

Statement of Consultation

Residential Design SPD

**May 2013
(Revision 17.06.2013)**



The Residential Design 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 Residential Design SPD has been prepared.

This 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

i. Who did the Council consult and how?

The existing Residential Extensions Supplementary Planning Guidance (SPG) was adopted by the Council in 1982 therefore it was considered necessary to update and amend the guidance to reflect changes in national guidance, and to continue to protect and enhance the character of the Borough.

Early stakeholder engagement was undertaken prior to the formal stage of public consultation as follows:

- **11 April 2012** – An internal initial project group meeting of Council Officers involving Development Management; Landscape; Highways; Housing; Building Control; Planning Policy. This was to scope the content of the SPD.
- **24 May 2012** – Initial cross-party Members briefing involving 17 Members, to scope out residential design issues
- **17 October 2012** – Urban Design London (UDL) Design Surgery – informal critique of the design guide from UDL and associates from various private architectural practices across London
- **5 November 2012** – Surbiton Ward residents associations briefing to introduce the guide and scope local issues further.

Once a draft SPD had been produced formal public consultation took place over an eight week period between 10 December 2012 and 1 February 2013. All those on the Council's Local Development Framework database were consulted, which includes more than 2,000 consultees. The following categories of consultee were consulted (a complete list of consultees can be found in Appendix 1):

- Statutory consultees
- Business community
- Community support groups
- Disability groups
- Education organisations
- Environment groups
- Ethnic groups
- Health organisations
- Heritage protection groups
- Local residents and interested parties
- Infrastructure providers
- Leisure groups
- Older people groups
- Planning Interest groups, e.g. planning consultants
- Political groups
- Religious groups
- Residents Associations
- Transport organisations
- Young people

Consultees were informed of the consultation by letter or email, while the draft SPD 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.

During the public consultation the SPD was reported to each of the Council's Neighbourhood Committees. Members were invited to make individual representations on the SPD while comments from the committees were also considered as consultation responses.

A Developers Workshop was held on 24 January 2013 to discuss the content and approach of the Residential Design SPD. This was attended by 12 local developers.

Summary of the Main Issues

A full schedule of consultation responses, with the Council's response, can be found in Appendix 2. This includes responses to the public consultation, Members' comments from Neighbourhood Committees and issues raised at the Developers Workshop. A summary of the main issues raised are as follows:

- Design quality – accessibility, amenity, character, conservation and setting
- Extension to existing dwellings – layout, daylight/ sunlight, size/ proportion and boundary conditions.
- Student Housing – layout, amenity and management.
- Car Parking – location, layout and quantum.

The draft SPD has been amended in response to the consultation, where necessary. Details of agreed changes are provided within Appendix 2.

Appendix 1 - Consultees

Statutory Consultees

- Claygate Parish Council
- Coal Authority
- The Mayor of London, Greater London Authority
- London Borough of Merton
- London Borough of Richmond
- London Borough of Sutton
- London Borough of Wandsworth
- Surrey County Council
- Elmbridge Borough Council
- English Heritage
- Environment Agency
- Epsom and Ewell Borough Council
- Mole Valley District Council
- National Grid
- Natural England
- Network Rail
- NHS Kingston
- The Planning Inspectorate
- Mobile Operators Association
- Transco
- British Gas Plc
- TfL
- Highways Agency
- Homes and Communities Agency (HCA)
- Ofcom Contact Centre
- Ofgem - London
- Powergen plc
- Scotia Gas Networks
- Thames Water Plc

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
- Chessington Nurseries
- Chris Thomas Ltd.
- Costco Wholesale UK 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 Culliford Ltd
- Hermes Hotel
- House of Fraser
- Howdens Joinery Co.
- Insight Services
- J Sainsbury plc
- J.R. Spalding Joinery
- Jackson-Scott Associates LTD
- John Lewis Partnership
- John Sharkey and Co.
- Kidd Adam Ltd
- 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)
- Simone Kay Stained Glass
- SNP Associates
- Spires Sports Ltd
- Spiritbond Student Housing 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

- London Forum of Amenity and Civic Societies
- Royal British Legion Institute
- Royal British Legion, Malden and Coombe Branch
- The Equality and Human Rights Commission

Disability Groups

- Anchor Trust
- Connect
- Crescent Resource Centre
- Disability Equality Group
- 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
- 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. Andrews & St. Marks C of E Junior 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 Boys School
- Tiffin Girls School
- Tolworth Girls School
- Tolworth Infants and Nursery School
- Tolworth Junior School

Environment

- BRE Group
- British Geological Survey
- 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 Britain
- 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
- Kingston and District Welcare Association
- Health and Safety Executives
- HUDU
- Inventures (NHS estates)
- Kingston & District Welcare Association
- Kingston Hospital Trust
- Kingston Samaritans
- Magic Roundabout
- Mental Health Partnership Board
- 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 CAAC
- Surbiton Conservation Area Advisory Committee
- The Garden City Movement

