

Royal Borough of Kingston upon Thames
Strategic Environmental Assessment Consultation, June 2019
Summary of public comments

Officer observation

The majority of comments relate to the impact of the LIP programme on biodiversity and in particular the loss of mature trees and green space. Following a national decline in support for Biodiversity Action Plans, the London Biodiversity partnership disbanded in 2013. It is proposed that the council consider biodiversity matters in consultation with its key environmental stakeholders, in order to inform LIP policy and investment decisions.

New Borough Objective - 4.6

To ensure biodiversity matters are considered for LIP projects in line with the council overall environmental strategy

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	Do you have any comments on the environmental baseline of the LIP3 (See chapter 5 of the SEA, pg 20)?
1	<p>The baseline should make explicit reference to the role of mature trees in the borough in terms of control / improvement of air quality, landscape / heritage, and as habitat for fauna. It should contain metrics for number of trees by species.</p> <p>The baseline should identify the bird, insect and mammal species (not just bats) that exist in the borough. Again, baseline metrics are required.</p> <p>The reason I put these forward is that mature trees and the fauna that depend on them are likely to be negatively impacted by insensitive development plans.</p>
2	
3	<p>In neither the SEA or LIP is an environmental baseline presented and there are no references or links to any baseline biodiversity information for the Borough. There is only a basic listing of certain important sites, nothing about the biodiversity of the Borough as a whole or mechanisms to record biodiversity data and the impacts of policy overall on biodiversity. The nearest that I can see available on Kingston Council's website is in the 'Evidence base for the Local Plan' but dates from 1992 (The Ecology Unit publication "Nature Conservation")! Perhaps this sums up the problem for biodiversity in Kingston.</p> <p>As such the SEA has nothing much to say about any potential biodiversity impacts – they cannot be discovered or understood because they have not been seen, monitored or measured. The Council are in effect blind to biodiversity decline in the Borough and are not providing any information on the problem to residents:</p> <p>"SEA 5.2.8. It is not foreseen that the LIP in itself will have any significant impact on biodiversity, flora and fauna."</p> <p>This is an extraordinary statement, given the LIP proposals, which also include transport plans with CrossRail2 in the time frame, and major development for housing targets (not least associated with CR2). For example, many trees have already been felled to provide cycle pathways such as in Jubilee Way and the biodiversity damage likely caused – but not measured - thus far by GoCycle should give pause for thought. Queen's Promenade in Surbiton is another example of mass felling and removal of cover for wildlife - for ornamental planting and decking. Whilst drainage sustainability and clean air are discussed in detail, the fact that we have a UK (especially SE and London) biodiversity crisis, with nature in steep decline, seems sidelined. The SEA and LIP are inherently unsustainable for biodiversity as they mostly ignore it.</p> <p>The LIP has no biodiversity baseline assessment (just a reference to practice guide). The only recent council meetings discussing biodiversity monitoring seem to assume it will (hopefully) be done by volunteers (Environment and Sustainable Transport Committee). The latest targets of this Committee do not appear to stipulate collection of robust Borough-wide data: https://modern.gov.kingston.gov.uk/documents/s78437/Annex%201%20EMP%20Themes%20Outcomes%20and%20Targets.pdf good</p>
4	<p>A Strategic Environmental Assessment (SEA) should be a systemic decision support process, aiming to ensure that environmental aspects are considered effectively in policy making for Kingston. Yet biodiversity is hardly mentioned and I am not sure you understand what it means</p> <p>Despite a Biodiversity Crisis equal to the Climate Crisis, we do not appear to have a Kingston Biodiversity Action Plan in the LIP. Of major concern is the lack of Ecological Impact Assessments and surveys in planning. How can you determine whether Net Gain is achieved if you do not have baseline surveys</p>
5	No consideration appears to have been given to impact that losing green spaces will have for our climate (increased surface run off for example during heavy rainfall)
6	Loss of mature trees and effect of further transport on biodiversity
7	

