

K+20 KINGSTON TOWN CENTRE DRAFT AREA ACTION PLAN

PREFACE

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1.0 INTRODUCTION

1. This preface sets out the evolution of the K+20 Strategy from 2001 leading up to the submission of the K+20 Kingston town centre Area Action Plan to the Secretary of State in May 2007, which has taken place within the context of a changing plan-making system. On adoption, the Kingston town centre AAP will be a Development Plan Document (DPD) under the emerging Local Development Framework for the Borough and will form part of the development plan for the borough. The existing development plan is the Royal borough of Kingston upon Thames Unitary Development Plan 2005 and the London Plan 2004.
2. The Preface seeks to establish the logic and justification for the AAP, preparation of which commenced well in advance of the introduction of the new plan making system and PPS12 Local Development Frameworks in 2004 and to demonstrate that the work carried out from the inception of the K+20 Strategy up to the submission of the Area Action Plan in May 2007 meets the nine tests of soundness for a Development Plan Document (DPD) as set out in PPS12. Within the narrative, particular emphasis is placed upon those tests that an Inspector may wish to focus upon given the circumstances particular to this Area Action Plan, leading up to an examination in Public. A self-assessment of soundness against all nine tests has been prepared as a separate document.
3. The Preface also seeks to demonstrate by reference to the Sustainability Appraisal report that there is only one realistic spatial alternative for the future development of Kingston town centre over the period to 2020, and that through extensive and wide ranging public consultation at each stage of the Plan, as set out in the Consultation Statement, there is collaborative agreement on this direction from stakeholders and the community in general.

2.0 DEVELOPMENT IN THE TOWN CENTRE 1980s-2005

4. Kingston town centre is a successful metropolitan centre, which is a renowned sub-regional shopping centre attracting around 18 million visitors a year from a wide catchment area across south west London and north east Surrey. It is one of 10 metropolitan centres in Greater London (AAP Plan 1 Strategic Context and Plan 9 for Retail Catchment Area).
5. The town centre has experienced two distinct phases of significant change and development over the past 20 years. Firstly, in the late 1980s and early 1990s under the Kingston Town Centre Local Plan 1985, there was demolition of the existing fabric of parts of the town centre for the subsequent construction of the town centre relief road, built to relieve traffic congestion on Clarence Street the main shopping street, followed by substantial office and retail development. This included: offices along Wood Street, opposite Kingston Station and retail development in the form of the Bentall Shopping Centre, including a new Bentalls department store and a separate John Lewis department store (AAP Plan 2).
6. More recently, between 2000 and 2005, a second 'wave' of development was completed under the Unitary Development Plan 1998 including mixed use development: to the north of the railway line on former power station, gas works and factory sites; at the riverside Charter Quay; at the Rotunda opposite Kingston Station on former bus garage and warehouse sites and around Kingston College on a former cold store site. This 'wave' included substantial residential development (around 1000 flats), cultural and leisure facilities (including a 14 screen cinema, bowling, health and fitness, and the theatre 'shell'), a nightclub, riverside bars/restaurants, a supermarket, a car park, new facilities for Kingston College, a hostel and a budget hotel. These developments have diversified the range of uses and functions in the town centre, which is identified as a priority in strategic UDP Policy STR21 Range of Functions in Kingston Town Centre.

3.0 BACKGROUND TO THE AREA ACTION PLAN 2001-2003

7. By mid 2001, after a decade of steady growth, concerns were being expressed about the loss of day-time visitors and the future attractiveness and vitality of the town centre. The need for a pro-active approach to address these concerns and a long term vision for Kingston town centre was recognised. In December 2001, Committee reports refer to the wide range of Council strategies and initiatives which impact on the town centre and the need for a comprehensive strategy to co-ordinate inputs and guide the longer term development of the town centre. It was envisaged that the strategy would have local and strategic implications and that it would focus on land uses and activities, transport, parking infrastructure and services. It would involve specialist studies, a member steering group and a forum with representatives from a wide range of organisations and stakeholders concerned with the future well being of the town centre, to ensure an 'inclusive' approach. Arrangements for preparing and overseeing the

strategy were delayed by the 2002 elections and a change in Council administration.

