enclosed alleys, maintaining or improving the lighting of routes, maintaining or improving casual surveillance and improving way finding signage.</i></p> <p>Agree/ Amend paragraph 2.11.2 as follows: <i>Adequate cycle parking facilities should be provided for both short-stay users (i.e. customers and visitors) and long-stay users (i.e. employees and residents). Cycle hire docking stations and pool bikes should not be considered a substitute for cycle parking facilities.</i></p>
11	Zipcar (Jonathan Hampson)		30	Paras 2.12.1/ 2.12.2/ 2.12.5	Points 2.12.1 and 2.12.2 both fall under the category of being important and not to be removed. They clearly explain why car clubs are a benefit, make the case for including car club schemes in developments, and stipulate that	No amendment

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			31	Para 2.12.4	<p>implementation needs to be from first occupations, all of which we strongly agree with. Similarly, point 2.12.5 is encouraging as it ensures that all developments over 5 units will be including car club schemes on site.</p> <p>We would make the case that 2.12.4 needs to be amended slightly to reflect the fact that with car clubs it is very difficult to provide a 'one size fits all' metric of a set number of units, in this case 40, equating to one car club vehicle being needed on site. When considering whether a vehicle is needed on site we look in depth at the existing network of vehicles in the area, PTAL, parking ratios and existing membership base. We would prefer that it read something like: "Residential developments providing 50 or more units should consult with a car club to determine whether providing a space/spaces for a car club would be necessary. The process of determining whether car club spaces are needed on site should be carried out on a case by case basis and the developer must provide car club spaces if they are required by the car club. Car club facilities should: "</p>	<p>Requirement for 1 car club bay per 40 dwellings taken from adopted Planning Obligations SPD. Any change would be inconsistent although it is acknowledged that this threshold may not be able to be applied in all situations and further negotiations with developer/car club operator may be necessary. The Council does not support Zipcar's proposed amendments to the SPD due to the statutory position of the Council with regard to achieving planning obligations. It is not appropriate to place requirements on those not bound by the planning consent granted.</p>

Appendix 3: Public consultees in final consultation for Sustainable Transport Supplementary Planning Document

Statutory Consultees

- Environment Agency
- English Heritage
- Natural England
- The Mayor of London
- Civil Aviation Authority
- Homes and Community Agency (now under the GLA's Housing and Regeneration Directorate)
- Primary Care Trust
- Office of Rail Regulation
- Transport for London
- Highways Agency
- Network Rail
- Surrey County Council
- Elmbridge Borough Council
- Epsom and Ewell Borough Council
- London Borough of Merton
- London Borough of Richmond upon Thames
- London Borough of Sutton
- London Borough of Wandsworth
- Metropolitan Police Authority
- Mole Valley District Council
- Claygate Parish Council
- Thames Water Plc
- British Gas Plc
- Coal Authority
- Mobile Operators Association
- National Grid
- NHS Kingston
- Ofcom
- Ofgem - London
- Powergen plc
- Scotia Gas Networks
- The Planning Inspectorate
- Transco

Businesses

- Adams and Adams Ltd
- Adrienne Hill Ltd
- Alderwick James and Co
- Allen Pyke Associates
- American Pie
- Arrow Plastics Ltd
- Barton Willmore
- Bell Cornwell Partnership
- Bentall Centre Management
- Bentalls
- BMR
- Boots
- British Home Stores
- Carluccios
- Carter & Carter
- Carter Bells LLP
- CBI (London Region)
- Chelsea Building Society
- Chris Thomas Ltd.
- Denis Wilson Partnership
- Diocesan Board of Finance
- DTA Computer Systems
- Edward Jones Ltd
- Egmont UK
- Federation of Small Businesses
- Formula Strike International Ltd
- Four Communications Group PLC
- Fusion Arts
- Gerald Cullfiord Ltd
- Hermes Hotel
- House of Fraser
- Howdens Joinery Co.
- J Sainsbury plc
- J.R. Spalding Joinery
- Jackson-Scott Associates LTD
- John Lewis Partnership
- John Sharkey and Co.
- Kidd Adam Ltd
- Kingston and Leatherhead Branch of CAMRA
- Kingston Employment Service
- Kingston Informer
- Kingston Innovation Centre
- Kingston Jobcentre
- Kingston Market Traders Association
- Kingston Tour Guides
- Kingstonfirst
- Lakeside Estates Ltd
- Lever Faberge
- LIDL UK
- Lloyds TSB
- Longford Securities and Equities Limited
- Malden Golf Club
- Maple Antiques
- Marks & Spencer

- Martin Campbell Commercial
- McDonalds
- Music Services
- Nathaniel Lichfield and Partners
- Newsquest South London
- Nova Distribution
- Oceana
- Old London Road Traders Association
- O'Neils (Mitchell and Butlers)
- Osiers Court Properties Ltd
- Palmers Solicitors
- Parris Boat Hire
- Pearson Maddin Solicitors
- Prim Vintage Fashion
- Radio Jackie
- RBS
- Riverside Vegetaria Ltd
- Roofwise Ltd
- Royal Mail Legal Services (Property Law)
- Sainsbury's Supermarkets
- Simone Kay Stained Glass
- SNP Associates
- Spires Sports Ltd
- Spuds
- Suna Supplies LTD
- Surrey Comet
- The Hippodrome Nightclub
- The Rose Theatre
- Tony Miller Systems Ltd
- TP Bennett Architects
- Turk Launches Ltd
- West & Partners
- Wilderberry Ltd.
- Wilkinson Stores

Community Support Groups

- Kaleidoscope
- Kingston Advocacy Group
- Kingston Carers Network
- Kingston Citizens Advice Bureau
- Kingston Victim Support
- Kingston Voluntary Action
- London Forum of Amenity and Civic Societies
- Royal British Legion Institute
- Royal British Legion, Malden and Coombe Branch
- Thames Community Foundation
- The Equality and Human Rights Commission

Disability Groups

- Anchor Trust
- Connect
- Crescent Resource Centre
- Disability Equality Group
- HFT
- Home Farm Trust
- Information Officer for Disabled Children
- Kingston Association for the Blind
- Kingston Centre for Independent Living
- London Access Forum
- Mental Aid Projects
- MS Society (North Surrey)
- Parkinson's UK
- People with Learning Disabilities Partnership Board
- Positive Action for Multiple Sclerosis
- R.O.Y.A.D
- Scope (N E Surrey) Geneva Road
- Sensory Impairment Team
- Surbiton Deaf Club
- Talking Newspaper
- Team for Disabled Children

Education

- Alexandra Infant School
- Bedelsford School
- Buckland Infant and Nursery
- Burlington Junior School
- Chessington Community College
- Christ Church Infants' School
- Christ Church Junior School
- Christ Church New Malden C of E Primary
- Christ Church Primary School
- Coombe Boys School
- Coombe Girls' School
- Coombe Hill Infant and Junior School
- Corpus Christi Primary
- Dysart School

- Ellingham Primary School
- Euphrates Education Foundation (Arabic School)
- Fern Hill Primary School
- Green Lane School
- Hindi Bal Bhawan
- Holy Cross Preparatory School
- King Athelstan Primary School
- Kingston College
- Kingston Grammar School
- Kingston Gurjarati School
- Kingston Tamil School
- Kingston University
- Knollmead Primary School
- Latchmere Junior School
- Learn English at home
- Lovelace Primary School
- Malden Manor Primary
- Malden Parochial Primary School
- Maple Infants School
- Our Lady Immaculate Primary School
- Princes Trust- Merton College
- Richard Challoner School
- Robin Hood Primary School
- Roehampton University
- Shrewsbury House
- Southborough School
- St Agatha's Catholic Primary School
- St Andrews and St Marks C of E Junior School
- St Joseph's RC Primary School
- St Luke's Primary School
- St Philip's School
- St. Johns C of E Primary School
- St. Mary's Primary School
- St. Matthew's Primary School
- St. Paul's C of E Junior School
- St. Paul's C of E Primary School
- The Hollyfield School and Centre for Continuing Education
- The Mount Primary School
- Tiffin Girls School
- Tiffin School
- Tolworth Girls School
- Tolworth Infants and Nursery School
- Tolworth Junior School

