

Appendix 3 - Proposed changes to the Riverside SPD

Ref. no	Page number of Draft SPD	Paragraph/ Location	Commentary	Reason for changes (if any)	Identified by	RBK response
1	27-36		Different Icons used.	Wrongly aligned	Officers	Icons updated
2		Fig 47	Figure wrongly located east-west route through the privately managed May Bate Ave estate.	Wrongly located	Resident/Portal	East west route from Sury Basin to Canbury Gardens realigned
3	p43	Fig 35	Text wrongly identified location.	Wrongly identified.	Resident	O2: text updated with removal of "e.g. an additional site to host the regatta"
4	p43	Fig 35	Missing landing stage to rowing and sailing clubs.	Missing information	Resident	Update figure to reflect location of landing stages.
5	p86	Cycling	Consider wording of missing cycle link "along the river".	NO CHANGE	Consultee/resident	The route of any future cycle infrastructure will be considered in line with the principles of the Riverside Public Realm SPD, and will be subject to further investigation and community consultation to ensure it/they are appropriately located and designed.
6	p53	Fig 49	Fenwick"s and other sites are in private ownership	Missing information	Consultee	Update figure 49
7	p9	1.5.2	Clarify wording of funding opportunities (inc. CIL 123)	Clarify wording	Consultee	1.5.2. "The character of the Riverside is explored in more detail in Chapter 5.0 which identifies a vision and design principles for each character area, based on a detailed review of existing issues and opportunities. Delivery mechanisms and sources might include using Section 106 or Community Infrastructure Levy funding."
8	p29	Principle 4	The SPD should justify how the requirement for "exceptional design" is justified	Clarify wording	Consultee	The majority of the riverside area is defined as a conservation area, and is host to a significant number of listed buildings of all types, due to their architectural and historic interest. Change text: "Principle 4. Exceptional design standards for new buildings and public realm will be required. Changes should conserve and enhance the quality of the built and natural environment as identified through the designated heritage status of the area, the architectural quality of its buildings, the riverfront as part of the Arcadian Thames and important strategic and local views to and from the study area."
9	p.32, 61	4.3.4. Proposals	There is a lack of clarity on the Council"s position with regard to mooring of the barge Gloriana.	NO CHANGE	Consultee	The aim of housing the Gloriana in the Borough remains an aspiration and would be beneficial for the borough, complementing the themes of the SPD to open up the riverside to diverse activities, supporting the cultural and tourist offer for the town, and celebrating the borough"s heritage. However, as this aspiration remains unfunded, it is a longer-term ambition.
10	p.84	Appendix B	Clarify the definition and role of the Thames as an area of nature conservation.	NO CHANGE	Consultee (EA)	The river Thames" status as a SMINC and SINC is identified in appendix B where there is a fuller discussion of the designated nature conservation sites in and adjoining the SPD area.
11	p.9	1.6.1	Remove reference to Design Guide.	Clarify wording	Officers	Delete para.1.6.1
12	p.82	Land use designations"	Update text to reflect planning history.	Clarify wording	Consultee	Delete: "Improvements to the Barge Dock P17c have not been implemented"
13		General	The SPD should not be used to assess forms of development other than public realm	NO CHANGE	Consultee (Kingston First)	Noted, however the public realm and other forms of development are interrelated, and cannot be considered separately. As such it is envisaged that this SPD could be used to inform and guide other types of development as they relate to the success, or otherwise, of the Riverside and the public realm.
14	Whole Doc	General	Confusion between Riverside Public Realm SPD and Riverside SPD.	Clarify wording	Consultee (Kingston First)	Updated reference 1.1.1. Add: "Is it known as the Riverside Public Realm SPD (or Riverside SPD for short)."
15	p.13	2.5.1	The SPD, by not making reference to the emerging Local Plan, fails to most accurately represent the current and emerging policy position.	Clarify wording	Officers/Consultee (Kingston First)	Add text with regard to emerging Local Plan. Add: "The Council will be preparing a new Local Plan"
16	p.10	2.1.1-2.1.2	Update reference to NPPF (July 2018)	Clarify wording	Officer	Add text with regard to revised and reissued NPPF. [replicate paras 7 and 8. The core planning principles no longer exist. Maybe use text from paras 91-100?. Para 124 as well?]