8. The Council commissioned several specialist studies in 2002 and 2003 to assess the current situation and provide the evidence base to guide the selection of options to address the issues being raised:
 - Retail Studies
 - Transport and Access Studies including parking, park and ride and rapid transit
 - Old Town Conservation Area Studies

9. In November 2002, the Executive endorsed the preparation of a strategy for Kingston town centre, to be known as K+20, and arrangements for overseeing it, "to ensure that there is a sound and shared framework for the future development of the town centre." The long term vision was to be based on a sustainable economy and a liveable environment. The Executive report referred to the "general desirability of preparing town centre strategies or action plans advocated in government guidance on town centres (PPG6) and to the proposed reforms of the planning system, including the replacement of UDPs with Local Development Frameworks, with Core Policies covering the whole borough, plus action plans for specific areas of the borough where there is pressure for development or specific changes are envisaged." The report indicated that: "Town centres such as Kingston will be particularly suited to such action plans."

10. At that time, in November 2002, the key drivers for embarking upon a spatial town centre action plan were noted by the Executive as:
 - recent changes in the town centre, comprising the completion and construction of a number of significant mixed use development schemes (see para. 6)
 - the findings of the independent Retail Study (see para. 11)
 - renewed developer interest in the provision of retail development in the town centre
 - the importance of access and transport issues
 - the increasing importance of quality of built form and urban design
 - discussions with the Mayor for London and the Greater London Authority on the role of Kingston within London and concerns about Kingston's 'consolidation' designation in the draft London Plan (2002), which originated from the London Planning Advisory Committee designation in the 1990's following substantial office and retail development in late 1980s and early 1990s
 - the wider benefits which should flow from a Strategy, including assistance in the pursuit of funding for public transport in the area
 - the work underway on a Business Improvement District proposal for the town centre
 - existing partnership working in the town centre

Retail Studies

11. The main findings of a 2002 borough wide Retail Study, commissioned to inform the K+20 Strategy, were identified as the need to:

- accommodate additional retail floorspace (through new build and intensification/upgrade of the existing stock) to enhance Kingston's retail offer
- improve accessibility by all modes of transport
- alleviate car parking problems
- promote linkages between shopping and leisure activity and
- improve the shopping environment.

12. Further work was commissioned to complete the retail picture including:

- A retail capacity study for the borough
- An assessment of the amount of additional retail floorspace that could be physically accommodated within Kingston town centre.

13. Taken together, the Retail Studies identified significant need, demand and capacity within the town centre for additional retail facilities to provide up to 50,000 sqm gross additional floorspace for comparison goods, including larger shop units, to help revitalise Kingston's retail offer, commensurate with its position as a metropolitan and sub-regional shopping centre.

Transport and Parking Studies

14. The Parking Study assessed current parking in the town centre and how spaces are used; reassessed parking figures and made recommendations on how many car parking spaces are required for the town centre; evaluated the impact of proposed CPZs and loss of parking spaces and consulted with stakeholders. The Study found that:

- there were nearly 7,000 public off-street parking spaces
- traffic congestion is the most serious problem affecting the environmental quality of the centre and the visitor experience
- for most of the year the off-street capacity is adequate or more than adequate to meet overall demand, but the most popular car parks are often full for parts of the day, whilst other car parks have many unused spaces
- in the peak pre-Christmas period, overall demand can exceed capacity, resulting in queuing and congestion on the town centre road network
- providing more parking would be counter-productive in terms of congestion, and mode shift objectives

The Study recommended making more efficient use of the existing stock by re-balancing demand between favoured and underused car parks, through a number of measures including signing, naming and marketing of car parks, pricing and opening hours. It also advised that provision for disabled drivers should be improved.

15. The Park and Ride Feasibility Study commissioned in 2001 identified opportunities for the provision of all-year round permanent park and ride facilities to access Kingston town centre, to improve access, reduce parking demand, encourage mode shift and reduce car use. Of nine initial sites identified and assessed, three sites were identified as having some potential: Tolworth, followed by Sandown and Kempton Park racecourses. However following consideration, the Council's Executive in July 2003 resolved not to pursue the Tolworth site for reasons relating to planning, existing congestion and potential adverse impact on travel demand choices. The sites for further consideration were to be Kempton Park, Sandown Park and land in the vicinity of the M25 Junction 9. All three sites are outside the borough. The strategy identified Kempton Park racecourse as the most suitable site, using the existing station on the Kingston to Shepperton line to access the town centre. However, this relies on co-operation from other partners, including Spelthorne District Council and United Racecourses.
16. The Rapid Transit Feasibility Study assessed the potential for rapid transit in the borough to improve access to the town centre. It was unable to identify any feasible tram scheme on the transport corridors studied and bus based alternatives were considered to be too marginal in financial terms to pursue.