Environment

- British Geological Survey
- CPRE
- CPRE (London)
- Department for Environment, Food and Rural Affairs
- Fairtrade Kingston Steering Group
- Friends of the Earth Kingston
- Greater London Playing Fields Association
- Hurley Palmer Flatt
- Kingston Fair Trade
- LA21 Forum
- London Parks and Gardens Trust
- London Wildlife Trust
- Protect Our Green Spaces
- RenewableUK
- River Thames Society
- RSPB
- Rural Pride Limited
- Save the World Club
- Surbiton and District Bird Watching Society
- Surrey Wildlife Trust
- Thames Landscape Strategy
- The Royal Parks
- The Woodland Trust
- Viridor Waste Management Ltd

Ethnic groups

- Inequalities Partnership Board
- Irish Traveller Movement in Britian
- Kingston Asian Arts Forum
- Kingston Chinese Association
- Kingston Muslim Women's Association
- Kingston Racial Equality Council
- Kingston Sikh Association
- Kingston Ulster Society
- Kingston, Richmond and Surrey African Positive Outlook
- London Gypsy and Traveller Unit
- London South West Chinese Community Association
- Milaap Centre
- National Federation of Gypsy Liaison Groups
- Refugee action Kingston
- Sarvoday Hindu Association
- SW London Vietnamese Community Association
- The Gypsy Council

Health

- ACSA (Addiction Support and Care)
- Canbury Medical Centre
- Health and Safety Executives
- HUDU
- Inventures (NHS estates)
- Kingston & District Welcare Association
- Kingston Hospital Trust
- Kingston Samaritans
- Magic Roundabout
- Mental Health Partnership Board
- NHS
- NHS Kingston
- NHS London
- NHS London Healthy Urban Development Unit

Heritage

- Coombe Wood conservation area
- Friend of Kingston Museum & Heritage Service
- Garden History Society
- Historic Royal Palaces
- Kingston Society
- Kingston Town Neighbourhood Conservation Area Advisory Committee
- Kingston upon Thames Archaeological Society
- Maldens and Coombe Conservation Area Advisory Committee
- MLA London
- Museum of London Archaeology Department
- Railway Heritage Trust
- Surbiton Conservation Area Advisory Committee
- The Garden City Movement

Housing

- A2 Housing Group
- Ability Housing Association
- Appley Properties Limited
- Asra Housing Association
- Bridger Bell
- Broomleigh Housing Association
- Clear Water Estates
- D&M Planning Ltd
- Fairview New Homes Ltd
- Family Housing Association
- Gleeson
- Hanover Housing Assoc.
- Hestia Housing (Kingston Womens Centre)
- Home Group
- Horizon Housing Group
- House Builders Federation
- Housing 21
- Inquilab Housing Association
- Invista Real Estate on behalf of Clerical Medical
- JLA Limited
- Kingston Churches Housing Association
- Kingston upon Thames United Charities
- L&Q Group
- MAA Architects
- Metropolitan Housing Trust
- Millat Asian Housing Association
- Moat Housing Society
- Moliar London
- New Era Housing Association
- North British Housing Association
- PAD Consultancy Limited
- Paragon Community Housing Group
- PML Building Services Limited
- Raglan Housing Assoc

- Richmond upon Thames Churches Housing Trust
- Riverhaven Ltd
- Rosemary Simmonds Memorial Housing Assoc.
- Sheperds Bush Housing Association
- Solon Wandsworth Housing
- SPH Housing
- Spiritbond Student Housing Ltd
- St George West London
- Teachers Housing Association
- Terry Hill Design and build
- Thames Housing Association
- Thames Valley Housing Association
- Threshold Housing and Support
- Town and Country Housing Group
- Wandle Housing Association
- YMCA

Individuals – 1555 local residents on the LDF database

Infrastructure Providers

- Health and Safety Executive
- Kingston Magistrates Court
- London Ambulance Service
- London Fire and Emergency Planning Authority
- London Fire Brigade
- London Fire Brigade
- Metropolitan Police
- MONO
- On behalf of Metropolitan Police Authority
- Police and Community Working Group
- UK Power Networks

Leisure

- AFC Wimbledon
- Campaign for Real Ale
- Cannons Health and Fitness
- Chessington Young Mums Group
- Friends of Kingston Museum
- Kingston Arts Council
- Kingston Centre for Independent Living
- Kingston Debating Society
- Kingston Museum
- Kingston Theatre
- Kingston Tour Guides
- LDWA London
- Leatherhead Golf Club Ltd
- Lexum Leisure (McCluskeys)
- Malden Camera Club
- Minima Yacht Club
- Minima Yacht Club
- Natural History Museum
- PRO-ACTIVE South London
- River Thames Boat Project
- Rotunda
- Saheli (Asian Womens Group)
- Scout Association
- Sport England
- Steadfast Sea Cadets
- Thames Sailing Club
- The Lawn Tennis Association
- The Theatres Trust

Older People

- Age Concern Kingston upon Thames
- Help the Aged
- Kingston Borough Forum for Elderly People
- Kingston Pensioners Forum
- Older Peoples Partnership Board

Planning Interest

- 3s Architects LLP
- Alliance Planning
- Arnold Gilpin Associates Ltd
- Assent Environmental Planning
- Barton Willmore
- Bell Fischer Landscape Architects
- Bonsor Penningtons
- Boyer Planning
- BRE
- Broadway Malyan
- Burnett Planning and Development
- C&S Associates
- Canadian and Portland Estates Ltd.
- Capitalise Assets LLP
- Cattaneo Commercial
- CBRE
- CgMs
- Chessington Nurseries
- Cluttons LLP
- Coal Pension Properties
- Colliers CRE
- Colliers International
- Crown Estate Office
- Cunnane Town Planning LLP
- Cushman and Wakefield
- Dalton Warner Davis LLP
- David Lock associates Ltd
- Davis Planning
- Day Group Ltd.
- DB Schenker (UK)
- DE Headquarters
- Defence Estates Property Team
- Denton Wilde Sapte
- Design Council CABE
- Designature
- Development Planning Partnership
- Dialogue
- DPDS Consulting Group
- DPP LLP
- Drivas Jonas Deloitte
- Elborough
- Entec, Environmental and Engineering Consultancy
- Entec UK Ltd on behalf of The Crown Estate
- ESA Planning Ltd.
- Evans Roden Myzen
- Firstplan
- FirstPlus Planning
- Fusion
- Fusion Ltd.
- G L Hearn
- G R Planning Consultancy Ltd
- Gerald Eve
- GL Hearn on behalf of Tesco Stores Ltd
- Gleeson Developments Ltd
- Greater London Authority
- GVA Grimley (Planning Consultants)
- Hammerson plc
- Hampshire County Council Pension Fund
- Heaton Planning Ltd
- Hemingford Properties
- Her Majesty's Court Service
- Indigo Planning Ltd
- Jema Property Fund Ltd
- Jones Lang LaSalle
- Kennet Properties Ltd.
- King Sturge LLP
- Kingston Hospital NHS Trust
- Kingston University Students Union
- Knight Frank
- Lancashire Digital Technology Centre
- Level
- Littman & Robeson
- London Assembly
- London Concrete
- Longmoore Regeneration Limited
- Malcolm Judd and Partners
- Malcolm Scott Consultants
- Marcus Beale Architects
- Martineau
- Metropolis Planning and Design
- Mineral Products Association
- Mono Consultants Ltd
- Montagu Evans on behalf of Hammerson PLC
- Morley Fund Management
- Nathaniel Lichfeld & Partners
- NHP Leisure Development Ltd on behalf of John Lewis
- Paul Dickinson and Associates
- PB
- Peacock and Smith
- Planning Mineral Products Association Ltd.
- Planning Potential
- PPML Consulting Ltd
- PRC Planning
- PRP Architects
- Quod Planning
- Rapleys LLP
- Regeneration Investments Limited
- Robin Bretherick Associates
- Rolfe Judd Architects
- RPS Planning

