

**Call in of Decision Two (Part 2) on 12 February 2019 by The Environment and Sustainable Transport Committee of Kingston Council to approve the 3rd Local Implementation Plan (the “LIP”) for the Borough**

The Greater London Authority Act 1999 (The GLA Act) requires each borough to prepare a LIP containing its proposals for the implementation of the Mayor’s Transport Strategy in its area.

We, the undersigned, call in the decision to approve the Borough’s LIP for the following reasons:

1. The LIP breaches Requirements laid out in TfL guidance on how to prepare LIPS <https://tfl.gov.uk/info-for/boroughs/local-implementation-plans> and more specifically in <http://content.tfl.gov.uk/third-lips-guidance-2018.pdf> – Guidance for Borough Officers on Developing the 3<sup>rd</sup> LIP, March 2018. The following Requirements of the latter guidance are breached:
  - R3 – Statutory Consultation. There is no evidence that all the consultees listed were actually consulted or demonstration that all consultees views were taken in to account in the final LIP. Specifically, there is no evidence that eight residents’ associations were consulted. Additionally, it is not democratic to choose 8 residents’ associations as representative of residents’ views across the Borough. It also is not correct not to seek the opinion of representative organisations such as the North Kingston Forum and associations that represent large numbers of residents. No evidence has been made available about which associations were consulted and the outcome of such consultation. The requirement to consult with stakeholders registered on the Local Plan consultee database also appears to have been breached.
  - R5 – Strategic Environment Assessment (SEA). There is no evidence that an up-to-date SEA has been completed. No such SEA is available on the Council’s website
  - R7: Local Context – the LIP does not give detail of “other characteristics of the Borough”, which it could easily have done using the Borough Character Study. The local context demographic information does not include coherent, full, accurate or up-to-date information on the Borough, of recent population changes as development has happened and of how these are affecting the local context. There is no detailed and up-to-date information on forecast increases in population and the changes that such growth will bring to the predominant characteristics of different areas of the Borough. Under Employment, the requirement for the Borough to provide for an additional 30,000 jobs on top of the 2016 London Plan expectation of 13,000 jobs (Kingston Transport Forecasting Report 2018) is not mentioned. No reference is made in this section to the Direction of Travel growth strategy approved by the Council in 2016 and no explanation is given of its implications for the Borough. No meaningful reference is made, detail or explanation given of the planned “nascent Opportunity Area” for Kingston
  - R11: The LIP fails to set locally-specific objectives for the 9 outcomes of the Mayor’s Transport Strategy, namely Outcomes 3,8 and 9. Objectives for some of the other outcomes are vague, for example, 5.1 Kingston “supports” CrossRail2 and subsequently, many are not specific, measurable, achievable, relevant and time-orientated
  - R12: The LIP does not reflect directly, specifically, accurately, clearly and consistently how other Mayoral strategies, such as the Mayoral strategy on Housing (summer 2018) and the forthcoming draft new London Plan (late 2019), that has set clear and

massive development targets for Kingston in terms of new housing and the provision of jobs, will affect the Borough

- R13 and R16: the LIP does not list CrossRail 2 as a project that will help contribute to the delivery of the Mayor's Transport Strategy out to 2041
2. The draft LIP is currently not available for residents or other stakeholders to see on the Council's website
  3. The Mayor's Transport Strategy does not mention a Kingston Opportunity Area. It is therefore incorrect and misleading for the LIP to include mention of an Opportunity Area in Kingston in point 2.4 and in the map on page B40
  4. Forecast household, population and employment growth figures in the LIP are not consistent, comprehensive or accurate with latest available data. No coherent picture is given of Kingston's recommended growth targets. Figure 3 is unclear and not explained. Points 2.14 to 2.18 give historical transport trend information and do not use data from the Kingston Transport Forecasting Report 2018 on predicted growth and the effect on transport requirements. Figures given to the Mayor's office in a bid for mini-Holland monies and the impact of what has been built and what has been planned to be built have also been omitted
  5. Misleading statements are made about CrossRail 2 (CR2) in points 2.24 and 2.81 which link CR2 explicitly and positively to the Borough's ability to meet its housing targets, when Kingston's core housing and employment growth figures are not dependent on the arrival of that infrastructure project. The misleading statement in 2.81 fails to inform people that the majority of the 20,000 extra housing units that must be built when construction of CR2 starts will be in Kingston. In addition, CrossRail 2 does not show up in any conveyancer infrastructure searches for people purchasing property in Kingston