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**By email and post**

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Dear Mayor

**DRAFT NEW LONDON PLAN**

Thank you for allowing Kingston First the opportunity to participate in the consultation on the draft New London Plan.

Kingston First is an independent, not for profit company which was established in 2005 to run the UK's first Business Improvement District (BID). The BID was set up to champion the interests of more than 750 businesses within Kingston Town Centre, to deliver change for the better. It seeks to protect the interests of these businesses and promote economic prosperity within Kingston Town Centre, and is now in its third term of business.

**OVERVIEW**

Having reviewed the draft Plan and the evidence base supporting these policies, Kingston First has a number of comments to make. These representations will follow the order of the London Plan, but in summary:

- The draft Plan takes a significantly more prescriptive approach than its predecessor, with policies intended to be applied directly in determining planning applications. Kingston First understands that the Plan should, according to the legislation, deal with strategic matters only. Kingston First is concerned that his prescriptive approach would alter the hierarchical relationship intended to exist between the GLA and Local Planning Authorities (LPA), and may adversely affect an authority's ability to effectively manage and shape the future prosperity of their administrative area.
- Future growth needs to be appropriately planned and managed. The need for densification must have regard to the unique heritage and cultural character of an area. The historic core of Kingston Town Centre is particularly sensitive and requires a detailed masterplan to accommodate growth in a suitable way. The London Plan should encourage the use of masterplans and supplementary planning documents to guide this growth.
- New homes can be provided within town centres but this should not be at the expense of its retail, commercial or leisure functions.
- The function of the town centre is changing and planning policies must provide a greater degree of flexibility in offering a diverse and engaging mix of town-centre uses.
- The evening and night-time economy presents an important opportunity for Outer London Boroughs and one which will support the sustainability of Kingston Town Centre.
- The London Plan must continue to promote more sustainable forms of transport. In doing so it must also identify the local infrastructure requirements needed to accommodate this transition. Kingston Town Centre needs an improved bus and rail interchange.

## **CHAPTER 1: PLANNING LONDON'S FUTURE**

Kingston First strongly supports the Good Growth initiative. The key to Good Growth is to establish and support commercial centres as a focus for strong and inclusive communities. Kingston First therefore support draft Policy GG1 and the focus it draws towards town centre environments.

Whilst densification is a viable way of accommodating future growth, Kingston First supports to approach set out within draft Policy GG2, which seeks to make the best use of land. Historic centres such as Kingston comprise a large number of small plots. The policy should encourage Local Planning Authorities to explore whether the inclusion of any neighbouring plots of land would improve the quality of the scheme and deliver the largest possible public benefit.

In addition to securing improvements to the physical, public realm, Kingston First also supports draft Policy GG5, which aims to support the economy. Kingston First supports the option of diversifying use where appropriate as this approach will enable town centres to react to any changes in demand and remain relevant to the changing needs of the population.

## **CHAPTER 2: SPATIAL DEVELOPMENT PATTERNS**

Kingston First strongly supports draft Policy SD1 and the designation of Kingston as an Opportunity Area. The borough has the capacity to accommodate future growth but this must not be at the cost of a good quality of life. Kingston First strongly advocates the notion of 'Good Growth' and the need to balance new homes with new transport infrastructure, shopping, leisure and job opportunities.

The scope for growth development, as set out in paragraphs 2.1.22 – 2.1.24 of the Plan, promotes Kingston Town Centre as being suitable for significant change. It is not clear whether its position, at the top of the list, marks it as an area which would experience the most significant change, but this should be clarified. The wording of this section should also acknowledge the historic character of this area, the importance of preserving or enhancing any historic assets, and stating that new development should not adversely affect the heritage of the town centre.

Kingston First is amenable to new development within the town centre, but this should not be at the expense of its retail, commercial or leisure functions, and its function as a major transport hub. Any development within the town centre should ensure that it remains well positioned as an attractive location for office and commercial space.

In addition to these specific Opportunity Areas, Kingston First also supports draft Policies SD2 and SD3, and the principle of working with the Wider South East. Kingston is a Metropolitan Centre located within an Outer London Borough. It has a strong relationship with towns and cities surrounding South West London and provides a significant draw into the Capital thanks to its retail, leisure and employment opportunities, as well as its appeal as a tourist destination. New infrastructure should support and enhance these links with the wider area and Kingston should be viewed as a significant bridge between London and the wider South East.

Kingston First supports Strategic Infrastructure Priority 10, which would see improvements to the South West Mainline, the implementation of Crossrail 2 South West, and further improvements to the A3. These projects will provide significant improvements to those commuting to and from the Borough.

However, many of these projects, including Crossrail 2, are not yet committed and there is a possibility that they will not be delivered. Much of the future growth within London appears to be planned around this particular project. The draft Plan should therefore be worded in a way in which a review is triggered, if this project is significantly postponed or abandoned.

