

Directorate of Place

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10th April 2014

Consultation on: Further Alterations to the London Plan

Please find enclosed this Council's consultation response to the proposed FALP. The three key issues raised in this Council's response are:

- support for the Crossrail 2 Regional option, which would trigger significant growth opportunities in Kingston Town Centre;
- the opportunity for Kingston Town Centre to be identified as an Opportunity Area; and
- the serious concerns with the proposal to disperse student accommodation for Central London institutions into areas of Outer London that are remote from the place of study.

If you have any questions in respect of this response please contact the Council's Development, Planning and Regeneration team via: dpr@rbk.kingston.gov.uk or 020 8547 5002.

Yours sincerely,

Councillor Simon James
Lead Member for Place, Sustainability and Sport

Encl – RBK Response to the FALP consultation

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<p>Increase in Housing Targets Policy 3.3 and Table 3.1.</p> <p>The proposed 643pa target for RBK</p>	<p>The Council has recently reviewed the SHLAA sites and identified three sites that for reasons set out below are no longer available for residential development in the target setting period and should be removed/re-phased in the Mayor of London's Strategic Housing Land Availability Assessment. The sites and the reasons why they will not come forward for housing are:</p> <ol style="list-style-type: none"> 1. The North Kingston Centre - the whole of the site is needed to deliver a 6 FE secondary school. No scope for residential. 2. Moor Lane – the site has been identified for an 'Achieving for Children project' under CLG's 'Transformation Challenge Award' that will provide learning facilities for children with disabilities. There is only very limited scope for some specialist residential ancillary to the main use. 3. Wood St – the office building has recently been the subject of a large office occupier let (to Saipem, an oil company) on a 15 year lease. The letting significantly reduces the opportunity for the site to come forward for residential in the short to medium term. In the longer term the building and the block in which it is situated (opposite Kingston Station) has significant potential for mixed use redevelopment, which would be greatly enhanced if the Crossrail 2 Regional option were to be confirmed as the preferred route. <p>The effect of removing these sites from the SHLAA target setting period will be to reduce RBK's annual delivery target by 31 (from 643pa to 612pa).</p> <p>The uplift in the housing targets will have a significant impact on the need for new and improved infrastructure provision, much of which will have a sub-regional dimension such as healthcare. The FALP needs to make clear that the Mayor of London will work with the boroughs to deliver sub-regional infrastructure needs, through the Mayor's London Plan Implementation Plan. Policy 3.3 and the complementary policies should make this clear.</p>
<p>The Need for Specialist Student Accommodation Paras 3.53A</p> <p>A more dispersed distribution of future student accommodation provision away from Central London</p>	<p>We are concerned that this proposal could encourage developers to disperse student accommodation for Central London institutions in areas of Outer London that are remote from the place of study and in locations where there is already a pressing need to provide accommodation for local institutions. It is not the case that student halls in Outer London necessarily provides more affordable accommodation; rents in the privately owned halls in Kingston average between £250/£290pw.</p> <p>The proposal runs counter to building sustainable communities – places where people can live and in this context study, and also runs counter to the London Plan policy objective of building lifetime neighbourhoods. Sustainable communities should not rely on the need for students to commute long distances between place of study and the place they live. There are already huge issues with</p>

