

**Kingston Town Neighbourhood Committee** - 4 June 2019

**South of the Borough Neighbourhood Committee** - 4 June 2019

**Maldens and Coombe Neighbourhood Committee** - 11 June 2019

**Surbiton Neighbourhood Committee** - 11 June 2019

## **Early Engagement on the Local Plan**

Report by Assistant Director, Strategic Planning & Infrastructure

Relevant Portfolio Holder: Councillor Malcolm Self, Portfolio Holder for Planning Policy, Culture & Heritage

### **Purpose**

To engage with the Neighbourhood Committee and seek comments from Members on the Local Plan Early Engagement as part of the public consultation.

### **Recommendation**

To **resolve** that the comments of the Neighbourhood Committee are reported back to the Strategic Housing and Planning Committee when it considers the Local Plan Early Engagement document and the Committee encourages individuals and organisations to submit their own responses.

### **Benefits to the Community:**

The Local Plan Early Engagement document is the first stage in the preparation of the Borough's Local Plan. This is the first public consultation on the new Local Plan for Kingston Borough, thereby allowing the community to help shape the document from the outset.

### **Key Points**

- The Council is preparing a new Local Plan which will replace the current Core Strategy (2012) and Kingston Town Centre Area Action Plan (2008). Planning applications must be determined in accordance with the local plan, unless material considerations indicate otherwise. For the Royal Borough of Kingston upon Thames, this will be the new Local Plan and the London Plan, and therefore the new Local Plan is critical in shaping the future of the borough.
- This is the first public stage of development of a new local plan for the Royal Borough of Kingston upon Thames. The consultation period runs from 1 May to 31 July 2019.
- There are very limited legal requirements for this stage, which only requires the notification of the council's intent to develop a new local plan, and must ask the public what that local plan should contain. However, this stage is used to undertake a significant public engagement exercise to seek the views of Kingston's varied communities and stakeholders about the future of the borough from 2019 to 2041. It is the most open and crucial stage of engagement as a local plan must be shaped by early, proportionate and effective engagement with a wide range of groups.
- Neighbourhood Committee Members are invited to provide comments on the Local Plan Early Engagement (at this link: [Local Plan Early Engagement \(Regulation 18\) May 2019 "Kingston: Looking Forward Together"](#) ) and Site Assessments documents (at this link: [Local Plan Site Assessments \(May 2019\)](#) )
- Responses to this engagement and statutory consultation will inform the development of the vision, objectives and planning policies that will be contained in

a future local plan. The feedback will be developed into a range of options, each of which will then be assessed using the sustainability appraisal process, to understand their economic, social and environmental impacts. This will help ensure the final local plan is an appropriate strategy for the borough, taking into account all reasonable alternatives.

## **Context**

1. The Council has started the process to replace its current Local Plan, which is made up of two documents called the Core Strategy (2012) and the Kingston Town Centre Area Action Plan (2008). There is a need to replace these documents due to the changing policy context, including national policy and the London Plan.
2. On 28 March 2019 the Strategic Housing and Planning Committee approved the Early Engagement Local Plan and Site Assessments for the purposes of public consultation. The consultation was launched on 1 May 2019 and is running for a three month period until the end of July 2019.
3. This stage of public consultation is a statutory stage, in line with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012, and as this is the first stage of consultation, the council must take the opportunity to reach out to as many members of the community as possible, including, residents, businesses, visitors, infrastructure providers and councillors.

## **The Consultation Document**

4. The Local Plan Early Engagement consultation document, called “Kingston: Looking forward together”, explains why a new plan is needed, and asks how we can tackle the challenges facing the borough and how we can help to shape the change that is needed over the period 2019 to 2041. A new plan will enable us to consider the changes that the borough will face in the future as well as any impacts from changes across London.
5. The number of people living in the borough is projected to significantly increase over the next two decades, and a challenging housing target set by the Mayor of London is expected as part of the new London Plan, of about 30,000 new homes between 2019 and 2041. It is therefore critical that we plan positively to meet this challenge. We also need to ensure the workplaces, infrastructure and services are developed alongside these homes to support our existing and growing population. We need to consider the type of places we want to create, and the impact on the health and well-being of residents, and our impact on the local and wider environment.
6. The consultation raises key issues and questions that will help to inform and set the vision of the Local Plan and ultimately direct how our borough will continue to be a successful place in which to live, work and visit.
7. We have also published a list of 153 sites around the borough that have been submitted to the council, either as part of the Call for Sites exercise that we carried out last year, or as part of work by the Greater London Authority. Within the list of sites are some council-owned assets. We welcome comments on all sites and the proposals that were put forward. It is important to note that the council does not have a view on any specific proposals at this stage, and we are seeking views on all sites from the community before assessing the merits of the proposal put forward. Members are welcome to comment on specific sites.

