

Kingston's Local Plan

Our vision for Kingston - Summary of comments document



Summary of consultation feedback (Regulation 18)
on the first draft of the Local Plan - August 2023

www.kingston.gov.uk/localplan



THE ROYAL BOROUGH OF
KINGSTON
UPON THAMES



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Overview




Kingston Council is in the process of preparing a new Local Plan for the borough. It sets out a vision for how we want Kingston to change and evolve over the next 20 years.


It will be used to guide development in Kingston and help decide planning applications.

The Local Plan covers a wide range of different and interrelated issues that need to be considered when new development is proposed. It will ensure we have the right development, in the right place and make sure it delivers the most benefit for our communities and the local environment.


Why are we preparing a new Local Plan?




Ensure our Local Plan is up-to date. It is used to decide planning applications.



To respond to the climate emergency which has been declared by the council.



Deliver on the aspirations of our communities and make sure this is a vibrant and inclusive borough to live, work, play and study.



Meet Kingston's needs as London grows.



To support our borough's recovery from COVID-19 and ensure it is resilient for the future.

Our engagement so far

Thank you to everyone who has engaged in the creation of the Local Plan. So far, we have carried out three rounds of engagement to seek the views of our communities on the future of the borough and what the Local Plan should contain.

Engagement so far has included:

- Early Engagement (1 May 2019 - 31 July 2019)
- Further Engagement (1 July 2021 - 30 September 2021)
- First Draft Local Plan (28 November 2022 - 28 February 2023)

Statements of Community Involvement have already been published for the early and further engagement. Feedback from these phases of engagement was used to prepare the first draft of the Local Plan.

During the last few months we have been reviewing the feedback from the consultation on the first draft. All of the comments we received are being considered as we develop the next, Publication version of the Local Plan.

In the meantime this document provides a summary of some of the key points raised during the consultation on each policy or topic area.

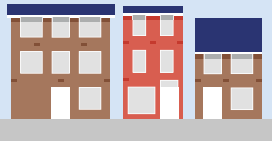
We will publish a Statement of Consultation with our responses to the comments and where changes have been made to the Plan and policies, alongside the Publication version of the Local Plan.



Statistics for the consultation on the first draft of the Local Plan

2,900

people viewed the engagement website



Over **340** pieces of written feedback submitted



21

face-to-face meetings and events

including with residents, businesses and young people



5

evening webinars



A pilot Urban Room set up with local groups -

providing an accessible exhibition space for people to find out about the Local Plan, with 4 lunchtime talks and staffed for 8 days



2

youth workshops organised by the Youth Council with large maps of the boroughs annotated with 130 flags with their ideas



What you told us?

The next few pages give an overview of some of the key comments we received about the Local Plan in general and on each policy. All of the comments we received are being considered as we develop the next, Publication version of the Local Plan.

General comments on the draft Local Plan and consultation process:

- Ensure all policies conform with national planning policies or the London Plan
- Review the Local Plan to ensure it aligns with latest census information and/or needs assessments and ensure this is reflected in what the borough needs to provide for existing and future communities
- The language is too vague in places making it impossible for it to be applied when development proposals are being considered
- Simplify some policies to remove ambiguity
- Clearer explanations needed around some terms such as 'design-led' and 'masterplan approach' and what 'good design' means
- Check that the Glossary captures all terms
- Viability of the Local Plan was raised (this will be tested before the next version of the Local Plan is published)
- Concern about the impact of the Plan on different genders
- Concerns about the publication dates of some of the evidence base documents
- Concerns about how the plans and policies can be put into effect
- Criticism that the consultation portal was confusing and the questionnaire was too long and could have put people off responding.



Vision and objectives

We want to make Kingston a better borough by 2041. The Local Plan will help us to achieve this. This chapter sets out our proposed vision, the environmental, social and economic objectives.



Key issue	Summary of comments
Vision	<ul style="list-style-type: none"> • General support for a sustainable, net zero borough with strong place-making and high environmental quality • Many feel it needs to be more specific, tangible and set out locally distinct improvements • Add references to the importance of our visitor economy and tourism • Concern raised about tall buildings and over development to meet housing targets.
Environmental objectives	<ul style="list-style-type: none"> • Support environmental improvements • Add reference to protecting the Green Belt which is currently in supporting text next to Key Diagram • Be more specific about what is meant by 'set the design bar high' eg Reference using design review panels, following National Design Guide • Add references to addressing flood risk • Greater reference to improving wildlife habitats and biodiversity in all areas not just green areas • Some question whether additional housing and climate change considerations are in conflict.
Social objectives	<ul style="list-style-type: none"> • Greater clarity needed about objective to reduce health inequalities • Greater reference to young people and meeting their needs • No sense of place or communities in the objectives.
Economic objectives	<ul style="list-style-type: none"> • Need to reference improving access to skills, training and education opportunities • No reference of the river as an asset to help transform Kingston town centre • Recognise the importance of new employment uses in Kingston town centre to respond to unmet need and diversify beyond retail and leisure.



Our neighbourhoods

The borough is divided into four neighbourhoods. This section highlights their individual characteristics and aspirations. The Local Plan will seek to support the delivery of these aspirations.



Neighbourhood	Summary of comments
Overall comments	<ul style="list-style-type: none"> • Support in general for the aspirations, with additional suggestions put forward • Request to be as specific as possible with examples in each neighbourhood • Some concern about lack of specific policies to address the different aspirations.
Kingston and North Kingston	<ul style="list-style-type: none"> • Support for the aspirations • Focus on preserving the town centre as a place to shop and visit • Reference its role to accommodate new homes • Add references to protecting the ecology of the River Thames • Add references to the market • Greater recognition of the different characteristics of the area, including shopping parades, small industrial areas etc • Add references about improving active and public transport • Separate new leisure centre and arts venue • No mention of reducing flood risk • Content needed that relates to Coombe Hill and other areas outside of the town centre.
Surbiton	<ul style="list-style-type: none"> • Make reference to the Queen's promenade • Agree with the aspiration to enhance the public realm and facilities in the town centre • Recognise the different building characters in the Neighbourhood • Protect and enhance the variety of trees in Surbiton • Acknowledge areas like Elmbridge Meadows etc.



Neighbourhood	Summary of comments
New Malden and Old Malden	<ul style="list-style-type: none">• Bring back character of the area with new developments• Each district centre should be more connected to the borough• Keep the focus of New Malden around the High Street• Improve green spaces and more trees needed• Mix of cultural heritage needed• Some concern about developing the night-time economy and impact on local residents• Open up routes along Hogsmill.
South of the Borough	<ul style="list-style-type: none">• Include mention of gypsies and traveller populations as they are having to deal with poor conditions• Support for the continued protection of the vast Green Belt and open spaces• Consider appropriate Green Belt release where exceptional circumstances exist in line with national policy• Acknowledge Tolworth Court Farm nature reserve• Add references about improving active and public transport.





Sustainable development strategy

This chapter set out policies for how we intend to plan the future of Kingston in a positive way to help us achieve much needed sustainable development in the borough.



Draft policy	Summary of comments
<p>Draft Sustainable Development Strategy Policy K1: Sustainable Locations for Good Growth</p>	<ul style="list-style-type: none"> • Mixed feelings for this policy. Some support for Kingston Town Centre to be the focus for development and investment while others disagree that the level of growth proposed should be allowed without Crossrail 2 and more infrastructure • Some comments that development shouldn't just be focused on Kingston Town Centre and should be spread to other parts of the borough too • Strong feelings that the Infrastructure, which is already 'creaking' won't cope. Concern about the quality of life for existing and future residents, as the council tries to meet housing targets • Disbelief that development can be delivered while protecting the existing rich character and heritage of the town centre • Concern expressed that the focus to meet the Mayor of London's housing targets will be to the detriment of the area's heritage. Some comments that recent decision making on planning applications reflect this • Request for the strategy to openly discuss the 15 minute city concept.
<p>Draft Sustainable Development Strategy Policy K2: Spatial Strategy for the Kingston Town Centre Area</p>	<ul style="list-style-type: none"> • Explain what the capacity for growth is, as required by the London Plan • Need to be more explicit about how the Local Plan will encourage and deliver the growth potential of the Opportunity Area • The role and opportunity of the river should be emphasised and celebrated • Explain in more detail how the Plan for the Kingston Town Centre Area will work together with the Local Plan • Identify more clearly the stakeholders and partners who will be needed to deliver this spatial strategy for the town centre • Provide more detail on what the 'zone of influence' on the map means • Comments from some that it is difficult to provide feedback when details of developments are not available and the 'zone of influence' is not properly defined or justified.