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	<p>students being viewed by the wider community as a transient population, and the FALP proposal will only serve to reinforce this problem, and undermine community cohesion and ownership of place.</p> <p>Kingston is one of just a small number of outer London boroughs that host a University. Approximately 21,000 students are enrolled at Kingston University, and there is an acknowledged need for a further 2,500 student bedspaces to accommodate first and third year students requiring places in halls of residence. Addressing this significant under-provision is a priority set out in the Council's Core Strategy, and the Borough should not be required to also accommodate students attending Central London institutions.</p> <p>The need to address Kingston University's significant student bedspace shortage is already putting severe pressure on the Borough's limited land availability to meet its conventional housing needs. There is a lot of local community concern about the problems that emanate from the 'studentification' of parts of the Borough by Kingston University students, and the impact this has on availability of housing for residents. The FALP proposal would potentially multiply this problem undermining social cohesion.</p> <p>The Plan should be strengthened to make it clear that where need is identified to provide student accommodation for local educational institutions in Outer London (as in the case of Kingston), this is the need that must be addressed and not the needs of Central London institutions.</p>
<p>The Need for Specialist Student Accommodation Paras 3.53B</p> <p>Proposal to seek to deliver "<i>an element</i>" of student accommodation that is affordable.</p>	<p>The Council supports the proposal for promoters of student accommodation schemes that do not have an undertaking with specified academic institutions to seek to deliver "<i>an element</i>" of student accommodation that is affordable.</p> <p>The FALP should clarify what is meant by both "<i>an element</i>" and indeed what is "<i>affordable</i>". 'An element' needs to be a meaningful proportion – we suggest 50% would be reasonable, in line with affordable housing requirements. Affordability needs to be defined by consensus at the Mayor's Academic Forum. Locally a rate of £150/week is considered to be affordable.</p>
<p>Opportunity Areas and Areas for Intensification Policies 2.13 and para 6.18B; and Annex 1.</p>	<p>The Council proposes that Kingston Town Centre should be identified in the FALP as an Opportunity Area.</p> <p>Evidence indicates that Kingston Town Centre is capable of accommodating significant new job opportunities and new housing of a scale broadly comparable to that identified for Bromley Town Centre (a centre proposed for inclusion in the FALP as an Opportunity Area).</p>

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	<p>The scale of ambition set out in the Council's Kingston Futures programme is evidence of the Borough's plans for regeneration. The plans for Kingston Town Centre include in the region of 1,500+ new homes and up to 54,000sqm net of comparison goods retail floorspace and up to 6,400sqm net of convenience goods floorspace up to 2028¹. There is a significant complementary need for additional leisure and commercial floorspace in Kingston Town Centre as set out in both the FALP Table 1.1 and the Council's latest Economic Analysis Study. The Study points to a Borough-wide floorspace requirement for B1 uses of up to 101,000sqm net that could generate as many as 6,660 B1 jobs², a significant proportion of which will be located in Kingston Town Centre. Thus, the forecast is for significant jobs growth in office and the retail and leisure service sectors.</p> <p>The prospects for growth in Kingston Town Centre outlined above are evidenced by the considerable amount of developer interest in the town. This interest together with the recent investment in public realm schemes such as the Ancient Market Area and the planned £30 million Mini-Holland investment in the cycling network, and the prospect of Crossrail 2 coming to Kingston combine to clearly indicate that Kingston could deliver Opportunity Area levels of growth and investment.</p>
<p>Crossrail 2: Policy 6.4; Paragraph 6.18B</p> <p>Sets out a strong intent to promote and develop Crossrail 2</p>	<p>The Council supports the 'Regional' route option for Crossrail 2 that will deliver wider growth opportunities as well as delivering transport and accessibility improvements to a much wider part of the network than the 'Metro' alternative.</p> <p>South-west London is comparatively poorly served by public transport. Kingston town centre is over reliant on the bus, with relatively poor train accessibility and no tube or tram connections. The relatively poor transport position is a negative factor in business and investor decision-making, and Kingston currently loses out to other better connected locations such as Wimbledon and Croydon where there has been significant private and public investment in recent years.</p> <p>The improvements to journey times (faster journeys to many central London locations), journey frequencies (service frequency would triple to 12 trains per hour under the Regional option) and connectivity for Kingston town centre, but also for the Borough's three other town centres, will deliver significant economic growth potential.</p> <p>Offices and hotels are particularly affected by poor accessibility, and</p>