Kingston First supports draft Policies SD6, SD7, SD8 and SD9, which relate to the role of neighbourhood, district, major, metropolitan and international town centres. Kingston is an established Metropolitan Centre which performs well, but to remain relevant and viable it must respond to the various challenges facing UK high streets.

The role and function of the high street is changing and town centres must adapt to the evolving consumer expectations. Traditional planning policies have sought to protect retail use but draft Policy SD6 is clear in that a greater degree of flexibility is required. These changes may include better infrastructure to support the logistics involved in 'Click and Collect' shopping and greater support for any leisure facilities which would support and promote this behaviour, rather than have goods delivered to the home.

### **CHAPTER 3: DESIGN**

Kingston First strongly supports a design-led approach to development and significant public benefits which can be achieved through the provision of high quality public spaces and buildings. Kingston First therefore support the wording of draft Policy D2 and its role in promoting and delivering good design.

The public realm is a major feature of town centre environments and it is essential that they function properly. Poor design has a direct impact upon the economic performance of local commerce and it is therefore important that new development takes full of any opportunities presented. Kingston First therefore support the wording of draft Policy D7.

The draft Plan sets out an ambitious programme of growth. To accommodate this there is likely to be pressure to build upwards, driving demand for taller buildings. The face of Kingston Town Centre has changed significantly over recent years. It supports tall buildings but only where they are appropriately located and there is no significant harm to the surrounding environment. Kingston First therefore support draft Policy D8 and the requirement for Local Planning Authorities to plan positively for new tall buildings. This approach would provide a clear framework which will provide certainty and promote growth and allow development to be scrutinised fairly.

For Kingston Town Centre, this scrutiny may need to have regard to the historic character of the area and the tourism this generates. Tall buildings within or around the historic core of the town centre may impact negatively upon this aspect of the local economy.

### **CHAPTER 4: HOUSING**

Draft Policy H1 sets an ambitious target for new homes across London. For Kingston, it sets a target of 1,364 new homes per year. This represents a 112% increase over the previous target. Whilst Kingston First is unable to comment on whether such a target is realistic or achievable, it is clear that delivering the target would require a substantial amount of new development.

Within the Kingston Opportunity Area, as outlined at Paragraphs 2.1.22 – 2.1.24, Kingston Town Centre is listed as one of four areas where there is scope for significant change.

This is true to an extent, with plans already approved for the redevelopment of the Eden Walk Shopping Centre, but Kingston has strong historical background and it is crucial that this setting is maintained to ensure that Kingston Town Centre remains relevant as a tourist attraction.

Kingston Council has already worked closely with the GLA in producing the 'Direction of Travel' document published in October 2016. It should take this collaboration further and identify strategic areas within the Town Centre which can be developed without impacting upon the historic character and setting of the town centre. It will not be sufficient to rely upon the established conservation area boundaries as taller buildings will have more wide-ranging impacts. The heritage of an area should be a major factor in Policy D8 and the requirement to plan positively for taller buildings.

Kingston First supports the provision of new homes within the town centre, as it is clear that this can contribute towards its vitality and viability. Kingston First does not object to the erection of new, taller buildings within the area, but believes that the unique characteristics of the centre, as a historic riverside market town, requires a higher level of design scrutiny.

In addition to new development, draft Policy H4 of the draft Plan also promotes the temporary or 'meanwhile' use of vacant buildings or land. Kingston First does not object such a policy, but asks that the wording is amended to make it clear that such uses are temporary, and should not set a precedent for housing on land which would otherwise be prioritised for commercial use.

Aside from traditional housing, the draft Plan also has regard to purpose-built student accommodation, and acknowledges that it is a 'specialist' form of housing and a need which must be addressed properly.

The education sector is an important part of Kingston Town Centre, as it is home to both Kingston University and Kingston College. Private student accommodation within the borough has historically been of a low quality, and a lack of supply has affected its affordability. Kingston First supports the wording of draft Policies H17 and H18 and the need to plan for affordable, appropriately sized accommodation for students.

#### **CHAPTER 5: SOCIAL INFRASTRUCTURE**

Kingston First supports the wording of draft Policy S3 and the need to plan positively for new and the expansion of existing education facilities. Facilities for Higher Education bring a wide range of socio-economic benefits and it is important that local authorities plan positively for them.

The London Plan should emphasise the importance of such establishments and encourage a degree of flexibility within the planning system to accommodate their growth.

Whilst it is important that educational facilities integrate with the surrounding area, Local Planning Authorities should support their growth and avoid ad-hoc developments which disperse facilities over a wide area. The London Plan should encourage the establishment of educational quarters and the types of supporting infrastructure and facilities needed to foster their growth.

#### **CHAPTER 6: ECONOMY**

In addition to its role as a major retail centre, Kingston Town Centre also provides a large number of office jobs.