Climate change and environmental sustainability

Kingston Council has declared a climate emergency and has published a Climate Action Plan, developed collaboratively with communities, partners and experts.

This chapter set out the policies to address climate change and how it should be dealt with in a coordinated manner as proposals for new development come forward, taking account of the policies already in the London Plan.



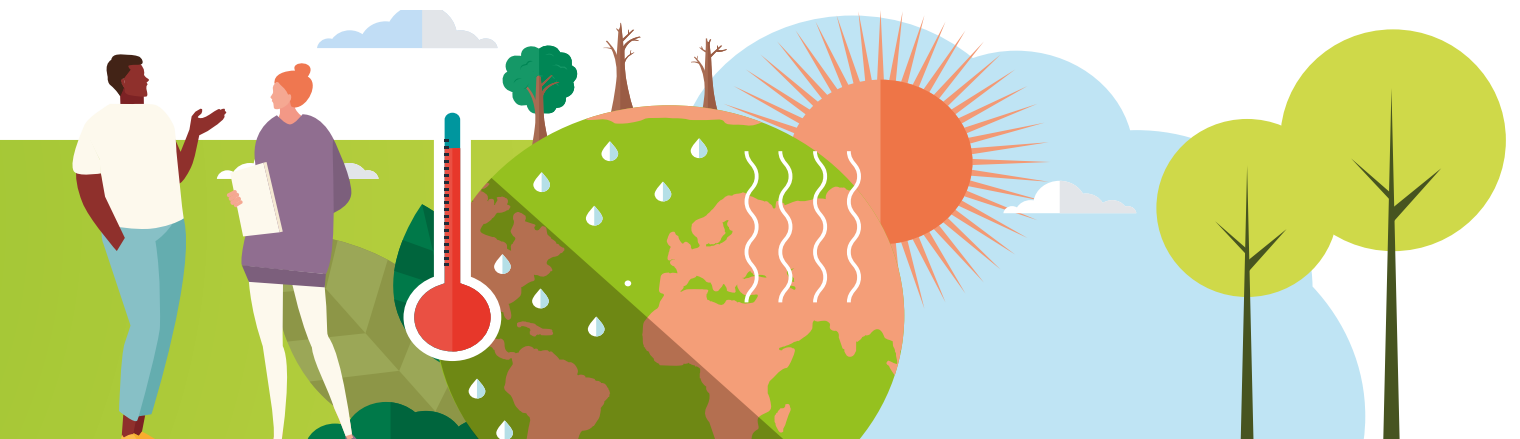
Draft policy	Summary of comments
<p>Draft Strategic Policy KC1: Climate Change and Environmental Sustainability</p>	<ul style="list-style-type: none"> • Some feel the objectives are not clear, and the policy lacks timelines and practical proposals • Should address insulation in new buildings and prioritise retrofitting instead of demolition • Should highlight the importance of nature-based solutions for climate mitigation, such as rewilding and tree planting • Should do more to promote alternative power and heating sources, including heat pumps, wind generation and district heating from rivers • Should expand on how climate change affects vulnerable individuals and economically disadvantaged communities • Should improve accountability and enforcement of carbon reduction requirements • Insufficient consideration to flood risk mitigation and protection of sensitive natural areas like the Hogsmill River.
<p>Draft Policy KC2: Air Quality</p>	<ul style="list-style-type: none"> • Should advocate for planting trees and hedges to serve as barriers against pollutants • Should explain what acceptable air quality levels mean and how this would be measured • Should ensure the Air Quality Positive requirement does not excessively hinder major developments • Should address air quality concerns in the Tolworth area, even though it is not identified as an Air Quality Focus Area • Should acknowledge that people in some areas are exposed to NO2 levels above regulatory limits and PM2.5 pollution above World Health Organisation guidelines • Some feel that Air Quality Impact Assessments (AQIAs) aren't always necessary for new build developments if there are no air quality issues or other measures can be taken.



Draft policy	Summary of comments
Draft Policy KC3: Flood Risk	<ul style="list-style-type: none">• Should encourage nature-based drainage solutions and natural flood management practices wherever appropriate• Should discourage the removal of gardens and green spaces with flat hard surfaces, which increases water run-off when it rains• Should reference and support the River Thames Scheme (a significant project aimed at reducing the risk of flooding from the Thames)• More needs to be done to address surface water flooding in Kingston, roads in the area are regularly flooded• Queries raised about the potential need to upgrade or extend sewerage infrastructure to increase the capacity required for new developments• Should set out requirements specific to Kingston, mention the mitigation measures in the Strategic Flood Risk Assessment and other consents that may be required.
Draft Policy KC4: Sustainable Drainage	<ul style="list-style-type: none">• Should emphasise the benefits of Sustainable Urban Drainage Systems (SuDS) and permeable surfaces from new and existing developments more• Should be clear who is responsible for maintaining surface water drainage and SuDS, including where green infrastructure has been proposed• Concerns with the increasing number of garden spaces paved over for parking, especially within controlled parking areas• The requirements for sustainable drainage should be more specific and detailed.
Draft Policy KC5: Sustainable water and wastewater management	<ul style="list-style-type: none">• Should emphasise the importance of the Hogsmill River, a rare chalk stream• Should do more to reduce and prevent discharges into the River Thames• Should provide more details about the technical requirements and their implications for new developments• Concerns with sewage and wastewater discharge into the waterways and the pressure from future developments• There should be early engagement between Thames Water and the developers to help understand drainage and infrastructure requirements for new developments• There should be a specific reference to Hogsmill Sewage Treatment Works to support future upgrades.