17	p.60-62	5.6	Clarify wording on how greenspace can be incorporated into Historic Wharves	NO CHANGE	Consultee (Kingston First)	Town Centre Proposals contains high-level and detailed proposals on integration of green space in the town centre.
18	p.51, 63, 75	Fig 47 & Fig 69 & Fig 90	Ensure alignment of proposed cycle parking provision with other Council initiatives.	Missing information	Officers	Bike Parking locations updated in line with the findings of the Cycle Parking Survey.
19	p.27	4.0	Suggested additional theme of "(...) riverside developments should not encroach on (or erode(?)) the river"	NO CHANGE	Consultee	Noted, the impact of "erosion" of the river is addressed, in different aspects under themes "Open Space and Active riverside", "the river providing a unique culture for Kingston" and "making space for water and biodiversity". The SPD sets out that the river is a resource with many diverse and often competing roles. The potential impacts and benefits of proposals will need to be considered (regardless of the applicant).
20		General	Heights assessment should be undertaken to provide further clarity on the heights of the buildings that are deemed to be appropriate at the river frontage.	NO CHANGE	Consultee (LBRuT)	Noted, however the focus of the Kingston Riverside Public Realm SPD falls upon public realm and open space. While it is acknowledged that the success of open spaces and other forms of (built) development are interrelated, and cannot be considered separately it is envisaged that the SPD should be used guide rather to curtail other types of development as they relate to the success, or otherwise, of the Riverside.
21	p.27	4.0.5	Concern there is a conflict between the aspiration of the different themes. Identify that "appropriate balance" is needed in developing and considering proposals.	Clarify wording	Consultee (LBRuT)	Noted, strengthen wording: (pp.27. 4.0.5) "Where there is potential conflict between the aims of these principles, appropriate balance should be struck"
22		General	Legibility of figures affect the clarity of the doc	Update formatting	Consultee (LBRuT)	Noted. Document format and layout to be investigated, to improve clarity.
23	p.23	Fig 16	SPD should document clubs and river users on the Richmond side, to give a fuller picture of river use.	Update information	Consultee (LBRuT)	Fig 16. Information on river users outside the SPD area to be updated and included in line with information supplied.
24	p.27	4.0.1	Text is oppositional and divisive.	Clarify wording	Consultee (LBRuT)	Text revised to reduce opposition statement re: Richmond and Kingston"s current roles. Proposed text: "Hampton Court, Kew and Richmond Park, were developed as formal landscapes with specific functions. Kingston's Riverside has evolved organically over recent decades from a place of industry and private ownership to a vibrant, public space for the town's people to enjoy."
25	p.32	4.3.4	Better define what we mean by "new interpretation materials"	NO CHANGE	Consultee (LBRuT/Kingston First)	Noted, no change. Interpretation materials relates to methods and tools used to reveal historic or other interest which is not readily appreciated, including notice boards or artistic installations. This is picked up in para 4.3.4 and further included in 5.6 "Kingston"s Historic Wharves & Market Town proposals". The detail as to how this is taken forward is not the scope of this SPD.
26	p.32	4.3.5 & 4.5.3	Greater clarity and support statements elsewhere in the SPD, namely para 4.5.3 which seeks to manage the impacts of such activities.	Clarify wording	Consultee (LBRuT)	Noted. Text change add: "to be located outside of the riverside area, taking advantage of facilities across the town." and "Increased leisure use or events on the riverside must consider the impact on adjacent residential areas, and the river itself"
27	p.36	4.5.3	Greater clarity and support statements elsewhere in the SPD, namely para 4.5.3 which seeks to manage the impacts of such activities.	clarify wording	Consultee (LBRuT)	Noted. Text changed add, "...actively managed in the Riverside to minimise negative impacts, to rebalance..."

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28	p.32	4.3.5	Greater clarity and link Movement/connectivity with wider themes.	clarify wording	Consultee (LBRuT)	Text changed "that potential facilities for commercial leisure cruises or for high-quality space for visitor mooring should only be considered in locations where they do not harm the character, openness and views of the river (by virtue or design); they do not interfere with the existing recreational use of the river, riverside or with river navigation; and that their development provides a benefit to the wider community."
