

A City for all Londoners: Royal Borough of Kingston response 11/12/2016

The Royal Borough of Kingston welcomes the opportunity to submit a response to the Mayor of London's 'A City for all Londoners' Consultation.

The Royal Borough of Kingston is on a trajectory to deliver on significant growth aspirations, having recently adopted a 'Direction of Travel' for the borough which was produced jointly with the GLA. This was the first stage in helping Kingston to be identified as an Opportunity Area in the next London Plan, as well as being a precursor to a new borough Local Plan. The Direction of Travel sets out the Council's aspirations to support and deliver significant growth of homes, jobs and investment and is linked to the anticipated arrival of Crossrail 2, which will provide a significant opportunity for supporting the growing demands of the borough.

Therefore, the Council recognises the opportunity it has to shape growth and achieve 'good growth' through its new Local Plan in alignment with the Mayor's ambitions for London. Overall, we are in broad agreement with the vision set out within this consultation document. However, as demonstrated within this response, we also feel there could be further recognition of the role and strategic importance of Outer London in meeting London's future challenges relating to growth, transport, sustainability and the environment.

The New London Plan

The Council are keen that the Mayor utilises the new London Plan to set out the high level and strategic context and framework for London, and that the document is less prescriptive than previous iterations. A less prescriptive London plan will permit Boroughs to develop and adopt their own detailed policies more attuned to local circumstances allowing for more detailed development management issues to be dealt with at the local level.

Please see below the key issues identified by the Council in response to the 'A City for All Londoners' consultation document.

Part 1: Accommodating growth

The Leader of the Council summarises the Council's vision for growth in the current version of 'Destination Kingston' - *"To embrace growth, Kingston has to balance its development needs. Population growth brings with it the need to create new housing whilst maintaining economic growth, creating new jobs and improving infrastructure. A key factor in this growth is the provision of new, available sites for both the housing and commercial sector."*

In this context, the Council recognises the challenge the London region face in growing sustainably and welcomes the Mayor's focus on growth locations and options. The Council also notes the ambition to balance competing and interrelated land uses through what is notionally referred to as 'good growth' and would like to see more detail and emphasis on this, particularly in an Outer London context. The ambition for well designed, higher density development around well connected transport nodes certainly resonates with the Council and Mayor of London's jointly adopted 'Direction of Travel' document and the Council are

committed to continued discussions with the Mayor on the emerging Kingston Opportunity Area and Crossrail 2.

Part of the challenge of delivering “good growth” is the need to acknowledge the inter-dependency between housing and employment space in forging sustainable communities. The Council is clear that it is essential to maintain an appropriate balance between housing and employment provision. This plays out, in a Kingston context, through the directing of growth and new development in and around key transport nodes and district centres, particularly at the proposed Crossrail 2 stations. This spatial dimension to our work, whilst still early in its development, will be critical to help sustain existing local services and facilities. It will be particularly beneficial where changes in shopping habits have weakened the vitality of some centres, with additional housing and employment uses boosting footfall and reinforcing the local economy.

In relation to the above, we are concerned that the consultation document does not adequately address sustainable economic growth outside the Central Activities Zone, particularly Outer London. It is crucial that a greater proportion of Kingston’s residents’ spend is retained in the borough, and this could be achieved through an increased daytime working population. It is also considered that Kingston has a lot to offer as an attractive workplace, and the local economy would benefit from diversification. Crossrail 2 would enable improved access to the client base in Central London, allowing businesses to benefit from an Outer London location (and affordability), with Central London contacts. Whilst the local office offer will be small compared to the traditional office locations, the *growth* in office stock, could be of significance with the right place-making approach.

The Council is keen to encourage a more diverse employment offer in the Borough as it seeks to maintain and expand its commercial base. We are also determined to avoid being characterised as a ‘dormitory’ of London and call on the Mayor to recognise and support the sustainable economic growth of suburban centres such as Kingston and Tolworth that have potential to expand their employment base.

The Council shares the ambitions of the Mayor in seeking to unlock the development potential of land in public ownership. Clearly TfL’s assets are an important component in the Mayor’s approach, given his direct control over its land. However, we are anxious to understand how the Mayor may bring his powers and influence to bear in assisting local authorities in working with other public agencies to unlock other vacant and potentially available public land to bring forward development.

Kingston Opportunity Area

As mentioned above, the Council is actively working with the Mayor to assess and realise an area taking in Kingston town centre and land to the east, as well as Tolworth and Chessington, for identification as an Opportunity Area in the next iteration of the London Plan.

The Council feels strongly that securing this designation is a key part of the Borough’s ambition for growth, and in this regard, we feel that the consultation document should go

further to clearly identify the key benefits that an Opportunity Area designation status would bring to the Borough, particularly in terms of local community benefit.

Crossrail 2

There is overwhelming support for Crossrail 2, and with plans set to serve all ten of the Borough's stations, we welcome the Mayor's ambitions for its delivery.

