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PART 1 POLICIES

Chapter 1: Introduction

1	Chapter 1 Introduction Relationship with other Council Policies and Programmes Paragraph 1.5 page 13	There is no longer an 'Interim Transport Plan'. Boroughs are required to produce 10 year 'Local Implementation Plans' (reviewed when necessary) to say how they will implement the Mayors Transport Strategy in their area and an annual 'Local Spending Plan' to bid for money to do this.	The first bullet point of paragraph 1.5 should read: 10 year 'Local Implementation Plan' and annual Local Spending Plan for transport
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Chapter 2: Regional and Strategic Context

2	Chapter 2 Regional and Strategic Context Paragraphs 2.3 and 2.4 Page 16	There is no mention of reducing reliance on the private car or supporting higher capacity and less supporting modes of transport – this is a key vision of RPG9	To the bullet point starting ' <i>access to jobs</i> ' add 'and there should be increased ability to meet normal travel needs through safe walking, cycling and public transport with reduced reliance on the car'
3	Chapter 2 Regional and Strategic Context Paragraph 2.16a (I) UDP Strategy Page 22	Generally support this statement, but should include reference to reducing reliance on the car as in RPG9	Insert after 'to be Sustainable' 'reducing the reliance on the car'
4	Chapter 2 Regional and Strategic Context Paragraph 2.16 Point a iii) Page 22	The bold text suggests maintaining the status quo, whereas guidance (PPG9 paragraphs 23 & 24) requires management and enhancement.	Amend text to say: "Safeguarding and enhancing the existing environment .."

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8	Chapter 2 Regional and Strategic Context New Policy STR16 Developing and Promoting Sustainable Transport Modes Page 32	Generally support but should strengthen by adding reference to reducing reliance on the car as in RPG3 and PPG13 plus supporting paragraph 11.12 p140 and elsewhere. No mention of Transport for London Also request a monitoring indicator for parking provision at all major developments (page 33)	Insert after 'meeting the travel needs of the borough' 'and reducing the reliance on the car' Add after 'it will work with the mayor of London' 'and Transport for London' delete 'average' add 'major' before 'new' and after 'residential' add 'and employment' in the annual monitoring indicators (page 33)
9	Chapter 2 Regional and Strategic Context STR21 Range of Functions in Kingston Town Centre Page 33	We welcome the additional wording on open space provision.	Support.
10	Chapter 2 Regional and Strategic Context STR22 & Paragraph 6.52 Townscape Strategy Pages 34 and 81	The first annual monitoring indicator introduces a concept not found in the policy itself. Also the term 'Green Corridor' has already been used in two other ways in guidance – features to promote the movement of wildlife through the developed fabric of London ¹ and for tree planting along major transport routes into London. This problem also affects a proposed change in paragraph 6.52.	Reword the Indicator to say: <ul style="list-style-type: none"> • Number of new green links in Kingston Town Centre. • Paragraph 6.52 should revert to the previous wording: '...green routes...'

¹ Policy 8 of 'Green Capital, Planning for London's Greenspace.' Countryside Commission Publications (CCP344), 1991.

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PART II POLICIES

Chapter 3: Housing and The Residential Environment

11	Chapter 3 Housing and the Residential Environment Table H1 Page 37	There are a couple of very minor inaccuracies in the table. Large identified sites for the first period should be 1406 instead of 1402, and for the second phase it should be 408 instead of 412. Adjust the totals accordingly. See page 142 of the London Housing Capacity study.	Delete 1402 and replace with '1406' 412 and replace with '408'.
12	Chapter 3 Housing and the Residential Environment Paragraph 3.11a Page 37	The Council states that the estimates for capacity in the future are highly speculative. It should be added that these estimates were based on a methodology that was agreed by consensus and has been consistently applied across London. Capacity estimates have historically underestimated actual completions in the past, and the Borough's own monitoring figures suggest that the Capacity Study estimate could be exceeded. It is therefore appropriate to keep provision under review as the Plan indicates.	Add 'Any figures for 10-20 years ahead by their very nature are speculative, however the methodology adopted for estimating windfalls was agreed London-wide and has been consistently applied.'
13	Chapter 3 Housing and the Residential Environment Paragraph 3.12 Page 37	This paragraph should reflect the wording in Policy STR1 that at least 4,810 additional dwellings will be sought up until 2016.	
14	Chapter 3 Housing and the Residential Environment Paragraph 3.13 Page 37	The borough did not make an estimate of vacant dwellings brought back into active housing use as part of its Empty Property Strategy for the London Housing Capacity study. Vacant dwellings can make an important contribution to meeting the demand for additional housing in the borough. The Council is targeting town centres, however, all vacancies should be encouraged to be brought forward. Does the borough have a target for the number that it will seek to bring forward, if so this should be included within Table H1 as an additional component of capacity along with the capacity from non self-contained accommodation (see comment on STR1).	Add 'within town and district centres and other areas'. Add a target of vacant dwellings to be brought back into use, if the borough has identified this in its Empty Property Strategy.

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15	Chapter 3 Housing and the Residential Environment Policy H6 and paragraphs 3.31 to 3.36 Page 37	The average density of sites identified by the borough for The London Housing Capacity study were 70 dwellings per hectare. This density is far higher than the PPG3 range, but is at the lowest end of the London range at 50 to 433 average dwellings per hectare for large identified sites. Given the increasing shortage of sites within the borough, it should be seeking to make maximum use of sites that do come forward. The Sustainable Residential Quality matrix included three categories of locations, town centre ped-sheds (within 10 minutes walking distance), sites along transport corridors and close to ped-sheds and more remote sites. The matrix also looked at a number of options for density depending on the local character and appropriate parking standards. The Sustainable Residential Quality work demonstrated that on large and small sites it is possible to maximise capacity, taking into account a sites surrounding character and by adopting a more flexible approach to density and parking standards, without compromising residential environmental quality and creating dwellings that reflect the needs of newly forming households. The matrix proposes a range approach to densities according to location. The density standards proposed by the borough are extraordinarily low - and fall below the minimum PPG3 range of 30 dwellings per hectare of PPG3, and those identified by the Capacity Study. As a basic proposition a minimum approach should be adopted for density, rather than the maximum approach adopted by the borough. The use of a range approach based on the SRQ matrix is recommended.	H6 should reflect the three types of locations identified in the SRQ matrix and provide a density range depending on the type of housing sought and the level of car parking provision that is appropriate.
16	Chapter 3 Housing and the Residential Environment Policy H9 and paragraph 3.51 Pages 42-43	The definition of affordable housing used by the borough in Policy H9, includes low cost market housing, however, the borough's own evidence set out in paragraph 3.51, shows that even the smallest market housing units are out of reach of new households. The borough should consider reviewing this definition to exclude low cost market housing.	Review as per comments.