- RPS Planning on behalf of Costco Wholesale UK Ltd
- Savills Commercial Ltd
- Savills Plc
- SLR
- Spiritbond
- St George West London Ltd
- Stewart Ross Associates
- Tetlow King Planning
- The Crown Estate
- THE JTS PARTNERSHIP LLP
- The Planning Bureau Limited
- TPAC Ltd.
- Tribal MJP
- Turley Associates
- Universities Superannuation Scheme Ltd.
- Waind Gohil Architects
- Warner Estates
- White and Sons Planning Consultants
- Workspace Group plc

Political

- Kingston Borough Liberal Democrats

Religious Groups

- African Families Support Services
- Ahmadiya Muslim Association Surbiton
- All Saints Church
- Church Commissioners
- Churches Together in Malden
- First Church of Scientist
- Institute of Tamil Culture
- Islamic Resource Centre
- Kingston and Surbiton District Synagogue
- Kingston Baha'is
- Kingston Baptist Church
- Kingston Chinese Association
- Kingston Liberal Synagogue
- Kingston Mosque
- Kingston Muslim Association
- Kingston Quakers
- Kingston, Surbiton and District Synagogue
- New Malden Methodist Church
- Religious Society of Friends (Quakers)
- St Catherine of Siena RC Church
- Surbiton Community Church
- The Korean Church
- United Reformed Church

Residents Association

- Agar House Residents Association
- Alexandra Neighbours Association
- Alpha Road Estate Residents Association
- Avenue Road Residents Association
- Barnsbury Crescent Residents Association
- Blenheim Gardens Residents Association
- Brook Road Residents Association
- Cambridge Road Community Association
- Canbury and Riverside Association
- Canbury Court Residents Association
- Charter Quay Residents Association
- Chessington Court Residents Association
- Chessington District Residents Association
- Chessington Hall Residents Association.
- Chessington Residents Association
- Clarence Street/ London House Ltd Residents Association
- Coombe House Estates Residents Association
- Coombe Ridings Residents Association
- Cumberland House Residents Association
- Dengrove Residents Association
- Dysart Avenue Residents Association
- Eaton Drive Householdes Association
- Fassett Road Residents Association
- Federation of Kingston Residents
- Federation of RBK Residents Associations
- FREDY Residents Association
- Greenwood Park Residents Association
- Groves Association
- Hawks Road Residents Association
- Kingston Society
- Kingston Vale Residents Association
- Knights Park Residents Association
- Korean Residents Association
- Korean Residents Society
- Lower Kings Road Residents
- Malden Rushett Residents Association
- Marlowe House Residents Association
- McDonald House Residents Association
- Melbourne Court Residents Association
- Melford Close Residents Association
- Mill Street Residents Association
- New Malden (Beverley Ward) Resident's Association
- OADRA
- Old Kingston Road Residents Association
- River Court Residents Association
- Riverside Residents Association
- Rose Walk Residents Association
- Royal Quarter Residents Association
- SCARA
- South Hogsmill Valley Residents Association
- Southborough Residents Association
- Spring Grove Residents Association
- Surbiton Central Area Residents Association
- The Alexandra Neighbours Association
- Tolworth South Residents Association

Transport

- Civil Aviation Authority
- Department of Transport Rail Group
- Freight Transport Association- London and South East Region
- Greater London Motorcycle Action Group
- H R Richmond Ltd
- Kingston Area Travellers Association
- Kingston Cycling Campaign
- Living Streets
- London Buses
- London Buses Network Operations
- London Cyclists

- London General Transport Services Ltd
- London United Busway Ltd
- Richmond & Kingston Accessible Transport
- Road Haulage Association Ltd
- South London Partnership
- South West Trains
- Sustrans
- Transport for London

Young people

- Parents Forum
- Young People's Forum
- Youth Advisory Council

Appendix 4: Public consultation responses

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
1	Mrs Caroline Cheales	email	1	Para. 1.18	Athelstan Road waste site is called Villiers Road on your website. Which is correct?	Not in the SPD draft/no amendment
			2	Para. 2.41	Required or requested for the development - to cover instances where a TA has been requested but the development is otherwise outside of the norm for a TA	Agreed/ delete para. 2.40
			3	Para. 2.69	Does this also cover provision of bike share/cycle hire facilities?	No/ no amendment
			4	Table 3	Would exclude typical bikeshare/cycle hire facilities as these are not routinely 'covered' and the type of stand is likely to be different to the sheffield/camden types(sic)	Bike hire beyond the scope of the SPD. SPG notes that different stand types may be considered/no amendment
			5	Appendix 1:	TS also required where junction modelling indicated - for example where a development is in close proximity to a busy junction with multiple/multi modal crossing movements - including pedestrians and cyclists. TP required for same reasons TS/TP required where there is a predictable seasonal peak of activity at the level normally set for average volumes. Construction Logistics Plan required for developments in residential areas, particularly where traffic calming present or close to school premises/routes.	Agreed. Covered in Travel Plan (third bullet)
			6	Appendix	Cycling measures to include memberships of bike	Beyond scope of SPD/no

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
				3:	share schemes	amendment
			7	Glossary	Add cycle hire and bike share definitions	Beyond scope of SPD/no amend.
			8	Figure 6	Lamberts Road and Beaufort Road should be reclassified from B Roads to C/classified unnumbered. It is not logical that the short sections beyond Ewell Road and Surbiton Road are B roads (B roads – roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network) - they are not part of a coherent network. These should more properly be considered as Classified unnumbered (smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. Similar to ‘minor roads’ on an Ordnance Survey map and sometimes known unofficially as C roads). Reclassification is now a local matter. The current classification is not consistent with the weight restriction limit and is causing confusion amongst haulage and construction companies - adding to the incidence of vehicles committing to a journey within with weight limited areas surrounding these roads. As the PRN enables traffic up to 40t, this inevitably leads to vehicles several times over the limit travelling through a residential area to reach the PRN to the north and west. The permitted limit is 7.5t. The current status is also inconsistent with	Road classification issues are beyond the scope of the SPD/no amendment

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
			9	Figure 10	<p>the prevailing characteristics of the road environment - both roads have 20mph speed limits and traffic calming engineering measures, as well as a long established but poorly complied with weight limit. It is accepted that the roads have a local importance, but they are not suitable for carrying significant quantities of through traffic - in both cases taking traffic past or directing it to 3 different schools (3 from - surbiton high, hollyfield, king athelstan and st joseph's). Heavy through traffic also has an adverse effect at peak times on the K1 and K4 bus routes. The costs involved in reclassification of these roads would be reasonable - there is limited existing signage and it is generally not of a good informal quality.</p> <p>I fully support the current extent of the freight restrictions area. Please see my comments with regard to road classification and the confusion caused by having two short sections of B road within the area and the resultant regular non-compliance with the limit, particularly by through traffic and vehicles wishing to access sites along lower marsh lane and Villiers road. You are already undertaking a signage review with a view to improving informational signage for heavy vehicle drivers and operators. Please also ensure that relevant e-services and underlying mapping services are also updated, particularly sat nav providers. The proximity of this area to A roads means that vehicles up to 40t regularly travel</p>	See above comment on SPD scope/no amendment required

