

To: Strategic Planning Team  
Kingston Council

19 August 2016

Dear Sir/ Madam

## **Detailed Reasons why the Direction of Travel Strategy should be REJECTED**

1. **The strategy will effectively be decided for good if approved in its current form. No one will be able to stop the Direction of Travel after September 2016.** Once approved by the Council, ie in September 2016 after being public for only 3 months, document will provide “supplementary planning advice to the London Plan by supporting the selective redevelopment of areas within the Borough”. This major strategy is being rushed through before anyone can stop it.
2. Robust risk assessment is critical in a growth plan on this scale and is absent in this strategy. The issues noted in the risk assessment are random and reflect a completely inadequate assessment of the risks inherent in following the confused plans laid out in this strategy and of mechanisms to manage them. No context is given for the risks identified, nor are risks related to the objectives from which they arise. The risks inherent in growth of this scale are huge and could have a huge impact on the well being of current and future stakeholders in the Borough. **The lack of adequate consideration of risk means this Direction of Travel strategy should be REJECTED.**
1. Contrary to assertions in the report, there is no evidence at all that the Council adopts a “proactive yet proportionate approach to the identification of risks across its activities.” Indeed, the Council’s failure to manage many of its existing activities properly or on a financially viable basis indicates that the council’s risk analysis skills are severely lacking.

The risks inherent in the proposed growth strategy for the Borough are huge and threaten the well-being of existing residents and stakeholders. These have not been considered. **The Direction of Travel strategy should therefore be REJECTED.**

3. The Direction of Travel has already been approved by the Mayor without any previous discussion with any stakeholders in the Borough. The Mayor’s approval should not take precedence over the fact that the Council should need a mandate from residents and other stakeholders for growth on this scale. **The council does not have a mandate from the Borough’s stakeholders to pursue the proposed growth strategy and the Direction fo Travel should be REJECTED.**
4. The Direction of Travel has NO input from anyone in Kingston other than two Tory councillors, Kevin Davis and David Cunningham, who ALONE have negotiated the details of the plan with the Mayor’s office and TFI. This is not democratic. For this reason, the **strategy**

**should be REJECTED** and the plan should be redrafted after a mandate has been obtained from residents and other stakeholders for growth on this scale and of this form in the Borough.

5. The strategy document refers to “areas of opportunity” that have arisen as part of the potential future delivery of CrossRail 2. These have never been discussed and it is completely unclear what and where these are. No consultation on these areas has happened. **On this basis, the Direction of Travel Strategy should be REJECTED.**
6. It is written in the Direction of Travel document that the “Direction of Travel ... reflects the **CULMINATION of ideas** on all these projects to date.” All “ideas” have been discussed only between a handful of individuals at the GLA, TfL, and *two Tory councillors*. Ideas have not even been sought on what growth should happen in Kingston, so they can not at all have culminated. **On this basis, the Direction of Travel Strategy should be REJECTED.**
7. The Strategic Growth Board, which consists solely of Kevin Davis and David Cunningham, was given authority by the Tory Council in March 2015 to negotiate behind closed doors with the GLA to develop an Opportunity Area for Kingston Town. How has this come to be extended to the whole Borough without even going to Committee? **On this basis, the Direction of Travel Strategy should be REJECTED.**
8. It is written in the Direction of Travel that “Any potential for confusion on the part of the public and business communities that *may have arisen by consulting on these projects separately has been removed.*” This point highlights the **undemocratic approach** of Kevin Davis and his administration to the people that they are meant to represent, by purposefully sidestepping consultation: **The strategy should therefore be REJECTED.**
9. Estimates for population growth in the Borough are unsubstantiated. There is also no sensitivity analysis or explanation of the assumptions that underlie the assertions made. **The Direction of Travel strategy should therefore be REJECTED.**
10. The Direction of Travel’s author mentions “**benefits for local communities**” that will arise from the Direction of Travel strategy. However, no detail is given of the form that such benefits will take. There is subsequently no evidence that residents agree with any benefits proposed. **The Direction of Travel strategy should therefore be REJECTED.**
11. It is written in the Direction of Travel that “The document presents potential areas of opportunity for selective redevelopment”. The term “**area of opportunity**” is not however defined. It is not clear whether such areas are actually Opportunity Areas as defined by the GLA for mass development? The council has been negotiating behind closed doors for Kingston Town to become an Opportunity Area, but the other “areas of opportunity” have not been discussed or consulted upon: **Norbiton, London Road and Cambridge Estate; Berrylands and Hogsmill Valley; Tolworth; New Malden and Chessington. For this reason, the Direction of Travel strategy should be REJECTED.**

