

**KINGSTON TOWN CENTRE AREA ACTION PLAN
SUBMISSION VERSION MAY 2007
SELF- ASSESSMENT OF SOUNDNESS**

Introduction

1. Section 20(5) of the Planning and Compulsory Purchase Act 2004 defines the purpose of independent examination into a Development Plan Document (DPD) as being to determine:
 - whether it satisfies the statutory requirements for plan preparation as set out in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Development) (England) Regulations 2004; and
 - whether it is 'sound'.
2. The Planning Inspectorate's "Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents" December 2005 (PINS Guide) refers to the requirement for Local Development Documents, such as this Area Action Plan for Kingston town centre, to be sound in terms of content and the process by which they are produced. Plans must be founded on robust and credible evidence, show good judgement and fulfil the expectations of legislation. The Guide (at para.12) recommends that Local Planning Authorities carry out an objective self-assessment, having regard to the tests set out in Planning Policy Statement 12: Local Development Frameworks (PPS12), to satisfy themselves that they have produced a sound DPD. The self-assessment can be submitted as part of the evidence.
3. The tests to be applied to assess the soundness of DPDs are set out in para.4.24 of PPS12 and fall into three categories:
 - Procedural Tests
 - Conformity Tests; and
 - Coherence, Consistency and Effectiveness TestsDPDs must be sound when submitted for examination (para.4.15).
4. This Self-Assessment has been carried out in response to the PINS Guide. It assesses the Submission draft Area Action Plan against each of the nine tests of soundness, which are set out in the table overleaf.

SOUNDNESS TESTS

PROCEDURAL TESTS		
1.	The DPD has been prepared in accordance with the Local Development Scheme.	✓
2.	The DPD has been prepared to comply with the Statement of Community Involvement (SCI) or with the minimum requirements of the Regulations where no SCI exists.	✓
3.	The DPD has been subjected to Sustainability Appraisal.	✓
CONFORMITY TESTS		
4.	The DPD is a spatial plan which is consistent with national planning policy and in general conformity with the Spatial Development Strategy, that is the London Plan. It has had proper regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas.	✓
5.	The DPD has had regard to the authority's Community Strategy.	✓
COHERENCE, CONSISTENCY AND EFFECTIVENESS TESTS		
6.	The strategies/policies/allocations in the DPD are coherent and consistent within and between DPDs prepared by the authority and by neighbouring authorities, where cross-boundary issues are relevant.	✓
7.	The strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base.	✓
8.	There are clear mechanisms for implementation and monitoring.	✓
9.	The DPD is reasonably flexible to enable it to deal with changing circumstances.	✓

PROCEDURAL TESTS

TEST 1: Has the DPD been prepared in accordance with the Local Development Scheme (LDS)?

1. The Kingston town centre Area Action Plan (AAP) is identified as a Development Plan Document in the authority's Local Development Scheme (LDS). The LDS was first approved by the Government Office for London (GOL) in April 2005 and included a section on Priorities for the Local Development Framework. This included reference to the need for the AAP for Kingston town centre (on which work had commenced in 2002) to proceed ahead of the Core Strategy. In response to the submission of a draft of the proposed LDS in December 2004, a letter from GOL dated 6 January 2005 commented on the Kingston Town Centre Area Action Plan 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."

2. A revision to the LDS was approved in January 2006. The LDS has been further updated to reflect current circumstances and in response to advice from GOL (by letter dated 6th December 2006). A further revision to the LDS was approved by GOL in April 2007.
3. The AAP accords with the details set out in the LDS in terms of its role, rationale and scope. It provides a vision and spatial strategy for the town centre which promotes change and conservation and which will guide future development and improvement to ensure that Kingston maintains its position as a metropolitan centre. This followed concerns about its future attractiveness based on evidence of static turnover and visitor numbers, a realisation that Kingston needed to strengthen its retail offer to maintain its competitiveness and attraction to shoppers, visitors and retailers, and renewed developer interest in redevelopment within the town centre. The AAP is the appropriate tool to provide the planning framework to promote and manage change in the town centre. The LDS stresses the importance of proceeding with the AAP which promotes a pro-active approach to the development and improvement of the town centre.

Summary of Evidence

- RBK Local Development Scheme
- Correspondence from GOL
- Submission AAP Part A Chapter 1 para.1.1
- this Self Assessment of Soundness

TEST 2: Has the DPD been prepared to comply with the Statement of Community Involvement (SCI) or with the minimum requirements of the 2004 Regulations where no SCI has been adopted?