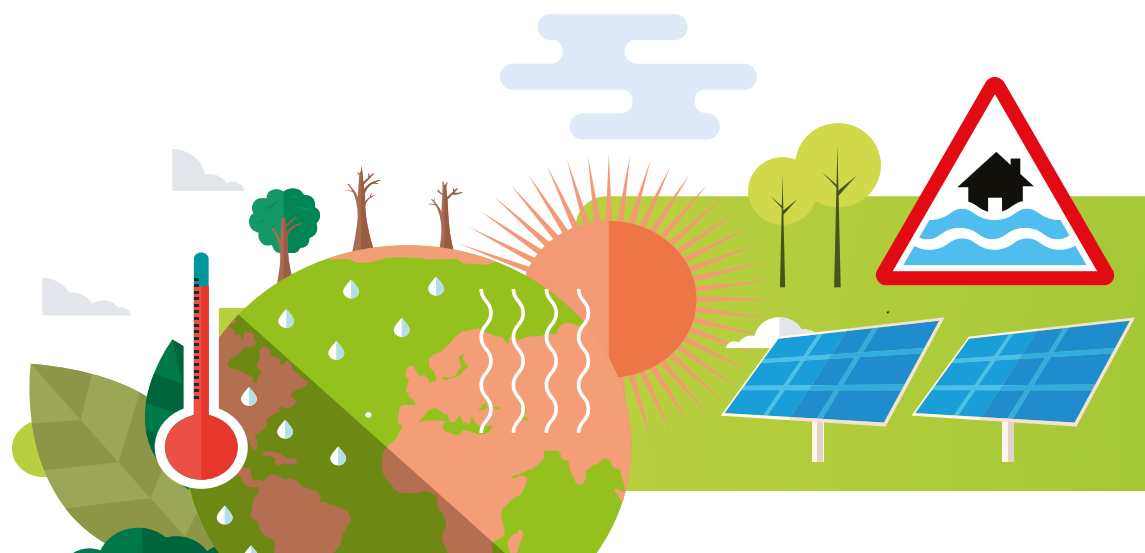


Draft policy	Summary of comments
Draft Policy KC6: Managing Heat Risk	<ul style="list-style-type: none">• New buildings should be required to meet the 'Passive House Standard'• Concerns that the new developments proposed in the Local Plan may lead to more heat-related issues• Requiring an Overheating Risk Assessment for all developments, regardless of size and location, may be excessive and disproportionate• Should utilise long-term modelling and evidence to demonstrate an understanding of the climate hazards and risks facing Kingston.
Draft Policy KC7: Minimising Greenhouse Emissions	<ul style="list-style-type: none">• Should prioritise reducing on-site emissions and only resort to off-setting via the Carbon Offset Fund to ensure policy compliance as a last resort• Should require major retrofit projects and extensions to outline the measures that will be taken to enhance the energy efficiency of the building• Concerns that some of the requirements are too prescriptive and impractical• Concerns that some requirements would make development unviable or prohibitively expensive for smaller builders and housebuilders• Concerns that requiring a Whole Life-Cycle Carbon Assessment for all major developments might be overly onerous for smaller projects• The Council should do more to support innovative energy projects• Suggestion for Seething Wells to be rewilded as a carbon sink.



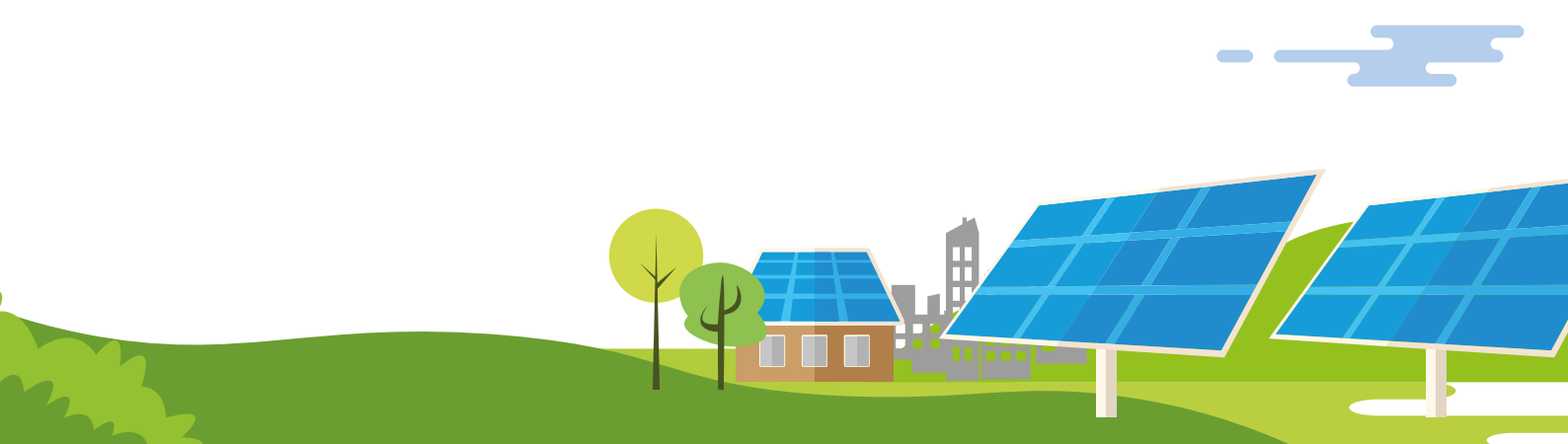


Draft policy	Summary of comments
Draft Policy KC8: Energy Infrastructure	<ul style="list-style-type: none">• Should encourage the adoption of alternative power and heating sources, including ground/air source heat pumps, photovoltaic (PV) panels, and wind turbines• Should include a 'pro-solar policy' and an 'energy efficiency policy' for new build developments and the retrofitting of existing buildings• Should require on-site renewable energy in all public buildings and install rooftop PV panels where it is feasible (e.g. offices, multi storey car parks)• Should work with Distribution Network Operators (DNOs) to ensure there is adequate capacity for full electrification (with new EV and heat pump load) at the scale required by 2038• Should take more actions to support renewable projects and facilitate the expansion of charging infrastructure, including through public investments• Should require energy masterplans for large-scale developments• Should safeguard any land required for energy infrastructure• Should insist that all developments are designed to be fully compatible with any existing or planned decentralised energy network.• Connection to the district heating network may not always reduce the total emissions from new developments. Achieving lower total emissions from a standalone solution may be possible.
Draft Policy KC9: Ground Contamination and Hazardous Substances	<ul style="list-style-type: none">• Should emphasise the positive role of development in improving land impacted by contamination• Should identify sensitive groundwater areas for protection and have cross-boundary discussions• Should define what is considered 'sensitive use' more clearly to prevent confusion regarding when a Preliminary Risk Assessment is necessary.





Draft policy	Summary of comments
Draft Policy KC10: Sustainable Construction and Supporting the Circular Economy	<ul style="list-style-type: none">• Should include references to the circular economy principles for developments involving the demolition of existing buildings• Should resist proposals that involve demolishing and rebuilding, when it is feasible to reuse the existing building and retrofit it instead• Should delete the phrase 'prioritise', this is not in line with the National Planning Policy Framework, which 'encourages' the reuse and retrofit of existing buildings wherever possible• Should recognise that reusing and retrofitting a building may not always be the most sustainable option in the long run. Sometimes, it's better to design a new building that is flexible and future-proof• Concerns that the threshold to provide a Circular Economy Statement and a Whole Life-Carbon Assessment is not practical/feasible or proportionate. The London Plan limits the requirement for a Whole Life-Carbon Assessment to schemes referable to the Mayor• Concerns that the requirements are too onerous when it relates to a change of use, especially when retrofitting and reusing a listed building• Might be useful to include criteria and additional policies for historic and traditionally built buildings.
Draft Policy KC11: Waste and Recycling Management	<ul style="list-style-type: none">• Should set out the waste and recycling space standards for developments• Should deliver the London Plan's requirements for waste management and circular economy, including planning for waste infrastructure• It is important to demonstrate there is sufficient capacity to accommodate the additional waste generated from new housing developments• Recommend policies are developed on waste management, to ensure waste facilities are built to high standards• Concerns that the current policy lacks sufficient criteria for evaluating new waste facilities and addressing their impact on nearby residents.





Design and heritage

This chapter sets out the approach to design and the historic environment. A key priority is to seek the very highest design standards in all developments throughout the borough and to ensure that any regeneration has heritage at its heart. Accessibility and climate change is a key part of the design process.



Draft policy	Summary of comments
<p>Draft Strategic Policy KD1: Delivering High-quality Design</p>	<ul style="list-style-type: none"> • Support for the policy but concerns about how meaningful it is when applications are being assessed • Although subjective respondents would like a clearer definition of what ‘good design’ and ‘design-led’ means • Some queries about the references included to guidance documents in the policy wording • Clearer definitions or examples needed for what will fall under the category of “fails to be suitable” or “inappropriate” • Concerns about the impact of tall buildings on local character • Some feel that repeating design context could stifle innovative and creative design and that design should reflect local character unless it can be justified that an alternative design approach would be appropriate • Policy wording needs to recognise the importance of optimising the development potential of a site • Strengthen the need for effective public engagement at the pre-application stage • Further work needed on developing design codes for the borough.
<p>Draft Policy KD2: Design Considerations for Development</p>	<ul style="list-style-type: none"> • Support for the level of detail required for major developments • Kingston’s Character Area Assessments need to be updated • Queries over use of some language • Flexibility needed about whether 3D modelling is needed and which product is used • Provision for ‘cycle routes’ should be added to the policy wording • Some of the language about the planning application and post-planning process is too vague and confusing; need to strengthen to avoid post-permission changes • Need more specific targets to push for better design standards • Reference needed to London Plan fire safety design standards.
<p>Draft Policy KD3: Amenity</p>	<ul style="list-style-type: none"> • Concern about lack of specific standards to measure schemes against e.g. overlooking.



