

Comments on the Draft London Plan submitted by the Kingston Borough Liberal Democrat Group of councillors.

In essence we share the Council's concern regarding the excessive and unobtainable 10 year housing requirement and, in particular, the total impracticability of the DLP's small sites policy which would have an adverse impact on housing affordability in RBK. We also consider that the DLP fails to understand both the importance to the Borough of local employment growth across many sectors and the pattern of journey to work flows of our residents. Central London is not the primary workplace destination for our residents. Kingston itself, together with the wider south east, is the more important focus for work. As a consequence of this lack of understanding in the DLP, the proposals for modal shift and car parking in areas of the Borough which have low PTAL ratings, and will continue to do so, will have an adverse impact on the deliverability of both additional jobs and homes.

The inconsistencies between this DLP and national policy appear to be justified in order to meet manifesto pledges by the London Mayor. The logical conclusion we draw from this is that manifesto pledges in Kingston would allow any new Local Plan for Kingston to contradict the London Plan. We believe that the DLP should be amended so that it does align with national policy.

We submit that the DLP should be a strategic plan for London whereas it appears to be a power grab by the London Mayor that undermines local democracy. The DLP should therefore be amended so that it is strategic for London and any new Local Plan for Kingston would then be able to comply with those strategic policies.

The current London Plan has a density matrix but also makes it clear that this should not be applied mechanistically. We believe that removing the density matrix altogether will be detrimental to the suburbs/Outer London and will permanently alter the character of many Outer London areas. Some form of density matrix should be retained with reference to PTAL so that both Local Authorities and developers have better guidance as to what is acceptable and expected.

We wish to expand on the point made in RBK's response to Policy H1 regarding phasing. Over the last 15 years completions have matched the current LP housing requirement in only two years. To expect the development industry to immediately double its output of completions by 2019 and then maintain this momentum consistently defies credulity. There is no evidence that the house building industry has the capacity to do so. Nor is it axiomatic that developers would suddenly wish to flood our local housing market. Nor is the necessary local infrastructure in place in many areas of Kingston.

What is required is a phased build up of housing requirements related to infrastructure provision combined with increased funding for RBK and RPs to build truly affordable homes. In addition the current restrictions on the use of right to buy receipts which the Borough faces need to be lifted so that we can truly help contribute to building more homes for Kingston residents.

This phased build-up of housing completions to a realistic level of (say) 750 units over the next five years might be achievable. An added advantage would be that RBK's forthcoming Local Plan would be able to prepare locally specific programmes of combined infrastructure and housing delivery with clear policies on land value capture and affordable housing provision based on pre-existing land values.

We wish to see a phased and evolving increase in housing numbers that can be planned for in advance, not imposed as an immediate unplanned hike which would simply encourage ill-conceived and poorly delivered speculative developments.

We have specific comments regarding the Council's comments on Policy H10. We agree with the first sentence but in relation to the second and third we agree with the policy as set out in the DLP, i.e. we would have wished for the second and third sentences ("However, regarding General Needs Rents remaining the same.....perceived as less viable.?") to have been deleted in the Council's submission.

We have a specific comment regarding the Council's comments on Policy H12. We agree with the general thrust of the Council's comments particularly that these detailed policies would be better addressed at a local level. But we do not believe that the sentences, "The resistance of one-bed units is at odds in meeting Kingston's housing need.?" should have been included in the Council's response. Policy H12, B is an example of where this DLP is setting a policy across the whole of London that would be better addressed at local level. With regard to policy H12, C, we believe that it is appropriate to set guidance at local level on dwelling size mix requirements and that this would provide more clarity and certainty for both councils and developers.