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Chapter 4: Economy and Employment

19	Chapter 4 Economy and Employment New Policy STR4 Local Economy Page 49	This policy is supported: directing large B1 use to Kingston town centre or to other areas of high public transport accessibility	Support
20	Chapter 4 Local Economy Paragraph 4.8a Page 50	Welcome reference in paragraph to the designation of Chessington Industrial Estate and Barwell Business Park as Strategic Employment Sites within the LPAC Framework (2000). However, the actual designation of Chessington is as a "Preferred Industrial Location" rather than a "Strategic Industrial Area".	Delete "Strategic Industrial Area" and replace with "Preferred Industrial Location".
21	Chapter 4 Economy and Employment Paragraph 4.11 Page 51	This paragraph is supported: the statement encouraging employment growth in centres which can be conveniently accessed by means of transport other than the car	
22	Chapter 4 Economy and Employment New policy E1a Existing Employment Land Outside Industrial/Warehouse/ Business Areas Page 55	Should add proviso that siting B1 development should be linked to public transport, consistent with STR16, T22 and PPG13	Should add after 'business developments will normally be permitted provided' 'the site is well served or with funding from the developer, has the potential to be well served by public transport and'

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23	Chapter 4 Economy and Employment E3 Office Development Page 57	Should add proviso that siting B1 development should be linked to public transport, consistent with STR16, T22 and PPG13	Should add after 'relevant policies, provided' 'the site is well served or has the potential to be well served by public transport and'

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26	Chapter 5 Shopping and Town Centres Paragraph 5.16 Page 65	A number of recent initiatives and publications such as the NHS Plan, the Urban White Paper, and the Government's National Strategy for Neighbourhood Renewal have emphasised the role of individual shops in providing accessible convenience shopping locally. The latter publication in particular emphasises the importance of local shops for the social inclusion agenda. The accompanying report from Policy Action Team 13 'Improving Shopping Access for People Living in Deprived Neighbourhoods', emphasises the need for 'positive planning' to facilitate and encourage good quality local shops. The Mayor therefore welcomes the inclusion of paragraph 5.16 but suggests that this should be elevated to a policy statement, with added reference to the need to encourage provision of further such facilities in appropriate locations, particular areas deficient in such local services. This could appropriately be added as a clause to policy S3.	Suggested elevation of policy 5.16 to a policy statement, with added reference to the need to encourage provision of further such facilities in appropriate locations, particular areas deficient in such local services. This could be added to policy S3 on local shopping.
27	Chapter 5 Shopping S2 Large Stores Page 66	Should be strengthened to reflect PPG6 - large stores out-of-centre are only acceptable where it is well served by a variety of travel modes or where improvements can be negotiated and funded by the developer	After 'demonstrable need for the proposal' add 'and where it is accessible by a variety of travel modes.'
28	Chapter 5 Shopping and Town Centres Policy S2 Large Stores point (b) Page 67	Point (B) of policy S2 refers to the fact that the method of nature of retailing and of the products sold may mean that town centre locations may not be applicable. The supporting text should provide explanation of the types of retailing this policy refers to, to avoid mis-interpretations and/or exploitation of the policy statement by retailers.	Add an explanation within the supporting text to the types of retailing that might be more appropriate to out of centre locations.

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29	Chapter 5 Shopping and Town Centres Paragraph 5.20 Page 68	This paragraph states, "existing town centres can normally meet the challenge presented by new retailing methods either within or at the edge of the town centre". The UDP does not provide evidence from a retail capacity study to substantiate the statement that Kingston's town centres can accommodate the capacity requirements of "new retailing methods", or provide clarification of what is meant by "new retailing methods". Similarly, has the Borough undertaken a retail need assessment that would establish in conjunction with the capacity study, whether sufficient capacity is available within the town centres to accommodate need? If sufficient capacity is identified such an assessment would provide an invaluable tool for the consideration of subsequent development proposals and the rigorous application of the sequential test?	1) Clarification is sought from the Borough as to whether retail capacity and retail need surveys have been carried out. 2) Clarification in the supporting text is sought as to what the Borough is referring to as "new retailing methods".
30	Chapter 5 Shopping and Town Centres Paragraph 5.24 Large Stores Page 69	This paragraph states that, "sites will only be considered suitable for out-of centre stores where both edge-of centre and out-of-centre locations are not feasible and where there is a demonstrable need". It is suggested that this is a typing error and should read, "sites will only be considered suitable for out-of centre stores where both town centre and edge-of-centre locations are not feasible and where there is a demonstrable need".	Amend paragraph 5.24 to read: "sites will only be considered suitable for out-of centre stores where both town centre and edge-of-centre locations are not feasible and where there is a demonstrable need".
31	Chapter 5 Shopping and Town Centres Policy S3 Page 69	Propose an additional policy on protecting and enhancing the provision of individual shops (see comments on paragraph 5.16).	See comments on paragraph 5.16 above.

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Chapter 6: Built Environment

32	Chapter 6 Built Environment Paragraph 6.5 Page 74	There is no mention in this paragraph of The Urban Taskforce report – 'Towards an Urban Renaissance', the Urban White Paper, LPAC Advice (1994) and other recent documents such as 'By Design' published by the DETR and CABE. These stress the importance of urban design in achieving high quality, sustainable cities. This paragraph, and the chapter in general fails to make adequate mention of these important issues. References and policies relating to urban design should cover the general design principles, the public realm, and design quality as they effect the whole of the Borough, not just specific areas such as SASCs or Conservation Areas.	Amend paragraph 6.5 and in other relevant sections of this Chapter to reflect the comments made so that it sets out the general principles of good urban design and the role they can have in fostering the UDP's main aims. The policy and justification should be based on the wealth of recent publications.
33	Chapter 6 Built Environment Paragraph 6.5 Page 74 and High Buildings Policy Page 74	This paragraph as currently worded makes no reference to strategic guidance in the form of LPAC advice on High Buildings. It is also noted that the High Building policy has not been changed or reviewed in light of that advice. The High Buildings policy pre-dates LPAC advice on high buildings and does not appear to be in line with that strategic policy. Because of this omission, the Chapter is not up to date with current guidance.	Refer and incorporate LPAC's High Buildings advice into this paragraph and modify other sections of this chapter accordingly, including the High Buildings policy so that it is in line with that advice.
34	Chapter 6 Open Environment BE9 & Paragraph 6.52 Trees and Soft Landscaping Page 80	Whilst accepting that this policy is primarily for visual amenity, the proposed revisions introduce considerations that could be harmful to wildlife habitat. Dead and dying trees can include 'veterans' of very considerable habitat value and can support a considerable variety of life. New tree planting can harm other wildlife habitat features. The amendment to paragraph 6.51 does not justify these changes.	Amend main policy to say: "1) ...damage to trees except as necessary to make them safe, or were they are of ..." Amend the proposed addition to paragraph 6.51 as follows: "...of each site, tree planting is not appropriate where it would harm existing valuable habitat, veteran trees should be retained wherever possible, and the Council generally favours ..."

