

Transport and Streets Draft SPD – Consultation comments and response to the second (February 2015) draft

Document Section	Respondent name	Respondent company / organisation	Comment	Council response	Change to SPD
All Sections	Thomas Blomberg	Cherry Trees Residents Amenities Association	<p>The Cherry Trees Residents Amenities Association (CTRAA) welcomes the Transport and Streets SPD and finds the draft proposal easy to understand and covering all important issues.</p> <p>We agree with all the points raised by the Kensington Society in their submitted comments, so we refrain from making a list of detailed comments ourselves, but ask that the KS comments are also regarded as comments from the CTRAA.</p>	Support and comments noted	No change
All Sections	Angela Gemmill	Marine Management Organisation	The MMO has no comments.	Noted	No change
All Sections	Stephen Hall	Highways Agency	<p>The HA will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN.</p> <p>We have reviewed the documents available and conclude that we do not have any comments at this time.</p>	Noted	No change
All Sections	Janice Burgess	Highways Agency	<p>The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport.</p> <p>The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.</p>	Noted	No change

All Sections	Gillian Fensome	Natural England	We confirm that we have no comments to make concerning the Draft Basements SPD or Draft Transport and Streets SPD and would state that our only concern regarding such issues would be if they impact on designated sites.	Noted	No change
All Sections	Young	n/a	One sentence sums up the approach of the Council and the planners and why so many residents are very concerned. That is that the supplementary planning document is designed to make it easier for applicants to make successful planning applications. No one wants to live in a borough set in aspic and most realise the need to continue to develop and improve the housing stock. However, insufficient attention is paid to the needs and comfort of the vast majority of residents who are not making planning applications. There were 393 applications including basements in 2014. Set that against the number of people who voted in the council elections. The current planning rules consistently favour the applicant and ignore the affected resident. Even when the rules would appear to protect that resident the council routinely ignores those rules finding in favour of the applicant.	<p>The Vision for the Royal Borough: Building on Success (reproduced below) includes the undertaking to uphold our residential quality of life so that we remain the best place in which to live in London. This is reflected in everything we do. No change.</p> <p>Our vision for Kensington and Chelsea over the next 20 years is to build on success. To further develop the strong and varied sense of place of the borough, we will, in partnership with other organisations and importantly with our residents:</p> <ul style="list-style-type: none"> • stimulate regeneration in North Kensington through the provision of better transport, better housing and better facilities; • enhance the reputation of our national and international destinations – Knightsbridge, Portobello Road, South Kensington, the King's 	No change

				Road, Kensington High Street, and Earl's Court by supporting and encouraging retail and cultural activities in particular; <ul style="list-style-type: none"> • uphold our residential quality of life so that we remain the best place in which to live in London, through cherishing quality in the built environment, acting on environmental issues and facilitating local living, including through strengthening neighbourhood centres. 	
All Sections	Gilbert	Knightsbridge Association	The Knightsbridge Association endorses the submission sent to you by the Kensington Society	Comment noted.	No change
All Sections	Michael Bach	Kensington Society	The Kensington Society strongly welcomes this SPD, which is now finely tuned and contains up-to-date new sections on: <ul style="list-style-type: none"> • streetscape (section 7: Streetscape) • historic street furniture (7.4.2), • signage (7.4.11ff), • adverts (7.4.12 and 13); • construction traffic management (8.1), and • measures to reduce the impact of construction (8.2). 	Support	No change
All Sections		The St Quintin and Woodlands Neighbourhood Forum	The St Quintin and Woodlands Neighbourhood Forum endorses the comments submitted by the Kensington Society and wishes to add the following points:	The reasoned justification for Council Policies CT1 and CT2 is included in the Consolidated Local Plan. The Council will consult	No change