8	I have been unable to find an environmental baseline, with no mention of the impacts of any developments presented other than stating those impacts will be 'insignificant'. In my opinion there has not been enough thought put into the LIP on the impacts on biodiversity.
9	Current Council policies are causing increases in pollution and deteriorating environmental conditions.
10	<p>The LIP 3 is inadequate and does not provide an adequate baseline. It provides no local context, does not explain how infrastructure requirements arising from the Borough's total housing requirements as set out in the SHLAA and London Plan will be met, and does not provide clarity about the scale of development being required and how this relates to forecast population growth in the Borough.</p> <p>Throughout the evidence base documents for the Local Plan there are so many contradictory and unsubstantiated and confused statements and such a lack of clarity, detail and meaningful context that it is impossible for any of those documents to be used to justify any plans for development as laid out in the Local Plan or as imposed by the London Plan in the Strategic Housing and Land Availability Assessment or the London Plan's base targets and additional targets for "opportunity areas". There is no meaningful cross-referencing between evidence based plans to substantiate plans being put forward by the council.</p> <p>The Housing Delivery Test Action Plan, in Part D, mentions the role of "rail and bus improvements" in the shorter term to respond to higher demand from a massively increased population. No consideration has been made of the impact on the natural and historical environment, townscape, noise, pollution and biodiversity of a significantly higher number of buses on the roads, and no information has been given in the LIP3 on what bus and rail improvements are envisaged. The Kingston Transport Study 2018 shows congestion on the roads throughout the Borough increasing significantly without CrossRail 2. This will result in significant increases in noise pollution on the affected roads.</p> <p>There is no evidence that the council has assessed adequately or even at all how the transport infrastructure needed to respond to the massive planned increase in population will meet the requirements of the Equalities Act 2010 to offer protection to vulnerable people and people with protected characteristics.</p> <p>5.1.3 The statement: "The Royal Borough is not as green as other Boroughs" with only 7.5% open space is in contradiction to the statement in the Housing Deliver Test Action Plan that "The borough also benefits from widespread green spaces and parks".</p> <p>5.1.6 Richmond Park is not in Kingston. This is a basic error which reflects the type of inaccuracies and misinformation and confusion that occur throughout Kingston's planning and evidence documents</p> <p>5.2.1 Bushy Park is not mentioned, despite the fact it adjoins the Borough and is affected by it</p> <p>Comments on the effect of LIP3 are inadequate. They are so generic that they are meaningless. They do not provide any context for the assessment being made, for example the nature of communities, neighbourhoods and the natural and historical environment across the Borough and how they will be affected</p> <p>5.4.5 Pollution. There is no statement about whether the LIP3 will have a significant impact – either positive or negative- on pollution levels. There is no contextual information and no cross-reference to other evidence base plans. This comment is so generic as to be meaningless. For example, how will the council's plans to make a 4 lane dual carriageway through Kingston going to improve pollution levels in Kingston town? What effect will many more buses on the roads have on pollution? The Housing Delivery Test Action plan states that bus travel will be the solution to increased population in the shorter term. The Kingston Transport Study 2018 shows congestion on the roads throughout the Borough increasing significantly in the absence of CrossRail 2. This will result in significantly higher levels of pollution. Even with CrossRail 2, there are projected pockets of congestion where pollution will be significantly higher than it is at present.</p> <p>5.9.9 No evidence is provided as to why implementation of the LIP should have a "significant positive impact" on the townscape of the Royal Borough. This is unacceptable. The additional transport that will be needed for the forecast increase in population is massive, particularly before CrossRail 2 is completed. If this is in the form of buses, the impact will be significant in terms of the impact of the sense of place of different areas of the Borough.</p> <p>The Borough Character study is not used as a point of reference at all either in the LIP3 or in the SEA which is an unacceptable omission.</p>

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Do you have any comments on the assessment of the environmental effects (See chapter 7 of the SEA, pg 32)?	
1	I consider the statement that the loss of trees will be "insignificant - positive" to be missing the point or misleading. The underlying assumption is that planting can compensate for the trees lost by development, but saplings will take decades to achieve the same CO2 scrubbing ability as the mature trees, and green walls and sedum rooftops on tall structures are highly unlikely to compensate. This is all well documented.
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3	<p>1) "loss of trees, 2) loss/degradation of railway line ecosystems, 3)transport related impacts on biodiversity" - but these are all very inadequate:-</p> <p>1) "Loss of trees": Mitigation/improvement for loss of trees is just some tree planting "opportunities", which, given the current policy/procedures of the Council, is inadequate to replace the CAVAT and biodiversity measures of the trees felled. It would be better 'to work around' the trees and encourage this behaviour, rather than letting developers or highways' maintenance treat trees as an inconvenience. The 'opportunity' to plant is not good enough for the status quo or net gain, it needs to be required and at an equivalence using accepted biodiversity measures, or greater. For example, the current policy of replacing a TPO tree 'one for one' is clearly negative given TPO trees are almost all mature. Likewise planting boundary/roadside saplings in exchange for mature trees is a major negative for biodiversity. And it should not just be trees, flora and fauna require consideration for biodiversity.</p> <p>2) "Loss /degradation of railway line ecosystems" – mitigation is that the LIP "strongly supports environmentally sensitive management of railway land" but as railway line ecosystems and associated biodiversity are not mentioned in the LIP, it is not clear how this will be mitigated.</p> <p>3) "transport related impacts on biodiversity": No biodiversity mitigation is given! All that is said under mitigation is that the LIP prioritises non-motor transport with reductions in emissions. This is the most serious omission.</p> <p>CrossRail2 is mentioned but this reduces rail overcrowding only to 2011 levels at great environmental cost due to the funding model – major development. The benefits are more for residents outside Kingston and the induced steep population rise within the Borough will put major pressure on our environment. Both the SEA and LIP state that the Council supports CrossRail2, presumably to increase revenue from development, but shouldn't a decision of this magnitude be consulted upon before the Council expresses support? The benefits to Kingston's residents, seem outweighed by the costs, especially environmental.</p>
4	Loss of trees in the borough is not taken seriously by the council who are in denial about tree loss v planting. In fact the response to accidentally finding out that the council has a strong Tree Strategy is to rewrite it even though it doesn't end until 2021. 200 trees could be felled on the Cambridge Road Estate. Need a biodiversity officer to address council ignorance
5	Increased rainfall will lead to flooding and nowhere for the water to go. More pollution and less trees to absorb this
6	Assessment is inadequate
7	There should be mitigation in place other than planting some trees. The plan should include the cessation of tree felling , timing of verge-cutting after plants have set seed, not building on Green Belt etc. There is also no mention at all of other flora and fauna.
8	Intentions to reduce pollution are clearly desirable, but I believe many of the proposed changes are likely to have the opposite effect. These include significant increases in the introduction of speed limits and traffic calming measures including speed bumps on major roads causing delays, damage to vehicles, safety issues and increased emission.
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Given that the SEA is being completed after the LIP3 was written and approved by the Council, the LIP3 is not able to respond to any actual issues that may exist or any effects that proposals for transport infrastructure across the Borough may have