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Chapter 7: Open Land and Riverside

35	Chapter 7 Open Land and Riverside Paragraph 7.1 Introduction Page 90	We welcome the new clause on increasing biodiversity.	
36	Chapter 7 Open Land and Riverside Paragraph 7.5 Safeguarding Open Land Page 92	Para.7.5 should have regard to para. 7.11 of RPG3 which states that where green chains and their associated open spaces are of more than individual Borough significance they should be designated as MOL.	Amend paragraph 7.5 so that it is clear whether it is appropriate for open spaces which form the Boroughs green chains should be designated as Metropolitan Open Land.
37	Chapter 7 Open Land and Riverside Paragraph 7.7 Page 92	See comment on STR5a above. Also there is no reference to the emerging Mayoral Biodiversity Strategy.	Amend to say: "...with all living things and their habitats throughout..." Add a new paragraph called 7.7b which says: "The policies of this plan will assist with the implementation of The Mayor of London's developing statutory biodiversity strategy."
38	Chapter 7 Open Land and Riverside Policy OL6 Protection of Other Open Land Page 97	Whilst welcoming this new policy, the inclusion under 'A)' of the nature conservation sites listed in appendix 6 and under '(C)' of those with an ecological function duplicates the intention of policy OL11.	Divide Appendix 6 into two, enabling this policy to refer to the other open spaces, but not the nature conservation sites, except where they belong in both lists. Add a cross reference to Policy OL11 in the justification text.
39	Chapter 7 Open Land and Riverside Policy OL6 Protection of Other Open Land Paragraph 7.30b (v) Page 98	The use of the word 'high' is unnecessarily restrictive.	Amend to read: '...species of conservation concern.'

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44	Chapter 7 Open Land and Riverside New Policy OL7: Open Space Improvement and Ancillary Development Paragraph 7.31 Pages 99	The wording in paragraph 7.31 is ambiguous and may lead to misinterpretation of the altered UDPs approach to considering ancillary development.	Reword paragraph 7.31 as follows: "Notwithstanding the protection given to open spaces under Policy OL6, it is recognised that improvements, where they are clearly ancillary to the use of the open space, may be desirable to make optimum use of borough's open spaces. This policy will be applied to secure appropriate open space improvements and ensure that developments which are intrinsically related to the use of the open space do not detrimentally affect its character."
45	Chapter 7 Open Land and Riverside Policy OL9 Developing Adjoining Open Space Page 100	The revision to include ecological value and function is welcome.	
46	Chapter 7 Open Land and Riverside Policy OL10: New Public Open Space Provision Page 101	Policy OL10 should require new open space provision particularly in areas of open space provision, in accordance with RPG3 paragraphs 7.18 and 7.19. This approach is already implied in paragraph 7.38 of the altered UDP, but should be made explicit in the policy.	Amend Policy OL10 to make specific reference to the provision of new open space particularly in areas of open space deficiency.
47	Chapter 7 Open Land and Riverside Policy OL10a & Paragraph 7.38b Green Corridors Page 102	See the observations on STR22. This policy combines two different corridor functions, but with an emphasis on visual greening of transport routes. The proposals map omits several Green Corridors recommended for biodiversity conservation in the handbook 'Nature Conservation in Kingston' upon Thames' (published 1992, Figure 6, p 25). Paragraph 7.38b refers to a nature conservation function, but only for railside corridors. If the term 'Green Corridor' is to be used, the protection should extend to all such areas, and the text should refer to the procedures adopted by the Mayor of London for their identification ² .	The model Green Corridors policy and justification of the London Ecology Unit should be used to supplement the proposed wording, with additional reference to the adoption of the procedures by the Mayor of London. The proposals map should show all the green corridors identified in the 1992 handbook.

² Policy, criteria and procedures for identifying nature conservation sites in London. Adopted by the Mayor as a firm basis for the London Biodiversity Strategy. First adopted by the LEC in 1994, by LPAC in 1995, and recommended in RPG3 in 1996.

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48	Chapter 7 Open Land and Riverside Policy OL11 Sites of Nature Conservation Importance Page 102	This policy requires minor update to match the new strategic policy on biodiversity (STR7a). A link needs to be made between the important wildlife habitat of these sites and biodiversity conservation.	In the policy substitute 'biodiversity' for 'ecological balance'. Add a paragraph: 7.39a The Sites of Importance for Nature Conservation include all the borough's most important wildlife habitat that is crucial to the maintenance of biodiversity.
49	Chapter 7 Open Land and Riverside Green Corridors/Green Chains/Waterway Corridors Page 102	<p>The Mayor supports the identification of the Hogsmill, Bonesgate Brook, Tolworth Brook and Beverly Brook as corridors to be protected as natural/semi natural links within the borough. These may also offer opportunities for public access.</p> <p>This is in keeping with RPG3b para 3.40 as these are all tributaries to the River Thames.</p> <p>However, the policy context for this protection seems confusing. Watercourse corridors feature on Map OL3 but are not referred to in any Policy. Further there are more watercourses within the borough than those identified on Map OL3.</p> <p>The UDP should be clear that where redevelopment takes place along these corridors, it will be expected to protect or restore the river to a reasonably natural state and at least to a predominantly open state.</p> <p>It is accepted that LPAC's 1994 advice on this matter also lacks complete clarity, however, RPG3b (para 3.40 2nd bullet) is clear that UDPs should identify existing and potential green corridors especially along canals and Thames tributaries.</p>	<p>A comprehensive review and clarification of the protection afforded to watercourse corridors is needed.</p> <p>This should identify the watercourse corridors within the borough, state why they are important and have a policy which seeks to protect and where possible enhance their natural value and encourage public access along the banks of the watercourse where appropriate. Where watercourses are culverted or otherwise substantially altered from their natural state the policy will expect, in all cases where it is reasonable, significant changes to be made to return the watercourse to a more natural state.</p>