			<p>While this SPD is titled "Transport and Streets" the scope of Transport issues covered is limited. The introduction states that the SPD 'provides further information and guidance in support of Core Strategy policies CT1 (Improving Alternatives to Car Use)' but says little in relation to this Core Strategy policy</p> <p>Is there to be a separate Partial Review of the Transport section of the 2010 Core Strategy? If not, local residents in the StQW neighbourhood (southern part of Dalgarno Ward and northern part of St Helens) have concerns that the impact on RBKC of development in LBHF and proposals for the Old Oak and Park Royal Development Corporation area are not being adequately planned for. Specifically:</p> <ul style="list-style-type: none"> Given the TfL and London Mayor's decisions that the best option for a new Overground connection to the HS2/Crossrail hub is at Hythe Road, how does this affect RBKC Policy CT2(b) for an additional station at North Pole Road? Is RBKC willing to refine this policy to make 'Western Circus' (i.e. beneath the Westway Roundabout the preferred location for such a station, and to commence active lobbying with LBHF, Imperial College, and other developers in White City East to convince TfL of the viability and benefits of such a station to improve PTAL levels in the surrounding area? What policies and proposals does RBKC have in response to the London Mayor and TfL decisions to proceed with an East West Cycle Super Highway? How will 	<p>on a revised draft of the CLP in mid 2016.</p> <p>Comments on location specific proposals are outside of the scope of this document.</p> <p>The Council will respond to the TfL consultation on the East-West Cycle Superhighway.</p>	
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			<p>those wishing to use this highway access it, or descend from it, when travelling to or from locations in RBKC?</p> <ul style="list-style-type: none"> • What does RBKC propose to do about the traffic pinch-point of the exit westwards from North Pole Road to Wood Lane/Scrubs Lane, where long queues in late afternoon and at peak hours are a regular feature of the day? <p>These issues relate to existing Core Strategy policies CT1 and CT2, so it would appear that they could be addressed within a SPD.</p>		
2	Neil Henderson	Gerald Eve LLP on behalf of the Cadogan Estate	<p>Paragraph 2.1.1 states that "any application the Council considers might have an impact on traffic congestion, public transport, or parking will need to be accompanied by a Transport Assessment". It goes on to state the parameters within which a Transport Assessment is required and that a Transport Assessment may also be required on "other types of development as necessary". Paragraph 2.1.2 goes on to advise that the scope of the transport assessment should be agreed at pre-application stage.</p> <p>Paragraph 2.1.4 requires a Transport Statement "in some cases", where a Transport Assessment is not required.</p> <p>Paragraph 2.2.3 states that a Travel Plan will be required on "other types of development that the Council may determine from time to time" in addition to</p>	Support and comment noted.	Amend Sections 2.1 and 2.2

			<p>those within the set scales and types of development set out in the SPD.</p> <p>The SPD does not offer sufficient clarity as to when a Transport Assessment or Transport Statement or Travel Plan is required. No thresholds are provided for when a Transport Statement is required.</p> <p>Requiring applications for "other types of developments" as necessary to be accompanied by a Transport Assessment or for Transport Statements or Travel Plans to be provided "in some cases" is too ambiguous and provides no real guidance in practice. Fixed parameters for when each report is required should be provided so that applicants have clear guidance from the outset as to what documentation is required to support their proposals.</p> <p>Clear written guidance should be provided by the Royal Borough as part of the pre-application process to ensure applicants have the necessary comfort they need to proceed to a full application.</p>		
2.	Michael Bach	Kensington Society	<p>Add reference to key policy which seeks to get development in the right place:</p> <p>NPPF Paragraph 34 requires that "plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised."</p>	Support	Amend as suggested.
2.1	Michael Bach	Kensington Society	<p>Table 1: A Use Class – create a list</p> <p>What is "car accumulation data"?</p>	Comments noted.	Amend text on parking occupancy. Reformat text as suggested.

			<p>B Use Class – create a list</p> <p>C1 Hotels: and “and coaches” at the end of information section. This even deserves a policy in the Core Strategy.</p>	<p>There is sufficient reference to coaches within the information requirements for hotel developments.</p>	
2.3.1	Michael Bach	Kensington Society	<p>Additional measures for the School Travel Plan should be added:</p> <p>Admissions criteria – can include proximity – preference given to pupils who live locally</p> <p>Awareness training – Walk to School</p>	<p>Support</p>	<p>Add “awareness training such as promoting the walk once a week initiative” to 2.2.7.</p> <p>Add a final sentence to 2.3.1; “The adoption by schools of an admission criterion based on the proximity of children’s’ homes to the school can support walking and cycling “.”</p>
3	Bilfinger GVA	Notting Hill Gate KCS Limited	<p>Like before, we note that the draft SPD continues to propose a reduction to the adopted car parking standards in order to encourage sustainable travel in the Borough.</p> <p>Whilst we do not object to the principle of encouraging sustainable travel, we seek to ensure that the ability to provide on-site parking is not restricted to such a level that redevelopment opportunities are prejudiced.</p> <p>Policies and standards should offer flexibility and acknowledge individual circumstances on a site by site basis, and not adopt an unduly prescriptive approach towards development proposals.</p> <p>With specific regards to the Newcombe House site, given the excellent public transport accessibility there will be very few residents who use a car for regular journeys. However, from our significant experience in delivering residential units across central London, we expect that there will still be considerable demand for on-site parking at</p>	<p>The London Plan 2015 sets maximum car parking standards for London. These define the range within which boroughs can tailor their own parking standards to respond to local conditions. The London Plan states that up to one space per unit can be permitted in respect of residential development in an urban context. It also states that all developments in areas of good public transport accessibility should aim for significantly less than one space per unit and that car free scheme should be promoted. Paragraph 32.3.5 of the Council’s Consolidated Local Plan states that car parking standards will be revised downward over</p>	<p>No change</p>