Housing

- | | |
|--|--|
| <ul style="list-style-type: none"> • A2 Housing Group • Ability Housing Association • Affinity Sutton • Age Concern • Appley Properties Limited • Asra Housing Association • Bridger Bell • Broomleigh Housing Association • Clear Water Estates • Fairview New Homes Ltd • Family Housing Association • Gleeson • Hanover Housing Assoc. • Hestia Housing (Kingston Womens Centre) • Home Group • Horizon Housing Group | <ul style="list-style-type: none"> • House Builders Federation • Inquilab Housing Association • Invista Real Estate on behalf of Clerical Medical • Kingston Churches Housing Association • Kingston upon Thames United Charities • L&Q Group • Metropolitan Housing Trust • Millat Asian Housing Association • Moat Housing Society • Molior London • New Era Housing Association • North British Housing Association • Paragon Community Housing Group • PML Building Services Limited |
|--|--|

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

Individuals – 1541 local residents on the LDF database

Infrastructure Providers

- Health and Safety Executive
- London Ambulance Service
- London Fire and Emergency Planning Authority
- London Fire Brigade
- Metropolitan Police Authority
- MONO
- 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
- 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
- Age UK Richmond upon Thames
- 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
- Broadway Malyan
- Burnett Planning and Development
- C&S Associates
- Hammerson PLC
- The Crown Estate
- Canadian and Portland Estates Ltd.

- Capitalise Assets LLP
- Cattaneo Commercial
- CBRE
- CgMs
- Cluttons LLP
- CNM Estates
- 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
- Drivas Jonas Deloitte
- Drivers Jonas
- Elborough
- Entec, Environmental and Engineering Consultancy
- ESA Planning Ltd.
- Evans Roden Myzen
- Firstplan
- FirstPlus Planning
- Fusion Ltd.
- Fusion Online Development Plan Monitoring
- 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 and Leatherhead Branch of CAMRA
- Kingston Hospital NHS Trust
- Kingston University Students Union
- Knight Frank LLP
- Lancashire Digital Technology Centre
- Level
- Linden Homes South East
- Littman & Robeson
- London Assembly
- London Concrete
- Longmoore Regeneration Limited
- Malcolm Judd and Partners
- Malcolm Scott Consultants Ltd
- Marcus Beale Architects
- Martineau
- Metropolis Planning and Design
- Mineral Products Association
- Mizen Properties Limited
- Mono Consultants Ltd
- Morley Fund Management
- Nathaniel Lichfield & Partners
- NHP Group
- NHP Leisure Development Ltd
- Paul Dickinson and Associates
- PB
- Peacock and Smith
- Planning Mineral Products Association Ltd.
- Planning Potential
- PPML Consulting Ltd
- PRC
- PRC Planning
- PRP Architects
- Quod Planning
- Rapleys LLP
- Redrow Homes
- Robin Bretherick Associates
- Rolfe Judd Architects
- RPS
- RPS Planning
- Savills Commercial Ltd
- Savills Plc
- SLR
- Spiritbond
- St George West London
- 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
- St Catherine of Siena RC Church
- Surbiton Community Church
- The Korean Church
- United Reformed Church

Residents Associations

- 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 R.A
- 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 Householders 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 Providers

- 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 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
- Transport for London - London Buses

Voluntary Groups

- Kingston Voluntary Action
- Thames Community Foundation

Young People

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

Appendix 2 – Responses to the Consultation

Table 1: Responses from the Public Consultation

The table below sets out all responses received to the public consultation and the Council's response. Any changes to be made to the SPD are included in the final column "RBK Response".

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
1	Transport for London (TfL)	Letter	1	12/2375 04 Representations\TfL 12-2375 Kingston Residential Design Guide SPD Borough response.doc	Policy Guidance 6: Front Garden Parking in New Developments: States that 'Planning permission is generally not required to install a vehicle crossover'. This statement should be amended to reflect the fact that crossovers which are proposed on the Transport for London Road Network require planning permission and if consent is granted, the applicant is required to enter into a Section 278 Agreement with TfL to implement the crossover.	<u>Amend</u> <i>Technical issue – change guidance to reflect TfL design parameters.</i>
2	Kingston University (Nathaniel Litchfield & Partners)	Letter	1	10305/NT /HW/3475573v3 04 Representations\Kingston Uni 10305 Residential Design SPD 08.01.13.PDF	Policy 46: Student Housing General Design Principles: Kingston University considers that it is important to include reference within the SPD to the importance of student accommodation being located in accessible locations. In addition, for small student accommodation developments, comprising less than 100 units, it is particularly important that developments are located close to other existing proposed student residential accommodation, where management resources can be shared. It is unlikely to be financially viable for isolated developments that comprise of less than 100 units to be able to provide the required level of pastoral care services, which could have an adverse impact on students and other nearby residents. Given the importance of location and its intrinsic link to design and pastoral care, we consider that these omissions should be addressed primarily within Policy	<u>No Change</u> <i>Not a design issue –management and viability issues are not justified grounds for departure from the guidelines. Each application will be considered on a case by case basis</i>