29	p.37	4.5	Greater clarity and link Movement/connectivity with wider themes.	clarify wording	Consultee (LBRuT)	Add "...and to the western bank"
30	p.36	4.5	Para. should be titled 4.5, not 4.4	Wrongly titled.	Consultee (LBRuT)	Update text
31	p.38	5.0.2.3	Should be titled "Town End to Ravens Ait" not "Queens Promenade"	Wrongly titled.	Consultee (LBRuT)	Update text
32	p.44	5.2.1	Strengthen wording with regard to further large buildings in the Riverside SPD area.	NO CHANGE	Consultee (LBRuT)	Noted . No action. The focus of the SPD is on public realm. While the relationship of buildings to public realm is critical to the success of both, the SPD does not seek to give guidance on these aspect of built development beyond their demonstrable impact.
33	p65	Fig 37 & Fig 71	Concern about the detailed impact of extending mooring at Canbury Gardens, and their impact in light of LBRuT policy L19	NO CHANGE	Consultee (LBRuT)	Noted
34	p.47	O1	O1 should read "GoCycle improvements."	NO CHANGE	Consultee (LBRuT)	Noted, the proposed green link between the river and the station is only partly delivered by the Go Cycle programme.
35	p.47	O8	Strengthen wording with regard to character and quality of proposed buildings in the riverside area.	Clarify wording	Consultee (LBRuT)	Text changed: "Any building must be of high-quality and reflect the scale and character of local boathouse architecture".
36	p.52	5.4.5.	Ensure clarity through continuity of reference to relevant K+20 policy position.	Clarify wording	Consultee (LBRuT)	add "significant impact on the character of the area and must be in line with K+20 Policy K9 and K10"
37	p.82	Appendix B	Further important views are not referenced within the SPD.	Clarify wording	Consultee (LBRuT)	Views: Policy K9 of the K+20 Kingston AAP identifies and safeguards (the following) views and panorama within the town centre. "Add: "The Views Study" (2018) notes a number of important and highly important views to, from and along the riverside, on both the east and west banks. Views are both static and kinetic, point to point and panoramic."
38	p.67/72	Weakness/proposal	Greater clarity over the use of paths/choice at Town End is needed to stop conflict of uses along Ports Road.	Clarify wording	Resident	Add; "W4. Confusion for pedestrians heading south and access to lower paths to avoid conflict with dedicated cycle lane"
39	p.46	Fig.41	Image(s) within the SPD contain apparent mooring violation, without this being referenced.	Update image	Resident	Update image Fig.41
40	p.29	4.1	SPD fails to mention the competitiveness and strengthen KTC offer and independent traders	Clarify wording	Portal	The public realm SPD seeks to support the operation of the town centre, including "the diverse retail offer of the town."
41	p.30	4.2	Promote additional slipways along the length of the thames	NO CHANGE	Portal	The SPD does not seek to promote additional slipways, but support use and access to existing slipways.
42	p.32	4.3	Opportunity for more housing in the riverside area	NO CHANGE	Portal	Identifying sites for housing is not within the scope of the Public Realm SPD.
43	p.34, 35	4.4.1 & Principle 4	Take opportunity to increase "native" biodiversity along the length of the riverside.	Clarify wording	Portal	4.4.1 "(...) biodiversity along the length of the riverside, including within the green spaces of(...)" & Principle 4 (bullet 2) "Create habitats for native species, and"
44	p.35	4.4	Making Space for water must include; planned active water management, and support the use of permeable paving/materials to reduce surface runoff	Clarify wording	Portal	Add: "Principle 5: Support measures to manage excess water including the use of attenuation and permeable paving."
45	p.71-2	Fig.90 & 5.9	Support for accessible access between the two banks (east and west) from Queens Promenade to Home Park (and/or Ravens ait)	Clarify wording	Portal	Strengthen text with regard to accessibility of any proposed connection between Ravens Ait and adjoining banks. Fig.90 Add "accessible" & 5.9 add "accessible"
46	p.32	4.3.3	The SPD must consider how the riverside area operates outside of summer season.	Clarify wording	Portal	Strengthen text with regard to the use of the riverside at different times of day/week/year. Add 4.3.3 "(...) exploited. However, the to fulfil its potential the riverside must function all year round and at different times of the day/week."
