

Lichfields comments

Aviva Investors (simon.green@avivainvestors.com)

Page: [Policy GG2 Making the best use of land](#)

Section: [GG2](#)

Aviva Investors is a longstanding stakeholder and investor in the Royal Borough of Kingston upon Thames. It owns and operates the Bentall Centre and its associated multi-storey car parks, the Seven Kings car park and a collection of other smaller retail properties in Kingston town centre. Aviva Investors also own the Barwell Industrial Estate and adjoining land in Chessington.

Planning policy is very important to Aviva Investors as it can provide greater certainty in the planning and implementation of future investment.

Aviva Investors support Policy GG2 in principle which seeks to create high-density, mixed-use places that make the best use of land. Aviva Investors particularly support part (A) which seeks to *“Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites”*.

Aviva Investors welcome the allocation of Kingston as an Opportunity Area and the recognition within the draft Plan that the Borough’s network of town centres, with their good levels of public transport accessibility have been identified as areas capable of accommodating development and intensification to provide leisure, cultural and night-time activity, commercial and retail uses, as well as high density housing.

Aviva Investors, however, as owner of land (Mellow Stocks) to the south of the Barwell Industrial Estate in Chessington, which is located in the Green Belt, objects to part (D) which seeks to “*Protect London’s open spaces, including the Green Belt...*”.

Paragraph 83 of the National Planning Policy Framework (NPPF) states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. The Mayor has elected not to replicate or refer to the NPPF policy regarding development in the Green Belt in draft policy, opting instead to use simplified wording that is at odds with national policy and therefore may not enable the delivery of sustainable development consistent with policies in the Framework.

We comment on this further in relation to Policy G2 – London’s Green Belt.

Page: [Policy SD1 Opportunity Areas](#)

Section: [SD1](#)

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Aviva Investors welcome the allocation of Kingston as an Opportunity Area in Policy SD1 and Figure 2.5, which allocates 9,000 new homes and 5,000 new jobs to the Opportunity Area. Aviva Investors welcome recognition at paragraph 2.1.1 that “*Opportunity Areas are the capital’s most significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity*”. Aviva Investors welcome the commitment in Policy GG1 and paragraph 2.1.3 that “*The Mayor will provide the support and leadership to ensure Opportunity Areas deliver their growth potential. He will promote and champion the areas as key locations for investment, and will intervene where required so that an ambitious, imaginative and inclusive approach is taken to accelerate and realise their growth and development*”.

Opportunity Area status for Kingston will make a key contribution to the implementation of the Plan's objectives, by helping to facilitate sustainable growth and increase access to funding opportunities. This status is vitally important to help ensure that the town centre continues to be a vital and viable focal point for the Kingston community and able to serve the needs of a growing and more discerning population. Without Opportunity Area status, Kingston may not be able to achieve sustainable growth or compete effectively with other large centres which currently enjoy the status, and all the benefits it affords.

Aviva Investors can play a significant part in realising the growth and development potential of the Kingston Opportunity Area. By expanding and improving the existing offer in Kingston Metropolitan Centre, Aviva Investors can help provide for the needs of a growing population, alongside other investment proposed in the town centre, including Crossrail 2.

Page: [Policy SD6 Town centres](#)

Section: [SD6](#)

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Aviva Investors support the continued allocation of Kingston as a Metropolitan Town Centre in the draft Plan. As set out in Annex 1 (Town Centre Network) Metropolitan Centres *“serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically they contain at least 100,000 sq m of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings”*.

Aviva Investors support Policy SD6, in particular: part (A) and the criteria to promote and enhance town centres and their vitality and viability; part (C) which promotes the potential for new housing within and on the edge of town centres to be realised through higher-density mixed-use or residential development; and part (F), which seeks to promote the management of vibrant daytime, evening and night-time activities to enhance town centre vitality and viability.

Aviva Investors support recognition in the draft Plan at paragraph 2.6.2 that to continue to thrive, town centres will need to evolve and diversify in response to current and future trends, technology advances, consumer behaviours, and the development of the 24-hour city. The acknowledgement that *“This need for adaptation and diversification, together with their good public transport accessibility, makes many town centre appropriate locations for residential-led and mixed-use high-density development”* is welcomed.

The Bentall Centre in Kingston is a very important provider of goods and services to the residents of the Borough and further afield. It employs over 2000 staff, supports a range of jobs and is a very important generator of wealth in the local economy. In order to maintain and enhance its existing role in the future, Aviva Investors must continue to invest in the shopping centre so that it remains competitive in the face of internet shopping and other town centres.

Page: [Policy SD8 Town centres: development principles and Development Plan Documents](#)

Section: [SD8](#)

Object - Aviva Investors is a longstanding stakeholder and investor in the Royal Borough of Kingston upon Thames. It owns and operates the Bentall Centre and its associated multi-storey car parks, the Seven Kings car park and a collection of other smaller retail properties in the Kingston town centre.