Draft policy	Summary of comments
Draft Policy KD4: Public Realm	<ul style="list-style-type: none">• Language needs to be strengthened to reference 'enhancing the ecological network' not just 'greenery'• Both green and blue infrastructure should be included• Would like to see policy reference the need to engage the public when designing public realm• Policy wording needs to consider everyone's needs and be inclusive.
Draft Policy KD5: Housing Quality and Standards	<ul style="list-style-type: none">• Concern that there are no design requirements for accessible housing, for those with disabilities• Desire to go above minimum space standards.
Draft Policy KD6: Residential Extensions, Alterations and Basements	<ul style="list-style-type: none">• General support for basement policies• Query about whether an Agent of Change Policy needs to apply to basement developments• Add further requirements for basement development adjacent to listed buildings in Archaeological Priority Areas• Concern about construction of basements and whether measures such as Construction Method and Management Plans should be added to the policy stipulations.
Draft Policy KD7: Residential Amenity Space	<ul style="list-style-type: none">• Support for policy exceeding the London Plan standards in relation to external amenity space for flats• Would like to see sustainable drainage built in• Some concern about references to no overlooking and if this might restrict some development in an urban setting.
Draft Policy KD8: Commercial Frontages and Signage	<ul style="list-style-type: none">• Concern that policy on signage could be overly restrictive for businesses• Clarity on the word 'signage' needed.
Draft Policy KD9: Telecommunications and Digital Infrastructure	<ul style="list-style-type: none">• Policy should be broadened to include all roads, not just 'main' roads• Suggestion that minimum residual footway should be increased.



Draft policy	Summary of comments
Draft Policy KD10: Views Management	<ul style="list-style-type: none">• Concern that policy approach on creating new views in the borough is too vague• For ease of reference a diagram should be added to show the 13 Protected Views and the definitions of the different view categories in the policy• Also need to also consider views from Hampton Court Palace back towards Kingston• Queries about whether the policy should reference developments using 3D visualisation to demonstrate impact on views.
Draft Policy KD11: Tall Buildings	<ul style="list-style-type: none">• Queries raised about the emerging tall building study and a desire for further explanation and clarity• Concerns around impact of tall buildings on the character of different parts of the borough and protected views• More detail needed on how tall buildings may be seen to contribute positively to views• Some would prefer to see the potential location of tall buildings designated as a zone, rather than site specific allocations• Impact on biodiversity through bird-strike and disorientation from lighting to both bats and nocturnal migrating birds should be recognised• Several respondents would prefer no tall buildings or want to see the number of tall buildings in Kingston kept to a minimum; and not higher than the existing tall buildings.
Draft Strategic Policy KD12: Heritage Assets	<ul style="list-style-type: none">• Support for recognition of the importance and value of heritage assets to the character and identity of Kingston• Reference specifically the importance of non-designated assets• Welcome inclusion of landscape and natural heritage assets too.
Draft Policy KD13: Development affecting Heritage Assets	<ul style="list-style-type: none">• Respondents stress the need to ensure that the locations and heights of any tall buildings do not harm the setting of heritage assets• Some concern that the Plan has not fully considered impacts to heritage assets outside the borough boundaries• Query about how internal alterations to heritage assets in Kingston town centre can be given greater support where this would assist businesses to make effective use of a building.
Draft Policy KD14: Archaeology	<ul style="list-style-type: none">• Comments in relation to the impact of increasing visitors on Richmond Park's archaeology.



Housing delivery

This chapter sets out the draft policies to increase housing supply in the borough to meet local and strategic housing needs. Building the right homes in the right places will improve the future supply for new homes and help to deliver more suitable housing for families and to cater for different needs.



Draft policy	Summary of comments
<p>Draft Strategic Policy KH1: Meeting the Borough's Housing Needs</p>	<p>Housing Target</p> <ul style="list-style-type: none"> Concerns remain about the housing target for the borough set by the London Plan Concern about lack of defined housing target beyond 2029. <p>Locations of Housing Delivery</p> <ul style="list-style-type: none"> Not enough sites have been identified to meet the housing target Too much reliance on the Kingston Town Centre area. Need to consider other locations in the borough as well Mixed views on Green Belt and Metropolitan Open Land with some adamant it should be protected while others want some to be allocated to provide new homes in the south of the borough. <p>Housing Types and Tenures</p> <ul style="list-style-type: none"> More affordable housing needed Clarification needed on preferred affordable housing tenure mix Mixed views on the requirements for a minimum number of family homes in developments Need specialist housing policies that consider needs of the most vulnerable people in the community and provide affordable supported housing Bring empty flats over shops back into use The borough has enough student housing Concern that there is potential for site allocations to be delivered as student accommodation, which will not deliver family housing needed. <p>Supporting Infrastructure Required</p> <ul style="list-style-type: none"> Public transport needs to improve before there is any significant increase in housing delivery. <p>Other comments</p> <ul style="list-style-type: none"> Seething Wells Filter Beds should not be built on Developers should not be able to bank sites for many years without developing them Prevent the conversion of commercial and industrial floorspace into housing Queries about how the council will meet the accommodation needs for refugees and boat house dwellers.



Draft policy	Summary of comments
Draft Policy KH2: Affordable Housing	<p>Affordable Housing Target</p> <ul style="list-style-type: none">• Delivery of affordable housing must remain a priority• Stronger action wanted to ensure affordable housing is delivered / viability test felt to be an easy opportunity to avoid affordable housing• Affordable homes should be genuinely affordable• No explanation as to how the affordable housing targets (of 50% on public land and 35% on private land), will be achieved with development frequently comprising only 10% affordable housing• Policy should allow flexibility with financial viability reviews in line with the London Plan• Student accommodation should be affordable for all students. <p>Location of Affordable Housing</p> <ul style="list-style-type: none">• Low cost housing in the most expensive locations is not a realistic aspiration - leads to excessively dense and tall developments• The council needs to identify sites that can deliver affordable family housing with gardens• Need to clarify that off-site provision or payment in lieu should only be in exceptional circumstances• The Council should identify surplus land in public ownership to deliver affordable housing. <p>Housing Tenures</p> <ul style="list-style-type: none">• Affordable housing should be provided for Key Workers, in line with other boroughs• Clarification needed in the Local Plan on preferred affordable housing tenure mix (including First Homes)• More affordable rental properties required.





Draft policy	Summary of comments
Draft Policy KH3: Housing Size Mix	<ul style="list-style-type: none">• Development not meeting minimum housing mix criteria should be refused - concerned that Part B in the draft policy wording gives a developers a get out clause• Mixed views on the requirements set out for more family homes being either too stringent or not stringent enough• There should be more flexibility in the housing size mix allowed• Some concern that approach to housing mix could curtail the delivery of housing in the borough• Some people express that there are too many flats being built• Housing size mix should be monitored annually.
Draft Policy KH4: Build to Rent Housing	<ul style="list-style-type: none">• Build to Rent can be a positive development opportunity if it offers security of tenure, and affordable rent and discount market rent• Concern that large scale Build to Rent housing developments encourages short term, transitional residents to move in, leading to destabilising the local community• Some want to see Build to Rent managed by the council or a social landlord and at reasonable rents.
Draft Policy KH5: Specialist and Supported Living Housing	<ul style="list-style-type: none">• Need specialist housing policies that consider needs of the most vulnerable people in the community and provide affordable supported housing• Want to see the Local Plan take greater consideration of the needs of disabled people - facilities for accessible housing including wheelchair access• Greater recognition needed that most of those needing specialist and supported housing are low-income households, and require 60% of specialist housing to be delivered as affordable• Ensure that specialist older people's accommodation is well-served by public transport and contribute to an inclusive neighbourhood• Amend the policy to include specialist housing for older people, people with a disability, and vulnerable people• Ensure specialist accommodation takes into account the needs of older people - they do not want small flats, in noisy high-rise blocks, but ground floor housing with outdoor space.