However, the Council recognise that there needs to be the right policy approach surrounding the funding package of Crossrail 2 and how the area around our stations can contribute towards the project. The Mayor should also be very clear, through the new London Plan, as to what his expectations are in terms of growth at specific Crossrail 2 stations, and the relationship to the baseline London Plan housing targets. It is strongly recommended that the growth envisaged as a result of Crossrail 2 is set out as a separate target for relevant boroughs with different timescales. In this way, the risk associated with this significant infrastructure investment can inform different options for local growth.

We feel that it is important that Crossrail 2 is always expressed as meeting two objectives:

1. Providing homes to support the wider London economy and housing deficit,
2. Providing local jobs with good access to clients and markets across London, particularly Central London.

It is of concern that Crossrail 2 is typically associated with the former, and therefore fails to deliver "good growth".

Part 2: Housing

As one of the key challenges facing our borough, the Council welcomes the recognition of the need to increase housing supply, as well as the intention to use the Homes for Londoners team at City Hall to work with councils, housing associations, developers, homebuilders, investors and others involved in building the homes required.

Affordable Housing

The consultation document states on page 39 that the aspirational target for affordable housing is 50% across a variety of tenures: "*low cost rented, the London Living Rent and shared ownership*". The Council support this approach, although we question why there is no mention of starter homes in the consultation document.

We would also like to understand how boroughs can require that developers deliver a London Plan target of 50% affordable housing on all residential development sites within the context of the NPPF. The Council must have regard to NPPF policies, which prohibit use of social housing grant in connection with Section 106 sites. It would be very challenging to negotiate delivery of affordable housing in a context where the national and regional policies were not aligned.

The release of TfL land and Metropolitan Police landholdings for development of housing would be very welcome, where it is appropriate to do so. However, it is not explicit within the document that this land will be used to deliver affordable housing or that the opportunity

would be taken to deliver low cost rent housing. Kingston has a significant need for low cost rented housing and under current legislative and policy conditions it is impossible to deliver through either Section 106 or in partnership with RPs on sites privately acquired with social housing grant. Similarly, we would support the release of public land held by other public bodies, such as the NHS, Network Rail, etc if it were to provide additional affordable housing for rent, either at affordable rents (capped at Local Housing Allowance (*LHA*) levels) or low cost rent, especially family units. However, we observe that it is difficult to influence third parties to pursue housebuilding programmes, especially for low cost affordable housing, when they may have to respond to other objectives and priorities in the best interests of their businesses.

A low cost rent product would be very welcome. The Council has some households living in temporary accommodation and on its housing register, which cannot afford to move into affordable rented homes even if they are capped at the LHA. For example, households which are wholly dependent on benefits have their income capped at £23,000 per annum and cannot access housing benefit to meet the shortfall on affordable rents. Kingston's SHMA (June 2016) shows that the greatest supply of social rented housing in the borough came from local authority relets. The Council has experienced a significant drop in local authority relets in the past 18 months added to which it might have to sell between 40-60 council homes per year to contribute to the Government scheme extending Right-to-Buy to tenants of RPs. These factors are reducing the supply of social rented housing and currently no support is in place to facilitate development of new social rented housing. The Council's SHMA shows that greatest demand for affordable housing in Kingston is in the social rented tenure.

The London Living Rent (LLR) is set at no more than one third of the local average household income, and therefore is vastly different from the national government-promoted products of affordable rent and Starter Homes.

We would support the introduction of an intermediate rental product that reinstates a link between household income and housing costs. However, in Kingston average household income levels are skewed, as we have a high number of high earners who live in the Borough. Therefore, we would like to use median incomes in this Borough. For example, average household incomes (by ward) are between £64,010 - £43,740 while median incomes are between £48,500 and £34,650. The Mayor has said he wishes to target this product at households on incomes between £35,000 and £45,000 and clearly this can best be achieved in Kingston, if median household incomes are used as the basis for calculating LLR.

Private Rented Sector (PRS)

We note that the Mayor is keen to harness the PRS/Build to Rent housing product. Although it is recognised that the Mayor has no formal powers to regulate PRS, he seeks a leadership role in improving it, including supporting local authorities in London to introduce licensing schemes where they are needed – which could help stop criminal landlords as well as recognising the good service that the majority of landlords provide.

The Council would be concerned if sites coming forward for development for PRS/Build to Rent were exempt from delivering affordable housing. A limited number of sites come forward each year and an exemption from delivering affordable housing, could provide a perverse incentive to develop land for PRS/Build to Rent. This would undoubtedly cause the Borough to lose further valuable sites to types of development not required to provide affordable housing. The Council already loses affordable housing from sites through permitted development rights and as a result of development to provide student accommodation. Student housing sites in practice do not deliver any affordable housing or payments towards development of affordable housing. You will appreciate this is frustrating for the Council and we would not wish to see affordable housing exemptions extended to further categories of site. If the Government is determined to exempt such sites from affordable housing provision and the Mayor can come forward with an affordable housing product for London that could secure on site delivery of intermediate housing from these schemes, the Council would support this initiative.