4. The Council's Statement of Community Involvement was adopted in January 2007. It was prepared during the AAP process and was submitted to the Secretary of State in April 2006. It was not in place during pre-submission consultation, which took place in 2003 and 2004 (Regulation 25) and pre-submission participation on the Preferred Option, which took place in 2005 (Regulation 26). However, the consultation for the AAP follows the requirements of the 2004 Regulations and the principles outlined in the SCI. The scope of the consultation undertaken has been far greater in extent than the minimum requirements set out in the Regulations
5. Full details of the consultation undertaken during the various stages of preparation of the AAP, together with details of the representations made, a summary of the main issues raised and details of how those issues have been addressed in the AAP are set out the Consultation Statement, prepared in compliance with Regulation 28.

Summary of Evidence

- Statement of Community Involvement 2007

- Submission AAP Part A Chapter 1 para.1.5
- Consultation Statement which accompanies the Submission AAP

TEST 3: Has the DPD been subjected to Sustainability Appraisal?

6. The AAP Preferred Options and Submission AAP have been subjected to Sustainability Appraisal and are accompanied by Sustainability Appraisal (SA) reports. Sustainability Appraisal has been carried out in accordance with the requirements of 'The Environmental Assessment of Plans and Programmes Regulations 2004', which incorporate the requirements of the European Directive on Strategic Environmental Assessment 2001 (the SEA Directive) and ODPM guidance on 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' November 2005.
7. Work began on the K+20 strategy in 2002, and there was a launch of the strategy in 2003 and consultation on issues in early 2004, prior to the adoption of 'The Environmental Assessment of Plans and Programmes Regulations 2004' (the EA Regs) in July 2004 (as required by the European Parliament "Environmental Assessment of Plans and Programmes Directive 2001") and the introduction of the new planning system under the Planning and Compulsory Purchase Act 2004 and the adoption of the Town and Country Planning (Local Development) (England) Regulations 2004 in September 2004.
8. There was consultation and engagement with the Environment Agency and English Heritage (two of the four designated "consultation bodies") during the early Issues Stage of this town centre AAP preparation in 2004.
9. The Authority carried out environmental assessment, in the form of Sustainability Appraisal of the Preferred Options (2005) and Submission AAP (2006), which consider the likely environmental effects of the AAP. SA involves a wider assessment than Environmental Assessment as it involves assessing the social, economic and environmental effects of a plan or programme.
10. The SA of the Preferred Options (June 2005) tested the spatial vision, preferred options objectives and proposals and the proposal site allocations against sustainability objectives. It appraised the preferred option and referred to the implications of a 'do-nothing' option and a 'higher growth' strategy. These 'options' are referred to in the Submission Sustainability Appraisal Appendices at Appendix 4.
11. All four designated "consultation bodies" were consulted on the AAP Preferred Options document and accompanying SA report in 2005. Responses were received from the Environment Agency (EA) and English Heritage (EH). The EA responded on the Preferred Options report and SA report and EH just on the PO report. A standard letter providing advice in respect of plan preparation under the new LDF planning system was

received from the Countryside Agency and there was no response from English Nature.

12. Account was taken of the EA representations on the Preferred Options AAP and SA reports, which related mainly to flood risk and a Strategic Flood Risk Assessment of the town centre was commissioned shortly after. This resulted in close working between the consultants conducting the SFRA, RBK and the EA in the preparation of the SFRA and recommendations regarding Proposal Sites and the drafting of a Flood Risk Management policy for the AAP. Account was taken of the EH comments in the drafting of AAP policies on design principles, environmental quality, high quality design of buildings and open spaces, streetscape, tall buildings, use of vacant and underused buildings and preservation of the historic environment.
13. The Submission Version AAP follows on from the Preferred Options with no significant changes, the Preferred Options SA was therefore taken forward and amended to take into account the amendments and refinements introduced in the Submission AAP, representations received and the ODPM guidance 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' published in November 2005, which set out a recommended format for SA.
14. There was further informal consultation with the EA and EH in 2006 on an initial draft of the AAP in 2006. There was engagement with Natural England on the AAP, SA and Appropriate Assessment in 2007. Natural England confirmed by letter dated 16 April 2007 that they have reviewed the SA for the AAP (including its component Strategic Environmental Assessment) and are satisfied that the potential effects on the environment have been properly assessed in accordance with the Planning and Compulsory Purchase Act 2004 and European Directive 2001/42/EC.