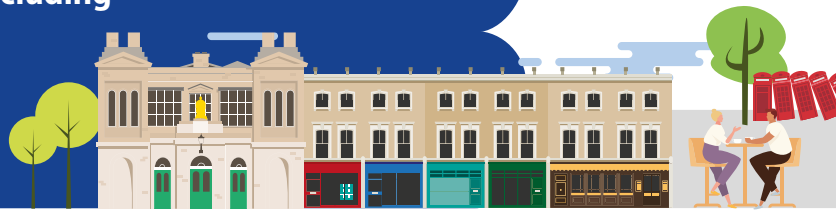
Draft policy	Summary of comments
Draft Policy KH6: Shared Living Housing and Student Accommodation	<ul style="list-style-type: none">• Shared living and student accommodation are separate distinct uses and should be dealt with under separate policies as they are within the London Plan• Require 60% of all shared living and student accommodation bedrooms to be affordable• Part B in the draft policy wording allows the automatic approval for the conversion of residential homes into houses in multiple occupation. Concerned that more proposals for shared living and student conversions will be approved• Shared living and Student accommodation should have a much tighter control due to the single type occupier that this form of accommodation provides.• Need to provide updated evidence on the need for student accommodation• Student accommodation in Kingston should be primarily aimed at students studying in the borough - not central London• The draft policy wording about converting self-contained housing into a house in multiple occupation should only apply to converting existing C3 residential use to shared living as the current wording is ambiguous• Houses in Multiple Occupation should be dealt with in a separate policy, not within a shared living policy.
Draft Policy KH7: Gypsies and Travellers	<ul style="list-style-type: none">• It is important to understand the accommodation needs of Gypsies and Travellers, including site specific requirements• Questions remain as to how the council will meet the identified accommodation need• Addressing the identified need should be an urgent priority• Suitable accommodation sites need to be identified.





Economy and town centres

The draft policies in this section set out the borough’s strategy towards supporting Kingston’s economy, including development in designated industrial locations and town centres as well as sites outside these locations where businesses and jobs are located.



Draft policy	Summary of comments
<p>Draft Strategic Policy KE1: Supporting the Borough’s Economy</p>	<p>Economy of the borough</p> <ul style="list-style-type: none"> • Support expressed for a greener economy and more greener businesses • Include more references to Chessington World of Adventures Resort and the University, as major contributors to the local economy • Ensure the borough’s leisure and tourism offer is recognised • Greater support needed for distribution sector (particularly last-mile logistics). <p>Town centres</p> <ul style="list-style-type: none"> • Some support for converting empty commercial and retail units into new homes, where appropriate and high quality • Concern about compatibility of promoting the night-time economy and new residential developments in Kingston town centre. <p>Affordable workspaces and retaining talent</p> <ul style="list-style-type: none"> • Welcome policy for including new affordable workspaces as part of new employment developments • Support for efforts to retain talented graduates from Kingston University graduates in the borough. <p>General comments</p> <ul style="list-style-type: none"> • Add references to the importance of partnership working • Concerns that there are no meaningful mechanisms to achieve some of the aims which are in the hands of market forces • The more detailed nuances of the Employment Land Review’s findings regarding office provision should be set out in both policy and the supporting text.



Draft policy	Summary of comments
<p>Draft Policy KE2: Employment Uses</p>	<p>Town centre comments</p> <ul style="list-style-type: none"> • Need a more realistic and flexible approach which responds to individual site circumstances, to protect existing employment floorspace, maintain the vitality of district and local centres, enable mixed-use developments and meet the needs of smaller businesses • Need restrictions to avoid conversion of employment uses into entertainment spaces unless adequate safeguards are in place • More flexibility needed to allow for alternative town centre uses at ground floor level • Mixed views about policy allowing for alternative uses in town centres and shopping parades. <p>Industrial uses comments</p> <ul style="list-style-type: none"> • More flexibility needed to support micro-distribution and urban logistic uses in key locations to allow for more sustainable supply chains and last mile delivery • Policy needs to safeguard rail freight sites outside of industrial areas.
<p>Draft Policy KE3: Development in Industrial Locations</p>	<ul style="list-style-type: none"> • Policies need to be more flexible if commercial uses are no longer appropriate or to allow more mixed-use developments • More cycle connections and facilities needed to support development in industrial locations • Concern about intensification of sites and level of public scrutiny • Policy needs to explain the range of industrial and related uses that are acceptable in Locally Significant Industrial Sites • Need to protect smaller industrial areas and allow greater flexibility of uses within them • New industrial uses should be clearly defined in the policy and encourage more sustainable/green industries.



Draft policy	Summary of comments
Draft Strategic Policy KE4: Town Centres	<ul style="list-style-type: none">• Many people value their local centres and parades. Small clusters of shops should also be included in the table• Queries about the conflict between growing the night-time economy and residential-led development and safety• Some concern raised about references to residential-led mixed-use development in the town centre and what this means for the commercial vitality of the area• Need to encourage and enhance active travel to and in all centres• Define more clearly what is meant by comparison retail and the sequential test• Desire to see more support in town centres for community, healthcare, educational and cultural uses• More accessible public toilets needed• Maintenance is important too and concern about graffiti and antisocial behaviour• Concern about provision of adequate parking at reasonable costs to support town centre vitality• Encourage more independent retailers and restaurants• There should be a time limit for buildings remaining empty and becoming an eyesore and supporting meanwhile uses.
Draft Policy KE5: Development in Town Centres	<ul style="list-style-type: none">• Concern about some buildings being vacant for a long time, awaiting redevelopment• Concern about the balance between protecting some employment floorspace and the need to deliver new housing and diversify town centres• Policy should be strengthened to encourage social infrastructure at ground floor level• Policies need to be flexible to reflect the different circumstances of the local centres and ensure their success• Protect local centres and shopping parades from being turned into flats with shop fronts replaced with household bin storage• Policies lack details about the scale of development allowed, relative to the size of the town centre• Support having homes above shops to create more vibrant live/work spaces in town centres• Define better what "main" town centre uses means• Ensure new development facilitates more active travel• Review and justify boundaries of town centres and include zoning• Concerned about the loss of car parks and the implications for Kingston town centre as a regional retail hub.



Draft policy	Summary of comments
Draft Policy KE6: Main Town Centre Uses outside Town Centres	<ul style="list-style-type: none">• Welcome the policy's support for local shops and the benefits of local convenience shops for residents• Request for any development proposals to be rejected if they are likely to have a significant adverse impact• Queries about why 400m walking distance is chosen (in relation to access to a convenience shop) and whether it can be reduced to 300m.
Draft Policy KE7: Visitor Accommodation	<ul style="list-style-type: none">• Queries over lack of support for additional visitor accommodation outside of town centres, e.g. bed and breakfasts and Chessington World of Adventures Resort in the south of the borough• Queries about the level of flexibility that might be applied for site-specific circumstances• Concern expressed about the level of transport access to support the visitor economy.
Draft Policy KE8: Hot Food Takeaways	<ul style="list-style-type: none">• Support for policy restricting hot food take-aways• Concerns raised about impact of late night deliveries, noise and waste resulting from hot food takeaways.
Draft Policy KE9: Betting Offices	<ul style="list-style-type: none">• Support for policy restricting betting offices• Some would prefer to see no new licences given for betting shops regardless of whether others are already present and particular concern if it is close to a youth centre or school.





Social infrastructure

Development needs to be supported by adequate and accessible infrastructure. This section set out draft policies to help ensure that population change and residential development in the borough is supported by a network of high quality, accessible and effective social infrastructure.