No evidence is given to support the assessment of the likely environmental effects, which all are assessed as having a positive impact. This is completely inadequate. Please read the LIP3 – it does not lay out how it will improve or mitigate any of the problems laid out in the chart in part 7 of the SEA.

Under Community Severance, the chart states that the LIP3 will reduce traffic volume. This is not substantiated in the LIP3 or in the Kingston Transport Study 2018 and the Housing Delivery Test Action Plan talks about the need for additional bus trips in the shorter term.

Under “unemployment”, the chart states that the LIP3 will “Make travel fairer”. There is no evidence to support this in the LIP3. It also states that the LIP3 will “reduce barriers to exclusion”. How will it do this? Again, this is not laid out in the LIP3

The impact of transport infrastructure in LIP3 on pollution and visual pollution is considered to be positive. How can this be case when increased bus travel needed to accommodate the massively increased population will result in higher levels of emissions that will affect buildings along their route and reduce air quality? The LIP3 does not even list CrossRail 2 as a project that will help contribute to the delivery of the Mayor’s Transport Strategy out to 2041. The Go-Cycle route has resulted in a significant loss of trees the length of its route and a baring of the landscape along which it travels.

The Risk Assessment in part 7.2.1 is completely inadequate. It does not assess any risks arising from the LIP3 in the context of the SEA. This is a significant failing.

The risk assessment refers to issues arising from outside the Borough which it then fails to address: “This Environmental Report will consider these issues in more detail where appropriate”.

The list of “problems” in the SEA (7.1,) and mitigations, all supposedly produce ‘insignificant’ to ‘positive’ outcomes for:-

1) “loss of trees, 2) loss/degradation of railway line ecosystems, 3)transport related impacts on biodiversity” - but these are all very inadequate:-

1) “Loss of trees”: Mitigation/improvement for loss of trees is just some tree planting “opportunities”, which, given the current policy/procedures of the Council, is inadequate to replace the CAVAT and biodiversity measures of the trees felled. It would be better ‘to work around’ the trees and encourage this behaviour, rather than letting developers or highways’ maintenance treat trees as an inconvenience.

The ‘opportunity’ to plant is not good enough for the status quo or net gain, it needs to be required and at an equivalence using accepted biodiversity measures, or greater. For example, the current policy of replacing a TPO tree ‘one for one’ is clearly negative given TPO trees are almost all mature. Likewise planting boundary/roadside saplings in exchange for mature trees is a major negative for biodiversity. And it should not just be trees, flora and fauna require consideration for biodiversity.

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Do you have any comments on the assessment of proposed measures (See chapter 8 of the SEA, pg 36)?	
1	I would add "seek to preserve mature trees" as this is one of the best ways to provide air quality improvements and to provide Summer shade for pedestrians and cyclists. as well as completing the existing cycle schemes. secure parking / storage for cycles should be considered (e.g. within existing car parks).
2	
3	This section is poor. It is not clear what the left hand (first column) is in either table because it is not labelled. Which are which objectives?
4	Delivery of cycle routes are negative not positive for biodiversity (because road widening for cycle routes results in tree felling or routes are put through green spaces/parks and more environmentally sensitive areas). This includes tree loss at Jubilee Way and the dreadful mess at the Pipe Track in New Malden where fences sever the corridor. where are the promised wetlands. where is the improved biodiversity outcomes. Nowhere just more
5	Very shortsighted. Not looking at amenities for local people. Potentially pricing them out of their own homes.
6	Ineffective
7	It seems as though all impacts are considered without biodiversity in mind. It may indeed be that a cycle lane produces a positive impact on the health of residents but what about on the biodiversity removed in order to install the cycle lane? There is only one side presented.
8	Although I support the need to improve road safety, there have also been substantial reductions in road space due to the addition of cycle lanes and dedicated cycle routes together with pedestrian improvements leading to very narrow traffic lanes. These traffic management changes reduce traffic speeds. increase congestion and result in more disruptive roadworks leading to increased vehicle emissions for all types of vehicle. It is also notable
9	

The SEA objectives and consideration of LIP policies, as presented in the tables 8 & 9, seem rather arbitrary. They are not evidence based and seem to represent a wish list. They are not supported by evidence from the LIP3.