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
					Guidance 46 or should form part of the accompanying text in Section 5.	
			2		<p>Studio Flats: To provide clarification, we consider that the word "individual" should be added to the second bullet point to read as follows:</p> <p><i>"In general individual access cores should serve no more than ten studio flats per floor"</i></p>	<p><u>Amend</u> <i>wording revised</i></p>
			3		<p>Other key local design issues: With respect to sustainability it is considered that requiring all student residential developments from 2013 onwards to meet BREEAM 'outstanding' is overly restrictive to the delivery of student residential accommodation. Instead it is considered that all developments should be required to meet BREEAM 'Excellent' and that there should be a requirement for strong justification for any failure to achieve this standard. Developments that exceed these standards should of course be welcomed, but we do not consider they should be a requirement.</p>	<p><u>No Change</u> <i>RBK Policy requirement that all development should adhere to. Each application will be considered on a case by case basis, and therefore a departure from the guidelines will require a firm rationale.</i></p> <p><i>(Ref: Climate Change Policy DM1 in the Core Strategy – all new development over 500m2 built to BREEAM Outstanding from 2013)</i></p>
			4		<p>Case Studies: Given that accompanying text acknowledges that the case studies provided at pages 101 and 102 do not in themselves represent well designed student accommodation it is considered that the heading should be amended to read as follows:</p> <p><i>"Examples of Student Accommodation"</i></p>	<p><u>No Change</u> <i>RBK has used examples in the RD SPD, which it deems to be of good quality.</i></p>

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
					<p>Case Study 1: IQ Wave, Vicarage Road, Kingston Town Centre</p> <p>For clarification it is considered that the introductory text to IQ Wave should identify that the development does not meet the identified proportion for cluster bedrooms.</p>	
3	CAMRA	Letter	1	<p>January 16, 2013</p> <p>04 Representations\CAMRA Comments on Residential Design SPD Draft Dec 2012 130116.pdf</p>	<p>Key Local Design Issues :</p> <p>We recommend that this paragraph includes an explicit reference to consideration of local community facilities in addition to levels of amenity for existing neighbouring residents.</p>	<p><u>No change</u></p> <p><i>This is not a design issue. There are many factors to consider when designing a scheme in context, and therefore is already covered by Policy CS16 RBK Core Strategy (protection of community facilities).</i></p>
4	Highways Agency	Email	1	<p>13 December 2012 14:45</p> <p>04 Representations\Highways Agency Royal Borough of Kingston Residential Design Guide SPD Consultation.pdf</p>	<p>We have reviewed the consultations and do not have any comment at this time</p>	<p><u>No change</u></p>
5	Gary Bartholomew	Email	1	<p>FW: SPD Guide</p> <p>04 Representations\Gary Bartholomew comments 28 01 SPD Guide.pdf</p>	<p>Maintain min. 1M gap to common boundaries (as previous SPG) and clearly state critical dimensions expected to boundaries at all upper levels.</p>	<p><u>No change</u></p> <p><i>This element is already covered by the design guide.</i></p>
			2		<p>Distance to side boundaries of 250mm is considered good, but should be considered an absolute minimum, and related to different housing types that can have differing</p>	<p><u>No change</u></p> <p><i>Already covered by the text. And</i></p>

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
					roof eaves overhangs.	<i>each application will be dealt with on a case by case basis.</i>
			3		Ancillary buildings with 50% retention of garden area considered too little. Generally a much larger garden area should be retained (can you imagine what 50% of any garden covered in buildings looks like!).	<u>No change</u> <i>There are many parameters to consider and this is not the only one, which the SPD outlines in the guidance. Therefore each application will be dealt with on a case by case basis.</i>
			4		Use of the statement 'In Keeping' with neighbouring buildings should be qualified with a statement on variety of massing, including roof ridge heights, can promote architectural richness.	<u>No change</u> <i>The inherent character of the area should be retained, and therefore only appropriate designs will be considered.</i>
			5		Landmark and dominant buildings with carefully considered design can lead to enhancement of an area and should be encouraged.	<u>No change</u> <i>RBK are currently exploring an additional SPD to cover tall buildings and key views.</i>
			6		Use of 'materials to match existing' should clearly state what those existing materials are in both type, colour/ texture etc. and should be strictly enforced – if reported as incorrect, action should be taken to ensure Planning Conditions are considered robust.	<u>No change</u> <i>All applications will be considered on a case by case basis, and therefore only appropriate schemes will be approved, that respond well to their context.</i>
			7		Encouraging an improved quality of presentation / application usually means a better design solution, better development and will usually result in a Planning approval.	<u>Addition</u> <i>See point 8 below</i>
			8		Promote use of professional architectural designers	<u>Addition</u>