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Aviva Investors object to part (B)(5)(a) of Policy SD8. Aviva Investors supports Part (B)(5), in principle, which states that in Development Plans, boroughs should identify sites suitable for higher density mixed-use residential intensification capitalising on the availability of services within walking and cycling distance and current and future public transport provision. The draft policy then goes on to list four examples of suitable sites, including “(a) *comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge of centre retail/leisure parks*”. Whilst we appreciate this list provides examples and is not therefore comprehensive, for the sake of clarity and consistency with other policies in the Plan (e.g. Policy H1(B)(2)(b)) we request the example refers to ‘car parks’ in the more general term, rather than specifically surface level car parks. Multi-storey car parks, for example, often occupy prominent town centre locations and can also represent an inefficient use of land, and could help facilitate sustainable growth. The Bentall Centre multi-storey car park site is already allocated in the Borough’s Area Action Plan for comprehensive development and this can play a part in the type of intensification proposed by the Plan.

We suggest the wording of Policy SD8 is amended as follows:

Part B(5)(a) – “comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge of centre retail/leisure parks”

Page: [Policy SD9 Town centres: Local partnerships and implementation](#)

Section: [SD9](#)

Support - Aviva Investors is a longstanding stakeholder and investor in the Royal Borough of Kingston upon Thames. It owns and operates the Bentall Centre and its associated multi-storey car parks, the Seven Kings car park and a collection of other smaller retail properties in the Kingston town centre.

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Aviva Investors support the approach being adopted in Policy SD9, particularly part (A) which states that in order for town centres to fulfil their full potential to accommodate growth and development, strategic local partnership approaches, community engagement, town centre management, business associations and Business Improvement Districts should be supported and encouraged. Aviva Investors support the policy approach that each town centre should have a Town Centre Strategy, produced in partnership at the local level, in a way that is inclusive and representative of the local community.

Aviva Investors is committed to engaging with the local authority and other town centre businesses and communities in order to promote the town centre's strategic role, and help enable opportunities for growth, and the potential to support regeneration.

Page: [Policy H1 Increasing housing supply](#)

Section: [H1](#)

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Aviva Investors support Policy H1, particularly the part (B)(2)(a) & (b) which states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:

“a) sites with existing or planned public transport access levels (PTALS) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary

b) mixed-use redevelopment of car parks and low density retail parks.”

Aviva Investors note Table 4.1 which sets ten-year targets for net housing completions (2019/20-2089/29) which each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents (Policy H1(A)). For Kingston, the ten-year target is 13,640, averaging 1,364 per year. This yearly target has more than doubled from the previous adopted London Plan target of 643.

Aviva Investors can play a significant part in this growth agenda. The Bentall Centre car park site is already allocated in the Borough's Area Action Plan for comprehensive development and this can play a part in the type of intensification proposed by the Plan.

Page: [Policy E5 Strategic Industrial Locations \(SIL\)](#)

Section: [E5](#)

Aviva Investors own the Barwell Industrial Estate and adjoining land (no. 48 in Table 6.3) in Chessington (Royal Borough of Kingston upon Thames).

Planning policy is very important to Aviva Investors as it can provide greater certainty in the planning and implementation of future investment.

Aviva Investors welcome the continued allocation of the Barwell Industrial Estate as a Strategic Industrial Location (SIL) in Policy E5 and the recognition (part (A)) that SILs “*should be managed proactively through a plan-led process to sustain them as London’s main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London’s economy*”.

Aviva Investors welcome the acknowledgement in part (B)(3) that boroughs, in their Development Plans, should “*explore opportunities to intensify and make more effective use of land in SILs in Development Plan reviews...*”.

Aviva Investors note the list of broad industrial-type uses (set out in part (C)) that should be supported in SILs. Aviva Investors also note the 'other uses' listed in part (D) that should be refused in SILs but welcomes the exception in areas released through a strategically co-ordinated process of SIL consolidation, which must be carried out through a planning framework or Development Plan Document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.

Page: [Policy HC6 Supporting the night-time economy](#)

Section: [HC6](#)

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Aviva Investors support Policy HC6, particularly the recognition at part (A) that boroughs should develop a vision for the night-time economy, supporting its growth and diversification, building on the Mayor's Vision for London as a 24-Hour City. Aviva Investors support the clarification provided in paragraph 7.6.1 that "*the night-time economy refers to all economic activity taking place between the hours of 6pm and 6am...*", which include eating, drinking, entertainment, shopping and spectator sports.

It is stated at paragraph 7.6.2 that "*The night-time economy is becoming increasingly important to London's economy*". Aviva Investors endorse this statement. Leisure expenditure including eating and drinking away from the home is projected to grow, alongside retail, and over recent years there has been significant investment in this sector, particularly in the development of cinema with food and beverage outlets, with many such developments proposed in town centres. This provides for a more experiential 'day out' visit, which in turn increases visitor dwell time and supports a strong evening economy. Experian forecast that leisure expenditure will increase on average by 1.4% per annum, a total increase of 23% between 2016 and 2031 over and above inflation therefore established development trends will continue.

Non-retail service and leisure uses increasingly perform a vitally important role in the overall offer of a centre, and encourage customers to visit centres. Food and beverage is a fast-moving and creative sector, with a steady flow of new concepts emerging. National chains have sought to increase their geographical coverage. These types of operators (Class A3, A4 and A5) i.e. restaurants, bars and pubs have supported other major leisure uses, in particular cinema developments.