Summary of Evidence

- Submission AAP Part A Chapter 1 para.1.6 and Chapter 4 paras.4.13-4.15
- The Sustainability Appraisal and Appendices accompanying the Submission AAP
- The Preferred Options Sustainability Appraisal 2005
- EH letter January 2005 and representations July 2005
- Natural England letter April 2007
- Environment Agency correspondence and representations 2005-2007

CONFORMITY TESTS

TEST 4: Is it a spatial plan which is consistent with national planning policy and in general conformity with the Spatial Development Strategy (SDS) that is the London Plan and has it had proper regard to relevant plans, policies and strategies in the area or adjoining areas?

15. The AAP is a spatial plan, it is consistent with national planning policy, in general conformity with the London Plan and has had proper regard to relevant plans, policies and strategies relating to the area and adjoining areas. This test has been split into three in order to test soundness.

4a. Is it a spatial plan consistent with national planning policy?

16. The AAP is a spatial plan which contains policies and proposals which are consistent with national planning policy, in particular PPS1 Delivering Sustainable Development; PPS6 Planning for Town Centres and PPS12 Local Development Frameworks.

17. A key objective of national planning policy, as set out in PPS6 Planning for Town Centres 2005, is to promote the viability and vitality of town centres by:

“Planning for the growth and development of existing centres by promoting and enhancing them and by focussing development and a wide range of services there in a good environment which is accessible to all”.

PPS6 also promotes the use of action plans, alongside other initiatives, to actively plan for growth and manage change or conservation.

18. The AAP plans for the sustainable growth and development of Kingston town centre. It aims to build upon the centre’s strengths, address its weaknesses and meet the needs of its catchment. Its policies and proposals:

- promote a wide range of enhancements to town centre uses to provide an enhanced range of shopping, leisure and local services;
- propose enhancements to all modes of transport to improve accessibility and promote social inclusion;
- promote sustainable economic growth, tourism, the efficient use of land;
- promote high quality, sustainable and inclusive design; and
- promote improvements to the public realm and open spaces and protection of the town’s heritage.

19. The GOL response to the consultation on Preferred Options 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.” Detailed comments made by GOL have been addressed in the Submission AAP.

Summary of Evidence

- GOL formal representations
- Submission Area Action Plan in particular Part A Section 2 and Part B Policy Context table on page 37

4b. Is it in general conformity with the Spatial Development Strategy (SDS) that is the London Plan?

20. The AAP has been drafted taking account of London Plan objectives and policies and is considered to be in general conformity with the London Plan. The Submission AAP Part A Chapter 2 paras.2.5-2.10 refer to the London Plan. Kingston town centre is designated as one of 10 metropolitan centres in the London Plan and the provisions of the AAP respond to London Plan Policy 2A.5 (the overarching policy for town centres), which provides strategic policy guidance (Submission AAP paras.2.6 and 2.20) 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
21. Other London Plan policies which are especially relevant to the AAP are set out in the Submission AAP para.2.7 and cover: London's Economy (3B.1); Integrating transport and development (3C.1); Supporting Town Centres (3D.1); Sustainable Design Principles (4B.1); Housing Targets (3A.2); Higher and Further Education (3A.22); the Blue Ribbon Network (4C.1) and Strategic Priorities for the South London Sub-Region (5F.1). The AAP Part B includes Policy Context tables at the start of each Chapter which cross refers AAP policies with relevant London Plan policies.
22. There has been on-going dialogue and meeting with GLA officers during each stage of the AAP preparation. Representations from the Mayor/GLA at the Preferred Options stage supported the broad approach and made a number of detailed comments regarding transport issues; housing; pedestrian routes; masterplanning; renewable technology, the Hogsmill river corridor and the need to undertake a flood risk assessment. Immediately following the Preferred Options stage, the Council commissioned a Strategic Flood Risk Assessment which was completed in 2006 and provides guidance including measures to be adopted by new development to manage and reduce flood risk and meet the requirements of PPS25 (see AAP Policy K24 Flood Risk Management page 110).
23. The GLA comments have been taken into account in the drafting of the Submission AAP. Policy K7 Housing includes reference to Lifetime Homes standards and to the need for affordable housing provision, in accordance