Policy	Summary of comments
<p>Draft Strategic Policy KS1: Social Infrastructure</p>	<ul style="list-style-type: none"> • Concerns raised by many people about whether sufficient infrastructure will be in place to support proposed new developments • Contributions from developers towards social infrastructure needs to be sufficient to meet the needs of the new development • Maintenance of existing infrastructure and public spaces is just as important • Many agree about the importance of resisting the loss of community facilities, spaces and buildings • Request to encourage and enable local people to be more involved in the development and regular updating of the Infrastructure Delivery Plan and for it to be informed by a local needs assessment • Strong desire to increase the amount of infrastructure which supports those most in need in the borough • Need more affordable community spaces, for different groups to meet and provide support/entertainment for residents • Review the chapter in line with new census information and ensure it is reflected in the needs assessment.
<p>Draft Policy KS2: Healthcare Facilities</p>	<ul style="list-style-type: none"> • Explain what the health inequalities are in the area or where there is information on what these are • Concern that development will not be supported by new social care facilities, which are increasingly needed • Request to reference Tolworth Hospital and the related developments on site • Identify Kingston Hospital and Surbiton walk-in as meeting a very important need in the borough.



Policy	Summary of comments
Draft Policy KS3: School, College and University Facilities	<ul style="list-style-type: none">• Queries about whether the council has identified additional sites for future provision of education and childcare facilities to meet identified needs• Make clearer references to adult education in the borough currently missing from this policy• Expand the policy to include reference to childcare facilities• Reference plans to intensify Kingston University's sites to meet existing and future needs.
Draft Policy KS4: Community Facilities	<ul style="list-style-type: none">• Introduce measures to rectify the severe shortfall in community facilities that support the development of children and young people, particularly those with special educational needs• Increase the provision of youth clubs• Clarify what the criteria would be for finding a community facility "surplus to requirements" which is currently too vague• Reword policy to be more flexible in order to allow other town centre uses other than residential to occupy buildings• Support repair cafes at key locations in the borough.
Draft Policy KS5: Arts and Cultural Facilities	<ul style="list-style-type: none">• Include information on the cultural mix of Kingston including information from the census• We should be proud of and push our arts and creative sector far more and the Local Plan should support that• Ensure libraries and community halls are protected• New cultural venues and/or facilities and spaces for outdoor cultural events are needed in Kingston• There should be no provision to allow for the loss of an arts or cultural facility in the policy.





Policy	Summary of comments
Draft Policy KS6: Sports Facilities	<ul style="list-style-type: none">• The Local Plan needs to be supported by an up to date and robust assessment of existing sports facilities; concern that existing provision is not enough to support increases in housing and employment• No playing fields should be used for development• Kingston should commit to providing and maintaining at least three public swimming pools in the borough, including one in the south of the borough• Sports facilities must be designed so as to avoid harm to the local biodiversity. Concerns expressed that some sports infrastructure is adopting increased use of lighting and artificial surfaces• The policy should refer to sports 'and recreation' facilities to be more inclusive of different facilities.
Draft Policy KS7: Play and Informal Recreation	<ul style="list-style-type: none">• More informal recreation facilities are needed for teenagers/pre-teens once they are too old for playgrounds. e.g more football/basketball/skateparks and consider more how the river could be used• Consider different accessibility needs in this policy - not just about physical accessibility. Need to account for the needs of children or adults with learning disabilities• Children's play spaces should be separate dedicated areas• Concern expressed about the suggestion of any loss being allowed or allowance for the re-provision of play spaces nearby - which may not be the same quantity - especially as the Plan suggests an increase in development.
Draft Policy KS8: Public Houses	<ul style="list-style-type: none">• Function rooms within pubs should also be considered within the discussion of social infrastructure• Support for the policy but doubts expressed that they can be protected if publicans are struggling• More public houses should be used for music venues which provides opportunities for musicians and vibrancy for the area• Identify public houses which should be protected and or considered for entry on the Assets of Community Value list.



Natural environment and green infrastructure

This chapter sets out the Local Plan’s draft policies to protect and enhance the borough’s natural environment. It provides an integrated approach for the planning and delivery of green and blue infrastructure.



Draft policy	Summary of comments
<p>Draft Strategic Policy KN1: Green and Blue Infrastructure</p>	<ul style="list-style-type: none"> • Reference the need to improve access to green spaces as part of the strategic policy. Some parts of the borough have much better access to green space than others. More green corridors could help rectify this • Support inclusion of blue infrastructure • River restoration and preventing discharges should be referenced • Although outside the borough boundary consider how we can protect and enhance nearby green spaces such as Richmond Park, a Special Area of Conservation And Bushy Park a Site of Special Scientific Interest.
<p>Draft Policy KN2: Open Spaces</p>	<ul style="list-style-type: none"> • Support the need for developments <i>maintaining</i> their open spaces • Concern about impact of new developments on existing open spaces, without new areas of publicly accessible green space being created • New public green and open space should be created in Areas of Deficiency • Queries raised about how policy requirements to create new areas of usable open space will balance with the objective of optimising development • Recommendation to designate borough’s parks as Local Green Spaces which would give them the same level of protection as Green Belt / Metropolitan Open Land • Protect against loss of any privately owned playing fields used for public amenity.