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
					along Villiers avenue, lamberts road and Lingfield avenue - causing significant nuisance to residential properties, damage to the road surfaces (which are traffic calmed) and road safety risks to vulnerable road users. Additionally, Lamberts Road runs above and alongside a mainline railway, which is protected only by a wire fence and some trees. The area has been recently reassessed for incursion risk and anti-slip road treatment applied. The assessor recommended that the weight limit is enforced as the greatest threat of incursion on the line is from heavy vehicles with unsecured loads.	
2	English Heritage (Claire Craig)	email	10	General	Thank you for the opportunity to provide comment on the Royal Borough of Kingston upon- Thames proposed Supplementary Planning Document (SPD) concerning Sustainable Transport. As the government's adviser on all matters relating to the historic environment and a statutory consultee in respect of the Strategic Environmental Assessment of plans, we are keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the local planning process. We have considered the proposed SPD in the context of the National Planning Policy Framework (NPPF) which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.	Comments noted as support /no amendment

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
					<p>Having done this, English Heritage makes the following observations:</p> <ul style="list-style-type: none"> · We do not support applications for car parking in front gardens in the context of heritage assets and their settings and trust that the Residential Design Guide referred to on pages 28 and 29 discourages such applications; · English Heritage does support sustainable urban drainage systems, as referred to on page 29, provided that this is done sensitively and only in contextually appropriate locations if a heritage asset or its setting is involved; · We welcome references within the document to the consideration of character and aesthetics within the public realm. Again, English Heritage trusts that these are meant to ensure the conservation and enhancement of heritage assets in accordance with the NPPF; and · We would encourage the inclusion of a reference to our Streets for All guidance which covers a range of matters pertaining to positive management of the public realm. This includes matters such as the best location and colouration for electric charging points for vehicles (against the fence line and dark livery respectively). 	
3	Environment Agency (Joe Martin)		11	General	<p>Having reviewed the document we recommend that you considered investigating the use of the River Thames as a means of sustainable transport within the borough. There is currently no mention of this within the plan. To do this we recommend that you review the Thames</p>	<p>Comment noted, and is appropriate as an issue for the Core Strategy Review/no amendment</p>

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
					Landscape Strategy and engage with the River Thames Alliance.	
4	The Groves Association (Sandra Flower-Chair)		12	Para. 2.11	Para 2.11 states that a Transport Assessment is required to demonstrate that trip generation from a site can be accommodated without adversely affecting the safety, efficiency or sustainability of the transport network. We thought that a transport assessment was about assessing the impacts of a development proposal and then including provisions to deal with these.	Present drafting requires emphasis on detrimental effects; it is not necessary to assess all impacts/no amendment
			13	Para. 2.13	We are confused by paragraph 2.13, which states that “For smaller scale, but still significant, development proposals a condensed Transport Assessment may be acceptable. This condensed Transport Assessment is referred to as a “Transport Statement” throughout this SPD.” We understand from Table 1 that transport statements would be required in accordance with the size thresholds set out in the table. However, we would also seek greater flexibility by setting out circumstances below these size thresholds where also at least a transport statement would be required. This would be based on such factors as the sensitivity of an area to traffic generation in respect of the physical size/capacity of the roads in the area, existing traffic generating uses, levels of traffic, parking congestion/stress and impact on the quality of the environment and its functions. This is particularly important in the Groves Area where the roads are extremely narrow (only wide	Draft SPD notes (in para 2.14) that the requirement for a Transport Assessment or Statement will be assessed on a case-by-case basis. The size thresholds are guidance only and do not limit when a transport statement may be required/ no amendment

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
					<p>enough for two cars), on street parking is at saturation levels, there are four primary and secondary school sites in very close proximity as well as other significant trip generators. The area is used as a short cut by cars and commercial vehicles. The area is very sensitive to the adverse impact of further traffic generation as highlighted in the recent proposals for school expansion and planning applications for 88-90 Coombe Road and 38 Lime Grove.</p> <p>It would also be helpful if it was stated that transport assessments/statements should use relevant and up-to-date information. For example the transport statement for 88-90 Coombe Road used out-of-date information on car ownership from the 2001 census, did not include existing traffic generation figures, and used a questionable approach to assessing on street parking levels and an inappropriate use of TRICS.</p>	Appendix 2 notes sources for information required/no amendment
			14	Para. 2.21	How would this be known without a transport assessment being carried out first?!	A Transport Assessment identifies the impact of future traffic movements. Applicants estimate traffic data as part of their application/ no amendment
			15	Travel Plans	We support the requirement for Travel Plans and car clubs but these should also apply to smaller residential and other developments especially school expansion proposals in the circumstances	A Travel Plan Statement is required for smaller development proposals; SPD requirements are regarded as

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
			16	Construction Logistics Plans	<p>that we have referred to earlier.</p> <p>We consider that these should be also required in wider circumstances than those set out in the SPD. The need for these should be based on the scale of the development relative to the sensitivity of an area as in the case of the Groves Area. Due to the 3 characteristics of the area which have been described earlier, it is very important to minimise the impact of delivery and servicing activities during the construction stage of such developments as the school expansion proposals and the developments proposed for 88-90 Coombe Road and 38 Lime Grove, all of which fall below the thresholds in the SPD.</p>	<p>proportionate /no amendment.</p> <p>This requirement threshold for a Construction Logistics Plan is felt to be appropriate/no amendment</p>
			17	Para. 2.53	<p>We welcome the reference in paragraph 2.53 of the reference to flexibility in considering each proposal on a case by case basis and this is the flexibility we are seeking in our earlier comments. However, we do not support increased parking provision as this will simply increase traffic generation, CO2 emissions etc contrary to the Council's stated aims for sustainable transport. If there is a shortfall in parking provision and concern about impact on onstreet parking then this can be controlled through S106 Agreements for both residential and non-residential development with severe penalty clauses if this is not abided by. Also travel plans should be dealing with this including through the use of car clubs.</p>	<p>SPD seeks to achieve a balance between parking demand and encouragement of alternatives to private vehicle use. Flexibility enables specific circumstances to be taken into account/no amendment.</p>

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
			18	Para. 2.58	Similarly we disagree with paragraph 2.58. We consider that car free developments should be supported when accompanied by appropriate measures to ensure that it does not result in car use.	Comment noted but SPD requirement regarded as appropriate/no amendment
			19	Para. 2.63	Reference should be included in Para. 2.63 to provision for cycle parking. There is reference to residential parking in 2.63(l), however, this should be expanded to refer to the need for the use of porous surfaces to deal with run-off even if it is addressed in the Residential Design Guide SPD. Similarly paragraph 2.63(m) should be stronger by requiring the use of porous materials in surface car parks.	Comment noted/Requirements for cycle parking are noted in para 2.68 seq. and this will be cross referenced in para. 2.63. Porous surfaces beyond scope of SPD
5	Health and Safety Executive (HSE) (John Moran)	email	20	General	Thank you for your request to provide a representation on the Strategic Housing Land Availability Assessment consultation document(sic). When consulted on land-use planning matters, the HSE where possible will make specific representations to ensure that compatible development within the consultation zones of major hazard installations and major accident hazard pipelines (MAHPs) is achieved. We have concluded that we have no specific representation to make at this stage of your plan-making process. This is because there is insufficient information in the consultation document on the location and use class of sites that could be developed. In the absence of this	No amendment required (Appears to be standard response for all planning documents – refers to SHLAA when this is not being consulted)