## Consultation with Neighbourhood Committees

8. The key issues that Members may want to respond to include:

○ **Where should the growth in housing be located?**

Our current housing target is expected to double from 643 new units per year to 1,364 units, as proposed in the draft new London Plan. We also have a backlog of housing need. We currently have about 1,000 homes being built across the borough and another 1,500 homes which has planning permission, but they are not yet under construction. We have estimated a number of windfall sites that will come forward, and a capacity on large sites through work undertaken with the Greater London Authority. All of these elements could provide the borough with an additional 15,700 new homes by 2041, which is approximately half of the proposed new London Plan housing target for the borough of about 30,000 additional homes between 2019 and 2041. We therefore need to find approximately 15,000 more homes and we put forward two ideas as to how this might be achieved:

**Scenario 1: Widespread growth** - The Mayor expects half of our annual housing target of 1,364 per year to come from 'small sites' (625). Small sites development can come from extending and redeveloping existing homes to make a larger number of new homes in areas within walking distance of stations or town centres. Development would need to make the most of every site, which would see high densities in town centre locations and around transport hubs to help achieve the housing need.

**Scenario 2: Concentrated growth** - this looks at how more development could come forward particularly within the potential new Opportunity Area, and within the most accessible locations, such as near railway stations, transport hubs and town centres. This could be supported by the arrival of Crossrail 2. Buildings in these locations would be at very high densities and include a mix of uses.

○ **Should we be thinking about whether it would be appropriate to build on parts of the Green Belt and/or Metropolitan Open Land to meet our housing needs?**

The protection of our green spaces, including the Green Belt and Metropolitan Open Land (MOL), is a priority. We therefore need to try our best to accommodate all of our housing need within built up areas. If this is not possible, an option may be to build on parts of the Green Belt and MOL, which would enable less dense development elsewhere in the borough.

○ **What infrastructure (including transport, community facilities, healthcare, education and leisure) is needed to support the borough now and in the future?**

Wherever in the borough we choose to deliver our new housing and other services, good infrastructure in the right place, and at the right time, is essential to meeting the future needs of Kingston's residents, businesses and visitors. This needs effective planning; efficient and appropriate use of land and facilities; and working with key partners such as Transport for London, and utilities providers.

○ **What type of workspaces should be provided and where?**

More people commute out of the borough to work than commute into the borough for work. We want to encourage more businesses and jobs to be created in the borough so that more residents have the opportunity to work here. Should we continue to protect our designated employment locations?

- **What is the future for our town centres?**  
Kingston town centre is the third best performing retail destination in London (based on retail expenditure). However, significant changes in how people shop, especially internet shopping, and competition from other retail destinations means that we need to think about how Kingston town centre, our district centres and local centres should adapt, so they continue to be successful places that people want to visit.
  - **Should we be doing more to attract and encourage visitors to the borough, and if so what? How do we support our town centres and should we encourage more night time activity?**  
Our heritage and public spaces are great assets for our town centres and more broadly across the borough. They create an environment that attracts visitors and provide spaces for markets, cultural activities and other types of events. More visitor attractions will bring more investment to the borough.
  - **How should we help people move around the borough?**  
Improvements to the transport network will be essential to support new housing and other development. We identify a number of infrastructure improvement projects in the Early Engagement document. We also need to promote sustainable travel through the Local Plan, and improve mobility and accessibility on our streets and transport networks, particularly for those who are less mobile.
9. Members can also provide comments on any other matters not covered by the consultation, and design your own vision of the borough by adding pins to a map using the online consultation portal, together with comments, showing where you would like housing, infrastructure, workplaces, and areas for biodiversity and nature conservation.

## Consultations

10. At the start of the consultation we notified all contacts held on the Strategic Planning consultation database of the details of the consultation, including where to find the consultation documents and how to respond. These include statutory consultees identified in the planning regulations, as well as other 'general consultees', i.e. those who have registered to receive updates and given the council permission to use their information for this purpose. We also notified all councillors of the consultation.
11. There will be consultation events for people to participate in and opportunities to engage in different ways online. The consultation has a very broad communications strategy, using both external (e.g social media, bus backs, stations, local magazines) and council channels (e.g the council's social media account, screens at Guildhall, libraries) to advertise the consultation. The programme will work to target a wide range of communities and demographic representatives across the borough to ensure that we are planning for everyone; not just those who tend to respond to council consultations.
12. The consultation approach meets the requirements of the council's adopted and draft new Statement of Community Involvement in order to meet the legal tests for the local plan. We have recently consulted on a revised Statement of Community Involvement and we will review any comments received in order to apply any new methods to this Local Plan consultation if appropriate.