			<p>Newcombe House. This demand is expected from residents who wish to be able to use a car infrequently, most commonly at the weekend, or who will use the space for long term storage. Demand is also expected from families who require the use of a car to facilitate family living.</p> <p>Given the demand for high quality developments in the Borough, we consider that any policy which unduly restricts the provision of on-site car parking would be inappropriate and unnecessary, and likely to prejudice the viability of residential development opportunities.</p> <p>The ambition of the policy will remain – to reduce reliance on the car and promoting sustainable modes of travel, relevant to this highly accessible location – and will not be adversely affected. However, unduly prescriptive and restrictive standards may result in arbitrary barriers to development.</p> <p>We acknowledge the need to promote sustainable means of travel, but reiterate the request that the car parking standards proposed by the current draft SPD are not unduly prescriptive so as to prejudice development, and the policies/standards are worded such that a site by site assessment can be made and flexibility afforded where necessary to deliver wider development objectives.</p>	<p>the lifetime of the plan. These adopted policies are reflected in the standards set out in Section 3.1.</p> <p>The range of parking provision permissible under the SPD does allow flexibility with the range. The maximum parking standards presents are set at the maximum acceptable levels in the context of the borough's poor air quality and issues of traffic congestion.</p> <p>Comments on location specific issues cannot be addressed by this document.</p>	
3	Anthony Walker	ESSA (Edwardes Square Scarsdale Abingdon	Car parking. We see cars parked often for many weeks with covers and clearly with no intention of moving. While this may be acceptable in areas not suffering from parking stress in areas close to the High	This issue does not relate to development or planning control. On street parking is regulated by Traffic Management	No change

		Associated)	Street and similar destinations this just increases stress not just because it takes up a space but also due to its immovable nature it tend to prejudice the efficient use of parking spaces.	Orders made by the Road Traffic Regulation Act 1984.	
3.1	Ed Kemsley of Peacock and Smith Chartered Town Planners and Development consultants	WM Morrison Supermarkets Plc	Our comments relate to Chapter 3, specifically Section 3.1, and the table showing maximum Car Parking Standards. We note that the table sets out very limited maximum parking standards for all types of developments, and whilst we accept the reasoning behind such limitations (i.e. traffic and congestion) we would suggest that the London Plan Parking Standards are adopted for retail development which link parking maximums to the sites PTAL rating rather than a blanket parking restrictions across the borough. This will ensure that each site and its parking provision is assessed on its level of accessibility, in line with Paragraph 39 of the NPPF.	The London Plan 2015 sets maximum car parking standards for London. These define the range within which boroughs can tailor their own parking standards to respond to local conditions. This SPD guidance is consistent with the London Plan and the NPPF. The latter are necessarily material planning considerations and will be taken into account.	No change
3.1.1	Anthony Walker	ESSA (Edwardes Square Scarsdale Abingdon Associated)	Air Quality Management. Can a more positive approach be taken to anyone sitting in a car with the engine running? We are aware that fines can be imposed but how often does that happen. Can some signage in key areas be provided?	This issue does not relate to development or planning control.	No change
3.1.7	Neil Henderson	Gerald Eve LLP on behalf of the Cadogan Estate	Where development includes both affordable and market units and parking is provided, paragraph 3.1.6 requires parking to be allocated equitably between market and affordable units. Where "the level of parking proposed for affordable units is less than that proposed for market units the Council will expect the disparity to be fully justified" . This suggests an equal split of parking between the two tenures. Whilst the Cadogan Estate supports the	Support and comments noted.	Amend to "Where development includes both affordable and market units, and where parking is to be provided, the parking should be allocated proportionally between market and affordable units. If the level of parking proposed for affordable units is less pro rata than that proposed for market units the Council will expect the disparity to be fully justified. The justification should

			<p>principle of providing affordable units in line with market standards the policy, as currently written, requires an equal split of parking spaces regardless of the split of tenure.</p> <p>It should be more clearly stipulated in the SPD that an acceptable level of equitably allocated parking is relative to the split between affordable and market housing. The text should clarify that if, for example, 40% of the units are affordable, 40% of the number of parking spaces should be allocated to the affordable units (based on the Council's parking standards), not 50% or more in order to be equal with the market housing as it is suggested by the current wording.</p>		include reference to the views of Registered Social Landlords and the demand for parking of future residents”.
3.1.8	Michael Bach	Kensington Society	Need for a separate paragraph on parking standards for housing for the elderly	There is a distinct standard for sheltered housing. We cannot distinguish between different types of housing within the C3 use class.	No change
3.1.9	Neil Henderson	Gerald Eve LLP on behalf of the Cadogan Estate	<p>Paragraph 3.1.9 states that "40 per cent of car parking spaces provided within new developments should be equipped with electric charging points".</p> <p>Whilst the Cadogan Estate supports the encouragement of 'greener' solutions, given the current level of cars requiring electric charging points it is considered that the requirement to expect 40 percent of spaces to be equipped with electric charging points at the outset is too onerous.</p>	Many parts of the Royal Borough have very poor air quality and considerable worse than London averages. We expect a higher take up of electric vehicles by Royal Borough residents (with access to off street parking) than the London average. This standard reflects local conditions. Additionally the cost of providing charging points	No Change