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50	Chapter 7 Open Land and Riverside Policy OL11a Species Protection Page 103	We welcome this new policy. However, as worded, the policy applies regardless of the status of the protected species in London or the extent of the harm. The London Ecology Unit recommended policy puts the appropriate tests into the policy.	Replace with the London Ecology Unit recommendation: 'Planning permission will not be granted for development or land use changes which would have a significant adverse impact on protected species or Biodiversity Action Plan species that are uncommon, declining or under threat in London.'
51	Chapter 7 Open Land and Riverside Paragraph 7.41a Species Protection Page 103	This paragraph attempts to define the 'protected species' of PPG9 paragraph 47, but unsuccessfully. Its listing of possible conditions and agreements may also risk infringing European Directives.	This paragraph can be replaced by the wording of PPG9 paragraph 47, provided the policy has been amended as above.
52	Chapter 7 Open Land and Riverside Paragraph 7.41b Species Protection Page 103.	The national Biodiversity Action Plan species should also be included in this paragraph.	Amend to read: "...work is also being carried out at the national, London wide (co-ordinated by the GLA) and local level..."
53	Chapter 7 Open Land and Riverside Policy OL14 Thames Policy Area Page 105	This new policy for the Thames Policy Area has a cross reference to that on the quality of the built environment, but not to the open environment or biodiversity.	Add to the policy: "...in accordance with policies BE1, OL4, OL10a, OL11."
54	Chapter 7 Open Land and Riverside Thames Policy Area Policy OL14 Pages 105-106	RPG3b (paragraph 3.23) states that development within the Thames Policy Area should encourage a mix of uses, including public uses, especially on the lower floors of buildings fronting the River, and which provides an attractive, safe and interesting environment. Policy OL14 does not encourage such a mix.	Policy OL14 should be redrafted to include this aspect of RPG3b.
55	Chapter 7 Open Land and Riverside Policy OL145 Appropriate Riverside Uses Page 106	Given the new strategic policy for biodiversity and the importance of the Thames for nature conservation, it is appropriate to add to this policy.	Add to the policy: "2. Water-related recreational uses. 3. Nature conservation."

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56	Chapter 7 Open Land and Riverside Thames Policy Area Policy OL145 Appropriate Riverside Uses Page 106	This policy does not have any reference to the appropriateness of transport related uses on riverside sites. RPG3b calls for local authorities to include UDP policies to promote both passenger (paragraph 3.47) and freight (paragraph 3.57) use of the river. Indeed, the Guidance goes on to state that UDPs should identify sites which are suitable for the loading and unloading of water borne freight. Whilst there may be limited opportunity for such uses along the stretch of the River Thames within Kingston, they should nevertheless receive support and should certainly not be excluded from a policy which lists appropriate uses. It is acknowledged that this subject is covered by supporting text in para 11.15 of the UDP review but changes are needed to this policy.	Policy OL145 should be extended to state that one of the preferred uses of riverside sites is for passenger or freight transport. Furthermore, the policy or supporting text should clarify that this may necessitate construction of structures in the river, in which case these should be appropriately designed in respect of both the character and ecology of their setting and be fit for purpose.
57	Chapter 7 Open Land and Riverside Open Environment Policy OL145 Appropriate Riverside Uses Page 106	There is a need to strengthen policy to reflect STR13 use of the Thames for transport	Add after 'the loss of existing open space' 'and facilities that enable the use of the river for transport or recreation'

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58	Chapter 7 Open Land and Riverside Water Conservation and Control Policy OL19 Page 110	This Policy should take a more positive approach to Sustainable Drainage. The problems associated with excess surface water run-off are well known and techniques for managing it more sustainably are now well documented and widely used. There may be particular site circumstances which limit or prohibit the use of sustainable drainage techniques but these should be the exception and such circumstances should be demonstrated by prospective developers.	Change wording of policy to: New development will need to manage its surface water run-off in a sustainable way unless there are over-riding reasons for not doing so. Supporting text should read: The Council will normally expect drainage to be handled by a sustainable management technique. These techniques include porous pavements, infiltration trenches/basins/filter drains, swales, detention basins/ponds and wetlands, even water butts can play a role. In some cases there may be valid reasons for not using sustainable techniques such as unsuitable ground conditions, suspected or actual contamination of ground. However, lack of space within a site will generally not be an acceptable reason for not using any means of sustainable drainage as the range of techniques allow for a wide range of circumstances.

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62	Chapter 8 Policy RL1 and Paragraph 8.15 Outdoor Recreation Facilities Page 114	The Mayor welcomes the deletion of the proposals for the provision of outdoor recreational facilities for Tolworth Court Farm, which is a Site of Importance for Nature Conservation.	
63	Chapter 8 Recreation and Leisure Policy RL2: New Indoor Recreation and Leisure Uses Page 114	It is welcomed that this policy has been amended to include reference to the sequential approach outlined in PPG6: Town Centres and Retail Development (1996) paragraph 1.11. It should, however, also state that out-of-centre developments should be 'in locations that are accessible by a choice of means of transport' (paragraph 1.11).	Reword Section A) after "...out-of centre sites " add the following words: "which are accessible by a choice of means of transport."

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Chapter 10: Minerals and Waste

64	Chapter 10 Minerals and Waste New Policy MW6 Air Quality Page 129	Support in general but would like to see it strengthened to include reference to traffic generation (linked to paragraph 11.10 page 140)	Add after 'local air quality levels' 'either directly or indirectly due to traffic generation'
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Chapter 11:Transport			
65	Chapter 11 Transport Paragraph 11.1 Page 131	Orbital travel needs have been addressed by TfL and SWELTRAC, particularly in terms of bus provision and improvements. Difficulties arise due to traffic congestion and historical infrastructure limitations.	Instead of 'is' before 'difficult' add 'can be' After 'difficult' add 'due to road traffic congestion and lack of direct rail links'.
66	Chapter 11 Transport Paragraph 11.4 Page 131	This section needs updating because PPG13 has now been revised	Add after PPG13 Transport in 1994' '(revised in 2001)' and delete 'The final version of revision to PPG13 is awaited'
67	Chapter 11 Transport: Paragraph 11.5 Page 132	There is no mention of Air Quality Management Areas in the Transport Chapter.	Reword paragraph to say: "Other relevant material is found in the Parks Development Plan, Sports and Recreation Strategy, Recycling Plan and environmental plans and programmes under the Local Agenda 21 umbrella. Under the Environment Act 1995 Local Authorities must review and assess their boroughs for air quality. If future concentrations are predicted to exceed the National Air Quality standard they have a duty to declare an Air Quality Management Area (AQMA). The Royal Borough of Kingston have completed their first review and assessment and are deciding on the exact area of their AQMA. The Council will then develop an Action Plan. The policies will strive to reduce pollution levels so that they are below the National Air Quality Standards by the target date. Where any relevant documents contain policies which necessitate changes to the UDP they will be identified in the Annual Monitoring Report."