Old Town Conservation Area Studies

17. The Old Town Conservation Area Studies included a Stage 1 Character Area Appraisal (2003) and Stage 2 Management Proposals and Supplementary Planning Guidance, including recommendations on the safeguarding and enhancement of the historic Old Town which is a very important part of the town centre, contributing to its attractive and distinctive character.

Business Improvement District

18. The concerns of town centre businesses about the loss of visitors and the future attractiveness and vitality of the town centre was the impetus for the initiation of work, which subsequently led to Kingston Town Centre Management, in partnership with the Council and the London Development Agency, promoting and establishing the designation of Kingston as the UK's first Business Improvement District in 2004, which commenced in January 2005. The BID period is five years initially and it aims to address short term operational and management issues. Priority projects include securing a cleaner, safer, brighter environment, better transport and support for small businesses in the commercial sector.

4.0 LAUNCH OF K+20 2003

19. The K+20 Strategy for the town centre was publicly launched in June 2003, with a community/ stakeholder workshop. A cross-section of stakeholders and the local community (200+) were invited to the Launch

including: businesses; representatives from residents', voluntary, community, religious, amenity and local interest groups; land/property owners; developers and statutory organisations. About 75 participants attended the launch event, which comprised a walking audit of the town centre in groups identifying its strengths and weaknesses followed by a workshop to discuss them and aspirations for the future.

20. Major strengths were identified at the workshop for the K+20 strategy to build on including:

- its attractive character
- the variety and quality of the shops
- the riverside and riverside developments
- the historic Market Place and Market Hall
- the Rotunda leisure/entertainment centre
- areas of the town like Fife Road with small shops and businesses

Weaknesses to be addressed included:

- congestion from cars and buses which dominate and divide the town centre
- parking
- unattractive approaches to the town centre, especially around Kingston Station
- poor quality streetscape and visual environment in some areas
- the existence of blank inactive and uninteresting frontages
- the town centre at night which was found to be intimidating

Aspirations for the future included the need to:

- Improve the quality of the streetscene
- Resolve transport issues
- Improve pedestrian links into and across the town centre
- Improve the area around:
 - Kingston Station
 - Old London Road
 - the Riverside
 - Vicarage Road and the former Slug and Lettuce pub

Several exhibitions were mounted in the town centre in 2003 to gain views from the general public. Full details of this stage are included in the Consultation Statement.

21. Prior to the public launch of K+20, a number of approaches had been received from retail developers keen to explore opportunities for new retail accommodation, as part of mixed use development. In February 2003, the Council's Executive resolved to enter into a one year Co-operation Agreement with major development company Hammerson. The purpose of the agreement was for Hammerson and the Authority to work together to establish the most appropriate approach for bringing forward individual development proposals within a mixed-use masterplan for a study area, which covered a large part of the core of the town centre. The Co-

operation Agreement commenced on 1 July 2003 and has been subsequently extended and currently runs to the end of December 2007.

5.0 ISSUES STAGE 2004

22. A set of Issues Papers, a summary leaflet and questionnaire were prepared in late 2003 /early 2004 for public consultation. The Issues Papers were broadly categorised into 'Uses and Economy', 'Access and Movement', and 'Urban Design and Environmental Quality'. Each set out the aims of the K+20 strategy and identified a comprehensive range of issues and opportunities/options for improvements, based on the following themes:

- the need to maintain a buoyant economy, with a wider range of uses and job opportunities
- the need to improve access and transport
- the need for a high environmental quality and urban design

23. This consultation set out a number of drivers for change, which reflected the evidence base built up from the:

- (i) findings of the various specialist studies
- (ii) the K+20 launch workshop outcomes
- (iii) internal cross directorate and cross party discussions and workshops
- (iv) structured meetings with key stakeholders and partners (e.g. Metropolitan Police, Environment Agency, major retailers, Kingston Town Centre Management Group, GLA)
- (v) existing local, regional and national policies and strategies.