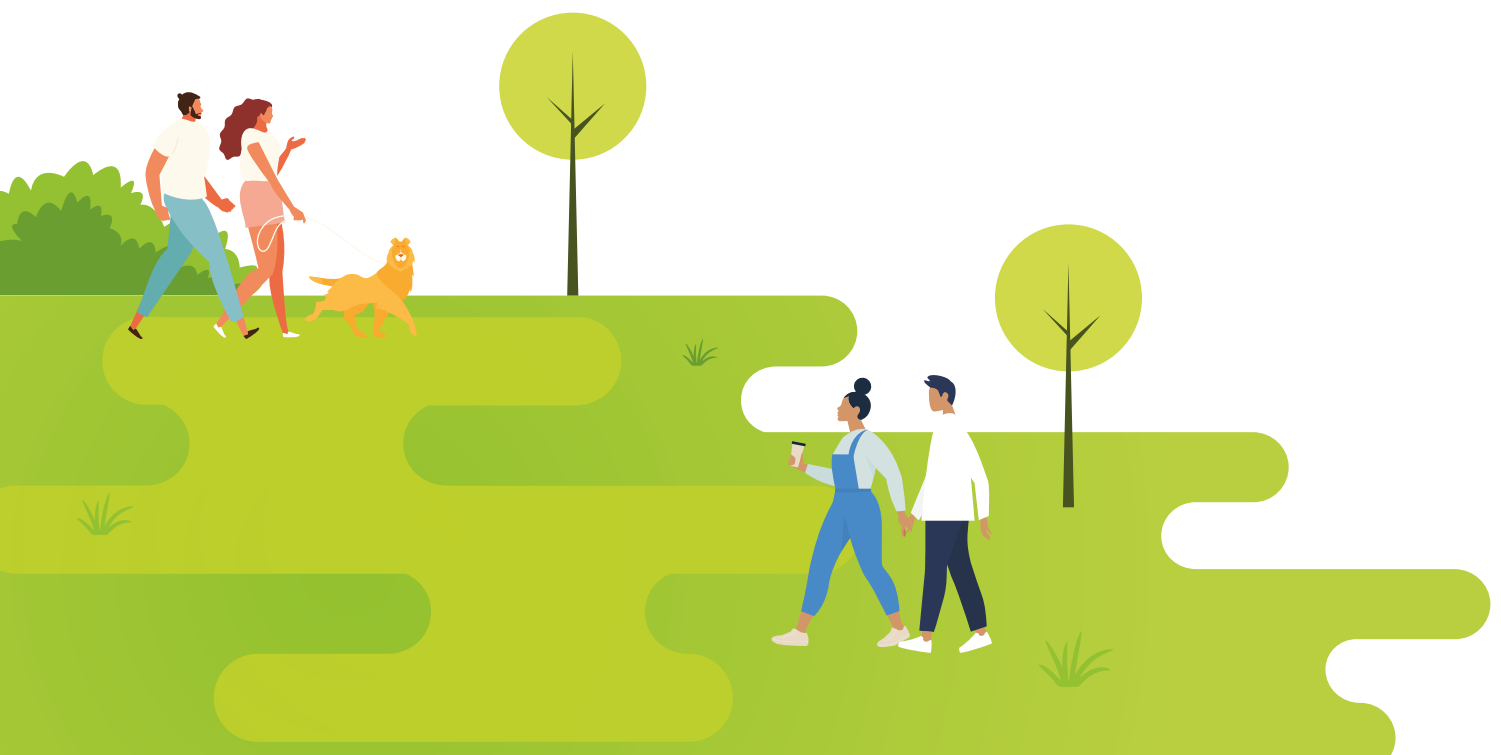


Draft policy	Summary of comments
Draft Policy KN3: Biodiversity	<ul style="list-style-type: none">• Support for the ambition of a 30% Biodiversity Net Gain (BNG) and the use of latest metrics to measure this - although many respondents were sceptical about whether this is achievable and/or feasible in the majority of cases and suggest that it should not go beyond the national requirement of a minimum BNG of 10% (as required by the forthcoming November 2023 Environment Act)• Need to include watercourses - to ensure biodiversity net gains should be required for both aquatic and terrestrial habitats• Ensuring biodiversity offsetting is always a last resort• Support for Seething Wells becoming a community nature reserve to address deficient access to nature in this area• Value of mature trees needs to be recognised - replacing them with young trees not the same• Greater direction needed on use of artificial lighting due to the impact on natural nocturnal behaviours of a range of wildlife• Strengthen the wording of 'resist' to 'refuse' in terms of applications which result in the loss, deterioration or fragmentation of priority habitats• Greater clarification on the type of developments that will require an ecological survey report to be carried out.
Draft Policy KN4: Urban Greening and Trees	<ul style="list-style-type: none">• Policy should also apply to minor developments• Should refuse felling of mature trees for development.
Draft Policy KN5: Food Growing	<ul style="list-style-type: none">• Allotments to encourage local food growing is strongly supported• Include community gardens and orchards• Some queries about whether more flexibility is needed and food growing should be required on a case-by-case basis.





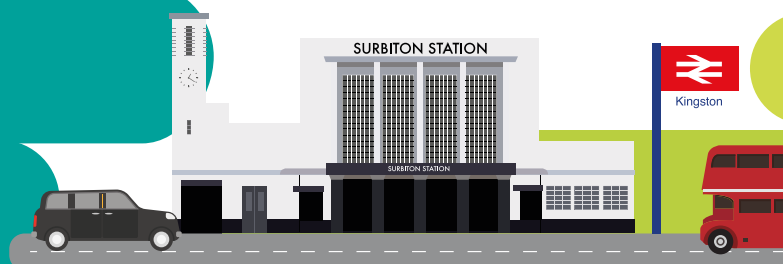
Draft policy	Summary of comments
Draft Policy KN6: Green Belt and Metropolitan Open Land	<ul style="list-style-type: none">• Strong support for protecting the Green Belt and Metropolitan Open Land• Requests to keep Green Belt land in good condition and for enforcement to manage any inappropriate uses• Queries about whether in some situations poor quality Green Belt land could be released; particularly to provide homes in the south of the borough• Strongly resist (inappropriate) development of Seething Wells Filter Beds• Propose addition of 'historical significance' and 'heritage value' in Part C:<ul style="list-style-type: none">• 'Proposals that improve public access to and involve outdoor sports and recreation activities on Green Belt or and Metropolitan Open Land could be supported where there is no conflict with the intended purposes, openness, historical significance, nature conservation and heritage value of such land.'• Request for a policy that addresses the development needs of Chessington World of Adventures Resort or for the resort to be removed from the Green Belt.





Transport and connectivity

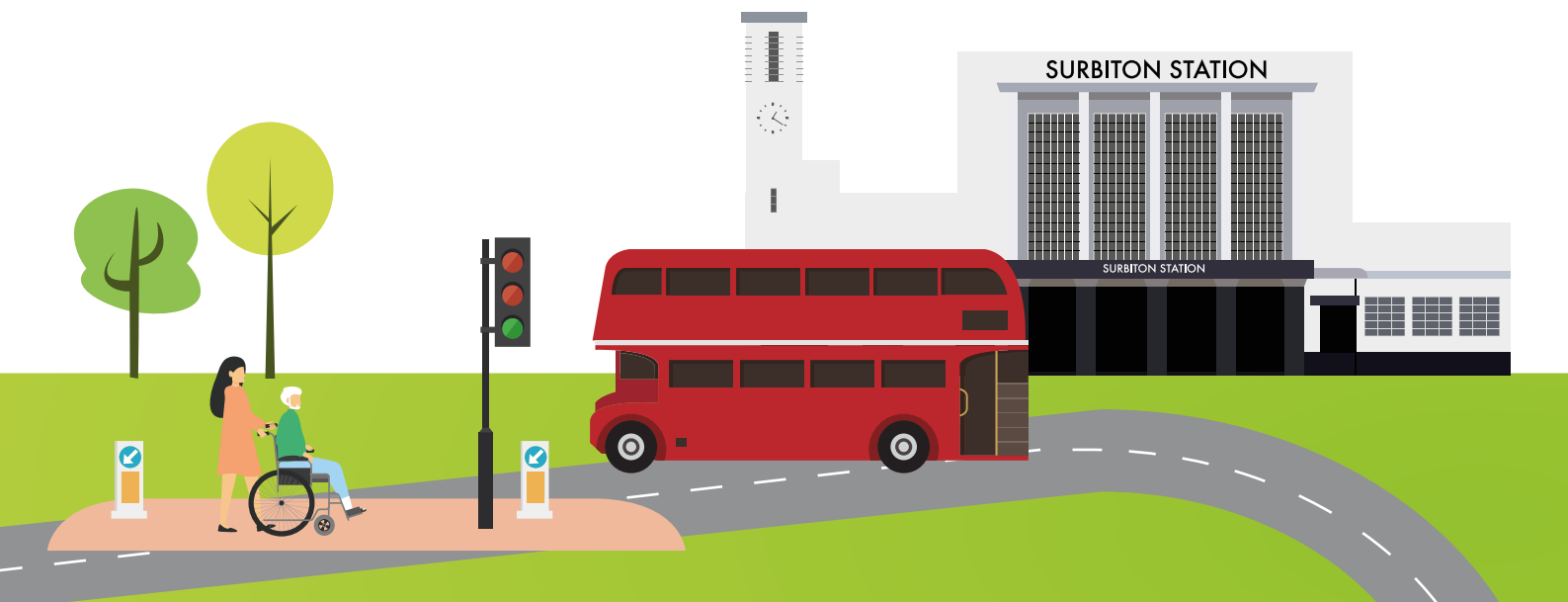
This chapter focuses on the seeking to achieve a more sustainable borough by promoting active travel and driving the Healthy Streets approach forward whilst improving connectivity across the borough.



Draft policy	Summary of comments
Draft Strategic Policy KT1: Strategic Approach to Transport	<ul style="list-style-type: none"> Majority support the contribution developments need to make towards the Healthy Streets approach and facilitating more trips to be made by active travel and public transport Concern that current public transport improvement infrastructure is inadequate for large scale development planned to take place Scale of development in allocated locations felt by some to be unjustified without Crossrail 2 Stronger emphasis needed on safeguarding public transport infrastructure sites across the borough, include bus and rail stations More emphasis should be made on the reality that major infrastructure improvements are dependent on external transport bodies, in particular Transport for London and Network Rail Support for the policy to make active travel (walking, cycling etc) even more accessible, safe and appealing.
Draft Policy KT2: Sustainable Travel and Healthy Streets	<ul style="list-style-type: none"> Further work needed to understand where the gaps of pedestrian and cycle networks are and allocate land for new routes Need to reference Low Traffic Neighbourhoods Respondents want reassurance that the Local Plan will be used to lobby for more affordable, efficient and reliable public transport, to support the proposed development Majority strongly endorse the Mayor of London's healthy streets approach Some concerns expressed about how the Local Plan is balancing sustainable travel with the needs of car users and the impact on the local economy.
Draft Policy KT3: Transport Infrastructure	<ul style="list-style-type: none"> Support for safeguarding our current transport infrastructure and sites for potential improvements, with some asking the Local Plan to be clearer on what is needed in the future.