			<p>The Further Alterations to the London Plan (FALP) adopted in March 2015 states in Policy 6.13 that development must "ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles". The SPD is therefore requiring double the 20% specified in the FALP.</p> <p>The Cadogan Estate recognises the need for such solutions in order to encourage the uptake of electric vehicles and would recommend that the wording of paragraph 3.1.9 should be changed to: <i>"40 percent of car parking spaces provided within new developments should be capable of being equipped with electric charging points and of that 40 percent, half (20 percent of the total) should be equipped with electric charging points at the point of the occupation"</i>. This would be consistent with the objectives of the policy whilst remaining representative of current demand.</p>	is not unduly onerous.	
3.4	Michael Bach	Kensington Society	Table 3.2: Spell out the uses	In our view this suggested change would impact detrimentally on the readability of Table 3.2.	No Change
4.1	Neil Henderson	Gerald Eve LLP on behalf of the Cadogan Estate	The SPD specifies in paragraph 4.1.2 that "all new additional residential units will be required to be residents parking permit free... including new build, redevelopment, change of use, conversion of HMO's, sub-division of larger dwellings and for developments where off-street parking is provided" .	Paragraph 4.1.3 is considered necessary for the Council's Policy Objectives to be achieved however it is reasonable to distinguish between the swapping of permits between residential properties and land use swaps.	Amend text to: The permit-free policy set out in the Core Strategy and the guidance in this document will not be applied retrospectively to existing residential units. The swapping of permit eligibility between existing properties or between existing and new residential properties

			<p>Paragraph 4.1.3 goes onto state that "the swapping of permit eligibility will not be accepted". It is the introduction of restrictions to prevent the swapping of permits between residencies which raises significant concerns for the Estate and which we comment on as follows.</p> <p>The concept of restricting the swap of parking permits has previously been considered by RBKC in the consultation for the draft supplementary planning document for transportation in July 2008. At this time, the Estate raised significant concerns about the effect this would have on the viability of being able to manage their Estate and rationalise existing land uses. At this time, the Council agreed with the Estate's concerns and a document removed reference to any restriction on the ability to swap parking permits.</p> <p>As you are aware, the Estate has a significant portfolio and is continually seeking to rationalise its existing uses to create better quality accommodation and a better disposition of land uses within the Estate. The approach to rationalising land uses is often marginal in terms of viability. This is principally due to the fact that the majority of land uses are protected in the Borough and the opportunities for creating additional new floorspace is extremely limited. As a result, in Cadogan's experience, the principle outcome of land use swap applications simply result in an improved disposition of land uses within the Estate's portfolio and better accommodation. However, because such</p>		<p>is not equitable or effective in achieving the aim of the policy as it will often result in an increase in on-street parking demand due to the different quality, size or location of the existing and new dwellings. For these reasons the swapping of permit eligibility between residential properties will not be accepted.</p> <p>The swapping of parking permit eligibility in respect of multi site redevelopments may be permitted where several land uses are being swapped and where several planning permissions are linked by planning obligation but only if it can be demonstrated that such a swap would not result in an increase in on street parking demand in any given area.</p>
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			<p>proposals generally do not result in additional floorspace or any significant difference in the existing floorspace uses, the value of the new rationalised floorspace that is achieved is not significantly greater than the existing. Any marginal increase in value that is achieved through better disposition of land uses or improved accommodation is reduced further by the cost of implementing these works.</p> <p>It can therefore clearly be seen that the viability of such use swaps, in the majority of cases, is marginal.</p> <p>In order to achieve improved accommodation through use swaps, the Estate often utilises its residential holdings of circa 3,000 flats and 200 houses. The majority of the Estate's residential holdings have the benefit of parking permit eligibility. This represents a significant part of the value of the property due to the shortage of parking in the Borough. If the Council now introduce a position where a key part of an existing residential unit's value is to be lost where that residential unit is "swapped" into another building, this will clearly have a significant impact upon the viability of use swaps which, in the majority of cases, are already marginal. The effect of this will be to disincentivise the Estate to actively pursue a programme of rationalisation in order to bring about the better planning of land uses within its portfolio as well as upgrading existing accommodation for its residential land and commercial tenants. The impact of such a policy upon the Estate's ability to commit to such a</p>		
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			<p>programme cannot be understated.</p> <p>Notwithstanding the concerns with regard to the viability of such measures, the introduction of such a policy appears to be wholly inequitable and without clear justification. Paragraph 4.1.3 states that the swapping of permit eligibility between existing properties will "often result in an increasing on street parking demand due to the different quality, size or location of the existing and new dwellings". This is not our experience and we consider it is important and necessary given the serious implications of such a policy, for the Council to fully evidence its concerns in this instance.</p> <p>The Estate fully recognises the need to ensure that <u>new additional</u> residential development should be permit free and, indeed, Policy CT1 specifically identifies this requirement. However, the Policy does not seek to restrict permit free parking allocation where there is no net additional residential accommodation being provided. It is on this basis that the Estate strongly objects to draft Paragraph 4.1.3 and we would request further detailed discussions with your Officers in order that the implications of this approach are fully understood by the Borough.</p>		
4.1.2	Michael Bach	Kensington Society	Line 1: delete "subject to" – otiose	Whilst this point is accepted, the borough is more than a controlled parking zone so the	No change