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
					especially fully qualified in design e.g. Architects to raise standards further.	<i>Insert reference in p.5 Background – Recipients 1.11 '...it is recommended that applicants use professional services, such ARB, RIBA, RICS where appropriate, in order to improve the quality of the design and presentation of the application...'</i>
			9		First point of contact for designers and especially applicants is the Kingston Contact Centre. Therefore, adequate training to CC and Admin checking dept. should be provided to ensure staff are fully conversant with SPD and especially items 6 & 7 above.	<u>No change</u> <i>RBK intend to train appropriate staff members on the use of the SPD</i>
6	E Robson	Letter	1	30 th January 2013 Residential Design SPD Consultation	Policy Guidance 40: Piggyback Extensions Policy Guidance should be amended to take account of the following: Removal of light from neighbouring properties: By raising the height of the side wall these extensions reduce light to the neighbouring properties. Where both neighbours are also 3 bed detached villas one of the neighbouring properties will usually have one bedroom, bathroom, kitchen/breakfast room facing the extension. The original low pitched roof allows good light into these rooms but increasing the height of the wall by 1.3m will have a considerable impact on the use of all these rooms but particularly the bedroom.	<u>No change</u> <i>Piggyback extensions will break the roofline and therefore will only be accepted as a full planning application. At which point neighbouring properties will have the right to object and the applicant will have to evidence the rights to light issues that may arise from the proposals.</i>
			2		Appearance of the property from the back and side:	<u>No change</u>

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
					Whilst the view of the property from the front and wider street scene is very important, the appearance of the property from the back and side are extremely important to immediate neighbours and the character of the area.	<i>RBKs priority is the street scene, in order to preserve the character of the neighbourhoods. This has to be balanced with residents rights to extend their property under Permitted Development – which has a series of parameters attached that the development has to adhere to.</i>
			3		<p>Accuracy and thorough consideration of facts: A review of recent applications for piggy back extensions includes one case where the planning officer considered that “side windows are already significantly overshadowed and do not receive much sunlight / daylight...therefore considered that it would not have a material detrimental impact upon the amenities of the neighbouring properties in terms of loss of daylight / sunlight”</p> <p>Surely if the existing light is poor then removing more light is very detrimental and should not be permitted. Another decision said that there were no dwelling rooms on the side of either neighbouring property, which does not appear to be the case as there is a bedroom at the side. Greater care and proper consideration of neighbour’s views should be paramount.</p>	<p><u>No change</u></p> <p><i>See points 1 + 2</i></p>
			4		<p>Policy Guidance 39: Dormer Windows Is a small improvement on what has been happening over the last 13 years but it does not go far enough to halt the deterioration of the areas appearance. Dormer extensions should be set back by more than half a metre from the existing roof edge and a presumption should be established in favour of the status quo and neighbours views.</p>	<p><u>No change</u></p> <p><i>See points 1 + 2</i></p>

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			5		<p>Policy Guidance 45: Front Gardens and Parking</p> <p>The paving of front gardens in North Kingston has harmed the appearance of many roads, sometimes resulting in a very bleak look. The report recognises the negative impact of converting front gardens to parking but it has omitted two of the existing safeguards against the paving of small front gardens. In the ‘Control of private accesses, off-street parking and vehicle crossings’ report by the Director of Environmental Services, Appendix E, dated 05/11/2002 it states that “the current Borough standard for an off-street parking space for an existing property is an unobstructed area 4.57m in depth by 2.4m wide”. The width is important as many frontages in North Kingston do not have a width of 2.4m due to bay windows and therefore off-street parking would result in cars parked along the length of the curb. This is dangerous for pedestrians and unattractive for the neighbourhood.</p> <p>Policy Guidance 45 should therefore be amended to include the requirement of a minimum of 2.4m width for all the minimum depth of 4.57m to ensure that cars can access the parking at 90 degrees to the curb.</p> <p>The Policy Guidance does not mention that some Neighbourhoods have supplementary guidance on off-street parking. The Kingston Town neighbourhood has stated that there is presumption against short frontage parking and applications should be refused. The decision by the Committee should override the guidance as it is area specific , therefore taking into account the character and issues of the Kingston Town area.</p> <p>Therefore Policy Guidance 45 should include reference to decisions by Neighbourhood Committees which take account of local conditions and therefore should continue</p>	<p><u>No change</u></p> <p><i>Guidance adequately covers car parking requirements. And each application will be dealt with on a case by case basis.</i></p>