12. This document does not provide a firm basis for defining the scale and location of growth in the Local Plan, nor does it give any details of the “evidence based studies” that will be used to support it. **The Direction of Travel strategy should therefore be REJECTED**
13. Point 19 – The council’s advertising of the strategy has been completely inadequate. This Direction of Travel strategy is of such importance that notice of Consultation should be given to every household and business in the Borough so that everyone has the opportunity to comment on it. **For this reason, the Direction of Travel strategy should be REJECTED.**
14. It is total unacceptable that public consultation is tailored to meet the requirements of an “emerging” Statement of Community Involvement that people have not had a chance to see. **For this reason, this Direction of Travel document should be REJECTED.**
15. The “Consultation report” will be drawn up solely by the GLA and the Council’s “Strategic Planning Team”. **This is unacceptable and undemocratic.** The make-up, objectives and authorities of this team are unknown. There appears that there will be no independent validation that the Consultation Report will reflect accurately and fully feedback from the public consultation. **The Direction of Travel strategy should therefore be REJECTED.**
16. The “emerging Kingston Opportunity Area” to which reference is made in the report is not defined. **The Direction of Travel strategy should therefore be REJECTED.**
17. The Direction of Travel mentions an “emerging Opportunity Area”. This is not defined or explained and on this basis **the strategy should be REJECTED.**
18. “Kingston Opportunity Area” is undefined. The only area that has been discussed at Committee before now has been the “Kingston **Town** Opportunity Area.” The Council has only disclosed to the residents of Kingston that it is pursuing Opportunity Area status for Kingston on 6 June 2016:
19. The Direction of Travel document refers to an **Opportunity Area Planning Framework (OAPF)** . Given this document is not publicly available, it can not be part of a strategy that the Council has put forward for public consultation. **The Direction of Travel strategy should therefore be REJECTED.**
20. Who gave the Council a mandate to secure a “commitment (from the GLA and TfL) to work with the council “on the basis that Kingston Town Centre will become an opportunity area “in due course.” The people of Kingston have not been told of these discussions until it is too late for them to influence their outcome. **On this basis, the Direction of Travel strategy should be REJECTED.**

21. No details are provided of the **Opportunity Area Planning Framework** that is being developed by the Council with the GLA. This is a key part of the Direction of Travel strategy, which can not be consulted upon without full information supporting it. **The Direction of Travel should therefore be REJECTED.**
22. No details are given of TfL's plans for Kingston station that "are likely to emerge later in 2016". **Without this information, the Direction of Travel should be REJECTED.**
23. "Affordable housing" is given little priority in this document, apart from to say that delivery of it remains "challenging". This is unacceptable. **On this basis, the Direction of Travel strategy should be REJECTED.**
24. The section headed Next Steps is a mishmash of things that are not presented as part of a coherent strategy. No explanation is given for how the priorities listed have been arrived at. No definition is given of what is meant by the "station quarter" nor of which area it covers. It is not clear what is meant by "Crossrail 2" being a priority. **On this basis, the Direction of Travel strategy should be REJECTED.**
25. The council wishes to engage with developers to secure investment "immediately" when this plan has only just been produced and is not adequate for the basis of any development commitment. This is inappropriate. **On this basis, the Direction of Travel strategy should be REJECTED.**
26. It is written in the Direction of Travel document that engagement with stakeholders will take place "where appropriate". This terminology will allow the Council to do little or no consultation on its proposals. **On this basis, the Direction of Travel strategy should be REJECTED.**
27. It is completely unclear how the figures showing the resource implications of the Direction of Travel strategy have been arrived at. However, Kingston Futures and the Council's Statutory Planning functions are being given a budget of nearly £4 million for the current financial year. This includes a budget of £874,000 just for "planning". No explanation of how the figures have been arrived at or how the money will be spent has been given. This is appalling and unsatisfactory. **The Direction of Travel document should therefore be REJECTED.**
28. The author of the Direction of Travel strategy mentions a "Kingston Opportunity Area Plan". No Opportunity Area for Kingston currently exists. **The Direction of Travel strategy should therefore be REJECTED.**
29. The Council has given the head of Planning and Regeneration the **authority to make "minor amendments" to the Direction of Travel strategy document.** In the case of Cocks Crescent, New Malden, this has previously led to the *complete revision of strategy with no public consultation whatsoever*. This is a way to completely by-pass residents' views of what is

needed and to bulldoze through the council's own plans. **On this basis, the Direction of Travel strategy should be REJECTED.**

**Caroline Shah**  
**20 August 2016**