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
					<p>information, the HSE is unable to give specific advice on the compatibility of future developments within the consultation zones of major hazard installations and MAHPs located in the area of your plan.</p> <p>Future Consultation with HSE – Local Plans</p> <p>The HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages of the planning process, and we may be able to provide specific advice on development compatibility as your plan progresses. Therefore, we would like to be consulted further on local plan documents where detailed land allocations and use class proposals are made, e.g. site specific allocations of land in development planning documents. We also recognise that there is a requirement for you to meet the following duties in your plan, and that consultation with the HSE may contribute to achieving compliance:</p> <ol style="list-style-type: none"> 1. The National Planning Policy Framework (Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents. 2. Regulation 10(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such 	

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
					<p>accidents by pursuing those objectives through the controls described in Article 12 of Council Directive 96/82/EC (Seveso II)1. Regulation 10(c)(i) requires that regard also be had to the need in the long term, to maintain appropriate distances between installations and residential areas, buildings and areas of public use, major transport routes as far as possible and recreational areas. To assist you in meeting these duties, information on major hazard installation and MAHP locations and general planning advice can be found on the HSE extranet system, to which all planning authorities have access. This contains lists of all major hazard installations and MAHPs, along with consultation zone maps where available. This information, in conjunction with the guidance in <i>PADHI - HSE's Land Use Planning Methodology</i>, which is available on the HSE website. (http://www.hse.gov.uk/landuseplanning/padhi.pdf), will allow you to identify compatible development within each consultation zone. The HSE recommends that where there are major hazard installations and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. The proposal maps in Site Allocation Development Planning Documents may be suitable for presenting this information. We particularly recommend marking the zones associated with any MAHPs, and the HSE advises that you contact the pipeline</p>	

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
					operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence. Details of pipeline operators and their contact details are also found on the HSE extranet pages. We also recommend that you include in your plan an analysis of compatible development type within the consultation zones of major hazard installations and MAHPs based on the general advice contained in the PADHI guidance. The sections on <i>Development Type Tables</i> (pg.9) and the <i>Decision Matrix</i> (pg.17) are particularly relevant, and contain sufficient information to provide a general assessment of compatible development by use class within the zones.	
6	Kingston Borough Labour Party (David Cooper)	email	21	Para 2.2.	The Hogsmill Valley is poorly served by public transport. So any development must provide for public transport improvements. In addition, there should be first-class cycling and walking facilities along “go Dutch” or “Copenhagen” principles advocated by London Cycling Campaign.	Comment noted. Issues to be covered in Hogsmill Valley DPD
			22	Paras 2.4-5	There is the danger that expanding low-density development in existing low density areas could become a further justification for never improving the transport in those areas. Any development in these areas should be expected to contribute to improved public transport.	Agreed. Contributions will be secured by S106 agreement as appropriate

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
			23	Para 2.51, a-b	These allow more car parking at developments where public transport is poor. This could give developers who don't support sustainable transport a perverse incentive to locate where public transport is poor. It would be better to allow less intensive development, or the type of development that doesn't create many jobs – for example, warehouses – at places with poor public transport.	Beyond the scope of SPD/no amendment
			24	Para 2.52	This implies that the Council would expect or require more parking where the development would otherwise cause on-street parking pressure – but this would also encourage car commuting and add to congestion. It would be preferable to consider the introduction of CPZs in these circumstances.	Comment noted but para 2.52 notes criteria only/no amendment
			25	Paras 2.53 - 54	Both allow for higher than standard parking levels, but the same problems result, encouraging car commuting and congestion. More imaginative solutions should be sought, such as getting developers to pay for park and ride.	SPD seeks to achieve a balance between parking demand and encouragement of alternatives to private vehicle use. Specific circumstances may be taken into account/no amendment
			26	Para 2.58	"Car free" (actually no parking space) development. PTAL level 5 (second highest public transport accessibility level) is too high a bar. Level 3 or even 2 could be enough in some	See above

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
			27	Para 2.68	<p>places to make a car-free lifestyle attractive – for example, if there are good shops and other facilities within easy walking distance, and this latter should be a consideration too.</p> <p>This adopts London Plan standards but more may be needed. The London Plan was recently amended to from 1 space per 250 square metres (sq m) to 1 per 150 sq m. Whether this standard is adequate depends on how many jobs the floor space generates – a past practice was to estimate 1 per 20 sq m, which, at 1 cycle space per 150 sq m, would allow 12% of workers to cycle. However, recent reports suggest offices are getting more productive, with 1 worker per 15, 10 or even 8 sq m suggested. The London Cycling Campaign has recommended 1 cycle space per 50 sq m office space, a standard that was adopted by the London Borough of Hillingdon.</p>	RBK decision to adopt London Plan standards/no amendment
			28	Para 2.89 d	<p>“Gated communities will be resisted where public access through the site would improve transport connectivity or public access to facilities.” Kingston Borough Labour Party endorses this policy.</p>	Comment noted
7	Kingston University (Nathaniel Lichfield and Partners)		29	General	<p>In principle, Kingston University supports the Sustainable Transport SPD and supports expanding and developing sustainable transport options within the Borough. The University also wishes to collaborate further with RBK to deliver the plans and ensure policies and measures take</p>	Comments noted/ no amendment Attendance offer to RBK for Travel Implementation Group noted

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
					account of the University's staff, students and visitors. The University currently hosts sustainable transport events and training sessions for its staff and students in conjunction with local and regional groups and would be happy to engage with RBK on training. The University has also set up a KU Travel Implementation Group which has met five times and seeks to improve Travel Policy and complements the key themes identified in the draft SPD as well as seeking to provide site specific travel plans for the university. The Travel Implementation Group is a University initiative and is open to external stakeholders and the University would welcome attendance from RBK.	
			30	Trans- port Charact- eristics	The draft SPD acknowledges that most of the Borough is relatively inaccessible by public transport as shown by poor PTALs. It identifies that most development should be directed to locations that are readily accessible by public transport. In response to this point we consider that the draft SPD should recognise that existing businesses/institutions need to expand and enhance their facilities and that these businesses/institutions are not always located in the most accessible locations.	Comment noted
			31	Trans- port Assess-	KU has an operational Travel Plan and seeks to reduce journeys to its sites by private car. One key element of this initiative is the University operated	Comment noted

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
				ment	bus between the University's campuses. The Travel Plan is currently being redrafted and will be sent for consultation to the relevant internal and external stakeholders ahead of a formal re-launch in early 2013.	
			32	Para. 2.17	Para identifies that a Travel Plan should be submitted with a Transport Assessment or Transport Statement. Then text should clarify that such a document is only required where it meets thresholds set out in Table 2 and that Travel Plan is not required for all development requiring a Transport Statement. Where existing Travel Plans are already in operation there should not be a requirement for a full revision of a Travel Plan to be produced. Instead, an addendum or minor change may only be required. These situations should be acknowledged within the SPD and not trigger the Council's full monitoring fee. We consider that the Travel Plan monitoring fee is excessive for education uses, particularly given that universities are publicly funded. We request that this fee is reviewed and reduced. It is also considered that the threshold for the requirement for a Travel Plan for educational development is too low and should be reviewed and increased.	<p>Comment noted</p> <p>Revision of Travel Plans may be reviewed on a case by case basis</p> <p>Monitoring fee beyond scope of the SPD (see planning Obligations SPD)</p> <p>Not agreed/no amendment</p>
			33	Para. 2.46	The University supports the recognition that the level of detail required in the Parking Management Plan will depend on the scale and complexity of the development.	Comment noted