This section seems to give a clear indication that the council is intending to embark on its massive development programme across the Borough, with housing targets of up to the 55,000 home number attributed in the draft new London Plan and SHLAA, whether or not we get CrossRail 2.

The lack of transparency in the LIP and SEA is unacceptable, and it is reflected in the confusion created by these two documents and the lack of coherence between them as well as by the varied and inconsistent information, if it can be called even that, laid out in the myriad of documents that form the evidence base for the Local Plan. The designation of vast swathes of the Borough as an "opportunity area" will be sufficient to justify massively high densities of development that will result in similar levels of development to that proposed with CrossRail 2. It was confirmed by the GLA at the Examination in Public of the London Plan that "opportunity area" targets are minimum targets, so Kingston's housing targets can rise with or without CrossRail 2.

The measures that the council intends to take in the LIP3 to plan for mass development in the Borough without CrossRail 2 appears to be considered as having the most positive impact in the assessment of proposed measures. Those that are rated most positively are measures that imply increased bus journeys and improvements of existing services. If this is all Kingston will get to accompany around 55,000 new homes in the Borough, the environmental effects will be dire. These are the only measures that get the "pp" or very positive effect rating:

- Lobby TfL to provide improved access to buses
- Lobby SWR to improve access to infrastructure provision at all stations in the Borough
- Ensure LIP schemes near railway stations fully assess access requirements
- Lobby partners to improve existing train services

CrossRail 2, in contrast, only receives a single "p" rating. Despite in section 4.1.4, the SEA refers to the opening of CrossRail 2 by 2030s as a "key aim" of the Mayor's Transport Strategy, the scheme is not considered to bring substantial positive outcomes. It seems like the council is preparing for the fact it may never come. However, development plans are not being reduced at the same time. CrossRail 2 is only mentioned three times in the whole document.

Why is there no reference to Kingston's multiple proposed "opportunity area"s and the impact of the transport infrastructure requirements needed to support massive population growth around transport hubs in such areas? This has not been addressed in the LIP3 or the SEA.

It is not evident that higher development densities will all be in areas of higher PTAL access. Take the Cambridge Road Estate. Some of the estate is in an area with an extremely low PTAL rating, but the council's plans are still to more than triple density of development on the site

The assessment of the category "Use CIL to fund transport infrastructure" is completely unclear and is not evidenced in the LIP3. This is a critical policy area in the new London Plan and needs to be evidenced and substantiated.

The positives for biodiversity for quite a few of the LIP outcomes are questionable, for example, delivery of cycle routes and GoCycle are likely to be negative not positive for biodiversity (because road widening for cycle routes often results in tree felling or routes are put through green spaces/parks and more environmentally sensitive areas). Extra planting of trees is unlikely to compensate for loss of habitat to a track– it would be extremely difficult to

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	Do you think electric vehicles are part of the solution?	Do you think road user charging is worth exploring to address local environmental concerns?
1	Yes	Yes
2	Yes	Yes
3	Yes	Yes
4	Yes	No
5	Yes	No
6	No	No
7	Yes	No
8	Yes	No
9	No	Yes
10	Yes	No

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How do you think we can work better with our partners to encourage more active and sustainable travel?	
1	Initial, I think it is about communicating clearly the vision for the borough and the objectives and engaging them as stakeholders more effectively (i.e. what is the narrative here - is Kingston just going to be a more built up version of today or is it going to be a model for green / low carbon development?). Then, I think it can be about incentives and rebates to encourage them to invest in services and infrastructure that supports the plan, and to set objectives themselves that are aligned with the plan.
2	Lobby neighbouring boroughs and TfL to improve their infrastructure that links to Kingston which would encourage sustainable travel
3	For sustainability, in terms of biodiversity, there are many partners the Council could work with in addition to those listed, for example: Kingston Biodiversity Network Wildlife Trusts Woodland Trust London, National Park City ZSL
4	Remember that electric cars are pillaging rare earth metals from national parks in Chile so there is always a toll on the environment.
5	Putting up the price of parking is only going to alienate the poorer and elderly members of our community.
6	Improvements in rail travel
7	It would have been a good idea to engage with them before you put the plans together in the first place.
8	Talk to the London Wildlife Trust, the Kingston Biodiversity Network, the London Bat Group to name a few, and listen to what they have to say. They are the experts. Work on detailed plans. More publicity, better monitoring of traffic conditions and information systems.
9	Better bike routes people don't use as paths. Increase penalties for cars road rage to make cycling respected

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Development should only be planned when there are sustainable travel options available to support it. The environmental impact of proposed development and of transport infrastructure and methods of travel that support population growth need to be fully considered and addressed.