Part 3: Economy

The significant population increase forecast over the next 20+ years suggests there will be both increasing pressure on relatively low value employment land, yet an increasing need for space for employment uses. This Council is clear that it is essential to maintain a balance between housing and employment provision. This can often be challenging because residential values in this Borough far exceed most forms of employment use, excluding some retail located in the town centre, and there is considerable pressure from developers to release employment land for housing use. The Council is keen for the Mayor to address these competing interests for land in a growth context in Outer London not just the CAZ, and recognise that higher density housing in town centres must not be at the expense of the provision of employment floorspace.

There is an inconsistency between the clear focus of office-based employment predominantly in CAZ and “*viable strategic locations for office space, including in Outer London*” in the report. The Council request a clearer policy direction that promotes the inclusion of office-based businesses alongside other commercial activity such as retail, food and drink and leisure uses around key transport nodes.

Industrial Land

The Royal Borough of Kingston has two Strategic Industrial Locations (SILs) and we will need to work closely with the GLA family in defining the future of these sites. It may be that, for those industrial locations that we wish to rationalise or intensify e.g. by introducing more intensive employment uses, this would serve as a useful marker. Consideration also needs to be given to how this might tally with aspirations around freight consolidation and other business needs to reduce congestion. Given the expectation that these areas are expected to deliver a significant proportion of growth, the GLA needs to take a strong lead in developing the evidence base to understand the implications of changing the use of these areas.

Tourism, Night Time Economy and Creative Enterprise Zones

The Council are in strong agreement with the Mayor's plan to 'spread economic benefits' through the promotion of tourism, night time economy and creative enterprise zones offering "support for creative spaces/affordable work spaces". We feel that these activities have potentially significant economic and cultural benefits. The Council are committed to further developing this type of approach through partnership working and would welcome the opportunity to form part of a working group to help shape the model with the Mayor.

The Council is concerned that the focus on international tourism promotion is relying too much on Central London. We would like to suggest that London & Partners' tourism strategy includes annual campaigns encouraging the Outer London boroughs to encourage tourism spend outside Central London.

Part 4: Environment, transport and public space

The Council notes that the report indicates a strong focus on green policy, whereby environmental objectives 'cross-cut' all topics. Whilst we are in strong support of this approach, in order to give these objectives further functionality we urge the Mayor to use the new London Plan to go further and recognise how green policy and objectives can be balanced with the growth agenda. In this regard, the Council believe that there is a need to quantify the value of the proposed initiatives, focusing on financial benefit and deliverability, given that detail is lacking on how to achieve a suitable level of 'buy in'. It also needs to provide clarity on energy standards for London and any carbon off-set mechanism, including retention of any receipts to be used at a local level.

Kingston is located on the edge of Greater London neighbouring a number of Surrey Councils with very different policy regimes in terms of critical issues such as car parking standards. Therefore, there is a need to better recognise the context in which boroughs are operating and embed this understanding in the development of strategy going forward. One size does not fit all.

Cycling and Walking

The Council welcomes the Mayor's support for cycling and walking, recognised in the consultation document as key to achieving 'Healthy Streets'. In relation to the Mayor's 'Healthy Streets' concept, we recognise our duty to improve the perceived and experienced environment of our streets and will continue to work with TfL to realise this vision. Therefore, we would welcome further detail of how the 'Healthy Streets' concept will be delivered and funded.

The Council is particularly aware of the significant benefits offered by cycling and will continue to build on the progress made on local cycle infrastructure. In this context, we note that the main focus of the consultation document is on cycling in Central London and cycle superhighways for commuters. Therefore, we would like further understanding of the Mayor's cycling vision for Outer London Boroughs, and believe that this should have more weight in the document. In the context of Kingston, we consider that an 'over-reliance' on cycle path segregation is not the solution to cycling infrastructure improvement, and that a

more pragmatic approach is required whereby a variety of cycling routes and interventions provide a more effective network within the local environment.

Please note that 'health' is spelt incorrectly on page 62.

Part 5: A city for all Londoners

The Council is in strong agreement with the themes and objectives set out in Part 5 which considers the health and safety of London's communities. In particular, we strongly support the document's focus on London's culture, recognising its significant benefits on some of the more softer aspects of growth.

Regarding public transport, we note that there is a lack of emphasis provided on the future of bus services within the consultation document. The Council is particularly reliant on its bus services being only one of two boroughs without tube services. Therefore, we feel that buses are a key aspect of London's transport system and require more weight in the consultation document.

Conclusion

Overall, the Royal Borough of Kingston upon Thames is in support of the broad aims set out within the Mayor's consultation document 'A City for All Londoners'.

The Council recognises its opportunity to shape growth and achieve good growth in alignment with the Mayor's vision and ambitions. Moving forward, the Council would like to emphasise the role and strategic importance of Outer London in meeting London's future challenges in relation to growth, transport, sustainability and environment. Therefore, we would like to see equal weight to between Outer London and Inner London on many of these key issues.

Yours Sincerely, Viv Evans (Head of Planning)