GLA ref no	<i>Kingston objection form Q5: Which policy/ proposal/paragraph/ site are you commenting on?</i>	<i>Kingston objection form Q7</i> Please state fully and clearly the reason for your objection/support	<i>Kingston objection form Q8</i> If you are objecting, please indicate what change you are seeking to the plan which could resolve your objection (use precise wording changes if possible)
68	Chapter 11 Transport Paragraph 11.7 Page 132	Slight changes to the wording in this section are required– 'Interim Transport Plans' have been replaced by 'Local Implementation Plans'	Delete last two sentences. Replace with: 'These policies need to be considered alongside proposals for specific transport schemes which are set out in the 10 year Local Implementation Plan and annual Local Spending Plan. These will reflect priorities contained within the Mayor's Transport Strategy.
69	Chapter 11 Transport STR 13 Sustainable Transport Strategy Page 137	Support the aim to reduce the need to travel, reducing reliance on the car and the use of the River Thames.	Support policy
70	Chapter 11 Transport Paragraph 11.8 Page 139	There is no mention of the provision for alternative fuels for vehicles.	Reword paragraph to say: "Land use and transport policies and decisions have major impacts on the environment and need to complement each other, by their contribution to meeting common environmental objectives. The Council look favourably on increasing the provision of alternative fuels for road vehicles in the borough. One way is to protect space on the forecourt of strategic filling stations for provision of Liquified Petroleum Gas, Compressed Natural Gas, electric charging points etc. The location of development can reduce the need to travel, reduce the length of journeys and improve access to jobs, goods and services for all sections of the community. Plan policies provide this positive integration by:.. Etc
71	Chapter 11 Transport Paragraph 11.9 Page 139-140	There is a need to encourage a shift from the private car use to more sustainable travel.	Reword paragraph to say: "These locational policies need to be complemented by transport policies which encourage a shift away from private car use to more sustainable travel in order to promote a cleaner, greener, healthier and more prosperous future for the borough." Continue with "For the borough..."

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72	Chapter 11 Transport Paragraph 11.12 Page 140	This statement is supported but is not strong enough and therefore not consistent with RBK's own road traffic reduction targets where road space re-allocation will be important.	Should change 'may' to 'will where possible'
73	Chapter 11 Transport Paragraph 11.13 Page 140	Pedestrianisation schemes often preclude access by bus, thereby reducing access by public transport, contrary to the aims of PPG6	'pedestrianisation schemes' should become 'reduced traffic areas'
74	Chapter 11 Transport Paragraph 11.16 Page 141	Traffic calming should not adversely affect bus services and this should be emphasised	Add after 'sustainable transport strategy' 'provided they do not adversely impact existing or potential bus routes,'
75	Chapter 11 Transport Paragraph 11.17 Page 141	New road construction should only be considered where it does not increase overall network capacity, in accordance with the Mayor's draft Transport Strategy policy 4G.28	Add at end 'and where there is no overall increase in highway capacity'
76	Chapter 11 Transport Paragraph 11.19 Page 141	Should be updated to reflect current situation	Should read 'Further details of the Council's transport policies will be given in the Local Implementation Plan following adoption of the Mayor's Transport Strategy. Annual funding bids to Transport for London will be contained in annual Local Spending Plans.'
77	STR14 The Road Network Page 141	Need to mention the Transport for London Road Network (TLRN) as a key part of the road hierarchy	In I) after 'those roads which' add ' form the Transport for London Road Network (TLRN) and....'

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78	Chapter 11 Transport Paragraph 11.29 Page 142	Wording changes required.	'Greater London Road Network' should become 'Transport for London Road Network'
79	Chapter 11 Transport Paragraph 11.33 Page 143	Wording changes required.	'GRN' becomes 'TLRN'
80	Chapter 11 Transport Paragraph. 11.38 Page 146	Wording change required.	'Greater London Road Network' should become 'Transport for London Road Network'
81	Chapter 11 Transport Paragraph 11.47 Page 152	Transport for London should be mentioned as a key partner	Add after 'in partnership with' 'Transport for London,'
82	Chapter 11 Transport Paragraph 11.66 Page 154	Additional wording to better reflect Government's target.	Add between 'seriously injured' and 'road accidents' ' and a 50% reduction in the number of children killed or seriously injured
83	Chapter 11 Transport Paragraph 11.71 Page 155	Wording change required.	Greater London Road Network (GLRN) becomes Transport for London Road Network (TLRN)
84	Chapter 11 Transport Policy T9 Bus Priority Measures Page 161	There is no reference to the London Bus Initiative which is mentioned in STR16.	Add to 11.92 'The London Bus Initiative takes this a step further by introducing a comprehensive range of improvements on a whole route basis. The aim is to cover all major bus corridors by 2011.'

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85	Chapter 11 Transport Paragraph 11.97 Page 163	Wording change required.	The Office of Passenger Rail Franchising has now become the Strategic Rail Authority (SRA)
86	Chapter 11 Transport Paragraph 11.101 Page 164	Supports the adoption of PTALS in land use planning process.	
87	Chapter 11 Transport Policy T15 Cycling Page 166	Policy should be strengthened to remove caveat 'where appropriate'. Standards should always be applied unless circumstances are exceptional (supported by para 11.118 and T20)	In iii) delete 'where appropriate'

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89	Chapter 11 Transport New Policy TN21a Provision and Management of Public Car Parking Page 171	Concern that this policy seems to suggest encouraging car access to Kingston Town Centre, contrary to government guidance (PPG6 and PPG13) and RBK's own sustainable access and road traffic reduction policies (e.g. STR23) Greater emphasis should be put upon the need for a balanced approach in that any new development would need to provide measures to promote use of sustainable modes - see policy DC5 that emphasises the need for complimentary public transport improvements	Add a new sentence after '(v) Availability of sites' 'This will be complemented by measures to improve accessibility by sustainable transport modes to provide a choice of travel options, in accordance with STR23' In the supporting text 11.128 add a new sentence at the end 'The Council will also seek to improve access to Kingston Town Centre and district centres by more sustainable modes of transport in accordance with STR13, STR16 and STR23 and it may be appropriate to revise parking targets as these improvements occur.'
90	Chapter 11 Transport T22 Contributions to Transport Fund Page 172	The statement 'including where the appropriate level of parking cannot be provided' contradicts the adoption of maximum parking standards PPG13 does not specify planning conditions that improves car parking (para 82) 11.132a and 11.132c also contradict the use of maximum parking standards.	Delete 'including where the appropriate level of parking cannot be provided on site' and replace with 'including where there may be a shortfall in parking' Delete 'improved public car parking' In 11.132a delete 'required' In 11.132c delete the first sentence

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Chapter 12: Kingston Town Centre