Development companies need to reduce their requirement for a 15 -20% profit margin so that more funding is available from development for transport infrastructure, and so that protection can be given to the natural and historical environment and existing neighbourhoods and communities receive the protection and respect they deserve whilst transport methods are improved.

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	Do you feel Transport for London has a role in improving the environmental impacts of transport in the borough?	What do you think that role should be?
1	Yes	Further investment in low carbon transport solutions.
2	Yes	Cleaner buses+ extending the ULEZ to cover Kingston
3	Yes	The draft London Plan has set Kingston (and other outer London boroughs) extremely challenging housing targets; is imposing Opportunity Area status on us (due to the joint endeavour of the Council & GLA) and development (within 800m of any railway station or town boundary) - targeting around half the land area of Kingston. This is without a
4	Yes	Not to make our borough even more of a concrete jungle with Crossrail
5	Yes	To have clearer knowledge about the impact of construction and to work alongside those who have knowledge in this area, on equal terms.
6	Yes	Train improvements and ending industrial action
7	Yes	Build preserving biodiversity into all plans, so it is at the forefront of discussions.
8	Yes	Monitoring and better liaison with Council officers.
9	Yes	Encouraging low emission travke
10		

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How do you think we can improve the health and wellbeing of those who live, work and study in the borough?	
1	Preserving and enhancing the leafy, green nature of the borough so as to use nature to improve air quality, reduce noise levels and calm the senses.
2	Reduce motor traffic (particularly by stopping rat running) and invest in infrastructure for sustainable travel, in particular more and better cycle routes.
3	<p>Given the climate and biodiversity crisis we are in, it seems naïve to think that this SEA and LIP is far reaching enough to mitigate a huge expansion in population and the built environment. Suggested improvements to health and well-being should be to improve our natural environment and to limit growth until we know it is, or can be made sustainable. At the moment that seems in serious doubt globally, let alone in a very crowded corner of the UK. Due to population rising unsustainably and climate change, the head of the Environment Agency is warning that England could run out of water in just 25 years. London will be most affected and Kingston is risking sacrificing resilience for growth. The biodiversity crisis is just as serious as the climate crisis and Kingston must do everything it can to arrest the decline.</p> <p>Suggestions include:-</p> <ol style="list-style-type: none"> 1) Not putting growth as the prime driver for the Council 2) Oppose any weakening of green space protections 3) Separate "Environment" from the "Environment and Sustainable Transport Committee" or remove the word "Transport". The two have conflicting objectives and very different scopes' - clearly the environment is far more wide-reaching than the confines of transport, yet the focus of the Committee seems to be upon transport and associated emissions. 4) Put biodiversity much higher up the Council's agenda - policies, procedures and practices. 5) Appoint an ecology officer - badly needed to provide a strategic overview and intelligence. 6) A replacement tree officer is needed for the post lost. 7) A first step is a robust biodiversity baseline for the Borough, and not just concentrating on a handful of of conservation sites; green fields, parks and brown field and rivers are all important for the Borough's biodiversity. 8) Implement and adhere to biodiversity targets and monitoring, perhaps through a Kingston Biodiversity Action Plan. These should be in the LIP and SEA. 9) Make Ecological Impact Assessments routine ias pat of the planning application and decision making process. 10) Take into greater account the environment and biodiversity in all planning considerations; they rarely seem to be considered, or impacts mitigated transparently, to maintain current levels of biodiversity, let alone net gain. Above all, consider biodiversity as a whole for each planning application, not just trees and protected species. Provide habitat for Section 41 species under NERC, such as house sparrows, where they were previously known and enforce planning recommendations for bat surveys on high potential buildings about to be demolished. Stop development on our flood plain. 11) Prevent or strongly discourage 'total footprint developments' 12) Provide much better protection for the Borough's trees 13) Ensure community consultation on felling of trees. 14) Implement measurable biodiversity targets, monitoring and a Kingston Biodiversity Action Plan as a matter of urgency. 15) Increase green space in the Borough and access to green space (not balconies or green roofs as equivalence) for mental and physical health. 16) Limit or tax artificial turf, it requires biodiversity mitigation if installed 17) Renew the service level agreement with GIGL 18) Stop building on our flood plains – it isn't sustainable. 19) Protect the Hogsmill fragile ecosystems – as stipulated in the Direction of Travel Document. Recent felling and planning approvals give little confidence this is being honoured, monitored or adequately mitigated.
4	Stop developing work places; we have lost Arrow Plastic, Fine Foods, our pubs, the laundry just in one small district in Norbiton all we get is housing housing housing. These are often sold abroad like Queenshurst. I am in despair over the councils inertia at Seething Wells, the sequestering of wildlife sites and nature spaces for infrastructure. Build on the surface car parks and take back control of the failing town centre. Stop everyone
5	Build less housing, not more. Increased open spaces mean better wellbeing. Better sports amenities and less high rise which created micro climate effect.
6	Not build on every golf course or field. Retain the green belt. Removing access to nature will badly impact on health & wellbeing. Ensure that the whole of Kingston is not a building site.
7	Ensure biodiversity is considered in all Council decisions, planning, policies and procedures. Implement a Kingston Biodiversity Action Plan in conjunction with local environmental groups.