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
			34	Para. 2.51	The University supports the Council's acknowledgement that parking for Use Class D1 will be assessed on a case by case basis. The University's sustainability team would welcome further discussions with the Council about the RBK Travel Plan Network and officers are encouraged to the University to identify how initiatives can be developed further.	Comment noted
			35	Page 32, table last row	It is overly restrictive to identify the exact design of cycle stands within the SPD. For instance, the university's sustainable team has consulted with designers and providers of cycle stands and parking to develop facilities to better meet demand, two of which are now available in the market. We consider the wording should be more flexible and could be adjusted to read as follows: <i>The Council has a preference for developments to include Sheffield and Camden stands, which are 700mm to 1000mm in length, although other stands/specifications will be considered. The cycle stand used should be able to secure both the frame and the wheel to the stand for maximum security, be able to support all types of cycles even when knocked, and easy to use.</i>	Comment noted/ add 'type'
8	Natural England (Francesca Barker)		36	General	Transport trends show an increasing demand for road and air transport, whilst levels of walking and cycling and bus use are declining. These trends can affect the natural environment, and people's experience of it, in three key areas:	Comment noted

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
			37	Para. 2.9	<ul style="list-style-type: none"> - Biodiversity, landscape, geodiversity - through direct and indirect impacts from land-take and traffic, but also through opportunities to protect and enhance biodiversity and landscape, for example through innovative verge management and the sympathetic design and location of infrastructure. - Climate change and energy - through greenhouse gas emissions and the environmental challenges posed by biofuels. - Quality of life - through people's access to and experience of the natural environment, and through the links between walking, cycling, health and well-being. <p>Natural England welcomes the SPD's prioritisation of sustainable transport users as referenced in 2.9. In general, sustainable transport has a low impact on the environment as a low carbon form of transport, whilst improving people's quality of life as mentioned above.</p> <p>Nature Conservation</p> <p>All transport, including sustainable transport, has the potential to negatively impact sites of nature conservation and priority species. Although the Borough does not contain any statutory designated wildlife sites within its boundaries, such as Special Sites of Scientific Interest (SSSIs), Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar site; there are designated wildlife sites immediately</p>	Comment noted

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
					<p>adjacent to the Borough, and as such developers should be aware that an environmental appraisal may be needed to assess the impacts of their transport strategy on designated sites and protected species. Information on this should be detailed in the Page 2 of 2 section on Transport Assessment in the SPD, with associated maps in the appendices of the SSSIs, SPAa, SACs, Local Wildlife Sites and Ancient Woodlands that are in or adjacent to the Borough.</p> <p>Transport infrastructure also provides opportunities to enhance biodiversity and green space, such as the provision of biodiverse verges; and these opportunities should be promoted as part of the Borough's sustainable transport guidance.</p>	Beyond the scope of the SPD/ no amendment
9	Oakhill & District Residents Association (Christopher Matkin)		38	General	<p>The report is laudable and forward looking insofar as it encourages RBK residents and businesses to move towards a greener future [I use this as an umbrella term that includes encouraging us to walk/cycle/use public transport etc.]. But its limitations for the general public are that it serves mainly as a guide for developers only who can then adopt a more Gaia-friendly approach in the future. The beneficial result, in the council's opinion, should speed up planning applications to make them compliant with the council's core values for transport within the borough.</p> <p>The consequence, they hope, will be a reduction in the waste of time and cost caused by a plethora of requirements currently in place.</p>	Comment noted

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					<p>The downside for the general public is that RBK's legal requirements to protect taxpayer's money in an increasingly litigious age make the SPD hard for the reader untrained in council/legal jargon to comprehend the scope of the proposed changes. This explains the narrow focus of the consultation which, in turn, inhibits a wider response for an organization such as ours as it does from individuals who may not be even aware that a consultation has been launched. For example, I regularly read all the free and paid for local print media but no mention has ever been made regarding this new SPD.</p>	<p>Consultation has included all stakeholders, neighbourhood and Council committees, and public database</p>
			39	Para 1.5	Succinct and to the point	
			40	Para 1.7	Ditto	
			41	Page 10	Map clear and easy to understand	
			42	Page 11	Succinct and to the point	
			43	Para 2.27	Succinct and to the point. Good overview of local needs vs. borough benefit	
			44	Para 2.53	A frank acknowledgment of the poor state of non-car transport generally within the borough despite the excellent train services at Surbiton and Kingston mentioned elsewhere in the report.	
			45	Appendic	The appendices are well laid out and easy to	

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			46	es General Para 1.1 Para 2.45/e	follow. The document fails occasionally and slips into shoddiness of expression; two examples: - Note: the transport network is the direct object of the compound verb to 'impact on' but the following eleven words have stolen its rightful place! -from 'please note'onwards has too many subjects crammed into one sentence and should have been edited.	Comments noted
10	Penny Baker		47	Para 1.11	Refers to a funding opportunity for RBK in development. Whilst developers should always pay for the impacts of their development on sustainable transport, such funding opportunities should not blind RBK to any negative effects on sustainable transport. To believe short term funding outweighs the protection of long term sustainable modes of transport is to ultimately damage the economic, environmental and quality of life interests within the borough. Mitigation measures are not always sufficient to encourage development. This response is written with the knowledge that RBK sustainable transport officers and highways engineers produced a “no objection” response to the current planning application for the Filter Beds at Seething Wells. This “no objection” published in RBK responses was detrimental to those of us who are dependent on bus services as well as cycling lanes along the Portsmouth Road	Comments noted, but beyond the scope of the SPD/ no amendment

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			48	Para 1.17.1	<p>and environs. A Freedom of Information request made by the writer of this response revealed that RBK had not even consulted bus companies operating on the Portsmouth Road/Brighton Road with regard to the impact of that development. This fails notice the impact on a fragile bus service into the neighbouring borough of Elmbridge on which many of us in both boroughs depend. The proposed development was moreover in excess of London Plan parking thresholds, on the Brighton Road/Portsmouth Road junction with huge implications for buses and cyclists. It should be a matter of embarrassment to RBK that there is an Abellio Bus stop outside the Guildhall where the transport and planning officers work, one wonders when RBK will object on behalf of bus services and cyclists at the expense of any speculative funding opportunities.</p> <p>If the references in this section to protecting bus services and cycling are to be given any credence then the failure by planning and transport officers to deal correctly with issues raised in response to 1.12 need to be addressed. RBK must in future provide proof that all modes of sustainable transport including buses and cycling have been consulted appropriately and RBK should chase proactively responses to ensure that bus companies in particular are enabled to ensure their participation, where there is proposed development producing significant car journeys</p>	<p>Comment noted. At present bus companies are not specifically consulted and expansion of stakeholders will be considered.</p>

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			49	Para 2.11	<p>over bus and cycle lanes. Where bus companies raise concerns in a consultation, these must be documented and consulted on in the public domain. Appropriate consultation with regard to buses must include bus companies operating along affected routes.</p> <p>A Transport Assessment should not be limited to assessing the number of trips generated by the development. A Transport Assessment should involve the consultation of those sustainable transport users who may reasonably be expected to suffer as a result from such development. This issue is covered above by responses to sections 1.11 and 1.17 and it is flawed methodology for these transport assessments not to include proper consultation of affected bus companies and cycling interests.</p>	See above comment
			50	Section 2.70	<p>The adherence to appropriate cycle parking standards in design of stands is welcomed. This response refers to highly inappropriate cycle stand design found in recent developments such as the Battersea Reach complex where the pathetically small number of cycle stands that exist on that development resemble symbolic sculpture rather than practical and usable cycle stands. Insufficient standard cycle parking remains one of the greatest barriers to social inclusion and adoption of cycling as a premier mode of transport. Town centres in the borough</p>	Comment noted