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
					to be adhered to.	
7	Mr Matthew Druce (West and Partners)	Web	1	R:\LDF\SPDs\Residential Design Guide\05 Stakeholder Engagement\04 Representations\West and Partners\1.pdf	Paragraph 3.9 In respect of the impact of new development on conservation areas, Part II, 76(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 requires special attention to be paid to the desirability of preserving OR enhancing the character and appearance of conservation areas and NOT to preserve and enhance as suggested at paragraph 3.9 of this document. This requirement is reaffirmed at paragraph 137 (pg 32) of the NPPF which states inter alia: “..Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably”. This requirement is commonly misinterpreted by decision makers thus it would assist if the policy and any subsequent guidance accurately reflected the legislation.	<u>Amend</u> <i>3.9, Policy Guidance 2 and Glossary definition of Conservation Area to ‘preserve or enhance’ (but not Policy Guidance 22)</i>
			2	R:\LDF\SPDs\Residential Design Guide\05 Stakeholder Engagement\04 Representations\West and Partners\2.pdf	Paragraph 3.16 See comments at paragraph 3.9. For ease of reference the requirement within the Act is for development to preserve OR enhance heritage assets and NOT preserve and enhance	<u>Amend</u> <i>3.16 to ‘protecting or enhancing’</i>
			3	R:\LDF\SPDs\Residential Design Guide\05 Stakeholder Engagement\04 Representations\West and Partners\3.pdf	Policy Guidance 3: Sustainable Design What is the basis for requiring new development to meet Level 4 of the Code for Sustainable Homes up to 2016, and Level 6 from 2016? Would it not be reasonable to seek a gradual progression to Level 6 by introducing a requirement/expectation for new residential developments to meet Level 5 at a relevant point in time?	<u>No change</u> <i>RBK Core Strategy Policy DM1 has been adopted and therefore current.</i>
			4	R:\LDF\SPDs\Residential	Paragraph 4.1	<u>No change</u>

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
				Design Guide\05 Stakeholder Engagement\04 Representations\West and Partners\4.pdf	This section appears to move away from the general design considerations for new development set out in the previous sections and introduces prescriptive policies in which proposals for new residential development (notably extensions) will be objectively assessed.	
8	English Heritage (Claire Craig)	Email	1	R:\LDF\SPDs\Residential Design Guide\05 Stakeholder Engagement\04 Representations\Residential Design SPD - English Heritage.pdf	We are sorry for being unable to provide a response to you on this work owing to demands on our service at the time. We are pleased to see the inclusion of the Boroughs character work in the document and we hope to undertake something of a pan-London review of design related policy documents later in the year. We may therefore be in touch on this topic then, as we continue to be very interested in the Boroughs work in this area.	<i>No change</i>
9	The Kingston upon Thames Society (Mr Brian Godding R.I.B.A)	Email	1	R:\LDF\SPDs\Residential Design Guide\05 Stakeholder Engagement\04 Representations\Kingston Society response 300113.pdf	This document and the guidance given are excellent and we are pleased that student accommodation is treated as a separate case. I particularly liked one of the opening statements: “Good design means placing people at the heart of the design process” This should apply to all planning applications whether residential or not. We are, however surprised that no mention is made of large developments, for instance the power station site. I appreciate that it is difficult but there are surely some ground rules that could be established.	<i>No change</i>
10	Jane Young	Email	1	R:\LDF\SPDs\Residential Design Guide\05 Stakeholder Engagement\04 Representations\Jane Young	The SPD will not be acceptable to the disabled community and will not be in the spirit of Equality Act 2010, if it does not clearly state that 10% of new housing should be built to full wheelchair standard (Wheelchair Housing Design Guide	<i>No change</i> <i>Guidance makes specific reference to Supplementary Planning Advise Note 2007</i>

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
				310113.pdf	2 nd Edition 2006, or later edition published by BRE) (I believe there is a model s106 clause which is used to cover the marketing of wheelchair homes, and another relating to the allocation of disabled parking spaces for flats), and 100% should be built to Lifetime Homes standards. I know I wrote a chapter for the SPD in 2009, I think it was, so I hope its in there, but at any rate the reference to design standards for Lifetime Homes for all new housing should be to the Lifetime Homes Design Guide published by IHS BRE and available at http://www.lifetimehomes.org.uk/pages/lifetime-homes-design-guide.html	<i>regarding Designing Inclusive Buildings – Lifetime Homes and Wheelchair Housing. And the 10% minimum is identified in 3.118</i>
11	Canbury and Riverside Association (Mr Richard Mobbs)	Email	1	R:\LDF\SPDs\Residential Design Guide\05 Stakeholder Engagement\04 Representations\Draft Residential Design Guide SPD - Comments from CARA 010213.pdf	<p>Paragraph 2.27: While the document recognises the negative impacts “...that arise from poorly design residential development in Kingston...” including “-missed opportunities to capitalise on valuable natural assets and landscape features such as the Boroughs riverside or woodland settings” and “-lack of strategic oversight of green infrastructure”, the guidance paragraphs focus on the impact on neighbouring or nearby public open spaces and amenities such as parks or the Thames.</p> <p>There is some reference to these issues in the Boroughs Core Strategy Document (e.g. pg 19 “Protect and enhance local spaces, Green Belt, and Metropolitan Open Land,...the River Thames and its environs and the Hogsmill Valley, by development management...” and on pg.28 “...enhancing the ecology and the quality of open spaces in Canbury Gardens, Athelstan Recreation Ground”) but this does not provide the sort of clear guidance that is needed, nor the quality of guidance that is given on other matters in this proposed SPD.</p>	<p><i>No change</i></p> <p><i>These elements are covered in the Core Strategy and Kingston Town Centre AAP (K+20).</i></p>