Figure A1.4 of the draft Plan identifies Kingston Town Centre as an area where office guideline 'B' should apply. This states that there is 'mixed-use potential' where there is capacity, demand and viability to accommodate new office development' generally as part of mixed-use developments including residential use.

Historically office floorspace has been provided through a range of office sizes, both within converted and purpose-built facilities. In recent years the introduction of permitted development rights, enabling a change of use from office to residential use, has affected the amount of office floorspace available within the town centre. The centre is now subject to an Article 4 direction which prevents this change of use taking place without planning permission, however the changes of use which did take place have affected the balance of existing 'mixed-use' developments and may also have affected the amount of smaller and more affordable workspace available to businesses.

Kingston First therefore supports the wording of draft Policy E1 and the need to plan for new mixed-use developments. Any larger office developments should show flexibility in adapting to future tenants, of various sizes, and ensuring that they are fit for purpose. Retail and other commercial units should be the focus for ground floor units to ensure that

there the streetscape remains active and vibrant, and to ensure that the provision of office floorspace does not jeopardise the retail or commercial function of the centre. Kingston First supports the provision of new low-cost and affordable office space set out within draft Policies E2 and E3.

## **CHAPTER 7: HERITAGE AND CULTURE**

As a Royal Borough, Kingston benefits from a long history and a unique riverside setting. The town centre stands out from other Outer London centres because of this.

Kingston First supports the requirement of draft Policy HC1 for Local Planning Authorities and Developers to understand and utilise the heritage significance of a site or area, and the need to develop a long-term strategy in and amongst substantial listed buildings, scheduled ancient monuments and conservation areas. This is particularly important given the need for more intense forms of development.

In a changing UK high street, it is clear that town centres must provide a range of services and opportunities which support and complement its traditional function as a retail hub. Cultural venues are of increasing importance throughout the capital. The support and protection for such facilities, as set out in draft Policy HC5, is supported.

In addition to increasing the range, diversity and quality of town centre uses, it also makes sense to support later operating hours. The evening and night-time economy needs to evolve. It has long been established within Inner London but not within Outer London boroughs, which continue to operate within a daytime setting. For many Londoners, this put many retail, leisure and cultural opportunities out of their reach, as many work during these times. Establishing a new evening and night-time economy will support the viability of the town centre and benefit local residents. Kingston First therefore supports the wording of draft Policy HC6.

As a Business Improvement District (BID), Kingston First is well placed to work with the Local Planning Authority to identify the constraints and opportunities in improving the evening and night time economy of Kingston Town Centre, and can work with them to develop a vision and management plan for this. It has already worked to diversify the evening economy, to include a greater range of dining and leisure venues and this has had a positive impact on footfall. Further improvements may also help to support an evening economy for retail use.

## **CHAPTER 8: GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT**

As a town centre Kingston benefits from its riverside setting. The Thames acts as a linear open space providing convenient access to some of the largest greenspaces within London; Home Park, Bushy Park and Richmond Park. Kingston has experienced first-hand the benefits that can be found in linking open spaces together, and strongly supports this approach. The wording of draft Policies G1 and G4 should be amended to place greater emphasis on the connection of these spaces and the formation of new linkages.

The town centre has very few green spaces. Kingston First actively promotes the provision of new small open spaces and pocket parks wherever possible, and the London Plan should be more explicit in expecting new development to provide useable areas of public realm.

The need to retain existing heritage assets limited the amount of green space available within the town centre, and so Kingston First welcomes draft Policy G5 and the concept of urban greening. This approach would encourage soft-landscaping to be provided on private land in areas where there is little opportunity to provide it on public land. Such an approach would significantly raise the quality of the public realm and the bar for not contributing to this initiative should be set high.

The scoring system set out within Table 8.2 will go some way to promoting the greening of urban spaces, however the wording of draft Policy G5 should encourage developers to exceed the target score wherever possible.

## **CHAPTER 9: SUSTAINABLE INFRASTRUCTURE**

It is important that new development and transport infrastructure is delivered without harm to the environment, during both the construction and operational phases of development. Kingston First supports the draft Policy S11 and continued efforts to improve air quality within the capital.

In addition to environmental sustainability, it is important that infrastructure supports the long-term viability of the town centre networks. As has already been discussed, it is vital that town centres adapt to changing consumer behaviour and this includes digital connectivity. Kingston First supports draft Policy S16 and the need to provide sufficient ducting space to plan for current and future need. In historic environments such as Kingston Town Centre, such planning should account for the difficulty in providing digital connectivity in and around historic buildings. New development should account for the connectivity needs of the surrounding area, in addition to the site itself.