## **Timescale**

13. The minimum statutory period to consult at the Regulation 18 stage of the Local Plan is six weeks. The council is undertaking consultation over an extended 12 week period due to the importance of the document and the need to maximise the number of people it engages with. The consultation period runs until 31st July 2019.
14. Following reporting to these Neighbourhood Committees, Members will have seven more weeks to respond to the consultation, and to also encourage local residents to get involved.
15. Once the consultation has closed, the responses will be reviewed and key issues raised through the consultation will be summarised alongside the council's response to those key issues in the statutory Consultation Statement. The council's response will set out how we have taken the key issues raised into account and to what extent we have addressed the matters raised. This will be used to inform the development of the new Local Plan including informing various options for the borough which will be reviewed through an Integrated Impact Assessment incorporating sustainability issues.

## **Resource Implications**

16. The costs of producing the Local Plan and undertaking the Early Engagement public consultation are met from existing budgets.

## **Legal Implications**

17. Development of a Local Plan is pursuant to the Town and Country Planning Act 1990 (as amended), the Planning and Compulsory Purchase Act (2004) (as amended by the Housing and Planning Act 2016) and the Town and Country Planning (Local Planning)(England) Regulations 2012 (as amended by the Town and Country Planning (Local Planning)(England)(Amendment) Regulations 2016). The current stage is as prescribed in Regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations 2012 (as amended).
18. Regulation 18 requires notification of specific and general bodies and persons, including anyone who may have an interest. The consultation must:
  1. notify those persons or bodies that we intend to prepare a local plan, and the subject of that plan, and
  2. invite them to make representations as to what that local plan should contain.
19. In line with regulations, all comments must be made in a public capacity and will be published as part of the plan-making process. Names of respondents (and where applicable companies/ organisations) will be published, but personal contact details will be removed from documents. Each response will be published in full including who made the representation.

## **Risk Assessment**

20. The National Planning Policy Framework (2019) states that local plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees. The Local Plan will need to satisfy a number of legal 'tests of soundness' at Examination concerning its preparation, which are to show that it has been positively prepared, justified, is effective and consistent with

national policy. The council must therefore undertake effective wide-ranging public consultation to avoid a challenge in this regard at the Examination stage.

### **Equality Assessment**

21. An EQIA is not required at this stage because this consultation does not seek to choose between or promote a particular strategy, policy or approach. Rather it asks open questions to seek a range of views. Specific equalities assessment will be undertaken at the next stage of plan development, as part of the Integrated Impact Assessment, to help inform decisions about the preferred approach or option.
22. It is noted that efforts will be made to ensure the responses are representative of the borough as a whole, rather than the more common outcome where representations tend to come from a much more narrow demographic range than is seen in the wider community.

### **Health Implications**

23. This stage is the first step in the preparation of a new Local Plan. The Local Plan will cover health and wellbeing implications and will include approaches to improving the health of our borough population.

### **Road Network Implications**

24. The scale of growth set out in the Local Plan Early Engagement document, and as envisaged in the new draft London Plan, will have significant road network implications which will need to be mitigated over the lifetime of the plan. These are set out in the Kingston Transport Study which is available as background evidence.

### **Environmental & Air Quality Implications**

25. This stage of consultation is the first step towards a new Local Plan. As the statutory plan which directs sustainable development, a Local Plan has a key role in securing positive environmental outcomes, including environmental and natural protections, resource use and pollution.
26. An Integrated Impact Assessment will be produced to develop the Local Plan and will include environmental objectives to test the plan.

### **Annexes on electronic version of the agenda:**

- Annex 1 - The Local Plan Early Engagement (at this link: [Local Plan Early Engagement \(Regulation 18\) May 2019 “Kingston: Looking Forward Together”](#) )
- Annex 2 - Site Assessments documents (at this link: [Local Plan Site Assessments \(May 2019\)](#))

**Background papers** held by author of the report, Lisa Fairmaner, Corporate Head of Planning. [lisa.fairmaner@kingston.gov.uk](mailto:lisa.fairmaner@kingston.gov.uk):

- Draft New London Plan showing Minor Suggested Changes (August, 2018)
- Draft Statement of Community Involvement (April, 2019)