8	Stop building blocks of flats!
9	Have more safe bike parking facilities in a secure area in car parks. Outside parking means bike are stolen or you just can't park.
10	<p>We need to reject the development targets that our council has agreed with the GLA.</p> <p>The disruption alone caused by development on such a massive scale will have a hugely detrimental impact on the mental and physical health of residents. It will also increase air pollution and damage the natural and historical environment, biodiversity, neighbourhoods and communities. A sense of place is critical to people's well-being and to nearly double the population of a borough in 22 years by creating massive large scale developments that are completely foreign to the neighbourhoods already in existence will destroy any sense of belonging that people have. The effects will be particularly big on vulnerable people and people with protected characteristics who should be protected under the Equalities Act 2000. It does not appear that an adequate assessment has been conducted in this regard. Many people may suffer terribly if they are displaced or forced out of their homes – the first of these may be people on the Cambridge Road Estate, many of whom may have protected characteristics. But it is not limited to them, the scale of development and “regeneration” proposed will affect us all. Is it surprising that so many children are having mental health problems when the place they called home is being ripped apart and being replaced with a dense, highly-populated area of towers that does not integrate physically or in any other way in to the surrounding areas.</p> <p>The option of doing nothing or doing a smaller amount of development is not being considered. In order to improve people's health and well-being, you needed to ask people what they value and how they would see development taking place and then make decisions about growth plans that clearly reflect people's aspirations. This has not happened. The health and well being of people in the Borough is at tipping point.</p> <p>Given the climate and biodiversity crisis we are in, it seems naïve to think that this SEA and LIP is far reaching enough to mitigate a huge expansion in population and the built environment. Suggested improvements to health and well-being should be to improve our natural environment and to limit growth until we know it is, or can be made sustainable. At the moment that seems in serious doubt globally, let alone in a very crowded corner of the UK. Due to population rising unsustainably and climate change, the head of the Environment Agency is warning that England could run out of water in just 25 years. London will be most affected and Kingston is risking sacrificing resilience for growth. The biodiversity crisis is just as serious as the climate crisis and Kingston must do everything it can to arrest the decline.</p> <p>Suggestions include:-</p> <ol style="list-style-type: none"> 1) Not putting growth as the prime driver for the Council 2) Oppose any weakening of green space protections 3) Separate “Environment” from the “Environment and Sustainable Transport Committee” or remove the word “Transport”. The two have conflicting objectives and very different scopes’ - clearly the environment is far more wide-reaching than the confines of transport, yet the focus of the Committee seems to be upon transport and associated emissions. 4) Put biodiversity much higher up the Council's agenda - policies, procedures and practices. 5) Appoint an ecology officer - badly needed to provide a strategic overview and intelligence. 6) A replacement tree officer is needed for the post lost. 7) A first step is a robust biodiversity baseline for the Borough, and not just concentrating on a handful of of conservation sites; green fields, parks and brown field and rivers are all important for the Borough's biodiversity. 8) Implement and adhere to biodiversity targets and monitoring, perhaps through a Kingston Biodiversity Action Plan. These should be in the LIP and SEA. 9) Make Ecological Impact Assessments routine as part of the planning application and decision making process. 10) Take into greater account the environment and biodiversity in all planning considerations; they rarely seem to be considered, or impacts mitigated transparently, to maintain current levels of biodiversity, let alone net gain. Above all, consider biodiversity as a whole for each planning application, not just trees and protected species. Provide habitat for Section 41 species under NERC, such as house sparrows, where they were previously known and enforce planning recommendations for bat surveys on high potential buildings about to be demolished. Stop development on our flood plain. 11) Prevent or strongly discourage ‘total footprint developments’