Finally, as a riverside location, Kingston First supports the continued promotion of the River Thames and other linked watercourses as a strategic route for freight and passenger transport throughout London, as set out in draft Policies S14, S15 and S16. Kingston and the surrounding area already benefit from privately operated passenger river boats, but the route should be promoted more readily as a viable transport link.

## **CHAPTER 10: TRANSPORT**

Draft Policy T1 sets an ambitious target of 80% of all trips within the Capital being made by foot, cycle or public transport. Kingston First supports this target and the transport schemes set out within Table 10.1 however, the London Plan should recognise that this approach cannot be applied rigidly throughout the capital. As an Outer London Borough transport and mobility are not entirely focused upon transport into and out of the centre of London. Private vehicle usage tends to be higher within this area as many residents have a need to travel out of London. The draft Plan should encourage improvements to public transport within London and the Wider South East, but also recognise that a degree of local discretion is needed to take any local circumstances into account. Within Kingston, a greater degree of private vehicle usage should be factored into the transport targets.

Kingston Town Centre is an outer London location in TfL Fare Zone 6. As one of London's top retail destinations, it significantly outperforms its public transport accessibility level (PTAL 6b). Despite this, its relationship with Outer London and the Home Counties mean that it is frequently visited by private car. It is not always practical to use public transport (for instance, where a large quantity of goods, or where bulky goods are purchased) and so it is important that the town centre maintains a good level of private car parking.

That said, Kingston First does support the increased use of public transport where practical. To assist in achieving the Mayor's target, there are several infrastructure issues needing to be addressed.

The first issue is rail travel. Kingston Town Centre benefits from a train station within easy walking distance from the town centre. Whilst measures are being introduced to reduce any physical barriers between the station and commercial core, there are still a number of perceived barriers needing to be addressed.

The station currently benefits from trains running in each direction every 15 minutes. Whilst this provides a good level of accessibility to the east, the line spits to the west, meaning that trains run every half an hour to Richmond and Shepperton. As outlined earlier, Kingston has strong links to outer London locations and so it is important that the frequency of the service towards these locations are increased. Crossrail 2 goes some way to addressing this but the final route has yet to be agreed, and it would not address the connectivity issue of Kingston to Richmond.

In addition to this, there is a perception that Kingston Town Centre is a peripheral Metropolitan Centre and a long distance from Central London. The reality of this is very different, and the TfL Fare Zone should be amended to reflect this. Rezoning Kingston Train Station will change this perception and entice more people to visit the Town Centre.

The second issue is bus travel. Kingston Town Centre is a major hub for bus routes, but the connectivity of these routes is affected by the fact that there are three bus interchanges, only two of which are recognised as a 'bus station'. These are Cromwell Road Bus Station, Fairfield Road Bus Station, and the interchange at Wood Street. This fragmentation can dissuade users from travelling by bus. Kingston First strongly supports the consolidation of these interchanges into a new, purpose built station. The GLA, TfL and Local Planning Authority should plan positively towards this solution.

The third issue is that of traffic. Bus routes in and through the are adversely affected by traffic running through the town centre. Kingston First encourages the GLA and TfL too look at the wider issue on how to reduce traffic flowing into the town centre. This may include upgrades to the A3 and A316.

Cycling is also a possibility. Kingston Town Centre benefits from a direct connection to the linear open space running alongside the River Thames and the wider strategic cycling network, however there are barriers linking this route to the surrounding residential areas. Kingston First supports the continued investment into cycling infrastructure and would support the implementation of a cycle hire scheme within the town centre.

#### **CHAPTER 11: FUNDING THE LONDON PLAN**

Kingston First supports the flexibility presented in draft Policy DF1. Whilst every effort should be made to present a policy compliant scheme, there are some instances where the public benefit of developing the site outweigh the need to secure other forms of investment through planning obligations. Giving applicants the opportunity to assess and present a viability issue helps to prevent the long-term sterilisation of development sites.

Chapter 11 should also include greater emphasis on Business Rate Retention, which is set to replace existing direct Government grants. Whilst Kingston First recognise that this mechanism has not yet been fully agreed, the draft Plan should set out its policy on how these funds could be managed and spent, and how local authorities and organisations can make their case for additional funds.

#### **CHAPTER 12: MONITORING**

Kingston First commends the GLA in keeping the London Plan regularly updated and fully supports the commitment set out within draft Policy M1. This means that those policy measures devised to address specific issues can be reviewed, adopted and dropped if needs be, based on their effectiveness.

#### **SUMMARY AND CONCLUSIONS**

The Royal Borough of Kingston upon Thames and Kingston Town Centre are key locations in which to focus the future growth of the capital. Kingston First supports this growth where it is appropriately balanced and where there is appropriate mitigation against any adverse impacts.

We trust that these representations will be given due consideration and are helpful in the next stage of the plan preparation.

Yours sincerely



Kirsten Henly  
Chief Executive

cc: The Board Members of Kingston First