The key messages were:

- ❖ with no new shopping development for 10 years, retail studies show that there is now a need, demand and capacity for more retail floorspace, to enhance Kingston's retail offer and enable it to maintain its position in the retail hierarchy;
- ❖ there is a need to broaden the range of cultural and leisure facilities to attract a wider spectrum of visitors;
- ❖ the role of the town centre as an office/business location has declined and there is a need to promote the town as a business location and improve the quality of its office space;
- ❖ there is a shortage of affordable housing and student accommodation;
- ❖ the need for a range of environmental improvements to streets and public spaces, including in the historic core, along the riverside and in parts of the town centre which have a poor quality environment
- ❖ the need to improve traffic circulation, make best use of car parking facilities, and promote alternative modes of transport to the car.

24. This evidence base manifested itself as a clear indication for sustainable growth of the town centre. There was a further realisation that any such growth would have to be framed against a number of geographical

constraints such as the river, the historic fabric, the railway line, the relief road, and the collar of established residential development drawn tightly to the town centre.

25. The Issues consultation took place in March and April 2004. The Issues Papers, Summary Leaflet and Questionnaire were circulated to 200+ organisations, businesses, land and property owners, and those who had attended the K+20 launch or expressed an interest in K+20. The papers were also made available on the Council's website and at Council offices and libraries. The summary leaflets and questionnaires were sent out to all businesses and residents in and around the town centre (about 3,500 addresses), to a random 5% sample of households across the borough (about 4,000 households) and made available on the website, and at libraries and public information points.
26. The Consultation Questionnaire was framed in such a way as to draw from the general context and thrust of the Issues Papers and summary leaflet, which recognised that the town centre needed to grow to consolidate its position, and that a 'no growth' scenario was not an option. This reflected two stark 'options', involving either 'planning for growth' to accommodate new facilities, or failure to plan for growth, which could result in loss of visitors and investment and stagnation. Different options for land uses and sector provision were set out including: additional shopping development, job opportunities, diversification of uses, and housing provision. Further details of the options considered are set out in Section 5 of the Sustainability Appraisal Report on Plan Issues and Options.
27. A total of 560 completed Issues questionnaires were returned and there were 24 detailed responses from local businesses and other organisations, from land and property owners, local residents, transport providers and adjoining authorities. Details of those consulted, the responses to the Issues consultation and the improvements that people would like to see in the town centre are set out in the Consultation Statement.
28. The results of the consultation were reported to the Council's Executive in September 2004, on the same day that the new Act and Regulations came into effect. The report referred to the introduction of the new legislation and to the proposed adoption of the K+20 Strategy as an Area Action Plan for the Town Centre under the new planning system. It pointed out that the AAP would be subject to the statutory processes of consultation and independent examination required by the Act and the forthcoming Regulations. At the time of writing the Executive report, the new Regulations and PPS12 had just been published, although drafts had been published for consultation in 2003.
29. The on-going engagement with a range of stakeholders following the 2003 launch of K+20 and through the Issues Stage in early 2004 was considered to meet the requirements of Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004. This

position was set out in the Council's Local Development Scheme, which was approved by the Government Office for London (GOL) in April 2005.

30. Drawing on the responses to the Issues consultation, the September 2004 Executive report set out the proposed next steps, which included a review of the information gathered to date, the preparation of a draft strategy with options to address the issues and public consultation in early 2005. Paragraph 24 of the Executive report states *inter alia* that "a draft Strategy with Options will be prepared....prior to a statutory period of public consultation in January/February 2005". The consultation responses would inform the refinement of the Strategy during 2005 and lead to the publication of a draft K+20 Strategy/Area Action Plan for a further period of consultation later in 2005 ("Preferred Options" stage). This would provide the framework to guide development and the regeneration of the town centre.

Additional Studies

31. A Secure Cycle Parking Study was commissioned for the town centre in 2004, as there is a high incidence of cycle theft. The study recommended the provision of three secure cycle parking centres on three of the approaches to the town centre.
32. An Office Study was undertaken to provide information on the condition of the office stock and an Employment Analysis to provide information on the breakdown of businesses operating in the town centre by business sector and employment by type of business, both in 2005.
33. Work commenced on a Transport Assessment of the town centre, including an assessment of current conditions and transport capacity, the impact of committed development, the methodology for assessing future development scenarios and travel demand/modal split assumptions and the assessment of the impact of significant new shopping facilities and additional travel demand on the town centre's transport networks.