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			2		<p>Policy Guidance 1: Place Shaping This guidance (“...ensuring that the design contributes positively to the public realm” and so on) is restricted to developments “in those areas recognised as having scope for enhancing character [which] will be expected to follow a regeneration-led approach”. Developments in all areas of Kingston, whether or not they require regeneration, should be expected to aim to have a positive impact. If introducing the idea of ‘place shaping’ as a consideration for all residential developments is regarded as aiming too high, at least there should be a clear indication of ‘place shielding’ that is to protect areas of existing good character from the detrimental effects of neighbouring development that would undermine the established character nearby.</p>	<p><u>No change</u></p> <p><i>These elements are covered in the Core Strategy and Kingston Town Centre AAP (K+20). And the Guidance covers these issues adequately. Plus each application will be considered on a case by case basis.</i></p>
			3		<p>Policy Guidance 2: Heritage led regeneration Consideration of the impact a new development on existing “...natural or cultivated elements, e.g. trees, gardens, and parks; views, focal points, or landmarks; and, other heritage features or assets...” should be required whether or not the development is in a Conservation Area. Of course there would be no detailed advice and guidance outside conservation areas, but there should still be a requirement to consider these local assets, and for new developments to avoid having a detrimental impact on them.</p>	<p><u>No change</u></p> <p><i>These elements are covered in the Core Strategy and Kingston Town Centre AAP (K+20). And the Guidance covers these issues adequately. Plus each application will be considered on a case by case basis.</i></p>
			4		<p>Policy Guidance 24: Plot Layout and Space Between Buildings The guidance “allowing for good levels of daylight and sunlight to neighbouring buildings” should be mirrored by guidance for a new development to avoid negative impact on public parks and the River Thames, where inappropriate development may overshadow or overlook the recreational</p>	<p><u>No change</u></p> <p><i>These elements are covered in the Core Strategy and Kingston Town Centre AAP (K+20). And the Guidance covers these issues adequately. Plus each application will be considered on</i></p>

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					space, adversely affecting the experience of park and river users. A version of the 25 degree rule could provide helpful guide for when a new development might be considered to adversely affect a park or river.	<i>a case by case basis.</i>
			5		Policy Guidance 25: Building Heights There should be guidance beyond “Proposals for residential accommodation that diverge from the established eaves height will be resisted streetscape [sic: should read ‘will be resisted as inappropriate to the streetscape] so that there will be resistance to developments of inappropriate height relative to their impact on parks, the river etc as well as the street.	<u>No change</u> <i>RBK are currently exploring the potential for a ‘Tall Buildings and Key Views’ SPD.</i>
			6		Policy Guidance 1: Place Shaping One concern stems from the use of the phrase ‘landmark building’ (introducing landmark buildings where appropriate to enhance a sense of place). This should be changed to “distinctive building”, which does not imply a tall building. In many locations a ‘distinctive building’ will enhance the character of an area, where a tall (‘landmark’) building could be out of place.	<u>No change</u> <i>RBK are currently exploring the potential for a ‘Tall Buildings and Key Views’ SPD.</i>
12	Threadneedle Property Investments Ltd (Richard Quelch, Barton Willmore)	Email	1	20569/A3/RQ R:\LDF\SPDs\Residential Design Guide\05 Stakeholder Engagement\04 Representations\Threadneedle Investment Ltd\Threadneedle Investment Ltd 01.02.13.PDF	Policy Guidance 4: Density Supportive of the Councils proposed approach to assessing the appropriateness of the density of new residential schemes based on prevailing density for the surrounding area and the townscape context	<u>No change</u>
			2		Policy Guidance 13: Private Amenity Space	<u>No change</u>

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					<p>Supportive of the SPDs acknowledgement that in applying minimum standards for private gardens for house, consideration should be given to existing site constraints, the character of the surrounding area and whether a requirement would compromise the optimisation of housing potential in accordance with the London Plan density matrix.</p> <p>However, our client considers that the proposed standard for private amenity space for flats of 10sqm + 1sqm for each additional occupant is likely to compromise the housing potential of some sites in accordance with the London Plan density matrix (particularly in central areas such as Kingston Town Centre). Also the provision of high levels of private amenity space, in the form of balconies for example, may comprise the high quality design of a new development proposal from an aesthetic perspective. Our client therefore considers that any private amenity space standard should be applied flexibly, as per its approach to applying private amenity space standards for houses.</p> <p>To accord with the Mayors adopted Housing Supplementary Planning Guidance (SPG) (2012) Baseline Standard 4.10.1, our client also proposes that the minimum SPD standard for private amenity space for new dwellings is amended to 5sqm for a 1-2 person dwelling and an extra 1sqm for each additional occupant.</p>	<p><i>All new dwellings must adhere to this standard set out in the London Plan. And all new developments will be considered on a case by case basis and provide a strong rationale if there is a departure from this standard.</i></p>
			3		<p>Policy Guidance 14: Communal Amenity Space Our client considers that this Policy Guidance should be amended to acknowledge that in achieving the minimum communal amenity space requirement of 50sqm consideration should be given to existing site constraints, the character of the surrounding area and the optimisation of housing potential in accordance with the London Plan</p>	<p><u>No change</u></p> <p><i>Not a design issue –management and viability issues are not justified grounds for departure from the guidelines. Each application will be considered on a case by case basis</i></p>