¹ Source: RBK Town Centre Study, prepared by GVA Nov 2013

² Source: RBK Economic Analysis Study, prepared by NLP April 2014

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	<p>the step change in public transport provision offered by Crossrail 2 will open up significant opportunities for growth in these sectors in Kingston town centre. However, opportunity is not only in these sectors; there is scope for high density mixed use redevelopment including substantial residential accommodation in the town centre, and particularly on the eastern-side of the town centre, where there are a number of significant potential development sites – that could accommodate large scale redevelopment akin to the expectations for Opportunity Areas. These sites could be unlocked by the step change in public transport provision provided by Crossrail 2, and help deliver the Mayor’s jobs and housing growth ambitions.</p> <p>Whilst the Council warmly welcomes the Crossrail 2 proposal we do seek clarification that existing sub-urban frequencies (eg Waterloo to Chessington South and Waterloo to Shepperton) will not be reduced as a result of Crossrail 2 services</p> <p>The issue of funding mechanisms for Crossrail 2 also needs to be addressed; it would be helpful if the FALP provided clarity on how Crossrail 2 could be funded. For example, the Mayor’s Community Infrastructure Levy should be used as part of the approach to funding, in line with the approach taken to fund Crossrail 1. However, the MCIL levy rates will need to ensure that development is not rendered unviable in Kingston Town Centre and more generally across the Borough. It is not appropriate or acceptable to seek to fund Crossrail 2 through development located in Green Belt, MoL or other landscape designations.</p>
<p>Housing Policy 3.8(B(a1))</p> <p>Support for the institutional private rented sector in addressing housing needs</p>	<p>The Council supports this proposal.</p> <p>RBK’s objective, as expressed in the SW London Intermediate Housing Strategy, is to target intermediate housing at households entirely excluded from the market in SW London. RBK is currently looking to develop a landlord incentive to bring more rented properties onto the market. The private rented sector is critical in helping local authorities to provide affordable housing and reduce homelessness and costs.</p>
<p>Housing Paragraphs 3.61-3.62</p> <p>Widening the eligibility of Affordable Housing / Rent to include larger family households, with salaries of up to</p>	<p>The Council objects to the proposed widening of eligibility.</p> <p>Widening the eligibility of Affordable Housing/Rent to include larger family households, with salaries up to £80,000, moves away from targeting assistance to where it is most needed.</p> <p>Kingston provides home ownership opportunity for Borough residents with income levels between £19,000 and £30,035, well below the existing upper limit, and the even higher level proposed. Some developers may see a raised upper threshold as an opportunity to devise schemes that cater for households earning just below that</p>

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£80,000, up from £64,300	<p>threshold, and cite this as a reason not to comply with local (borough or sub-regional) affordability criteria.</p> <p>The Council therefore requests this proposed change is not taken forward.</p>
<p>Town Centres Policy 2.15D and Policy 4.8B</p> <p>Support for proactive management of town centres</p> <p>Look for new and innovative forms of retail activity</p>	<p>The Council welcomes support for the proactive management of town centres, particularly given the structural changes in the ways retailing is undertaken and the impact this will increasingly have on how town centres operate. The Council supports the Mayor's aim for centres such as Kingston to consolidate their position as key shopping, leisure, cultural and commercial destinations through planned re-development including multi-channel shopping facilities and complementary activities.</p> <p>The Mayor's strategic direction accords with the Council's Kingston Futures programme, which sets out a proactive approach to lead the redevelopment of Kingston Town Centre. The Kingston Futures work that is currently on-going involves proactive engagement with local landowners, and the preparation of briefs to guide redevelopment within the town centre.</p> <p>Kingston is well placed to attract and develop new and innovative forms of retailing. The town centre is Metropolitan in scale, there is considerable developer interest from national firms as well as local developers and critically it has the knowledge and research resource of Kingston University to call on. There is also a demonstrable need for new Grade A office floorspace in Kingston Town Centre.</p> <p>A recently prepared retail need assessment identified the principal gap in Kingston's retail provision as the higher quality end of the retail market where there is considerable unmet demand for representation in the town. However, in addition and as set out in the FALP, retail continues to evolve, and there will be a need to accommodate new innovative forms of retail floorspace that will service the changing requirements of shoppers operating in this electronic online shopping age. Kingston, because of its profile is a prime candidate to host this type of innovation.</p>
<p>Town Centres Policy 2.15D c2</p> <p>Proposal for diversification of uses away from retail functions in the mid-sized centres</p>	<p>Whilst in principle we understand and support the strategic aim of this policy shift, which is to reinforce poorly performing centres through the replacement of under-utilised retail space with residential. However, we are concerned that if applied as a blanket approach, there is a risk that the better performing more vibrant mid-sized centres, such as the successful District Centres of Surbiton, New Malden and Tolworth in this Borough, could lose retail units to residential. Loss of retail units, for which there is a demand, to residential use would undermine a centre's attraction to shoppers and investors, and harm the centre's vitality and viability and its role at the heart of the community.</p>