47		General	The SPD privileges pedestrians and cycles over cars	NO CHANGE	Portal	One of the primary aims of the SPD is to reclaim the riverside for pedestrians and other cyclists for movement and enjoyment.
48	p.37, 59 & 61	Connectivity and movement network	Cycle links north South important (inc. beside JLP)	NO CHANGE	Portal	This principle is already identified within the SPD (pp.37). Strengthen wording of proposals (pp.61)
49	p.37	Connectivity and movement network	Provide a minimum width along the riverside (2.4m) inc. for pushchairs/wheelchairs	NO CHANGE	Portal	The detailed design of spaces and projects should be designed to meet the most appropriate design standards at that time.
50	p.40, 48-49	5.1.8 & 5.3	Cycling in Canbury Gardens should be limited to those paths where cycle connections are most useful.	Clarify wording	Portal	Remove reference to "all paths" to "selected paths". Para. 5.1.8 & 5.3
51	p.48-49	5.3	Differing opinions on the location of the bandstand within Canbury Gardens	NO CHANGE	Portal	Noted. To be reviewed as part of any masterplan or detailed plan for the gardens
52	p.48-49	5.3	Differing opinions on the value of increasing tree cover in Canbury Gardens	NO CHANGE	Portal	Noted. To be reviewed as part of any masterplan or detailed plan for the gardens
53	p.37	4.5	Differentiating between classes of cyclist is complex, and impossible to define. Therefore the use of terms such as "leisure cyclist" is confusing.	Clarify wording	Portal	"Leisure" cyclist is not a useful definition, therefore remove the word leisure to ensure clarity. Principle 3 "Leisure Cyclists will only be encouraged to make use of the riverside walk where its is wide enough (...)"
54	p.43, 49	Fig.35 & 5.3	Address light pollution in Canbury Gardens (tennis club)	NO CHANGE	Portal	The intrusive lighting from the tennis club is already address as both a weakness and addressed in the proposals for Canbury Gardens.
55	p.43&49	Fig.35 & 5.3	Consider the needs of dog owners/walkers and the role of Canbury Gardens	NO CHANGE	Portal	Noted. To be reviewed as part of any masterplan or detailed plan for the gardens
56	p.43&49	Fig.35 & 5.3	Test reality of allowing areas of Canbury Gardens to flood, and investigate using space on the other side of the river to accommodate flood waters too.	NO CHANGE	Portal	Noted. To be reviewed as part of any masterplan or detailed plan for the gardens
57	p.41, 43&49	Fig.27 & Fig.35 & 5.3	Incorporate Community Garden and the opportunity for productive growing in the landscape into commentary on Canbury Gardens	Clarify wording	Portal/Consultee	Noted. Text in support of the Community Garden and food growing to be included in relevant sections of the SPD, as supported by draft London Plan Policy 8.8.1. Add: "Fig.27 update:, "S6; Community Garden and growing space", & O7 "Intensify planning for pollinating specie, at appropriate locations and work with Community Garden to increase productive use of gardens for growing"
58	p.43&49	Fig.35 & 5.3	Consider detail on how biodiversity will be increased and the feasibility of proposals	NO CHANGE	Portal	Noted. To be reviewed as part of any masterplan or detailed plan for the gardens
59	p.43&49	Fig.35 & 5.3	Differing opinions on the value of the formal/informal character of the Gardens	NO CHANGE	Portal	Noted. To be reviewed as part of any masterplan or detailed plan for the gardens

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60	p.55&61	Fig.58 & 5.6	The frontage and lift/stair/underpass at John Lewis (including former nightclub) are unattractive and block movement from the riverside up to Clarence Street.	Clarify wording	Portal	pp.55 W2 "Poor connection north and to the south of Kingston Bridge (...)", "W4 Current lack of activity on embankment river edge outside John Lewis and the former nightclub" & "W8 Poor connection east and west from Clarence Street to the Riverside". Pp.61 "Expand food and drink, cultural, leisure and heritage uses. Reactivate John Lewis riverside terrace, Turk's landing building and the former nightclub under Kingston Bridge with active (...)"