with UDP Policy H9 and the Affordable Housing SPD. Pedestrian routes are referred to in Policies K10 Public Realm and K17 Pedestrian Environment; renewables in Policy K9 Design Quality and the Hogsmill in Policies K14 The Hogsmill River and K17 Pedestrian Environment. The Transport policies and proposals in Chapter 9 of the draft AAP Policies K15-K20 include a range of access improvements including complementary measures to reduce the impact of future development on road network and congestion. A Transport Assessment has been undertaken to test the feasibility of accommodating the significant increase in retail and residential development proposed, as well as other town centre uses, with associated highway and transport improvements (ref. AAP para.4.11).

24. The AAP also takes account of the South London Sub-Regional Development Framework 2006, a non-statutory planning document, as referred to in Part A Chapter 2 of the AAP paras. 2.11 –2.12. Of particular relevance is the support for the scope and growth envisaged in this AAP for Kingston town centre. The SRDF states: *"Implementation of Kingston's K+20 vision will strengthen its metropolitan role further and build upon its main attractions including the ancient market, major department stores, the River Thames and expanding leisure offer"*.

Summary of Evidence

- Submission AAP Part A Chapter 2 paras.2.5-2.10 and Policy Context tables in Part B pages 39, 55; 71; 82; 90; 104; 108;109 and 111
- The London Plan 2004 and Proposed Alterations to the London Plan 2005 and 2006
- Representations from the Mayor/GLA

4c. Has the AAP had proper regard to relevant plans, policies and strategies in the area or adjoining areas?

25. Figure 1 in Part A Chapter 2 of the AAP page 8 refers to a host of borough strategies and plans, which are relevant to the AAP and which have been taken into account in preparing the AAP. The AAP's planned focus of investment and regeneration of the town centre is consistent with the overall aims and priorities in those plans and strategies.
26. The Local Implementation Plan (LIP), which is the Local Transport Plan for the borough, approved by the Mayor in 2005 is especially relevant and has guided the transport policies and proposals in the AAP (Part A Chapter 2 para.2.24 and Part B and Policy Context table on page 90).
27. The designation of Kingston town centre as the UK's first Business Improvement District in 2004 is relevant (see AAP Part A Chapter 3 para. 3.22 page 25, Part B Chapter 10 para. 10.4 page 105 and Part D Chapter 13 para.13.25 page 168). The BID addresses short term operational and management issues in the town centre as well as promotional matters and some environmental improvements. It is the role of the AAP to provide the

longer term strategy, setting out the policies and proposals to enhance Kingston's role as a metropolitan centre.

28. The adjoining London Borough of Richmond (LBR) has made representations on various stages of the AAP. Their latest representations in April 2006 refer to the influence of Kingston's attraction as a metropolitan centre on spending in their borough, in particular on Richmond town centre, designated as a major centre in the London Plan. Although they consider that the proposed retail development in Kingston will increase trade draw from LBR, the LBR LDF will propose sites in Richmond to meet their retail needs and they conclude that the viability of these sites will be unaffected by the K+20 proposed development. The adjoining Borough of Elmbridge, which includes Esher town centre, wrote in response to the informal consultation on the AAP in early 2006 that they had no comments to make on the draft AAP.
29. The supporting text and reasoned justification for Submission AAP Policy K1 New and Enhanced Shopping Facilities, set out in paras.5.4-5.7 and in Appendix 1 to the AAP (The Retail Hierarchy, Kingston's Catchment Area and Impact of the Plan on Neighbouring Centres), considers shopping provision in town centres in adjoining boroughs and other strategic centres.
30. Network Rail and Transport for London express support for the proposed improvements to Kingston Station (Policy K16 Public Transport). TfL also support (i) the proposals to rationalise car parking, provided there is no increase in overall supply (Policy K20); (ii) the principle of comprehensive redevelopment of bus facilities to enable the removal of buses from Eden Street (Policy K16); (iii) improved cycle parking provision (Policy K18) and (iv) the initiatives to improve taxi and private hire vehicle provision (Policy K19).
31. Following concerns raised in representations by the Environment Agency and Thames Water about flood risk, environmental enhancements, sustainable construction and utilities infrastructure, the submission AAP and its policies in Part B Chapter 11 Infrastructure Provision and Flood Risk (Policies K22-K24) have been strengthened to address the matters raised. The adoption of a Waste Strategy for the borough in 2004 is referred to in para.11.4 of the Submission AAP, together with reference to the Joint Waste DPD which is being prepared with adjoining authorities.