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			51	Chapter 2	<p>still lack standard cycle facilities for parking, leaving cyclists little choice but to use inappropriate street furniture. This not only leads to overcrowding but can also result in more cycle theft. Residential areas in the borough do not generally have cycle park facilities, leaving visitors to residential areas in difficulty with regard to cycle security. It is time that planners gave more thought to the provision of cycle parks in residential areas, and not just confined to new developments.</p> <p>Policy Guidance on cycle parking whilst desirable for commercial, residential blocks and estates, misses the point on the overriding need generally to get more cycle parks available. Cyclists suffer from bike theft often through the lack of provision of standard cycle park stands. Everywhere including commercial, residential blocks and estates, overcrowding on cycle park stands also makes it extremely difficult to use D locks adding further opportunities for theft. A lack of any cycle park stands in an area, results in cyclists having to secure cycles to railings and also lamp posts, road signs etc. As an example of how vulnerable cycles become when there are no stands available, this consultee has been told by a cyclist that he had had three Brompton cycles stolen, and that on one occasion the top of the lamp post was dismantled in order to steal the cycle. It remains the case that there are many areas</p>	<p>SPD encourages cycle parking and seeks to raise potential developer awareness</p> <p>Comment noted; see above</p>

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					where there is no cycle stand nearby, and the only way to achieve more usage of cycles for everyday as opposed to leisure use, is to ensure that cycle stands are available at certain required distances. Such a specification needs planning requirements. The provision of secure cycle parking whilst desirable in certain areas, should not render as unaffordable, the provision of a greater number of desperately needed standard cycle parks. Secure cycle parking is a luxury compared to standard cycle parks. The lack of standard cycle stands is a matter of social exclusion as failure to provide these in greater numbers particularly in certain residential areas, disadvantages most - those with the greatest need for improvements to low cost social mobility.	
			52	Section 2.73	Car clubs should not be used in mitigation to allow massive car parking facilities. Again the Seething Wells Filter beds must be cited as an example where it appears references to a car club was sufficient for transport officers to forget about parking thresholds and implications for buses and cyclists as well as pollution. Car clubs on new developments where there has previously been no parking are traffic generating and do not represent a guaranteed diminishing of car journeys.	Car clubs are part of a range of measures to reduce private vehicle use, and are encouraged by the SPD/ no amendment
			53	Section 2.74	Car clubs are not “alternatives to private car use”, the motor car is the motor car whether or not it is	Comment noted

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			54	Section 2.76	<p>used by a car club. Only a car driver could have written such a polluting phrase.</p> <p>This section has no validity with regard to curbing car generation as it fails to refer to a maximum number of cars or indeed car parking. It is a motorists charter and appears driven by those with financial interests in car clubs. This paragraph requires inspection as to issues regarding conflict of interest and pecuniary advantage.</p>	Not agreed
			55	Section 2.85	<p>Whilst there are many cycle and pedestrian routes and protections in the borough, they are only as good as their enforcement and visibility. There are areas in the borough particularly around the Richmond Road/Kingston Rail station, where pedestrian and cycle routes are now so unclear due to failure to maintain, that now cyclists and pedestrians are left with a confused pathway leading to conflict. In addition, cycle boxes in many areas are becoming unclear and are repeatedly ignored by the motorist. It is also the case that motorists quite often stop on pedestrian crossings. In addition to maintenance of cycle and pedestrian routes it is becoming clear that there needs to be additional measures to prevent motorists parking in cycle boxes and on pedestrian crossings.</p>	Comment noted; beyond scope of SPD
11	Surrey County Council	email	56	General	We generally support the guidance set out in the document, but would like you to address the	Comment noted

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	(Sue Janota)		57	Section 1.17	<p>following points in producing the final version.</p> <p>The borough boundary between Kingston and Surrey does not limit the benefits of travelling by bus to/from Kingston and reference to TfL and Surrey County Council operated bus services both being equipped to provide realtime information along the routes could be included. A current Surrey County Council project is in progress to enable the live TfL service data to appear on bus stop screens (and through other media channels) along sections of routes that cross the boundary into Surrey.</p>	Comment noted
			58	Bus Corridors	<p>It would be helpful to add a map of bus corridors as an appendix - to go alongside cycle/walk/highways/freight etc maps already included. Include a reference on the need to consult with the County Council on any development proposal that might have a significant cross boundary impact on the transport network in Surrey at an early stage. If there are found to be significant impacts in Surrey arising from proposals in Kingston borough, then funding must be provided from those developments to mitigate the impact in Surrey.</p>	Agreed/map of bus corridors added
12	Transport for London (Joanna Kesson) (2 nd representation)	Additional comments to previous	59	Para 2.52 Point 5 Paras	<p>Suggest "car trips" rather than "car use".</p> <p>These paragraphs should be worded to reflect the Mayor's Housing SPG (2012), which provides</p>	<p>Not agreed</p> <p>Comments noted; SPG adopts London Plan policy/ no</p>

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
			60	2.53 - 2.60 Para 2.61	<p>guidance on how to implement the housing policies in the 2011 London Plan (LP). The SPG acknowledges that parking poses particular issues in outer London where development densities and public transport provision are relatively low and residents are more dependent on the car than elsewhere in the capital (LP paragraph 2.36 and Housing SPG paragraph 1.3.51). Annex 3 of the Mayor's Housing SPG provides parking guidance based on the findings of the Outer London Commission.</p> <p>Outer London displays much more variation in the factors underlying NPPF parking policy, such as accessibility; type, mix and use of development; and car ownership levels. Greater flexibility is therefore required in implementing pan-London parking policy and standards in outer London. "Boroughs are best placed to interpret how the standards should be implemented in low PTAL areas", however "outer boroughs are advised to take a firmer approach to implementation of the residential parking standards in major developments, town centres, and Opportunity Areas" (paragraphs A4 and A6, Annex 3).</p> <p>It is important in the Sustainable Transport SPD to emphasise Policy 6.13A of the London Plan in which "the Mayor wishes to see an appropriate balance being struck between promoting development and preventing car parking provision that can undermine cycling, walking and public</p>	<p>amendment</p> <p>Agreed/additional reference made in SPD</p>

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
			61		transport use”.	
			62	Cycle Parking	<p>Further guidance on Blue Badge parking bays can be found in the Lifetime Homes Standard (2010).</p> <p>The following comment raised during initial consultation has not been addressed: Cycle parking requirements must be in addition to any pool or bike hire provision that may be available locally or on site. The latter cannot be considered a substitute for the provision of secure cycle parking in accordance with London Plan standards (paragraph 6.36 of the London Plan Revised Early Minor Alterations 2012). Other amendments to the London Plan which should be addressed in the Sustainable Transport SPD are:</p> <ul style="list-style-type: none"> - Where it has been demonstrated that it is not practicable to locate all cycle parking within the development site, developers should liaise with neighbouring premises and the local planning authority to identify potential for, and fund, appropriate off-site visitor cycle parking. In all circumstances, long stay cycle parking should normally be provided on site. - The <i>London Cycling Design Standards</i> (TfL 2005) sets out good practice regarding the provision of cycling infrastructure, including how spaces should be made secure and sheltered from the weather. 	<p>Comment noted</p> <p>Previous comments (Table 2) apply</p>