61	p.56, 59, 61	Fig.68 & 5.6	Potential conflict between residents of the town centre and events/activities which could lead to disturbance.	Clarify wording	Portal	Strengthened wording. Add: 5.5.9 "(...) public events. Additional activities should acknowledge and be responsive to the needs of town centre residents". Pp. 59 Threat "Potential conflict between commercial activity, leisure use and residents as well as residential/visitor moorings." Pp.61 "Intensify activity (...) permitted. Activity should acknowledge the needs of town centre residents."
62	p.59	Fig.68 & 5.6	Vehicle access from High Street to Eagle Brewery Wharf is private property.	NO CHANGE	Portal	Noted.
63	p.55	Fig.58	Thames Side has a particular character that should not be ignored or lost.	Clarify wording	Portal	Add: O9 "Reinstate the historic industrial character of Thames Side".
64	p.48	5.3	Dock use at the Barge Dock must be retained (in line with requirements of K+20)	Clarify wording	Portal	Add: "Any building at the Barge Dock should reflect the scale and character of local boat house architecture. The building must support the leisure use of the Gardens (including potentially a cafe) associated with increased public access to and boat use of the adjacent inlet and the continued use of the dock, in line with the requirements of Policy P17."
65	p.23, 32-3, 61, 72	Fig.79 & Fig.89 & 5.9	Differing opinions on the provision and control of moorings (charges and duration of stay). The primary concerns being (1) the impact of poorly managed moorings on the appearance of the riverside or (2) supporting the success of mooring by addressing the lack of provision of adequate facilities for mooring and leisure craft.	NO CHANGE	Portal/Consultee (Kingston Soc.)/LBRuT	Moorings add to the character and vibrancy on the riverside and town centre. Issues affecting the use of moorings can best be addressed through a dedicated moorings strategy, to address use and management issues. Para. 3.6.1 states that the London Plan, Core Strategy and K+20 AAO support the increased use of the river for recreational uses. The SPD is in line with these documents in supporting these activities.
66	p.69, 71, 73	Fig.89 & 5.9	Consider Ravens Ait and the scout/community use as a Community Asset.	NO CHANGE	Drop-in	It is the role of local communities to identify these assets and make a formal application through the Council to have the asset designated.
67	p.31, 67	4.2 & Fig.79 & 5.9	Consider the management and maintenance of landscape along Queen Prom (inc. benches/flower beds/railings)	Clarify wording	Portal	4.2 add " (...) localised character. With consideration given to the long term management and maintenance of public space to ensure its durability." & Fig.79 Add "T2: The potential for lack on ongoing maintenance to affect the quality of the riverside".
68	p.31, 67, 72	4.2 & Fig.79 & 5.9	Consider safety at night (inc. the use of low level lighting)	Clarify wording	Portal	4.2 add "Public realm enhancements will improve the quality and safety of the environment (...)". & Fig.79 "W 4: Levels of lighting affect feelings of safety". & 5.9 NO CHANGE
69	p.34,68-71, 73 and Appendix C		Differing opinions on the value of Seething Wells as a wildlife habitat. More info needed.	NO CHANGE	Portal	Noted. Further investigations into the exact nature and value of this habitat to be considered alongside any detailed proposals for the area, or adjoining sites.
70	p.3, 27	Exec. Summary & 4.0.3	Lack of clarity over the use of the term "Arcadian" in the Kingston context.	Clarify wording	Portal	Noted. Reference in Appendix B to be made at the start of the document. P.3 "Appendix B describes and explains Kingston" position and role in the Arcadian landscape in greater detail."
71		General	Ensure adequate provision of clean and accessible public toilets.	NO CHANGE	Portal	Noted. Addressed in Equalities Impact Assessment.
72	p.48, 49, 55, 60	5.3	Remove cars/parking from all riveredge spaces; Thames Side car park is a negative presence, cars in north Canbury Gardens and servicing on Thames Street are disruptive to the quality of the space and all discourages cycling on these routes.	Clarify wording	Portal	Support noted. This suggestion is already accommodated by the proposals for Canbury Gardens and Town Centre area proposals. pp.49 Northern Entrance Proposal: "on" - "of"
73	p.72,74	5.9 & 5.9.1	Queens Promenade has a peaceful and relaxing character, which is distinct to the riverside in the town centre. Ensure this quality is not lost through promoting incompatible activity and uses.	Clarify wording	Portal/Consultee (Kingston Soc.)	Clarify wording of Para. 5.9.1 with regard to preserving the quality of Queens Promenade. "Queens Promenade offers a distinct environment from the activity of the town centre." "A series of new activities will provide interest along the route, while complementing the more restive character of this portion of the riverside".