6.0 LOCAL DEVELOPMENT SCHEME

34. Paragraph 2.9 of Chapter 2 to PPS12 (September 2004) states:
"The Core Strategy should normally be the first development plan document to be produced, except where the local planning authority has up-to-date saved policies (see paragraphs 5.3-5.5) and where the priority in the local development scheme is the preparation of an area action plan or other development plan document."
35. A draft of the proposed Local Development Scheme (LDS) was submitted to the Government Office for London (GOL) in December 2004. This included reference to the preparation of an Area Action Plan (AAP) for Kingston town centre in advance of the preparation of the Core Strategy for the borough and set out the urgency and reasons for taking the AAP forward in advance of the Core Strategy. These related to the concerns

about the loss of visitors and the future attractiveness and vitality of the town centre and the need for a pro-active approach through the preparation of an Area Action Plan to address the issues and ensure that Kingston maintained its position as a metropolitan centre and sub-regional shopping centre.

36. GOL responded by letter dated 6 January 2005 and commented on the AAP as follows: "We understand and support the reasons for giving priority to the Kingston Town Centre AAP. The modified timetable remains challenging, but would appear to be achievable." The LDS which includes the Kingston town centre AAP was first approved by GOL in April 2005. Subsequent revisions were approved in January 2006 and April 2007.

7.0 PREFERRED OPTIONS 2005 – AREA ACTION PLAN AND SUSTAINABILITY APPRAISAL

37. The Council's Executive considered a report on the K+20 Kingston Town Centre Area Action Plan – Preferred Options and Sustainability Appraisal in May 2005 and agreed the documents for public consultation. The covering report referred to the AAP as being the first Local Development Plan Document to be prepared and come forward for public participation on Preferred Options. It referred to the Preferred Options document setting out the proposed policy directions for Kingston town centre, together with relevant issues, proposals and alternative approaches, where appropriate. It also referred to the public participation as taking place under Regulation 26 (pre-submission public participation) and to the more formal process being required, in comparison to the earlier engagement.

38. Building on the Issues stage in 2004, the AAP Preferred Options Consultation (June 2005) document was underpinned by the need to plan for growth. Under 'Pressures for Change' the document states that "there is now pressure and need for new development, including shops, housing employment, leisure, cultural, community and educational facilities, as well as transport and environmental improvements. The rationale for this stance was:

- Kingston is one of 10 metropolitan town centres in London. Because of their good transport links these are good locations for major facilities such as shopping, entertainment and office based employment
- Retail studies show that there is need, demand and capacity within Kingston's catchment area for additional shopping facilities over the next 10 years
- Failure to plan for growth could result in stagnation, loss of shoppers, failure to attract new investment, inappropriate development and pressure for out of town development
- As part of Greater London, sites need to be developed to help meet housing needs
- Employment growth is forecast by the Mayor across south London in sectors such as professional and business services, education,

creative industries and tourism and Kingston has a role to play in securing some of the employment growth.

39. The 'Preferred Options' Consultation document (June 2005) sought views on:

- the proposed 'Preferred Option' or Vision for the town centre:
"The overall vision is to preserve and enhance Kingston's attractive character and historic environment, to provide high quality new facilities in the less attractive parts of the town centre, together with transport and environmental improvements."
- a number of preferred sub-options which supported the vision and related to proposed mix of town centre uses, enhancements to the built environment and proposals for transport and access improvements
- development and improvement options for 10 Character Areas that had been identified within the town centre and each of the 14 identified Proposal Sites.
- reference was made to the quantum of development overall and to the location of new development.

The document included a questionnaire, which posed a number of questions, which sought support or otherwise for the above vision and sub-options. A Preferred Options Summary Leaflet was also prepared for consultation purposes with the same questionnaire as for the main document.