91	Chapter 12 Kingston Town Centre Paragraph 12.1 Introduction	<p>This paragraph states that, "recent developments and the lack of future development sites mean that large scale increases in office or retail floorspace are not expected". This will place increased importance on improving the quality and attractiveness of the town centre and, through identification of priority uses and monitoring of development, encouraging diversification into appropriate town centre uses".</p> <p>The GLA, as a result of its latest round of London wide town centre health checks has proposed that Kingston metropolitan centre, be classified with a 'consolidation' policy designation, in view of its limited development capacity. Consolidation means that policy should focus on qualitative improvements to redress deficiencies of provision and consolidate a centres strengths. In line with this, the GLA is supportive of the Boroughs statement in paragraph 12.1.</p> <p>However, in response to the GLA's proposed designation of Kingston as a two star consolidation centre, the Borough responded, "the C** designation is not yet appropriate for Kingston Town Centre...there are significant town centre and edge-of centre development opportunities...It is considered that a C* designation would be a more appropriate designation at this time" (letter dated 28/09/00).</p> <p>In view of this the GLA has accepted the Boroughs view and changed the proposed policy designation to C* in the latest review of the town centre network to be sent to Boroughs in April 2001. However, the statement in the letter, "there are major significant development opportunities, does not seem to accord with the statement in the proposed alterations to the UDP, outlined above, that there is a "lack of major development sites". Clarity is sought from the Borough as to whether the statement in the UDP that there is little development opportunity, or the statement in the letter 28/09/00, more appropriately describes Kingston town centre, to ensure that the most appropriate policy designation is provided by the GLA.</p> <p>Nevertheless, the GLA supports the Boroughs policy to address</p>	Clarity is sought from the Borough as to whether the statement in the UDP that there is little development opportunity, or the statement in the letter 28/09/00, more appropriately describes Kingston town centre.
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GLA ref no	<i>Kingston objection form Q5: Which policy/proposal/paragraph/site are you commenting on?</i>	<i>Kingston objection form Q7</i> Please state fully and clearly the reason for your objection/support	<i>Kingston objection form Q8</i> If you are objecting, please indicate what change you are seeking to the plan which could resolve your objection (use precise wording changes if possible)
	Pages 177-178	deficiencies in provision of certain uses and seek to diversify the uses found within Kingston town centre and encourage community, cultural and entertainment uses, over further retail and office floor- space. However, the Borough should ensure that any additional development should not compromise environmental or qualitative improvements, as a significant number of "new" uses are proposed, within what appears to be relatively little development capacity.	
92	Chapter 12 Kingston Town Centre Policy STR21 The range of functions in Kingston Town Centre Chapter 12 Page 178	First paragraph bullet 1) remove wording "where appropriate". The second paragraph states that "large scale office development (B1a) will only be considered as part of mixed use developments. Given that both paragraphs 12.1 and 12.13 states that large scale increases in office and retail floorspace are not expected" this policy is misleading and its deletion suggested.	Suggested removal of the sentence, "large scale office development (B1a) will only be considered as part of mixed use developments" from policy STR21

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Chapter 13: District Centres

93	Chapter 13 District Centres Paragraph 13.11 Page 195	The first sentence states, "Surbiton and Tolworth district centres contain peripheral areas which are less attractive to retail uses and with their advantageous town centre location could accommodate other uses". The statement would be clarified by a change of wording to read, "Surbiton and Tolworth district centres contain peripheral areas which are less attractive to retail uses, <i>but because of their town centre locations could accommodate other uses</i> ".	Alteration of wording to read, "Surbiton and Tolworth district centres contain peripheral areas which are less attractive to retail uses, <i>but because of their town centre locations could accommodate other uses</i> ".
94	Chapter 13 District Centres Policy DC5 Car Parking in District Centres Page 199	Support the addition but policy could be strengthened to reflect the need for a balanced approach. This will act as a general policy for all district centres.	Policy name to become 'Access to District Centres' The policy should read 'The Council will seek to secure good access to district centres by sustainable transport modes and the adequate provision of public car parking with the objective of etc.'
95	Chapter 13 Tolworth District Centre Paragraph 13.50 Page 206	This paragraph states, "Tolworth lacks the range of community and leisure facilities found in the other district centres or Kingston, e.g. a community centre, and opportunities exist to secure improvement by sensitive location within the district centre as with the community Library". This statement to support the provision of community facilities in Tolworth is welcomed. However, clarification is sought on the meaning of the last clause of the sentence, "as with the community Library".	Clarification is sought on the meaning of the last clause of the sentence in paragraph 13.50, "as with the community Library".

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Chapter 14: Resources and Implementation

96	Policy RES3a & paragraph 14.33a Page 213	The inclusion of a new section and policy on Environmental Impact Assessment is welcomed. However, it could be improved by reference to Schedule 1 and Schedule 2 of the Regulations relating to proposals which <i>always</i> and <i>may</i> require EIA. Although Para 14.33 encourages developers to contact them at an early stage to obtain a screening opinion which is appropriate, for clarification purposes the section should state that the Council will screen <i>all</i> developments that fall under Schedule 2 of the Regulations to determine the need for an EIA as required under the Regulations rather than only those where a screening opinion is specifically requested from developers.	Add reference to Schedule 1 and Schedule 2 of the Regulations. Add before the last sentence of 14.33a "The Council is required to screen all developments which fall under Schedule 2 of the Regulations to determine the need for an Environmental Statement".
97	Paragraph 14.33b Page 213	14.33 refers to the details listed in Schedule 4 of the EIA Regulations. . . population, flora, air, architectural heritage etc. However, the list in schedule 4 paragraph 3 (EIA Regulations 1999) is not all inclusive, other aspects of the environment may be relevant. In addition, some Environmental Statements may include an analysis of social and/or economic impacts given the increasing emphasis on sustainable development. The Council should consider adding a reference to the effect that other additional criteria outside schedule 4 may be requested to be analysed within the Environmental Statement and link this with the need to analyse the sustainability (environmental, economic and social aspects) of major developments.	Amend accordingly.

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Chapter 15: Proposals Sites:			
98	Chapter 15 Proposals Sites Proposals Site: PS26 Page 218	Although this proposal is not proposed for change, the new strategic policy STR7a should require a revision, as a small part of the site overlaps a Site of Borough Importance for nature conservation.	Either the part that overlaps the site of importance should be deleted from the proposal site, or the necessity to accommodate nature conservation considerations in any development should be acknowledged in the text.
99	Chapter 15 Proposals Sites Paragraph 15.23 Page 218	Support additional text that expects developers to contribute to transport improvements.	
100	Chapter 15 Proposals Sites PS2 Vicarage Road/Water Lane Page 220	This is an ideal site to promote reduced car and car free development, particularly housing, in accordance with PPG3.	Add after 'A contribution to transport improvements will be required (T22)' 'This site would be suitable for the provision of reduced car or car free development, particularly housing.'
101	Chapter 15 Proposals Sites PS3 Richmond Road Gas Land, Skerne Road Page 221	This is an ideal site to promote reduced car and car free development, particularly housing, in accordance with PPG3.	Add a sentence 'This site would be suitable for the provision of reduced car or car free development, particularly housing.'
102	Chapter 15 Proposals Sites PS4 Sopwith Way/Kingsgate Road/Richmond Road Page 223	Car parking should not be a requirement – this contradicts the use of maximum parking standards and suggests that they will be applied as though they are minimum standards. This is an ideal site to promote reduced car and car free development, particularly housing, in accordance with PPG3.	Delete 'Car parking' Add a sentence 'This site would be suitable for the provision of reduced car or car free development, particularly housing.'