Draft policy	Summary of comments
Draft Policy KT4: Car Parking and Car Free Development	<ul style="list-style-type: none">Majority of responses support car-free developmentSupport for the flexible approach set out that if a car park site is redeveloped, a sufficient amount is retained on-site or re-provided to meet local needs and protect the vitality of town centresMany welcome giving priority to cycle spaces, electric vehicle charging points and car club spaces in new development, and set out in the policy.
Draft Policy KT5: Sustainable Servicing	<ul style="list-style-type: none">Support for the need to provide space in new developments for home deliveriesSuggestion that the impact of construction and servicing vehicles on 'existing businesses/properties' is included within the requirements for new development.
Draft Policy KT6: River Transport	<ul style="list-style-type: none">Many respondents support increased use of the river as a method for sustainable transportSome respondents highlight concerns about potential noise, air and water pollution and impacts on local amenity uses that could arise from increased use of the river for transport.





Implementation and monitoring

Monitoring allows us to assess whether we are delivering on our proposals, the effectiveness of planning policies and whether any policies need to be reviewed in light of the latest issues affecting the borough.

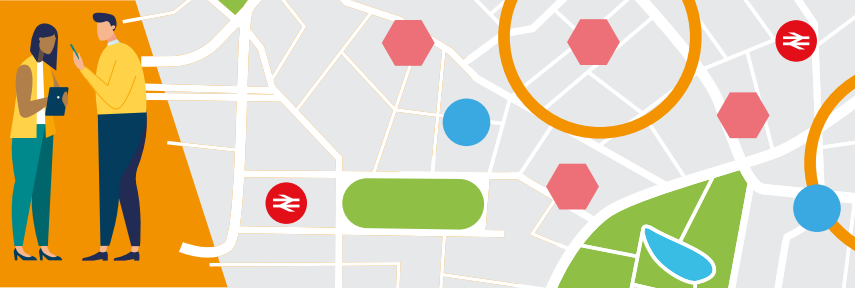


Key Issue	Summary of comments
Draft Policy KI1: Infrastructure and Developer contributions	<ul style="list-style-type: none"> • Support for securing contributions from developers towards appropriate infrastructure • Add in references about how stakeholders and communities can be consulted to influence the right infrastructure • Add in references in Part D to encourage developers to engage with other stakeholders, as well as the council, to understand impact of their development eg the Environment Agency • Section still to be added about bridging the gap between policy and delivery.
Draft Policy KI2: Monitoring	<ul style="list-style-type: none"> • Ensure the key performance indicators are SMART - specific, measurable, achievable, relevant, and time-bound • Query about the baselines for measuring the effectiveness of the Plan • Concern targets for gypsy and traveller pitches are too low • Suggestions about using technology to help with monitoring.





Site allocations



As part of the first draft of the Local Plan there was a chapter setting out specific policies for a series of sites allocated for future development. They set out the types of land use that would be supported, specific development requirements and design considerations that should be used to inform schemes for each site.

We have received specific feedback on many of the site allocations which will be used to inform the next

version. The table below summarises some of the general pieces of feedback we have received.

Inevitably, a lot of the responses received were from the landowners or developers of the sites themselves, with varying numbers and details to those proposed in the draft Local Plan. We will be working through the details of each site on a case by case basis to establish the parameters for taking them forward. Sites will also be viability assessed before being finalised in the plan.

Key issue	Summary of comments
Car park sites	<ul style="list-style-type: none"> • Respondents highlighted that some of the car parks are well used and in good condition • Doubts about the availability and timing of redevelopment for these sites • Concerns that there is no clear strategy to ensure that there will be enough parking spaces to meet future demands once the car park sites are gone.
Development capacity of sites	<ul style="list-style-type: none"> • Most developers and landowners disagreed with the development assumptions in the draft plan. Many are advocating for higher housing numbers for their sites and are against the maximum building height limit proposed for their site (they argue that it would hinder a viable scheme and does not align with the appropriate heights shown on the Draft Tall Buildings Map)
Additional sites	<p>Additional sites requesting specific allocation for residential uses include:</p> <ul style="list-style-type: none"> • Cambridge Road Estate • Tolworth Tower • Signal Park • Hollywood Bowl at Tolworth • 121-137 London Road, Kingston • Kingston University campuses • Other small sites • Green Belt/Metropolitan Open Land(MOL) sites.
Green Belt/ Metropolitan Open Land (MOL)	<ul style="list-style-type: none"> • Some responses have asked for the Local Plan to include a limited release of Green Belt land in the Chessington North/Hook area to provide housing and community facilities in their local area. More than 135 people responded to a consultation to support the inclusion of the Hook Park site in the Local Plan which is being promoted by a developer proposing family housing, a public park and community facilities with supporting infrastructure.

What is happening next?



Consultation on other documents

As part of the consultation on the first draft of the Local Plan we also consulted on a number of other supporting documents. This included the:

Integrated Impacts Assessment (IIA)

There are a number of documents that make up the IIA. These include:

- **Sustainability Appraisal** - a process that is carried out throughout the preparation of the Local Plan in order to promote sustainable development by assessing the extent to which the plan, when judged against reasonable alternatives, will help achieve relevant environmental, economic and social objectives
- **Equalities Impact Assessment** - assessing the likely equalities effects as a result of policies to ensure that the plan does not discriminate or disadvantage people and enables consideration of how equality can be improved or promoted.
- **Health Impact Assessment** - assessing the impact of the Local Plan on human health in the borough and the likely effects on health outcomes in the local population
- A web map was also produced to support the IIA to allow viewers to interact with the data that went into the site assessments and IIA used by our consultants (WSP).

A **Habitats Regulations Assessment** was also undertaken to assess if the development proposed by the Local Plan would harm any protected features of a recognised European habitat site.

The Council is required to re-run the IIA process on the next iteration of the Local Plan to ensure that any changes made to policies, designations or site allocations are fully tested for their impact and ensure that any negative impacts are mitigated against.

Draft Infrastructure Delivery Plan (IDP)

The IDP is being updated alongside the Local Plan based on consultation responses received. This document will be updated more regularly than the Local Plan to ensure it contains the most up to date information of infrastructure requirements in the borough.

Statement of Consultation

As part of the Local Plan process, we are required to demonstrate how we have engaged through the preparation of it. This summary is the first round of feedback we are providing on the Regulation 18 first draft of the Local Plan. By the time we reach the Publication stage in winter 23/24, we will publish the council's response to the comments received and set out how we have engaged throughout plan preparation.

The feedback we have received on all of these documents will be considered as we prepare the final versions.

What's happening next

All of the comments we have received are being considered as we develop the next version of the Local Plan. We are also working on a number of studies which will provide an evidence base for the Local Plan and its policies.

When this is all ready we will prepare the Local Plan for its next formal stage of consultation. This will be the Publication version of the Plan. We will then carry out a consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

We are hoping to finalise the plan and ensure it is aligned with all the evidence-based documents and other strategies by winter 2023/24.

Following a final phase of consultation on the Publication version in the spring/summer 2024, we will prepare to submit the Local Plan to the Secretary of State for public examination later in 2024.



KINGSTON'S LOCAL PLAN

The Local Plan - Summary of comments document



Summary of consultation feedback (Regulation 18)
on the first draft of the Local Plan - August 2023

For more information about the Local Plan please visit our website
www.kingston.gov.uk/localplan

If you have any questions please email localplan@kingston.gov.uk
or call our contact centre on 020 8547 5000 and ask for someone
from the Planning Policy team to call you back.



THE ROYAL BOROUGH OF
KINGSTON
UPON THAMES