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	Does the Strategic Environmental Assessment capture all possible environmental impacts of the Local Implementation Plan 3?	Please tell us what you feel is missing
1	No	A vision of what a 'good' set of outcomes would look like (as opposed to a set of problems to be mitigated).
2	Yes	
3	No	No. It fails to capture biodiversity impacts almost completely and mitigation is weak or non-existent. For example, the impacts considered under Biodiversity, flora and fauna mention only one element of the flora – trees. The Environment Agency comments were to consider both flora and fauna.
4	No	No time to do this you need a biodiversity officer, the council have no idea what it is doing with our environment.
5	No	All of the above. It is purely about building more houses. Nothing about flood defences or open spaces. No specifics outlined regarding amenities
6	No	Real work on biodiversity already present in the borough. Seething Wells has not been protected despite promises made.
7	No	Detail. There is no mention of any biodiversity other than trees, either an oversight or a lack of understanding, neither of which are acceptable.
8	Yes	
9	Yes	
10	No	<p>The LIP3 plan is inadequate and does not address all the transport infrastructure that is actually being planned for the Borough ie Crossrail 2 nor the scale of the development that will need alternative transport arrangements to be made if Crossrail 2 never happens. Given the SEA is being completed after the LIP3 was approved, it can not be considered as sound or adequate and it responds to a document that was found to be inadequate by the council's scrutiny panel. It seems to be irregular that the Scrutiny Panel approved the LIP3 whilst upholding the challenge of the decision to approve it. If the LIP3 is inadequate, so must be the SEA written after the LIP3.</p> <p>Here are the reasons for my challenge of the LIP3, all of which were UPHHELD by the Scrutiny Panel which then oddly-enough, confirmed approval of the document:</p> <p>"Call in of Decision Two (Part 2) on 12 February 2019 by The Environment and Sustainable Transport Committee of Kingston Council to approve the 3rd Local Implementation Plan (the "LIP") for the Borough The Greater London Authority Act 1999 (The GLA Act) requires each borough to prepare a LIP containing its proposals for the implementation of the Mayor's Transport Strategy in its area. We, the undersigned, call in the decision to approve the Borough's LIP for the following reasons:</p> <p>1. The LIP breaches Requirements laid out in TfL guidance on how to prepare LIPS https://tfl.gov.uk/info-for/boroughs/local-implementation-plans and more specifically in http://content.tfl.gov.uk/third-lips-guidance-2018.pdf – Guidance for Borough Officers on Developing the 3rd LIP, March 2018. The following Requirements of the latter guidance are breached: o R3 – Statutory Consultation. There is no evidence that all the consultees listed were actually consulted or demonstration that all consultees views were taken in to account in the final LIP. Specifically, there is no evidence that eight residents' associations were consulted. Additionally, it is not democratic to choose 8 residents' associations as representative of residents' views across the Borough. It also is not correct not to seek the opinion of representative organisations such as the North Kingston Forum and associations that represent large numbers of residents. No evidence has been made available about which associations were consulted and the outcome of such consultation. The requirement to consult with stakeholders registered on the Local Plan consultee database also appears to have been breached. o R5 – Strategic Environment Assessment (SEA). There is no evidence that an up-to-date SEA has been completed. No such SEA is available on the Council's website o R7: Local Context – the LIP does not give detail of "other characteristics of the Borough", which it could easily have done using the Borough Character Study. The local context demographic information does not include coherent, full, accurate or up-to-date information on the Borough, of recent population changes as development has happened and of how these are affecting the local context. There is no detailed and up-to-date information on forecast increases in population and the changes that such growth will bring to the predominant characteristics of different areas of the Borough. Under Employment, the requirement for the Borough to provide for an additional 30,000 jobs on top of the 2016 London Plan expectation of 13,000 jobs (Kingston Transport Forecasting Report 2018) is not mentioned. No reference is made in this section to the Direction of Travel growth strategy approved by the Council in 2016 and no explanation is given of its implications for the Borough. No meaningful reference is made, detail or explanation given of the planned "nascent Opportunity Area" for Kingston o R11: The LIP fails to set locally-specific objectives for the 9 outcomes of the Mayor's Transport Strategy, namely Outcomes 3,8 and 9. Objectives for some of the other outcomes are vague, for example, 5.1 Kingston "supports" CrossRail2 and subsequently, many are not specific, measurable, achievable, relevant and timeorientated o R12: The LIP does not reflect directly, specifically, accurately, clearly and consistently how other Mayoral strategies, such as the Mayoral strategy on Housing (summer 2018) and the forthcoming draft new London Plan (late 2019), that has set clear and massive development targets for Kingston in terms of new housing and the provision of jobs, will affect the Borough o R13 and R16: the LIP does not list CrossRail 2 as a project that will help contribute to the delivery of the Mayor's Transport Strategy out to 2041 2. The draft LIP is currently not available for residents or other stakeholders to see on the Council's website 3. The Mayor's Transport Strategy does not mention a Kingston Opportunity Area. It is therefore incorrect and misleading for the LIP to include mention of an Opportunity Area in Kingston in point 2.4 and in the map on page B40 4. Forecast household, population and employment growth figures in the LIP are not consistent, comprehensive or accurate with latest available data. No coherent picture is given of Kingston's recommended growth targets. Figure 3 is unclear and not explained. Points 2.14 to 2.18 give historical transport trend information and do not use data from the Kingston Transport Forecasting Report 2018 on predicted growth and the effect on transport requirements. Figures given to the Mayor's office in a bid for mini-Holland monies and the impact of what has been built and what has been planned to be built have also been omitted 5. Misleading statements are made about CrossRail 2 (CR2) in points 2.24 and 2.81 which link CR2 explicitly and positively to the Borough's ability to meet its housing targets, when Kingston's core housing and employment growth figures are not dependent on the arrival of that infrastructure project. The misleading statement in 2.81 fails to inform people that the majority of the 20,000 extra housing units that must be built when construction of CR2 starts will be in Kingston. In addition, CrossRail 2 does not show up in any conveyancer infrastructure searches for people purchasing property in Kingston"</p> <p>The SEA plan fails to capture biodiversity impacts almost completely and mitigation is weak or non-existent. For example, the impacts considered under Biodiversity, flora and fauna mention only one element of the flora – trees. The Environment Agency comments were to consider both flora and fauna.</p>