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103	Chapter 15 Proposals Sites PS11 107-163 Clarence Street/Station Buildings, Fife Road and 58-66 Fife Road/30 Castle Street and former Empire Works Page 228	This is an ideal site to promote reduced car and car free development, particularly housing, in accordance with PPG3.	Add a sentence 'This site would be suitable for the provision of reduced car or car free development, particularly housing.'
104	Chapter 15 Proposals Sites PS12 55-83 Clarence Street, 4-46 Fife Road Page 229	This is an ideal site to promote reduced car and car free development, particularly housing, in accordance with PPG3.	Add a sentence 'This site would be suitable for the provision of reduced car or car free development, particularly housing.'
105	Chapter 15 Proposals Sites PS7 Clarence St/Cromwell Road/Hardman Road Page 230	This is an ideal site to promote reduced car and car free development, particularly housing, in accordance with PPG3.	Add a sentence 'This site would be suitable for the provision of reduced car or car free development, particularly housing.'
106	Chapter 15 Proposals Sites PS22 Head Post Office Land, Ashdown Road and Land Rear of DSS, Brook Street Page 235	Car parking should not be a requirement – this contradicts the use of maximum parking standards This is an ideal site to promote reduced car and car free development, particularly housing, in accordance with PPG3.	Delete 'Car parking' Add a sentence 'This site would be suitable for the provision of reduced car or car free development, particularly housing.'
107	Chapter 15 Proposals Sites PS23 Ashdown Road/Lady Booth Road Page 236	This is an ideal site to promote reduced car and car free development, particularly housing, in accordance with PPG3.	Add a sentence 'This site would be suitable for the provision of reduced car or car free development, particularly housing.'

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108	Chapter 15 Proposals Sites PS29a Rockware Plastics and Land Adjacent, Skerne Road, Kingston Page 239	Support the inclusion of a statement encouraging a reduced level of car parking	Support.
109	Chapter 15 Proposals Sites Proposals Site: PS35 Thames Water Plc Portsmouth Road Surbiton Page 250	The deletion of proposals for built development and marina are welcome, as is the recognition of the nature conservation value of the site. Built development or a marina could not be accommodated without some harm to biodiversity. However, the term 'recreation' should be clarified so that it only refers to outdoor recreation in accordance with RPG 3 and PPG 2.	Further clarification on this point will be welcome.
110	Chapter 15 Proposals Sites PS39a Station Car Park, Surbiton Page 252	Support the inclusion of a statement encouraging reduced level of parking Car parking should not be a requirement – this contradicts the use of maximum parking standards	Delete 'Car parking'
111	Chapter 15 Proposals Sites PS36 Former Surbiton Post Office and Sorting Office, Victoria Road/St Mary's Road, Surbiton Page 251	This is an ideal site to promote reduced car and car free development, particularly housing, in accordance with PPG3.	Add a sentence 'This site would be suitable for the provision of reduced car or car free development, particularly housing.'
112	Chapter 15 Proposals Sites Proposals:PS44 Page 257	The deletion of proposals for active recreational development is welcome, as these would be harmful to the nature conservation value of the site.	Support.

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113	Chapter 15 Proposals Sites Proposal PS49, Govt. Offices north of Barwell Business Park Page 257	Proposal PS49 covers land that forms part of a Strategic Employment Site (an Industrial Business Park) within the LPAC Framework (2000) and an Industrial/Warehouse/Business Area under Policy E1 of the UDP. In addition to Business (B1), Industrial (B2) and Warehousing (B8), "community uses" are identified as being appropriate on the site. Community uses are inconsistent with the designation of the land as an Industrial Business Park and Industrial/Warehouse/Business Area.	Delete "community uses" from the list of appropriate uses.
114	Chapter 15 Proposals Sites Proposals: PS50 Page 260	Although this proposal is not proposed for change, the new strategic policy STR7a should require a revision, as a small part of the site overlaps a Site of Metropolitan Importance for nature conservation.	The part which is in the Site of Metropolitan Importance should be deleted from the proposals area.
115	Chapter 15 Proposals Sites New Proposal Site PS50a Aggregates Depot, Kingston Road, Tolworth Page 261	Support encouragement of rail freight.	Support

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Appendix 1: Parking Standards for New Development

116	Appendix 1 Parking standards for New Development Page 262	Parking standards for residential uses should be based upon those outlined in the Sustainable Residential Quality matrix, which relates density and car parking. The matrix allows for a maximum of 1 space per dwelling in more accessible locations, 1 to 1.5 in sites with moderate levels of accessibility and between 1.5 and 2 in more remote locations. This should be considered as an average to be achieved over an application site. PPG3 (para 62) states that car parking standards that result on average in development with more than 1.5 off-street car parking spaces per dwelling are unlikely to reflect the Government's emphasis on securing sustainable residential environments. Paragraph 57 expects boroughs to examine critically standards such as car parking to make the best use of urban land. The maximum standard of 3 spaces for large dwellings and for 2 spaces in Kingston town centre are excessive in this context and should be critically examined using the SRQ matrix as a guide.	Revise the parking standards in line with revisions to Policy H6 to be in accordance with PPG3 and using the SRQ matrix as a basis.
117	Appendix 1 Parking standards for New Development A1 General Retail Page 267	Standard of 1:35 much lower than all comparable boroughs such as Hounslow, Richmond and Sutton	Should become 1:50 generally and 1:100 in Kingston Town Centre and district centres
118	Appendix 1 Parking standards for New Development A2 Financial and Professional Services Page 268	Should be consistent with B1 standards, in line with other London boroughs	Should be as B1 standards

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119	Appendix 1 Parking standards for New Development B1 Business Standards Page 268	Standard for 'Remainder of Borough' is unacceptable as it is contrary to RPG9 and below other boroughs such as Hounslow and Richmond Standard for district centres is too low as RPG9 states that more rigorous standards than 1:100 should be applied in more accessible areas, consistent with other boroughs such as Bromley and Richmond In Kingston Town Centre, due to its very high PTAL , the standard should be stricter in line with other comparable major town centres such as Bromley, Hounslow and Richmond	1:40 for 'Remainder of Borough' should become 1:100 1:100 in 'district Centres' should become 1:300 1:300 in Kingston Town Centre should become 1:600
120	Appendix 1 Parking standards for New Development B2 (General Industry) and B8 Storage and Distribution Page 269	These should be consistent with B1 standards, as in Richmond and Hounslow	As B1 Standards
121	Appendix 1 Parking standards for New Development C1 Hotels and Hostels Page 269	For hotels, standard should be consistent with other outer London boroughs such as Richmond and Hounslow	1 space per bedroom should become 1 space per 2 bedrooms