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	<p>The FALP policy change needs to be caveated to require that changes of diversification will only be supported where there is clear evidence that the centre is underperforming and there is clearly an over-supply of retail floorspace.</p>
<p>Town Centres Policy 4.8B Paragraph 2.72A</p> <p>Proposes that Council's should monitor, manage and control clusters of uses in town centres</p>	<p>The Council supports the control of clustering uses in town centres where these create a negative impact. The intrusion on the 'high street' of clusters of uses such as betting shops and fast-food takeaways can be detrimental to the wider development of the local economy. For instance, in New Malden District Centre there is soon to be a sixth betting shop. When retailers are replaced by such uses, the opportunities for local entrepreneurs and other businesses to establish, and the overall attraction of the high street could be diminished.</p>
<p>Town Centres Table A2.1</p> <p>Proposed downgrading of office employment prospects in Kingston Town Centre from a category "A/B" rating to category "B".</p>	<p>The Council expresses serious concerns over the proposed downgrading of office employment prospects in Kingston Town Centre. This is very unhelpful and does not accord with the local evidence that demonstrates demand for new high quality office space. For example Oil company Saipem has recently taking up occupancy of 8,200 sqm of high quality town centre office space bringing 800 employees to the town. Neither does the proposal accord with the 2014 Borough Economic Analysis Study, prepared by NLP that like the FALP points to significant growth prospects. This need for new high quality office space has been compounded by the considerable loss of office space to residential across the Borough under the recent changes to permitted development rights. There is evidence that the lack of high grade office space in Kingston Town Centre is not only a bar to new entrants, it is also forcing some established businesses displaced by change of use to residential to move out of Kingston.</p> <p>Critically in terms of strategic policy the downgrading sends the wrong signal in the context of the transformational prospects that will be delivered through the prospect of Crossrail 2, and the Council's proactive Kingston Futures delivery strategy. Such a downgrading is contrary to the evidence, and will only serve to undermine the potential of these strategic initiatives and the future growth prospects of Kingston Town Centre.</p> <p>The Council therefore requests this proposed change is not taken forward.</p>
<p>The Economy Policy 2.15C Policy 4.2(A(e)) and Paragraph 4.13A</p> <p>Proposes that the</p>	<p>The Council welcomes the undertaking from the Mayor to monitor the impact of the relaxation of permitted development rights - from office to residential (use class B1 to C3). This Council's experience is that whilst the change is delivering housing units, the quality of that housing is substandard, and because of the lack of planning control and lack of infrastructure contributions the change is creating poor</p>

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<p>Mayor will monitor the impact of the Government relaxation of permitted development rights</p>	<p>quality places.</p> <p>The Council requests that the Mayor also closely monitors the soon to be introduced A1/2 to C3 permitted change. In this Council's view the Government's relaxation of the rules runs counter to building sustainable communities – places where people can live, work and shop, and counter to the London Plan policy objective to build lifetime neighbourhoods.</p> <p>The Council urges the Mayor to take a strong and robust position in seeking to limit the relaxation to the current three year period with no extended period.</p>
<p>The Economy Table 1.1</p> <p>Employment growth in Kingston forecast to rise from 78,000 in 2011 to 91,000 in 2036, providing 13,000 additional jobs.</p>	<p>The Council supports the employment forecasts as set out in Table 1.1. The Borough's very recent Economic Analysis report identifies that employment growth in the Borough averaged 14% over the past 16 years with the main focus of job growth in the administration and support, retail, education and professional services sectors. The report, prepared by NLP forecasts that these sectors will continue to expand over the next 15/20 years, and additionally significant growth is also forecast in the creative industries sector.</p> <p>There is significant potential to expand the creative industries sector (arts, performance, design, film, culture & leisure, software and technology/media) in Kingston, particularly given the activity at Kingston University and Kingston College. Creative industry businesses initially require a minimal footprint with room to grow as they become successful, scale up to 'production' and add staff. These industries develop fast and have the potential to increase economic growth, employment and attract other complimentary supply businesses into an orbit around them.</p> <p>Kingston is well placed to expand its creative industries sector, which will help diversify the Borough's employment base, and making the Borough less reliant on retail, public sector and education employment opportunities. The Council are keen to pursue an 'Innovation and Growth Hub' in one of the Kingston redevelopment opportunity areas.</p> <p>Whilst the majority of future employment floorspace demand is likely to be for small, inexpensive work spaces or work units, there will continue to be demand for/from larger employers to locate sizeable workforces in single buildings in the Borough. Oil company Saipem have recently relocated to the Kingston Town Centre bringing 800 office-based employees, and there have been other such enquiries from companies looking to accommodate hundreds of staff centrally on one site with all the ancillary facilities - staff restaurant, fitness facility and car park etc. Additionally, the NLP report highlights a need for more mixed use/affordable workspace for business start ups and small & medium sized enterprises. The local Chamber of Commerce has also identified this opportunity.</p>