Summary of Evidence

- Submission AAP
- Strategies and plans as detailed in the AAP Part A Chapter 2 and Figure 1 page 8 and AAP Background Documents listed in AAP Appendix 7 including the Local Implementation Plan.
- Representations from consultation bodies

TEST 5: Has the AAP had regard to the Authority's Community Strategy?

32. The Royal Borough of Kingston upon Thames Community Plan 2004-2009, which was prepared by the Kingston Community Leadership Forum, a partnership of organisations representing all sectors of the Kingston Community, includes a number of elements and priorities which relate specifically to Kingston town centre and are therefore of particular relevance to the K+20 AAP. The AAP refers to the Community Plan in Part A Chapter 2 paras.2.22-2.23. Both through its policies and through proposals for individual sites, the AAP seeks to deliver the spatial aspects of the Community Plan relevant to Kingston town centre. Direct links between Community Plan themes and priorities and individual policies in the AAP are identified and cross referenced throughout the AAP in Part B in the Policy Context Tables at the start of each Chapter. Key elements of the Community Plan (para.2.23 in the AAP) which are relevant to the town centre and reflected in the AAP spatial vision, its objectives, policies and policies are:

- A clean, safe and environmentally sustainable town centre (AAP key objectives 3 and 7; AAP Policies K9 and K21))
- A centre of excellence for learning, with Kingston University and Kingston College playing a central role (AAP key objectives 1 and 2 and AAP Policy K8)
- A diversified and balanced economy (AAP key objectives 1 and 2 and AAP Policies K1- K6 and K8):
 - Ensuring that the town centre remains attractive to businesses
 - Encouraging employment that is attractive to residents and provides highly skilled jobs with high added value
 - Encouraging a strong service sector and creative industries
 - Maintaining Kingston's position as a regional retailing centre with a diverse choice and a pleasant environment
- A regional entertainment and cultural centre, providing vibrant and exciting entertainment options for the whole age range and with the Thames as a focal point for a range of activities on and around the river (AAP key objectives 1 and 2 and AAP Policy K6)
- A focus for tourism and recreation, with a quality hotel and conference facilities (AAP Policy K6)
- Well maintained, sustainable housing to meet the needs of the whole community (AAP key objective 2, AAP Policy K7)
- A transport system accessible to all (AAP key objective 6, AAP policies K15-K20):
 - Creating partnerships to ensure that Kingston benefits from improved transport
 - Reducing congestion on the transport network whilst maintaining the number of people that visit and work in the borough

Summary of Evidence

- Submission AAP especially Part A Chapter 2 paras.2.22-2.23 and Part B Policy Context tables on pages 39, 55; 71; 82; 90; 104; 108;109 and 111
- The Community Plan - Royal Borough of Kingston upon Thames 2004-2009

COHERENCE, CONSISTENCY AND EFFECTIVENESS TESTS

TEST 6: Are the strategies/policies/allocations in the DPD consistent within and between DPD's prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant?

33. The strategies/policies/allocations in the AAP are consistent within the AAP. No other DPD has yet been prepared by this Authority.
34. The Part B topic based policies in the submitted AAP relate directly to the AAP's eight key objectives and are arranged in chapters under the relevant objective. The Part C Proposal Site policies for key areas of change and development and policies for the key areas of conservation (the three parts of the Old Town Conservation Area) relate to the overall vision and key objectives and where appropriate Part B and Part C policies are cross-referenced.
35. There are cross boundary issues in that Kingston town centre is a metropolitan centre and sub-regional shopping centre and its catchment area extends beyond borough boundaries into south west London and north east Surrey (see Plan 9 page 42 in the Submission AAP). The AAP's retail proposals (Policy K1 and paras.5.4-5.9) seek to enhance Kingston's retail offer with new facilities to meet the needs of catchment area shoppers, particularly to meet the need for fashion store provision, so that Kingston maintains its position and does not lose market share from the main part of its catchment to competing centres such as Croydon and Guildford, both of which have new shopping facilities in the pipeline and to the out of town Bluewater Shopping Centre in Kent. With this approach, the AAP would consolidate Kingston's market share within its principal catchment area and have only marginal effect on the zones of influence and respective catchments of the nearest metropolitan centres (Sutton, Hounslow and Croydon) and major centres (Richmond, Wimbledon and Putney). This is explained in the AAP Appendix 1 - The Retail Hierarchy, Kingston's Catchment Area and Impact of the Plan on Neighbouring Centres. The AAP retail proposals seek to complement existing facilities within Kingston town centre, within the borough's three district centres (Surbiton, Tolworth and New Malden) and its local centres which are anchored by shops that mainly meet day to day local needs.
36. Policies K16 (Public Transport - in relation to the promotion of cross GLA / Surrey boundary bus services and rail plus bus services to Kingston from Surrey Districts via Surbiton Station) and K19 (Other Measures to Improve