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122	Appendix 1 Parking standards for New Development C3 Dwelling Houses Page 270	Parking provision should not exceed 2 spaces per unit , in line with the aims of PPG3 to restrict average parking provision to under 1.5 spaces per unit and other London boroughs such as Hounslow, Bromley and Sutton An extra statement should be included in the town centres to allow for reduced parking levels or car free housing, consistent with Policy T20 , PPG3 and other boroughs such as Hounslow.	For 'Remainder of the Borough' the Provision for Maximum Standard should read: Studio/1-2 bedroom:1 space 3+ Bedrooms:2 spaces Add to 'Kingston Town Centre' and 'District Centres' column 'Where appropriate, car parking provision in these areas may be reduced, providing there is no risk of on-street parking, for example within a CPZ and there is a legal agreement that residents would not be eligible for parking permits.'
123	Appendix 1 Parking standards for New Development Cycle Parking Standards Page 273	Generally supportive of the good level of provision for cycle parking, especially for B1 use. However, query as to why provision for town centre food retail and universities/colleges (important as Kingston is a University town) is lower than other good boroughs such as Hammersmith & Fulham and in the former case lower than LCN guidelines	Standard for food retail town centre/local shopping centre could be '1/125m2' rather than '1/300m2' for Universities, Colleges it could be '1 space per 10 staff/students' rather than '1 space per 8 students/staff'

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Appendix 6: Sites of Nature Conservation Importance

124	Appendix 6 and Proposals Map	<p>The following queries were noted:</p> <ol style="list-style-type: none"> 1. The annotation for some linear features of nature conservation importance by a central line leaves the protected area ambiguous. Along both the Beverley Brook and Bonesgate Stream there are areas of land within Sites of Importance for Nature Conservation that the arbitrary central line does not indicate for protection. 2. Hogsmill River Valley - the section of river between Ewell Road and The Hollows is missing from this site. Note it is The Mayor's recommendation that The Hollows, Six Acre Meadow/Malden Meadow are essentially extensions of the Hogsmill River Valley site. 3. Chessington Wood should be extended up the old trackbed by 100 metres to the north. 4. Tolworth Court Farm & Medieval Moated Manor is inconsistent with the recommended SINC boundary (see previous comments in relation to this site). 5. Bonesgate Open Space - should not include the open space adjacent to the Bonesgate Stream north of Chessington Road; only the watercourse is part of the recommended site here. 6. Rushett Common should be extended south the Borough boundary on the eastern verge of Leatherhead road. 7. Clayton Road Wood. It is recommended that the steep bank adjacent to Clayton Road, west to the gated entrance to the adjacent playing field be included within this site. 8. Causeway Copse Open Space. 	Further discussion on these issues would be welcome in order to seek amendments in line with these detailed comments.
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Royal Borough of Kingston Upon Thames UDP First Review March 2001 Proposed Representations from the Mayor of London			deposit period 27/03/01 – 08/05/01
GLA ref no	<i>Kingston objection form Q5: Which policy/proposal/paragraph/site are you commenting on?</i>	<i>Kingston objection form Q7</i> Please state fully and clearly the reason for your objection/support	<i>Kingston objection form Q8</i> If you are objecting, please indicate what change you are seeking to the plan which could resolve your objection (use precise wording changes if possible)

	Page 276	<p>9. Was it your decision not to include the ex-allotment land adjacent to Alexandra Park as a Local SNCI, or is this an omission?</p> <p>10. Wimbledon Common is also SSSI (correctly indicated on the map but not listed in Appendix 6).</p> <p>11. The Richmond Park section is also National Nature Reserve (NNR).</p>	
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Glossary			
125	Glossary Page 280	The proposed new text describing green corridors should be changed to match the wording of the Mayor's adopted procedures ³	Change the text to reflect the adopted procedures.

Environmental Appraisal (N.B this is a separate document so the page numbers are different.)			
126	Environmental Appraisal EIA Paragraph 8.4 page 89	It is known that the application of EIA to major planning applications does not <i>guarantee</i> more environmentally –friendly decision making as stated, however, it can often result in more informed decision making that makes developments less environmentally damaging than they could be in the absence of the process. The sentence could be phrased more positively to recognise the important role EIA can play in the decision making process in that it can highlight and predict impacts and suggest innovative mitigation measures that may not otherwise come to light or be adequately considered before a decision is made.	Add to end of last sentence in para 8.4 "by enabling informed decision making by providing prior information on the likely impacts and mitigation measures.
127	Environmental Appraisal EIA 1.3.10 & 8.9 Page 89	It is recognised that an <i>environmental</i> appraisal was carried out because of the alteration rather than the full replacement of the plan, although some social and economic welfare criteria have been added at 1.3.10 which is positively a move in the direction of a sustainability appraisal as recommended in PPG12. The intention to conduct a sustainability appraisal of the UDP for the next UDP review is welcomed given that sustainability is the main driving force behind reviews.	

³ Policy, criteria and procedures for identifying nature conservation sites in London. Adopted by the Mayor as a firm basis for the London Biodiversity Strategy. First adopted by the LEC in 1994, by LPAC in 1995, and recommended in RPG3 in 1996.

GLA ref no	<i>Kingston objection form Q5: Which policy/proposal/paragraph/site are you commenting on?</i>	<i>Kingston objection form Q7</i> Please state fully and clearly the reason for your objection/support	<i>Kingston objection form Q8</i> If you are objecting, please indicate what change you are seeking to the plan which could resolve your objection (use precise wording changes if possible)
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Proposals Map

128	Proposals Map: Thames Policy Area	<p>The proposed boundary of the TPA as shown on the UDP proposals map differs significantly from the indicative boundary shown in RPG3b.</p> <p>Whilst there may be some cases where the difference is justified, there are three general areas in which the proposed TPA boundary fails to meet the requirements of RPG3b.</p> <ol style="list-style-type: none"> 1) There are some areas where land has a clear existing visual relationship with the river, these should all fall within the TPA. 2) In other case property along roads which are approximately perpendicular to the River Thames has or could have (given redevelopment) a visual relationship to the river. 3) In some cases land which currently has little or no direct or visual relationship to the river, could in future have a visual relationship if redevelopment were to be of sufficient scale and/or height. <p>The fundamental reason for these shortcomings is that the proposed TPA boundary uses the existing Strategic Area of Special Character. This boundary is based on existing developments whereas the TPA should also include areas where potential future development or redevelopment could have a visual relationship to and impact on the River.</p>	<p>The boundary of the proposed Thames Policy Area should be amended to reflect more closely the advice given in RPG3b and LPAC's principles for defining the TPA.</p> <p>The Mayor and GLA officers are happy to assist in this process.</p>
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