				wording as proposed is considered to be satisfactory.	
5	Michael Bach	Kensington Society	Expand title to include forecourt parking	There is very little content within the chapter related to forecourt parking. The minimum dimensions for car parking spaces on hard standings are set out in Chapter 3.	No change
5	Michael Bach	Kensington Society	Add CL6 (a) to Local Plan policy basis in the introduction	This is already included.	No change
5.1	Anthony Walker	ESSA (Edwardes Square Scarsdale Abingdon Associated)	Existing parking spaces in front of houses which may have been large enough originally now with larger vehicles end up with the cars hanging over the pavement. This is the case in Abingdon Villas for example and with the combination of this and the crossovers it is difficult for wheelchair users or those with pushchairs to walk along the street. The requirement for a clear width of 1.3m becomes nonsense.	<p>The Council as highway authority can act against overhanging vehicles that are obstructing the footway.</p> <p>The Council requires a minimum of 2m clear footway width to be retained where possible. As highway authority we are responsible for ensuring our footways are of high quality and provide an attractive walking environment. This is a responsibility we take very seriously.</p>	No change
5.1.2	Michael Bach	Kensington Society	<p>See former UDP Policy CD54 which resisted off-street parking in forecourts and gardens if it would result in the loss of:</p> <p>a. existing garden space b. any trees of amenity value c. most of the street garden wall or</p>	This point is covered adequately by the existing text.	No change

			<p>railing or lead to an unsightly breach.... d. daylight or outlook enjoyed by a basement dwelling.</p> <p>Add an additional bullet to paras 5.1.2 or 5.1.4:</p> <p>“The proposal involves the loss of boundary walls, gate piers or railings which contribute to the character and appearance of both the buildings and the streetscape”</p>		
5.1.4	Michael Bach	Kensington Society	3rd bullet: Line 2: add “, railings” after “walls”	Support	Amend as suggested
5.1.8	Michael Bach	Kensington Society	Line 2: After “directly” add “into the soil”.	Support	Amend as suggested
5.2.1	Eva Skinner	Onslow Neighbourhood Association	New vehicular accesses, where (has been spelt were).....”	Comment noted.	Amend as suggested.
6	Bilfinger GVA	Notting Hill Gate KCS Limited	<p>We continue to support the principle of servicing strategies which avoid undue impact on highways users promoted by the current draft SPD.</p> <p>However, we note that the Council will generally seek to achieve this through the promotion of on-site servicing, which we object to on the basis that this does not give full consideration to site specific factors.</p> <p>Reiterating the thrust of the comments made above in respect of parking standards, policies relating to servicing and deliveries should offer flexibility and acknowledge individual circumstances on a site by site basis; they should not adopt an unduly prescriptive approach that may prejudice</p>	<p>The Council’s Policy on servicing is Policy CL7 of the Consolidated local Plan. An updated version of this policy was adopted on 14 January 2015. These comments relate primary to the adopted policy rather than this supporting guidance.</p> <p>Comments on location specific issues cannot be addressed by this document.</p>	No change