Accessibility - in relation to the promotion of potential permanent park and ride facilities) refer to and involve cross boundary matters, which will require, as stated, co-operation from partners including transport providers and other organisations and authorities.

37. The AAP has been prepared in advance of the Core Strategy to address the specific needs of Kingston town centre (as set out in the approved Local Development Scheme). The AAP has been prepared to be consistent with national planning policy and the London Plan. It seeks to supersede all the Part 1 and Part 2 policies in Chapter 12 of the UDP on Kingston town centre and the UDP policies for Proposal Sites within the town centre. It is not considered that the AAP policies will pre-empt Core Strategy policies for the town centre. For both the AAP and the Core Strategy, as a metropolitan centre, policies for the town centre are guided by national planning policy, the London Plan, other strategies and plans, sustainability objectives, stakeholder/community engagement and the physical nature of the town centre.
38. The objectives of the AAP were appraised against the SA objectives and overall were found to provide a sustainable framework for future growth and development in the town centre.

Summary of Evidence

- Submission AAP, including Part B pages 37-38 Policy K1 pages 40-43 and Appendix 1 pages 182-183 and Background documents listed in Appendix 7 of AAP
- The London Plan 2004
- The 2005 UDP

TEST 7: Do the strategies/policies/allocations in the AAP represent the most appropriate in all the circumstances, having considered the relevant alternatives, and are they founded on a robust and credible evidence base?

39. It is considered that the policies in the AAP represent the most appropriate in all the circumstances having considered the relevant alternatives, and that they are founded on a robust and credible evidence base. The wide ranging existing strategies and specialist studies commissioned to inform the Submission AAP and the drafting of its policies and proposals are listed under the Summary of Evidence at the end of this 'Test'.
40. One of the purposes of the AAP is to provide a planning framework to guide future development and improvement and to pro-actively promote and manage change and conservation in the town centre so that Kingston maintains its attractiveness to visitors commensurate with its position as a metropolitan centre. Chapter 1 of the Submission AAP pages 35 refers to the rationale for preparing the AAP and to the factors which have limited the range of realistic 'alternative' options and shaped the direction of the AAP. Chapter 3 paras.3.24-3.27 refer to the centre's spatial characteristics which provide constraints and opportunities which affected the selection of

the Preferred Option in 2005 and its range of sub-options for town centre uses, design and environmental enhancements, transport, access and infrastructure improvements.

41. Section 5 of the Sustainability Appraisal Plan Issues and Options and the Preface which accompanies the AAP and this Self Assessment sets out in detail the process and factors which led to the selection of the Preferred Option and its sub-options (see para.39 above) and to the development of the policies and proposals in the AAP. Relevant sections are reproduced below.

42. In summary, building on the Launch and Issues stages in 2003 and 2004, which identified issues to be addressed and opportunities/options for development and improvement, the AAP Preferred Options document (June 2005) 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 is given as:

- 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 employment growth.

43. 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:

- the need to be consistent with national planning policy
- the need to be consistent with the London Plan and to have regard to other relevant plans, policies and strategies
- the need to have regard to the RBK Community Plan 2004.

44. A further raft of factors have also influenced the spatial objective and direction of the AAP:

- the specialist studies commissioned to provide a robust and credible evidence base for K+20 (retail, parking, park and ride, integrated transport, Old Town Conservation Area, flood risk and management, and archaeology, implementation and delivery)
- the sustainability appraisal process
- the physical nature of the town centre and its constraints and attributes
- the responses from stakeholders and community engagement.

45. 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. These factors as set out in para.39 above are detailed in Section 5 of the Sustainability Appraisal.

