

## **Kingston and Surbiton Constituency Labour Party- Response to draft London Plan**

We welcome the opportunity to comment on this document, which we have read with care. There are many proposals which we support and we particularly welcome the aims to address inequality and to tackle the appalling housing shortage. We also welcome public health interventions on fast food, air quality and healthy streets, although we would like to see clearer discussion of how inequality will be addressed and inclusiveness increased.

However, we consider that there is insufficient recognition in the draft Plan of the differences between inner and outer London boroughs, particularly in relation to housing stock and the adequacy of transport links. In consequence, some of the proposals are not clearly based on good quality evidence and are likely to be politically unpopular.

We also question whether population growth projections are sufficiently robust in the light of the uncertainty created by Brexit, and we raise the wider question of whether successive governments can continue with the laissez-faire model by which activity in London is increasingly out of balance with the rest of the country.

### **Chapters 1 and 2 Good Growth and Spatial Development**

Many of the principles are sound, but putting them into practice will be contentious. For example, what will the criteria be for 'appropriate' locations for higher density building? How will densification in suburbia fit with Policy GG2, 'understand what is valued about existing places', and 'strengthening London's distinct and varied character'?

We welcome the emphasis on sustainable and inclusive regeneration, particularly as it relates to the Cambridge Road Estate in RBK, identified as a strategic area for regeneration. The emphasis on shared understanding and collaboration with local communities (2.10.2 and 2.10.3) is welcome.

Policy SD1- how will boroughs provide social infrastructure, unless central funding is restored?

2.1.22 refers to the 2016 Direction of Travel document for RBK. Feedback on that document queried why Surbiton was largely omitted for development, despite having some of the best PTAL scores in the borough, both for rail and bus travel.

The discussion in chapter 2 gives insufficient attention to the poor connectivity of transport in much of the borough. The only new transport investment will be Crossrail 2, which is generally welcome but will only serve radial, not orbital journeys. There is a map (Fig 2.13) of commuter flows into London, but little or no discussion of commuting out, or across outer London. Unless such issues are addressed by other more flexible transport, plans to reduce car use are not realistic.

Also, the planning process in general relies quite heavily on PTAL, but the glossary points out that 'A limitation of PTALs is that they only reflect access to the public transport network, but not the opportunities and services reachable through the network'.

It should also be pointed out that access to rail stations in the borough (other than Surbiton) is very different from access to a tube station. Several stations in the borough have only two trains an hour. The existence of three zones (4,5 and 6) in RBK is also a disincentive to use trains.

There is little or no discussion on the effect of being adjacent to a major arterial route, in our case the A3, and the effect this has on travel patterns (including severance).

There are several discussions in this chapter to the proactive management of town centres. This would be welcome, but it is not clear how it could be effected, since much of the power currently seems to rest with landlords and developers.

### **Chapter 3 Design**

Policy D1 states that design should 'respond to local context', and that scale, appearance and shape should respond to the identity and character of the locality. How is that consistent with the plans to double housing targets in RBK?

Infrastructure delivery plans are discussed (3.6.2) but it is not clear what bodies are involved and how they are co-ordinated. Lack of clarity locally is a source of resistance to developments, since the infrastructure is already seen as being under stress.

3.6.3 refers to joint working with TfL, but it needs to be remembered that locally South Western Railway is a key player.

D9 and 11 we welcome policies on basement development and fire safety.

### **Chapter 4 Housing**

As discussed previously, we recognise the need for more housing, but doubt that the targets for RBK are realistic, particularly the target for small sites. If houses are demolished to build ten- unit, four storey blocks this will greatly affect the character of suburban streets and it is not clear how an inflationary effect on land prices could be prevented.

We welcome the emphasis on affordable housing, but the London Living Rent (4.7.5) looks complex and if it varies by ward could create anomalies near ward boundaries. We welcome the greater use of EDMOs and control of short-term lets (4.11.1) also support for specialist accommodation (Policy H14) and attempts to reduce the speculative building of student accommodation (H17).

### **Chapter 5 Social infrastructure**

These are useful policies but we query whether RBK is able to deliver all of them in the context of central government cuts.

### **Chapter 6 Economy**

We welcome the use of Article 4 Directions to limit the loss of office blocks, and the support for SMEs.

### **Chapter 7 Heritage and culture**

We welcome the protection of pubs which serve the community (7.7.6); Kingston has lost three to student accommodation in recent years.

### **Chapter 8 Green infrastructure and natural environment**

Generally we welcome these proposals but suggest that there should be more flexibility on the green belt and MOL, where carefully controlled development could be beneficial. At present, south Chessington is very linear, and some development might enable better infrastructure, including a better bus service.

### **Chapter 9 Sustainable infrastructure**

Generally we support these policies and particularly welcome the ban on fracking and the emphasis on recycling. We note the reference (9.5.6) to the short-term nature of water companies' investment plans; the large ring main in New Malden was a source of flooding for many years. Thames Water has now been working on it for about two years, and seemed to think it was a matter of historical pride that the existing main was 200 years old. We commented in the London Fire

Service consultation in 2017 that flooding due to poor maintenance by water companies should be addressed.

### **Chapter 10 Transport**

We welcome policies to regulate heavy freight traffic in suburban areas, but in general this chapter is almost entirely predicated on a mantra of 'walking, cycling, public transport', and risks losing credibility because of it. There is little evidence base given for the proposals, for example the % of cycling which is purely recreational and additional to car use, the needs of parents with young children, etc. It should be noted that the mini-Holland scheme in RBK has had several politically unpopular elements, and one element, in New Malden, was defeated by resident opposition.

Car use needs to be reduced by having realistic alternatives, rather than relying on disincentives such as traffic jams and inability to park.

We welcome opposition to Heathrow expansion, unless it can demonstrate no additional noise or poor air quality. However, we propose there should be a requirement to reduce current noise, given the blight this creates for our neighbouring borough, Richmond.

### **Chapter 11 Funding**

We note that this is heavily dependent on the Treasury, and deplore the bad faith of Tory-controlled councils which dismiss the Plan on the grounds of lack of funding.

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