Royal Borough of Kingston upon Thames

Strategic Environmental Assessment Consultation, June 2019

Summary of public comments

Do you have any further comments?	
1	No
2	Electric vehicles have some role to play but brake and tyre wear will still form a significant amount of particulate pollution and does not reduce congestion. Improved walking and cycling routes would be a better investment.
3	It is not entirely clear to me what the Local Implementation Plan 3 is for – just transport or related development? The forward by Cllr Gander says it is mostly about sustainable transport, and the introduction confirms it is to deliver the Mayor's Transport Strategy (MTS) so I have tried to restrict my comments to transport and closely related aspects.
4	The council has abrogated its responsibility for the environment and to us. It has put everything up for grabs; this is not what we require a council for but to be stewards of a strong environment and a strong environmental policy. The current admin is floundering around whilst our borough is being destroyed by developers. It appears to be assisting wholesale in this melee, nothing to be proud of here.
5	
6	No
7	With the increased concern around the impacts of developments on the environment and on biodiversity, the declaration of a climate emergency, the knowledge that unless we do something now that future generations will have no future, the plans are wholly inadequate.
8	The Environmental Assessment is very vague.
9	

10

The SEA and the LIP3 are fundamentally unsound because there is a statutory requirement for the SEA to be prepared as part of the LIP3, to be consulted upon simultaneously and to be considered by council committee together for approval or rejection.

This has not occurred. The process of creating the council's LIP3 therefore needs to start again and to be completed correctly according to the legal requirements.

The LIP 3 is inadequate and does not provide an adequate baseline. It provides no local context, does not explain how infrastructure requirements arising from the Borough's total housing requirements as set out in the SHLAA and London Plan will be met, and does not provide clarity about the scale of development being required and how this relates to forecast population growth in the Borough.

Throughout the evidence base documents for the Local Plan there are so many contradictory and unsubstantiated and confused statements and such a lack of clarity, detail and meaningful context that it is impossible for any of those documents to be used to justify any plans for development as laid out in the Local Plan or as imposed by the London Plan in the Strategic Housing and Land Availability Assessment or the London Plan's base targets and additional targets for "opportunity areas". There is no meaningful cross-referencing between evidence based plans to substantiate plans being put forward by the council.

The Housing Delivery Test Action Plan, in Part D, mentions the role of "rail and bus improvements" in the shorter term to respond to higher demand from a massively increased population. No consideration has been made of the impact on the natural and historical environment, townscape, noise, pollution and biodiversity of a significantly higher number of buses on the roads, and no information has been given in the LIP3 on what bus and rail improvements are envisaged. The Kingston Transport Study 2018 shows congestion on the roads throughout the Borough increasing significantly without CrossRail 2. This will result in significant increases in noise pollution on the affected roads.

There is no evidence that the council has assessed adequately or even at all how the transport infrastructure needed to respond to the massive planned increase in population will meet the requirements of the Equalities Act 2010 to offer protection to vulnerable people and people with protected characteristics.

Section 9. Monitoring is fundamentally unsound because the SEA does not set and specific or measurable objectives that can be monitored or measured, expectations and mitigating measures are not specified and there has been no attempt whatsoever to identify any undesirable effects of the LIP3.

There are no measures within the LIPs that reduce environmental impacts. It is a vague, confusing and confused document and presents nothing but vague generalities. The following statement is therefore unsound and open to legitimate challenge:

"Monitoring for the Strategic Environmental Assessment (p. 49 LIP)
9.2.2 Monitoring should focus on any significant environmental impacts that give rise to irreversible impacts upon environmental attributes in the area. This SEA found very little evidence of significant environmental impacts because of measures within Kingston's Third Local Implementation Plan. Where adverse impacts have been found, mitigation measures were presented to minimise