			<p>development proposals.</p> <p>There will be circumstances – including those at Newcombe House – where the continued use of on street servicing can be adequately managed to ensure that it does not have a detrimental impact on the highway condition, and which allows for space to be retained for the provision of high quality public realm.</p> <p>This can avoid potential conflicts between pedestrians and vehicles within the site, contribute towards more efficient site layouts, and avoid congestion spots at the entrance/exit to the site.</p> <p>Flexibility and a considered site by site assessment should be at the heart of these standards, and not a prescriptive inflexible approach that places unnecessary restrictions on development.</p> <p>As the Council is aware, Newcombe House has been identified as the only site in the Notting Hill Gate area that is capable of delivering new public realm. The quality of this space should not be prejudiced through the requirement for on-site servicing.</p> <p>On this basis, we recommend that servicing strategies continue to be assessed on a site by site basis in the context of the wider objectives for the site, and that flexibility is afforded to the policies and standards of the draft SPD.</p>		
6.3.1	Michael Bach	Kensington Society	<p>Most shops in the Borough are serviced from the street. Small convenience stores are fine – make clear that these are not supermarkets. This is a matter of scale.</p>	<p>Even small shops in a challenging location can be difficult to service. Therefore scale is but one consideration. The</p>	No change

				existing text is considered to be satisfactory.	
6.3.1		The St Quintin and Woodlands Neighbourhood Forum	The Forum supports the statement in 6.3.1 that there may be locations where supermarkets are not permitted due to servicing problems and resultant loss of amenity. The Tesco Metro at North Pole Road (located in a former pub, with no permission for change of use required) has created continuing problems. Delivery vehicles stop in North Pole Road itself, creating blockages in a busy bus route. Cages litter the pavement impeding access to the bus stop, on a narrow pavement. Despite continual reminders from residents that servicing should be carried out round the corner in Latimer Road, the management of Tesco appear unable or unwilling to enforce such action by delivery drivers.	Support noted Comments on location specific issues cannot be addressed by this document.	No changes
7	Eva Skinner	Onslow Neighbourhood Association	Streetscape Policy CT1(g) change this paragraph to the following: 'Require improvements to the walking environment. Require improvements to the cycling environment that is not detrimental to pedestrians. Secure pedestrian and cycle links through new developments.'	This comment relates to a Policy within the Council's Consolidated Local Plan. The Council will consult on a revised draft of the CLP in mid 2016.	No change
7	David English	English Heritage	With regard to the Transport and Streets SPD we welcome the Royal Borough's continued commitment to its public realm, which is an important feature in the Borough's extensive conservation areas. To this end, we welcome the reference to your existing Streetscape guide in section (7.8) of the Transport and Streets SPD. You may also wish to add a reference to our publication Streets For All (https://content.historicengland.org.uk/image	Support noted. Many of the principles illustrated in "Streets for all" have been incorporated into the borough's online streetscape guidance.	No change

			s-books/publications/streets-for-allguide-to-management-of-londons-streets/streets-for-all-london.pdf/) which illustrates many of the issues described in section 7.0 (Streetscape) of the SPD.		
7		The St Quintin and Woodlands Neighbourhood Forum	<p>RBKC Policy CR4 states resist temporary or permanent advertising hoardings, or freestanding adverts on streets, forecourts or roadsides, or advertisements attached to street furniture, where these negatively impact on our high quality townscape or on public or road safety;</p> <p>The terms 'forecourt and roadside' could do with some supplementary explanation. Outdoor advertising companies seek out all possible sites for major freestanding structures, including e.g. railway embankment land, pedestrian routes (e.g. at Westway Sports Centre). Paragraphs 7.4.11-13 should take account of the relentless efforts by outdoor advertising companies to locate such structures on any unused scrap of land.</p>	Support	Add "or on other areas of public domain" to 7.4.12
7.1.1	Michael Bach	Kensington Society	<p>Third sentence – the elements of the street scene also include street boundaries – especially walls and railings.</p> <p>Line 5: Add: “street boundaries” after “paving”.</p>	Support.	Amend as suggested
7.1.1	Anthony Walker	ESSA (Edwardes Square Scarsdale Abingdon Associated)	Reference should be made to boundary walls and railings and where there are hedges or planting at the front the need for these to be kept trimmed to avoid overhanging the footway and reducing the useable area.	Comments noted. Issue of unkempt hedging does not relate to development or planning control.	Add “street boundaries” to 7.1.1
7.1.4	Michael Bach	Kensington Society	Streetscape Guide – need a consistent name and initial capitals, plus a weblink	<p>Comment noted.</p> <p>A weblink is provided at the end of the Chapter</p>	Amend text as necessary to achieve consistency.