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					<p>density matrix. The rigid application of this requirement could render some schemes unviable. This acknowledgement would also reflect the flexible approach that the Council has taken to the application of the private amenity space standards for houses in Policy Guidance 13.</p> <p>As per our clients comments in respect of Policy Guidance 13, we also request that the requirement that any shortfall below the 10sqm standard for private amenity space be added to the communal amenity space requirement be amended to refer to a 5sqm standard for private amenity space.</p>	
			4		<p>Policy Guidance 15: Public Open Space Our client requests that there is an acknowledgement that the contributions identified in Table 1, whether secured via planning obligations or the Councils Community Infrastructure Levy (CIL), are subject to viability. In respect of the Councils CIL this will be tested by an Inspector at Examination in Public.</p>	<p><u>No change</u></p> <p><i>Not a design issue –management and viability issues are not justified grounds for departure from the guidelines. Each application will be considered on a case by case basis</i></p>
			5		<p>Policy Guidance 17: The 45 degree rule & Policy Guidance 18: Loss of lights to existing windows Policy Guidance 17 acknowledges that the 45 degree rule “...is only an indicator and the acceptability of a development proposal will also be dependent on ground levels on site and the orientation of buildings...”</p> <p>With regards to Policy Guidance 18, our client considers that the 25 degree rule should be treated as ‘a rule of thumb’ and it should not be a requirement of the SPD that development proposals must strictly adhere to.</p> <p>In many cases, particularly in denser urban areas, new</p>	<p><u>No change</u></p> <p><i>The guidance sets out clear design parameters that all new development must adhere to.</i></p>

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					development proposals may not be able to comply with this 'rule', which would often render land undevelopable. A more detailed Daylight and Sunlight Assessment will often be submitted with a planning application which more accurately assesses the impact of new schemes on surrounding properties. Our client therefore considers that Policy Guidance 18 should be amended to acknowledge this.	
13	Gresham House PLC (Jason Lowes, Rapleys)	Email	1	JAL/Ih/701/19/1 R:\LDF\SPDs\Residential Design Guide\05 Stakeholder Engagement\04 Representations\Rapleys\RB Kingston Residential Design Reps 010213.pdf	It is clear from review of the document that it primarily acts as design guidance for small-scale residential development, given the comments made in para.1.9 of the draft document in relation to major, regeneration-led development. However, it is noted the principles of the document and residential design guidelines are still considered relevant as good practice.	<u>No change</u>
			2		From an assessment of the document it appears that no specific requirements are placed on residential designs above that already outlined in adopted planning policy. In this respect, the specific guidance should not be considered as strict requirements for all development, and each proposal will still be considered on its own merits. This is welcomed, and should be particularly relevant when considering masterplan proposals for larger sites.	<u>No change</u>
14	Natural England (MR Jamie Melvin)	Email	1	72669 Kingston Residential Design Guide R:\LDF\SPDs\Residential Design Guide\05 Stakeholder Engagement\04 Representations\Natural	The consultation which we have been offered the opportunity to comment on is of a low risk/priority for Natural England, so we will not be offering representations at this time. The lack of further comment by Natural England should not	<u>No change</u>

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				England\72669 Kingston Residential Design Guide 010213.pdf	<p>be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may be able to make comments that will help the Local Planning Authority (LPA) to fully take account of the environmental value of areas affected by this plan in the decision making process.</p>	
15	RBK Neighbourhood Engineering	Email	1	Car Parking Standards	<p>Student Parking Developments</p> <p>Parking and cycle parking standards</p> <p>As a rule of thumb, developments should be car-free where they are proposed in areas that manage on-street parking by way of CPZ's and the only exceptions in those cases would be for:</p> <p>Dropping off and collecting students and their belongings at beginning and end of terms; One car parking space per accessible study bedroom and Emergency, essential operational, and service vehicles.</p> <p>Where developments are proposed in areas without on-street parking management a level of parking within the site should be provided so as not to create additional parking on nearby roads to the disadvantage of residents. Each case to be considered on their merits, and should reflect the guidance as set out in the “parking standards” sections of the Sustainable Transport SPD and especially that section referring to ensuring there is no increase in on street parking resulting from the development. In these cases the applicant will need to support any reduction in on-site parking provision with a detailed parking management plan, setting out how they intend to ensure students do not bring cars into the area and what actions would be taken against those that do.</p>	<p><u>Amend</u></p> <p>Insert text into Policy Guidance 46 – last bullet point above ‘For further information on the design of vehicle parking please see English Partnership’s ‘Car Parking What Works Where’ (2008)(40)’</p>