40. The Spatial Objective of the AAP is given as "To accommodate sustainable growth and enhance the local economy, with new homes, shopping, leisure and cultural facilities, more jobs and improved access, whilst preserving and enhancing the environment and historic character, to ensure that Kingston remains a prosperous and attractive place where people enjoy living, working, studying and visiting". The following factors are identified as guiding the spatial objective of the AAP:

- a) the need to be consistent with national planning policy
- b) the need to be in general conformity with the London Plan and to have regard to other relevant plans, policies and strategies
- c) the need to have regard to the RBK Community Plan 2004

Inherent within the document was a further raft of factors that influenced the spatial objective and direction of the AAP:

- d) the specialist studies commissioned to provide a robust and credible evidence base for K+20 (retail, car parking, secure cycle parking, park and ride, integrated transport, and the Old Town Conservation Area)
- e) the sustainability appraisal process
- f) the physical nature of the town centre and its constraints and attributes
- g) the responses from stakeholder and community engagement.

These factors provided an informed limit on the extent to which any realistic alternative options could be meaningfully identified and brought forward in the town centre. They are detailed in Section 5 of the Sustainability Appraisal: Plan Issues and Options.

41. The Sustainability Appraisal was prepared and consulted upon in accordance with the 2004 SA Regulations. Details of the process are set out in Section 2 of the SA report.
42. The 'Preferred Options' was launched at a stakeholder event in June 2005, to which nearly 300 people were invited and 90 attended. Full details of the extensive pre-submission public participation, which ran from June to August 2005 are set out in the Consultation Statement.
43. The results of the participation on the Preferred Option and the Sustainability Appraisal were reported to the Executive in October 2005. The responses included the return of 2500 completed questionnaires and comment forms and 30 responses from statutory organisations, local residents, local interest groups, land and property owners and businesses. The responses are summarised in the Consultation Statement, which also sets out how the comments are addressed in the AAP.
44. The GOL response to the consultation in August 2005 stated: "Many aspects of the proposals are supported by Government policy, and the general approach being taken seems to us to be sound." The GLA, including Transport for London also supported the broad approach, as well as making a number of detailed comments.

Conclusion on Preferred Option

45. The 'Preferred Option' takes account of all the factors which limited the range of realistic alternative options, as set out in paras. 39-40 of this Preface and described in Section 5 of the Sustainability Appraisal report. It would attract appropriate investment and allow for sustainable growth and an appropriate level of development within the town centre boundaries, through redevelopment and intensification of uses on vacant and underused sites and replacement of unattractive and outmoded development. It would provide for a balanced mix of uses and services, including retail, offices, public administration, housing, community uses, leisure and entertainment facilities and improved facilities for Kingston University and Kingston College, within a vital and economically buoyant centre with a sustainable transport network. It would help re-balance the distribution of attractions across the town centre and safeguard and enhance the historic environment, the riverside, townscape and open spaces, and existing areas of good quality development.

Further Studies

46. Two further studies were commissioned in 2005 following the Preferred Options consultation. The first was a Strategic Flood Risk Assessment

(SFRA) of the town centre, much of which is at risk from flooding from the River Thames and Hogsmill River to assist in assessing development proposals and to recommend measures to manage and reduce risk from flooding. An Archaeological Study was commissioned to provide an Overview of the archaeological resource across the town centre which is within an Area of Archaeological Significance and an overview of investigations that have taken place.

8.0 PREPARATION OF SUBMISSION VERSION AREA ACTION PLAN AND ASSOCIATED DOCUMENTS 2006-2007

47. Taking account of the views received at the Preferred Options stage, the Preferred Option and its sub-options were carried forward into the preparation of the submission version AAP and formulation of associated policies and proposals, and work continued on Sustainability Appraisal. One Proposal Site was subsequently dropped following the completion of the SFRA and consideration of flood risk. Several Proposal Sites which were spilt were broken down into a number of smaller Proposal Sites, increasing the overall number of Proposal Sites from 14 to 20.
48. In March 2006, the Council's Executive endorsed a draft of the AAP for 'informal' consultation with key stakeholders, prior to it being finalised for Executive and Council approval and submission to the Secretary of State. The purpose of this 'informal' stage of consultation was to provide key stakeholders with the opportunity to comment on the draft AAP and its detailed policies and to allow time for these representations to representations being invited following submission of the Area Action Plan to the Secretary of State.
49. This consultation took place in March and April 2006 when the draft AAP was distributed to 125 organisations. Details are set out in the Consultation Statement. Responses were received from 21 stakeholders, and their views were taken into account in finalising the draft AAP and amending and refining some of its policies.
50. The response received from GOL in May 2006 made a number of informal comments on: implementation; the links between the AAP and the Sustainability Appraisal; the link between the adopted UDP and the AAP; objectives; the need for policies to be specific to the town centre and the need to ensure that AAP policies do not pre-empt Core Strategy policies. A meeting was held with GOL to discuss their comments in June 2006 and it was agreed that the revised AAP would be forwarded to GOL.
51. The responses to the informal consultation were reported to the Executive in early July 2006, with an amended draft AAP and Sustainability Appraisal. It was resolved to refer the draft AAP and Sustainability Appraisal to Council later that month for approval. The documents were subsequently approved by the Council on 18th July 2006 for submission to the Secretary of State.