74	p.71, 73	5.9 & 5.9.1	Concern about potential direct or indirect impacts on active river use, due to changes in landscape or riverbank, including the location of osier beds at Ravens Ait and the potential impact on width and safety of river use.	Clarify wording	Portal	Fig.89: "O1: Replant reed beds on island where conflict with river uses is minimised". & 5.9 "Replant traditional osier beds where conflict with river users is minimised"
75	p.71, 73	Fig.89	A destination already exists at the Southern end of Queens Promenade.	Clarify wording	Portal	O4 "Support the success and growth of a destination at the end of Queens Promenade"
76	p.71, 73	Fig.89	Concern over appropriate access and appreciation of Seething Wells while not disrupting the habitat.	Clarify wording	Portal	O2: "Provide sensitive public interface with filter beds." Proposal: "Potential hide or viewpoint over Seething Wells habitat with visitor interpretation"
77	p.67, 71, 72	Fig.79 & 5.9	Concern that planting of trees in the riverside area will impact on wind (thereby negatively impacting on sailing), sunlight and views.	Clarify wording	Portal	Noted. 5.9: add "Implement arboretum planting (...) with consideration on impact on sailing" Clarify location "to be located between Portsmouth Road and the Promenade"
78		General	Concern about misuse of proposed spaces, including use by skateboarders.	NO CHANGE	Portal	Noted. However, consideration needs to be given to ensure public areas can be enjoyed by everyone, including people who enjoy skateboarding.
79	p.3	Character Areas	Clarify the meaning of "nonessential activity"	Clarify wording	Portal/Consultee (Kingston Soc.)	Noted. Pp.4 (para2.) "Additional space will be created by the removal of non essential activities; relocation of activities which do not support or in other way have a direct connection with the riverside"
80	p.8	1.3.4	Commentary that the SPD lacks clarity on how proposals will be achieved.	NO CHANGE	Portal	1.3.4 sets out the the role of the SPD in supporting the delivery of projects.
81	p.71	Fig.89	Identify the historic interest of the electric substation at Westfield Landing.	Clarify wording	Portal	Fig.89 "Reveal the historic interest of the substation at Westfield Landing". The historic and architectural interest of the substation can be considered in a review of the Riverside South Conservation Area.
82		General	Concern the SPD will open the door to inappropriate development.	NO CHANGE	Portal	Chapter one sets out how the SPD will sit alongside other planning documents, as part of a wider consideration for dealing with proposed developments. The Public Realm SPD does not identify development sites.
83	p.34	4.4.7	Concerns about considerate construction in carrying out works in the public realm and their impact on residents and wider riverside.	Additional wording	Portal	Add: "4.4.7 Ecosystems are often susceptible to changes and disruption. Any works carried out in the riverside area need to ensure they are considerate to both local resident populations and wildlife."
84		General	Commentary that the SPD makes proposals for private land, outside the ownership of the Council.	NO CHANGE	Portal	SPDs cannot be used to allocate sites for particular uses, this can only be done through the Local Plan. SPDs can however provide guidance on how development on both public and private land could be brought forward, and the principles by which such proposals would be assessed.

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85	p.43, 48, 51	Fig.47	Potential conflict between fishing and riveruse should be acknowledged and avoided.	Clarify wording	Consultee	Noted. To be reviewed as part of any masterplan or detailed plan for the gardens. And add, Fig.47 "T1: Relationship between fishing, and vegetated edge and river users"; & 5.3 "Provision of fishing platforms at appropriate points along the riverbank, while avoiding conflict with river users"
86	p.32-33	4.3	SPD fails to identify the opportunities presented to work with existing cultural institutions to support this ambition.	Clarify wording	Consultee	pp.33 Principle 2 Add: "riverside walk as a stage, working with existing institutions to encourage more cultural events on the river."
87		General	Concern about the provision of water and wastewater infrastructure to support new development.	NO CHANGE	Consultee	Noted, however, the focus of the Kingston Riverside Public Realm SPD falls upon public realm and open space. While it is acknowledged that the success of open spaces and other forms of (built) development are interrelated, and cannot be considered separately