Table 2: Comments from Neighbourhood Committees

Committee Meeting	Document Ref.	Comment No.	Comment	Officer response
Kingston Town Planning Sub Committee			"Welcomed this excellent and detailed guide."	Support noted.
Maldens & Coombe Neighbourhood Committee			The policy wording in relation to gated developments should be amended to give the Council more power to resist inappropriate gated developments.	<p><u>Amend</u></p> <p>Revision to PG12: Consistent with the aims of inclusive design set out below, pedestrian access and social inclusion should be encouraged in all new developments in the Borough. Consequently, proposals that seek to exclude public access are divisive, prevent social permeability, and diminish community cohesion <i>will not be supported</i>, particularly where the introduction of boundary or gated features would be at odds with the character of the <i>streetscape</i> or locality in general.</p> <p>The gating of residential communities <i>will</i> only be considered <i>in wholly exceptional circumstances</i> as a last resort, where <i>it can be demonstrated that</i> the safety and security benefits of introducing gating <i>to protect vulnerable communities</i> is considered to outweigh the benefits of encouraging social cohesion and integration. <i>Where wholly exceptional circumstances are demonstrated</i> care should be taken when <i>locating</i> and designing gates so that:</p> <ul style="list-style-type: none"> • gates are not installed in a prominent location, • views into the development are

Committee Meeting	Document Ref.	Comment No.	Comment	Officer response
				maintained, <ul style="list-style-type: none"> • the height and form of gates to be installed are not overbearing nor imposing, and • their design contributes positively to the general character and appearance of the <i>streetscape</i>
South Of The Borough Neighbourhood Committee			The Guidance is welcomed as it will be helpful to developers, designers/architects, Members, officers, Residents Association representatives and other members of the public wishing to comment on planning applications.	Support noted.
			In particular, the guidance on amenity space, density and minimum space standards is welcomed.	Support noted.
			A high priority is also that the Guidance will reinforce the Sustainability policies of the Council's Core Strategy, and the mandatory requirements for new residential development to achieve successively higher levels of the Code for Sustainable Homes, to ensure that high standards (for example for energy efficiency) are automatically required for all residential developments.	Comment noted.

Table 3: Feedback from Developers Workshop

Observation	Officer Recommendation
1. The guide should be reasonable , allowing for the circumstances of individual sites. There is also some concern that the advice contained in the guide will not be applied consistently by the Council.	Policy guidance has, in general, been drafted to allow some flexibility e.g. ‘in most cases/wherever possible’ etc. Explained that it was the Council’s intention to train Development Management, Members, Contact Centre staff on the use of the guide.
2. Pre-application advice – it was felt that although the level of detail in the guide was adequate, the advice contained within it would not replace the need for pre-application advice or the role of the duty planner – ‘policy guidance cannot replace discussion’	Advised that these services would continue to be offered and that they should be seen as complementary to the advice contained within the guide
3. Catslides (Policy Guidance 37) – somewhat contentious and restrictive in terms of what a householder may want to achieve and what the design guide suggests would be acceptable	Presumption in favour of retaining ‘cat-slide’ roofs ‘in most cases’
4. Precedent! – It is not clear from the guide whether the Council will take a stronger stance on issues of precedent following the adoption of the guide. Is it the Council’s intention that it will not accept the precedent argument if there are examples of ‘poor’ design in the street already and an applicant is attempting to replicate these...?	<p>The draft Residential Design Guide sets out the Council’s view on character and design of residential development. The guide is intended to help developers to avoid the mistakes of the past. Given the level of clarity on character and design set out in both the guide and the Borough Character Study, the Council feels that any argument of precedent will be weakened. It is important to remember the contribution an individual house/plot makes to the character of an area. As such the Council will take a strategic view on the potential erosion of character of an area through inappropriate or poorly designed residential development.</p> <p>That said, applications would still be considered on a site by site basis.</p>
5. Permitted development vs. residential design guide – how does the Council intend to reconcile poor quality development allowed under permitted development with development that is just over allowances and, therefore, requires planning permission? Is this reasonable?	Recognition that at the limits of what is allowable under permitted development it is often difficult to construct a convincing argument as to why an individual should not be allowed to construct similar e.g. ugly box dormer under planning consent. It is hoped that the RDG will provide clarity to developers and their agents as to why it is important to protect the character of the townscape in Kingston through practical examples of the erosion of this character looking at Kingston’s 5 common house types
6. Architectural drawings – often the quality of plans submitted is poor.	Insert paragraph referring the reader to common places they could look for architectural services e.g. RIBA, RICS websites...