52. However in August 2006, GOL expressed “significant concerns” about the form and content of the draft AAP, mainly in relation to the tests of ‘soundness’, following the high profile Stafford and Lichfield Inspectors’ decisions which found both plans to be unsound. Following meetings and discussion with GOL, it was agreed to delay submission of the draft AAP to the Secretary of State and to review the AAP, consider the tests of soundness further and address the issues raised.
53. During the period August to December 2006, the Plan was revised in terms of its structure, rather than the content of the AAP proposals themselves and this Preface was prepared relating to the procedures and processes of plan preparation. In support of the review, advice was sought from external planning consultants and from Counsel. Meetings and discussions continued with GOL.
54. The revised Area Action Plan and Sustainability Appraisal report were considered by the Council’s Executive on 5 December 2006. As already indicated, the AAP proposals themselves remained unchanged, revisions are set out below:
- background information reduced and greater use of cross-referencing to supporting studies
 - referencing of AAP to UDP, Community Plan and London Plan expanded
 - referencing to community and stakeholder views and how these were taken into account expanded
 - number of policies reduced by grouping and where necessary made more ‘locally distinctive’
 - implementation section strengthened
 - chain of conformity considered further, AAP proposed ‘strategic’ policies dropped and Section 2 paras. 2.13-2.21 in the AAP strengthened. AAP to rely on ‘saved’ UDP Strategic Policies (excluding Kingston town centre strategic policies) and the London Plan overarching policy for town centres.
 - format of Sustainability Appraisal revised to conform with the guidance issued in November 2005
55. The Executive approved the AAP and SA for referral to full Council in January for consideration and approval to submit to the Secretary of State and authorised any necessary further revisions. Following a further meeting with GOL also attended by DCLG on 18 December, some further minor changes to the AAP and associated SA were advised to ensure that the documents are as robust as possible prior to submission to the Secretary of State. However, the revisions could not be made in time for further GOL consideration and Council on 9 January 2007.
56. Further revisions were made to the AAP and SA and there was a further round of informal consultation with key stakeholders in March 2007, which resulted in some further amendments to the wording/drafting of the AAP.

57. On 24 April 2007, the Council approved the K+20 Area Action Plan and associated Sustainability Appraisal for submission to the Secretary of State. A community/stakeholder event was organised and held on 19 May to launch the Plan, prior to its submission to the Secretary of State, which took place on 25 May 2007. The formal period for representations to be submitted, in accordance with Reg 29 (1) runs from 25 May to 6 July 2007.

58. The Area Action Plan is accompanied by:

- Sustainability Appraisal
- Consultation Statement (Reg 28)
- Appropriate Assessment Screening Opinion of the likely effects of the AAP on two Special Areas of Conservation of European importance (Richmond Park and Wimbledon Common) under Regulation 48(1) of the Conservation (Natural Habitats &c.) Regulation 1994
- Submission Proposals Map
- Schedule of Proposed Changes from the UDP Kingston Town Centre Inset Area Proposals Map to the AAP Proposals Map and accompanying Plans A and B

9.0 POLICY CONTEXT FOR THE AREA ACTION PLAN AND CONFORMITY (AAP Part A Chapter 2 paras.2.13-2.21)

59. The statutory development plan for the borough is currently the Unitary Development Plan First Alteration 2005 (UDP) along with the London Plan. The UDP sets out strategic and detailed planning policies for the borough and key objectives for land use planning, which are also relevant to this Area Action Plan:

- Encouraging new development to be sustainable
- Encouraging strong sustainable communities
- Safeguarding and enhancing the existing environment for future generations
- Practising equal opportunities

60. The UDP will be replaced by the emerging Local Development Framework for the borough, which will comprise a series of local development documents, including this Area Action Plan for Kingston town centre, which is a Development Plan Document (DPD) as set out in the Local Development Scheme. Most strategic and general policies in the UDP will remain in use, some being 'saved' until September 2007 and others until August 2008 or longer, subject to the agreement of the Secretary of State, until they are superseded by the Core Strategy and Development Control Policies.