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<p>The Economy Policy 4.10 and Paragraph 4.53</p> <p>Support for the promotion of start-up, co-working and grow-on space.</p>	<p>The Council supports this change.</p> <p>The opportunity for growth from start-up units to larger space as growth comes (with a long-term financial commitment) is important in developing local businesses from micro start-ups to small/medium sized companies with resulting bigger employment opportunities and would be good for furthering broad-scale economic development.</p> <p>There is already a comparable policy in place in the London Plan in respect of another key affordability issue - small shop units – that encourages Councils to work with developers to provide affordable small shop units suitable for new start up retailers. This proposal to assist start-up business space will compliment the affordable shops policy and is supported.</p> <p>There is an emerging proposal within the South London Partnership to consider the creation of a south London Innovation Centre, designed to promote spin-out and commercialisation through targeted incubation, such as expert support, partnership development or availability of appropriate space. Kingston Council is leading on this work and will keep the GLA informed of progress.</p>
<p>The Economy Paragraph 2.36</p> <p>A more flexible approach to the provision of office parking standards in neighbourhoods with low public transport accessibility levels</p>	<p>The Council welcomes this proposal because it will go some way towards 'levelling the playing field' with office locations in neighbouring Surrey Districts, where parking standards are much more relaxed. A more flexible approach to town centre parking in outer London would remove a major disincentive to office development in areas of the Borough where public transport is comparatively poor.</p>
<p>Climate Change Policy 5.4A</p> <p>New policy on strategic investment in power</p>	<p>The Council welcomes the support for the pursuit of low carbon decentralised low carbon energy opportunities, and points out that these measures will contribute to improving security and efficient use of energy (in turn reducing CO₂ emissions) via demand side management and low carbon decentralised low carbon energy generation. Developers working with the energy providers will be accountable for future investment in the energy infrastructure to service new development, and this change should be a powerful driver towards greater energy efficiency in buildings thus reducing overall demand.</p>
<p>Climate Change Policy 5.4A</p> <p>Where land is required for energy</p>	<p>The Council supports the encouragement for boroughs to allocate suitable sites for low carbon heat generating infrastructure.</p> <p>This Borough has recently prepared a Decentralised Heat Network masterplan that indicated potential for a viable heat network based on</p>

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infrastructure, boroughs should allocate suitable sites	key commercial, civic and educational heat receptors. The work is currently progressing to the feasibility stage where the opportunities for energy station(s), pipe networks and heat receptors will be explored in more depth.
Climate Change Table 5.3 New borough-level waste management targets	The Council welcomes the new more realistic targets for the management of municipal solid waste arisings, and commercial and industrial waste arisings.
Sustainable Transport Policy 6.9; and paragraph 6.45 Promotes cycling mini-Hollands	<p>The Council enthusiastically supports the Cycling mini-Hollands initiative, and the changes to the cycling policy that are positive for Kingston. This includes the implementation of a network of cycle routes that are safe, convenient and attractive to users. The changes reflect this Council's ongoing work with TfL to deliver various infrastructure projects to encourage cycling and improve associated safety. Indeed this Council has been successful in a bid to the Mayor for mini-Holland funding with the aim of transforming cycling in the Borough through substantial investment concentrated in specific areas. The Council would also consider supporting well designed extensions to existing Cycle Superhighways (routes 7 and 8) linking with the Borough.</p> <p>The Council is committed to delivering a step change in cycling provision in support of the growing number of cyclists in the area. This Borough is making good progress towards meeting the Mayor's aim to increase the cycling mode share to 5% across London (Kingston's share is now almost 3%, the third best performing outer London borough). The securing of additional cycling infrastructure is a matter of priority to ensure targets are met.</p>
Public Houses Policy 4.8; and paragraph 4.48A Encouragement to prevent the loss of "valued community assets (specifically pubs) where justified by robust evidence"	<p>The Council supports the recognition of the important role played by public houses in the social fabric of communities. Where there is evidence of need, community asset value and viability of pub use the Council would support the retention and enhancement of public houses.</p> <p>The proposed reinforcement of policy in the London Plan compliments Policy DM24 in the Council's Core Strategy.</p>