7.3.2		The St Quintin and Woodlands Neighbourhood Forum	The Forum supports the statement in 7.3.2 that footways should be at least 2m in width.	Support Noted	No change
7.3.2	Michael Bach	Kensington Society	Footway widths – this refers to a minimum of at least 2m wide. Need a cross-reference to Table 9.1 Clear Footway Width Requirements	Comment noted	Add: “Minimum clear footway requirements are set out at Table 9 in Section 9.1”.
7.3.4	Michael Bach	Kensington Society	Add a sub-heading before this paragraph: “Private forecourts”.	The paragraphs related to privately maintained footway areas are most appropriately presented under a “footways” sub heading to emphasise that they are integral to our footways.	No change
7.3.7	Eva Skinner	Onslow Neighbourhood Association	Carriageways Add 'Any suggestions that cyclists should be allowed to travel against the flow of one-way traffic, should only be considered provided there is no detrimental effect on the local pedestrians'	Comment noted. The borough's cycling schemes take full account of pedestrian safety. This paragraph relates to street design rather than traffic management on the existing network.	No change
7.3.12	Eva Skinner	Onslow Neighbourhood Association	Additional bullet point 'Central islands on designated crossing points should only be allowed where the length of the crossing exceeds 15 metres'	This degree of precision is not considered to be desirable. The best design for a crossing in terms of safety, function and appearance will depend on local circumstances.	No change
7.4	Chris Thomas	On behalf of the British Sign and Graphics Association; and Outdoor Media Centre	We commented on an earlier draft of this SPD in December 2013. We note that the Council have accepted some of our observations and are content that the section on “Signage (paras 7.4.8 – 7.4.10) now clearly only concerns traffic signs and not commercial advertising. We still think that it would be helpful if the title were	Comment noted. Throughout section 7.4.8-7.4.10 the terms “sign” and “signage” is used as a general term which encompasses traffic signs but excludes advertising. This is sufficiently clear	No change

			changed to "Street and Traffic signs"	within the text.	
7.4	Chris Thomas	On behalf of the British Sign and Graphics Association; and Outdoor Media Centre	<p>As to the "Adverts" section (paras 7.4.11 – 7.4.13), we accept that this improves upon the previous draft. However we remain concerned that paragraph 7.4.12 makes the assumption that all free-standing advertisements and those attached to street furniture "add visual clutter". This categoric assumption is wholly unfounded in fact. Free-standing advertisements and those attached to street furniture may add clutter.</p> <p>But, as required by the Advertisements Regulation, each case must be considered on individual merit by reference only to amenity and public safety. We therefore suggest that paragraph 7.12 be redrafted as:</p> <p>"The installation of free-standing advertisements within the street or advertisements attached to street furniture may add visual clutter and may detract from the quality of the streetscape. Such installations may also reduce footway width to the detriment of public safety and pedestrian convenience. As a result, proposals for new advertisements on the street, including those mounted on street furniture, will be resisted where they have a detrimental impact on amenity or public safety"</p>	The suggested replacement paragraph is well drafted however it does not convey this authority's unfavourable views on on-street advertisement. I am satisfied that the existing text is not in conflict with the advertisement regulations.	<p>No Change. The below text will be retained.</p> <p>7.4.12 The installation of freestanding adverts within the street or adverts attached to street furniture adds visual clutter to the public domain and can detract from the quality of the streetscape. Such installations can constrict footway width and detract from the quality of the pedestrian environment. As a result, proposals for new adverts on the street including when mounted on street furniture are likely to be resisted for detrimentally impacting on local amenity.</p>
7.4	Chris Thomas	On behalf of the British Sign and Graphics Association; and Outdoor Media Centre	In paragraph 7.4.13 it is not possible to assume that some vaguely described advertisement (position, size and means of display – all undefined) will distract motorists. We suggest "will" be replaced with "may". Again, each proposal must be	Support and comment noted.	<p>Amend as:</p> <p>"In some locations, such as at complex road junctions, roadside adverts, depending on their position, size and means of display, may unduly distract</p>

			considered on individual merit.		motorists and pose an unacceptable risk to highway safety.”
7.4	Chris Thomas	On behalf of the British Sign and Graphics Association; and Outdoor Media Centre	Finally, in the last sentence of paragraph 4.7.13, the assumption is made that, in residential street, advertising is likely to be unacceptable for detracting from the amenity of the area. Again, this statement is unsupported by fact. For example, consider Holland Road which is well described as residential. Yet here, advertisements on bus shelters are seen all along the road and clearly do not detract from the amenity of the area. We therefore suggest that this last sentence be amended to: “On residential streets, advertising will be unacceptable where it detracts from residential amenity on the appearance of the area”.	The purpose of this SPD is to provide guidance on the Council’s approach to assessing applications for advertisement consent. The existing text does this satisfactorily.	No change.
7.4.1	Eva Skinner	Onslow Neighbourhood Association	Under sub paragraph 7.4.1 please add a further paragraph as follows: Where benches are considered it is important that the bench is not suitable for 'rough' sleeping; thus the bench should have dividing partitions to make rough sleeping uncomfortable.	Comment Noted. The Council as highway authority can install benches on the highway without the need for planning permission. The suggested paragraph is not considered necessary.	No change
7.4.7	Eva Skinner	Onslow Neighbourhood Association	Add an extra sentence at the end: 'However where such structures attract unauthorised advertising material (prostitute cards etc), the utility company must show that they have in place a regular cleaning policy that removes such offensive material from their structures.'	Support and comment noted.	Add the following sentence to 7.4.7. We expect utility companies to maintain their equipment to a high standard both internally and externally.
7.6.1	Michael Bach	Kensington Society	Line 4: After “solid structures” add “such as projecting signs”.	Support	After “solid structures” add “including projecting signs”.