Summary of Evidence:

- Submission AAP Part A Chapter 1 paras.1.1-1.7 pages 3-5
- Sustainability Appraisal of Submission AAP
- AAP Background Studies and Documents listed in Appendix 7 of the AAP including:
 - Retail Studies 2003 and 2006*
 - Old Town Conservation Area Studies 2003-2005
 - Parking Study 2003 and Parking Strategy 2005
 - Local Implementation Plan (Transport) 2005
 - Secure Cycle Parking Study and Strategy 2004
 - Rapid Transit Feasibility Study 2003 and Integrated Transport Study 2004
 - Park and Ride Study 2003
 - Office Survey 2005
 - Strategic Flood Risk Assessment and Management Study 2006/2007 *
 - Archaeological Overview 2006*
 - Hotel Feasibility Study 2007*
 - Kingston town centre Summary of Transport Assessment 2007
 - Employment Analysis
 - Analysis of Housing Provision
 - Business Improvement District Business Plan and Town Centre Management Strategy

*During the Preferred Options stage, it became apparent that some additional studies were required to complete the evidence base for the AAP. This need was reinforced by representations made at Preferred Options stage and through on-going stakeholder liaison. The additional studies were completed in 2006 and early 2007.

TEST 8: Are there clear mechanisms for implementation and monitoring?

46. The AAP has clear mechanisms for implementation and monitoring, which are detailed in Part D of the Submission AAP: Implementation and Monitoring Framework. Part D refers to the partnership working which will be required with a range of stakeholders in the public, private and

community/voluntary sectors to deliver and implement the AAP vision for the town centre over the period to 2020, with the Council playing a lead role. It explains the work undertaken with external consultants on delivery of the AAP, risk assessment and the level of commitment to implementing the various elements of the AAP.

47. The AAP policies are worded in such a way as to make it clear how each policy will be implemented. Part D of the AAP sets out an indicative programme for the delivery of the main elements of the vision for the town centre in Schedules 1 and 2. It includes details of agencies responsible for delivering each of the AAP's 24 Part B policies, Part C policies for the 20 Proposal Sites and 3 key areas of conservation, together with milestones and targets. It sets out a Monitoring Framework with indicators and targets related to each of the AAP's eight key objectives.

Summary of Evidence

- Part D Submission AAP and Appendix 6 which details town centre improvements since the inception of the K+20 Strategy 2002-2006
- Annual Monitoring Report
- Reports/representations by public and private sector delivery bodies

TEST 9: Is the AAP reasonably flexible to enable it to deal with changing circumstances?

48. It is considered that the AAP is flexible enough to be able to deal with changing circumstances.

49. Across the town centre, the areas identified as having potential for significant change and improvement (AAP Plan 6 page 26) have been broken down into 20 Proposal Sites and there are also 3 key areas for conservation and enhancement (AAP Plan 21 page 118). The former are sites suitable for development to accommodate new or intensified town centre uses, to achieve the objectives set out for each character area and the Vision for the town centre overall (AAP Plan 7 page 32). Some are vacant and underused sites, with a poor quality environment; others have poor quality buildings, which would benefit from redevelopment and renewal. A few are within or close to the key areas for conservation and enhancement in the Old Town Conservation Area, where the emphasis is on safeguarding and enhancing the historic environment and environmental quality.

50. The character and attributes of each of these areas is described in Part C of the AAP, accompanied by plans which analyse the built fabric, experience, frontage quality and public realm. Development, design, movement and environmental objectives are set out for each of the areas, with an accompanying plan. They aim to identify and build upon the positive qualities of each of the character areas and to improve any negative aspects. The majority of the Proposal Sites cover quite large areas and mixed use development is proposed. The Proposal Site policies

are not overly prescriptive and thus allow a degree of in built flexibility for development proposals within the overall framework for the town centre.

51. The implementation of the AAP will be monitored against a series of indicators derived to monitor performance against the spatial objectives as set out in Part D of the Submission AAP, Schedules 1 and 2 pages 171-180. Progress against the indicators will be set out in the Council's Annual Monitoring Report. Careful monitoring of progress will determine whether there are any issues which affect or threaten implementation of the AAP, whether there are any changes in the assumptions that underpin the AAP or whether any amendments or review are required.

Summary of Evidence

- Submission AAP – Part B, Part C including Chapter 12 para 12.5 Page 119 and Part D particular C and D
- Annual Monitoring Report