ID No.	Name/Organisation	Method	#	Doc. ref.	Comment by consultee	RBK response/ Consequential amendment to SPD
			63	Walk Routes	<ul style="list-style-type: none"> - Cycle parking provided for staff should be suitable for long stay parking, particularly in terms of location, security, and protection from the elements (see <i>The London Cycle Design Standards</i> (TfL 2005). - Revised cycle parking standards (Table 6.3) with particular regard to standards for visitors' cycling parking. <p>The following comments raised during initial consultation have not been addressed: The SPD mentions the borough strategic walking network but fails to relate this to TfL's pan-London network of walking routes, known as the Walk London Network. The London LOOP route, part of TfL's network, passes through the borough and through Kingston town centre. The SPD should support the maintenance of the Walk London Network where development is proposed, and require developers to enhance this pan-London walking resource where appropriate. The SPD should also re-emphasise that the use of PERS for all planning applications requiring a TA is recommended by TfL to ensure the needs of pedestrians are fully considered in the development process.</p>	Previous comments (Table 2) apply
			63	Peds and Cycling Way	Although signage to improve pedestrian and cyclist way finding is mentioned in the SPD, this should not be limited to onsite signage for large developments. Pedestrian signage to and from	Issues already incorporated in SPD/ no amendment

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				finding	development on walking routes to key local facilities such as shopping, education and public transport should be considered and provided for in all significant developments (e.g. those that require a full transport assessment). TfL would encourage the adoption of Legible London within the borough and recommends that the borough actively seeks developer contributions to fund its expansion.	
13	South of the Borough Neighbourhood Committee		64	General	The inclusion of advice in relation to electric vehicle charging infrastructure is welcomed – in terms of practical implementation, this should be supported by increased signage and publicity about the location of these charging points – signage should explain whether car-parking charges relate to usage of the points when located in Council car-parks.	Comments noted
			65	General	While it is recognised that the purpose of this document is to advise developers on how to locate new developments so that they can be served by sustainable transport, the Committee emphasised the importance of Council policy which encourages improvement of public transport so that it serves as many of the Borough's residents as possible, wherever they live, and in this regard the Committee: - noted with concern the PTAL (public transport accessibility) ratings of 'none' and 'very poor' for large areas of the South of the Borough Neighbourhood and	Comments noted

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			66	General	<p>- drew attention to its Community Plan commitments to improving public transport links (and railway station improvements) for the South of the Borough – an important example being improvement of bus routes to healthcare provision.</p> <p>In relation to the statement on page 7 that ‘46% of all trips in 2011’ are by car, it was queried how a ‘trip’ is defined. In relation to Transport Assessments (para 2.14), it was requested by a Residents Association representative that these should be required as frequently as possible for South of the Borough Neighbourhood developments and that the over-crowding on buses should be taken into account as a ‘locally significant’ issue justifying this requirement.</p> <p>While it is understood that the document inevitably addresses technical issues, it was noted that a considerable amount of jargon is used in the document.</p>	Comment noted; appropriate editing undertaken
14	Friends of Kingston Museum and Heritage Service (John McCarthy)		67	General	The Friends have no comments to make on these policies.	
15	Highways Agency (Patrick Ryder)		68	General	We have reviewed the consultations and do not have any comment at this time.	
16	John Knowles		69	General	I have logged in, but after spending a lot of time doing that, I find I am bound to a system of commenting para by para. That is not what I want to do. I cannot imagine how you can think	Comments noted. Adopted RBK policy is to promote public transport in all aspects; comments seek to reopen the

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					<p>consultees want to spend hours and hours doing that. I am not in sympathy with this document, nor the government or mayoral policies underlying it. Nowhere is "sustainable" defined. While it is clear that the policies are anti car, without an analysis of the terminology and its meaning, it is inevitable that a lot of assumptions are regarded as sacrosanct. I consider the assumptions to be an imposition on the residents, anti-democratic in approach and practice. I am more interested in promoting movement. Among the transport constraints on p 7 three are lacking. One is inadequate road capacity generally, another is inadequate public transport capacity in the peak, and a third is the inability of PT to serve all possible origins and destinations. The lack of tube and tram are mentioned as things lacking, but they make little difference to car use in nearby boroughs which have them. (Let trams be ignored in this case - buses can do the same for the same priority on the road, and go on beyond the tram route to close to homes; busways over short distances achieve more, when buses are obviously the only mode which can provide PT over much of the borough).</p> <p>Reliance on PTALs. New Malden, or at least its centre, is considered to have good PTAL (these are still long walks to PT in NM). Despite that, PT goes in only a few directions. To Central London rail in the peak it is reasonably frequent but is very crowded. There are very few directions</p>	<p>consideration of policy issues already determined/ no amendment</p>

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					<p>served by the remainder of PT, and it is not frequent or reliable. Consider the time taken, the time waiting in the cold with uncertain outcome, the time to change routes and undergo all the same again.</p> <p>Promoting higher density living. This is a response to London property prices. As it is turning out in practice, it means lots of small flats along busy, noisy, polluted roads, which for all the planning dogma, will still be busy roads in fifty years time. This approach is planning resulting in nuisance, not the reverse. It is allowable to build these dense flats without providing parking. This makes it impossible for their occupants to take certain jobs (by type or location), and to have the benefit of a car for social and recreational travel in places where and at times when cars are not a problem. Further, it imposes these limitations on occupants of new/additional dwellings. If there are things wrong with the use of cars, then the use of all cars should be controlled or limited, whether they are owned by occupants of new or older buildings, and wherever is the origin or destination, in this Borough, another London borough, or outside London. The control of cars (need for, manner of) is a matter of time and place. (And cars should be taken to include all light vehicles - consider tradesmen's vans and delivery vehicles).</p> <p>I see in the proposals no consideration of what generates the traffic problems of RBK, and what</p>	

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					<p>hope there is of altering it. Promoting cycling has limits, and much of the cycling which results is diverted from PT. Where can movement be speeded up and congestion reduced - not considered. Is allowing shopping parking in KTC a major generator of traffic? What would be the effect of Park and Ride, something close in, with fast and reliable buses to KTC? Most of the requirements on business are very restrictive, almost saying keep customers and employees away from us. Extending hours at which goods vehicles can deliver will disturb local residents, both at points of delivery, and roads used to reach them (there are already too many relaxations of overnight HGV bans). (the map on p 59 does not include the 2300 - 0700 ban on >7.5t vehicles in Sussex Rd/Sussex Place New Malden). What to do? Define sustainability and the consequences of having more of it for people's mobility, and way of life for a start. Then find whether that is what people want, in relation to other means of achieving the goals of sustainability. I shall be very surprised if people want what is proposed in this document. When you find that out, start again, and consider some improvements which benefit people.</p>	
17	Jonathan Horner		79	General	<p>This needs to go much further to promote cycling by more investment in this area instead of in car related measures. For example, a big effort and investment is needed to have more dedicated cycle lanes which are separate from roads. As an</p>	<p>Comment noted. SPG seeks to promote cycling and alternatives to private vehicle use</p>

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					<p>example, there is space to do this along parts of Tudor Drive and Richmond which have very wide verges. We need more cycle shelters too. Painting lines on roads is not the answer. We need to make cycling safer so it appeals to more people. Money obtained from car parking charges should be used for cycling improvements and parking charges in central Kingston should be hugely increased which will also encourage people to walk, cycle or use public transport to travel into the centre.</p>	
18	Greater London Authority (Stewart Murray) (Second representation)		80	General	<p>The SPD appears comprehensive and should prove to be a useful tool for both planners and prospective developers. Both the GLA and TfL are supportive of the aspirations set out in the Sustainable Travel SPD, including aims to: protect and enhance bus services and facilities; promote cycling and improve cycling facilities; locate high trip; generating development in areas with high public transport accessibility levels; safeguard land for transport; support car club networks in new development; and install electric vehicle charging points in accordance with London Plan standards. However, there are a number of comments in relation to the consultation which are set out below.</p> <p>(Remainder of letter repeats TfL response verbatim – see above)</p>	Comment noted