8.1.6	Eva Skinner	Onslow Neighbourhood Association	3rd line from top amend as follows: '.....to have liaised with neighbouring residents and the Local Residents Association (if there is one) and dealt with their concerns in advance.....'	Support and noted	Add "to ensure neighbours' views and concerns are taken into account"
8.1.6	Anthony Walker	ESSA (Edwardes Square Scarsdale Abingdon Associated)	Procedures need to be agreed to ensure that the relevant range of local residents are consulted.	Comment noted. Additional guidance on this point is provided within the Basements SPD	No change
8.2	Lucy Owen	Port of London Authority	The PLA welcomes the reference in the document at paragraph 8.2.6 to the use of the Borough's waterways where appropriate for the transport of construction and waste materials however, it is considered that the draft SPD could go further. For example, when a planning application is submitted the Transport Assessment and Travel Plan should consider the role that the River can play in transporting passengers, set targets for River use and detail the measures that will be taken to encourage use of the River. The consideration of use of the River in this way would accord with the Mayor's River Action Plan which sets a target to increase passenger journeys on the Thames to 12 million a year by 2020 and maximise its potential for river travel.	Only a small number of sites in this borough have frontage to waterways. The additional guidance suggested would not be relevant to most development within the borough. Notwithstanding a reference to river use will be added to Section 2.2 (Travel Plans) and the relevant Council policy, CT1 (n) will be highlighted within the Local Plan policy basis provided at the beginning of Section 2.	A reference to river use will be added to Section 2.2 (Travel Plans).
8.2.1	Michael Bach	Kensington Society	The constraints on construction activity will require a more flexible approach especially in mews, cul de sacs, one way streets and generally in narrow streets. Add at the end: "The Borough contains streets, such as mews, cul-de-sacs and one-way streets, which due to their width and parking situation, makes the servicing of	The need to avoid unacceptable impacts on the lives of residents is covered adequately by Section 8.1	No change

			construction sites more difficult. These will require a more flexible approach by contractors to avoid an unacceptable impact on the lives of residents.”		
8.2.1	Anthony Walker	ESSA (Edwardes Square Scarsdale Abingdon Associated)	Where is the evidence of parking saturation held? Do residents need to record this? Contractors should be encouraged to use lorries of a suitable width according to the particular roads to be used.	The Council undertakes borough wide parking surveys every few years the most recent of which, undertaken last autumn, will be made available shortly. Parking occupancy data is available from the Council upon request. Many CTMPs stipulate the maximum size of vehicle that can be used.	No change
8.2.2	Anthony Walker	ESSA (Edwardes Square Scarsdale Abingdon Associated)	We are concerned that there have been occasions where an acceptable arrangement for skips etc has been agreed as part of a basement planning application only to find that once work commences additional parking bays are suspended having been agreed with the Highways department. Co-ordinated responses are needed.	Comment noted. The Council is continually trying to improve coordination between departments to ensure that any inconsistencies are avoided.	No change
8.2.2	Michael Bach	Kensington Society	After firsts sentence add: “There will a general presumption that all skips, materials and equipment will be kept off the street wherever possible. Developers and contractors will need to demonstrate why this cannot be done before on-street storage will be agreed.”	In some circumstances the act of delivering a skip to an off street position will be more disruptive than having a skip on street.	No change
8.2.2		The St Quintin and Woodlands Neighbourhood Forum	The Forum supports the proposed additional wording from the Kensington Society at 8.2.2. “There will a general presumption that all skips, materials and equipment will be kept off the street	In some circumstances the act of delivering a skip to an off street position will be more disruptive than having a skip on street.	No change

			wherever possible. Developers and contractors will need to demonstrate why this cannot be done before on-street storage will be agreed.”		
9.1.13	Eva Skinner	Onslow Neighbourhood Association	The association thinks that it would be useful to insert (see bold) in the first line after “umbrella stand”, or benches whether attached permanently, or free standing, to the outside wall of the premises, or other items.....	This paragraph advises that “space heaters, barriers, umbrella stands or other items associated with external seating areas will not normally be given consent or granted planning permission by the Council due to the negative impact they have on the streetscape and their potential to increase inconvenience to pedestrians, particularly those with impaired vision”. We consider benches to be external seating. External seating can, if properly managed, add valuable vitality to our streets.	No change