Page: [Policy G2 London's Green Belt](#)

Section: [G2](#)

Aviva Investors own land (Mellow Stocks) to the south of the Barwell Industrial Estate in Chessington (Royal Borough of Kingston upon Thames), which is currently in the Green Belt.

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Policy G2 and supporting text (paras. 8.2.1–8.2.2) confirm the Mayor’s support for the continued protection of London’s Green Belt. Part (B) of Policy G2 states that “*It’s [sic] [the Green Belt] de-designation will not*”. Paragraph 8.2.1 states that “*The Mayor strongly supports the **continued protection of London’s Green Belt***”.

Paragraph 83 of the National Planning Policy Framework (NPPF) states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Paragraph 87 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

The Mayor has chosen not to replicate, reflect or refer to NPPF policy regarding altering Green Belt boundaries, or development in the Green Belt, in his draft policy, opting instead for simplified wording that is not consistent with national policy. However, the supporting text to this draft policy does refer to the NPPF in the context of defining Green Belt boundaries and development management. The Mayor is, in effect, selectively referring to NPPF policy, while also stating that de-designation of the Green Belt will not be supported in any circumstances.

The Mellow Stocks site owned by Aviva Investors comprises scrub land and is not considered to contribute positively to the openness of the Green Belt (bordered by the A243, Chessington World of Adventures and the Barwell Industrial Estate SIL), nor other Green Belt purposes set out at paragraph 80 of the NPPF. Its future development could provide a natural extension to the existing industrial area to the north, or for other uses, to provide opportunities for sustainable growth and deliver the associated economic benefits. It is accepted that exceptional circumstances would need to be demonstrated for its release, or very special circumstances for inappropriate development, in line with the NPPF, but national policy does not preclude this potential outcome. Draft Policy G2 (B) as currently drafted seems to deliberately fail to acknowledge this fact.

The wording of Policy G2 should therefore be amended as follows:

(A) The Green Belt should be protected from inappropriate development:

- 1) development proposals that would harm the Green Belt should be refused **except in very special circumstances***
- 2) the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.*

*(B) The extension of the Green Belt will be supported, where appropriate. Its de-designation will not, **except in areas released through the preparation and review of a Borough's Local Plan, for which exceptional circumstances must be demonstrated.***

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Aviva Investors support the recognition in supporting text to Policy T6 - paragraph 10.6.1 - that *“To manage London’s road network and ensure that people and businesses can move about the city as the population grows, new parking provision must be carefully controlled”* and note the acknowledgement in paragraph 10.6.2 that *“Opportunity Areas offer the potential to coordinate new transport investment with development proposals to embrace car-free or car-lite lifestyles from the outset”*.

Aviva Investors, however, objects to Policy T6, particularly part (B), which states that *“Car-free development should be the starting point for all development proposals that are (or planned to be) well connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’)”*.

Table 10.3 sets out maximum residential parking standards and states that within a Metropolitan Town Centre (such as Kingston) should be car free. Table 10.5 deals with maximum retail parking standards and again, states that development should be car-free for all areas of PTAL 5-6 (Kingston is PTAL 6a).

Paragraph 39 of the National Planning Policy Framework (NPPF) states that if setting local parking standards for residential and non-residential development, local planning authorities should take into account a number of factors including the type, mix and use of development, and local car ownership levels. The Mayor does not acknowledge the opportunity offered by the NPPF for local planning authorities to set their own standards.

Aviva Investors is concerned about the Mayor’s approach taken to car parking provision for residential and retail uses, and the accessibility of town centres/highly accessible locations by car.

Access by car to retail uses is essential to the continued success and competitiveness of town centres, especially compared with the ease of access by car to other competing out of centre retail facilities. A balance therefore needs to be struck between the Mayor's objectives and the need to ensure this does not inadvertently cause shoppers and visitors to town centres to go elsewhere to shop, thus negatively impacting the vitality and viability of accessible town centres. If shoppers and visitors do go elsewhere, for example to out-of-centre facilities which are generally served by free, surface level car parking, this would not be sustainable from an environmental, social or economic perspective.

Access by car to residential uses in outer London can also be necessary, depending on the type, mix and use of development proposed e.g. if family-sized accommodation is proposed. There are more limited public transport choices in Outer London.

The wording of Policy T6 (and part (A) of Policy T6.1 and T6.5 and Tables 10.3 and 10.5) should be amended as follows:

*“(B) Car-free developments should be the starting point for all development proposals in places that are (or planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’). **When setting local parking standards for residential and non-residential development, local planning authorities should take account of the following:***

- **the accessibility of the development;**
- **the type, mix and use of development;**
- **the availability of and opportunities for public transport;**
- **local car ownership levels; and**
- **an overall need to reduce the use of high-emission vehicles.**

*(I) Where sites are redeveloped, existing parking provision should be reduced to reflect the current approach, **or local parking standards,** and not be re-provided at previous levels where this exceeds the standards set out in this policy, **or in locally adopted planning standards.**”*