61. For Kingston town centre this AAP, on adoption, will supersede all the policies for the town centre as set out in Chapter 12 of the UDP that is: the three strategic policies STR21 Range of Functions, STR22 Townscape Strategy and STR23 Accessibility, detailed policies KTC1-KTC27 and policies for town centre Proposal Sites PS1-PS22a and PS29a.

62. The reasons why this AAP is replacing the strategic policies for the town centre relate to the pressing need to address issues such as the lack of new comparison shopping development in the town centre over the last decade.
63. UDP Policy STR21 Range of Functions affords priority to residential, recreational, leisure and community uses and open space in the town centre and does not envisage growth and significant retail development. It stems from the early 1990s when substantial retail and office development had been completed and diversification to other uses was required. Diversification has been achieved over the past few years with significant residential and leisure development. Retail studies show that there is now need, demand and capacity for additional town centre retail development and that need will grow in future years. In addition, the changing policy context, in directing the appropriate scale of retail development to reflect a centre's position in the retail hierarchy, concerns about the vitality of the town centre, reflecting increasing competition from retail development in other major town centres and renewed developer interest, reaffirm the importance of the town centre for a whole range of uses, including retail. These factors indicate a need for a shift in priorities concerning town centre uses, consistent with the Kingston's role as a metropolitan centre and with the London Plan and PPS6, which promote economic growth and a full range of uses.
64. UDP Policy STR22 Townscape Strategy includes a general height restriction for new development in the town centre, which is now considered to be too prescriptive. New policies covering the high quality design of buildings and public spaces are a more appropriate means of safeguarding Kingston's character and securing a high quality environment.
65. This AAP implements UDP Policy STR5 Shopping and Town Centres which seeks to enhance Kingston's role as a regional retail centre and strategic centre. It will also rely on the remaining 'saved' UDP strategic policies (excluding STR21, STR22 and STR23), until they are replaced by Core Strategy policies.
66. In addition, the AAP is responding to Policy 2A.5 of the London Plan, which designates Kingston as a metropolitan town centre and requires local policies that:
- seek to exploit and enhance the accessibility of town centres from the areas which they serve, particularly by public transport, walking and cycling
 - provide for a full range of town centre functions including retail, leisure, employment services and community facilities, in line with other policies of this plan
 - seek to sustain and enhance the vitality and viability of town centres including maximising housing provision through high density, mixed use development and environmental improvement

67. On adoption, this AAP will become part of the development plan for the borough, along with the remaining 'saved' UDP policies and the Mayor's London Plan. Once the Core Strategy is adopted, the strategic policy framework for this AAP will comprise national planning guidance, the London Plan and the Core Strategy DPD.

10.0 COMMUNITY AND STAKEHOLDER ENGAGEMENT

68. Throughout the K+20 process, as well as the formal and informal stages of consultation, there has been on-going liaison with statutory organisations, stakeholders and the community through meetings and briefings, including Kingston Town Centre Management, the Kingston Society, retailers, businesses, land and property owners, developers, and residents.

69. A detailed account of the wide ranging and extensive consultation that has taken place is set out in the Consultation Statement (as required under Regulation 28), which accompanies the Submission AAP. This sets out details of the responses received and how they have been addressed.

70. However, what is apparent is that the level and extent of consultation responses and general feedback, both statutory and non-statutory, has informed, influenced and moulded the various stages of the AAP. Thus, the AAP has been built up by means of an iterative process, having taken due regard of stakeholder and community engagement since the initial K+20 launch in 2003. The Issues consultation identified strengths to be built upon, weaknesses to be addressed and aspirations for the future, which have been worked up through the plan process into the Vision for the town centre, the Preferred Option, key objectives, and the policies and proposals set out in the Submission AAP. Overall, there has been a consistent level of support for the Preferred Option and Submission AAP, and it is considered that within the bounds of reasonableness, there is a common agreement from stakeholders that the Vision, Plan objectives, policies, proposals and delivery mechanism are the most appropriate for Kingston town centre.