

PM London comments

Page: [Chapter 1 Planning London's Future \(Good Growth Policies\)](#)

Section: [1.0.5](#)

You state earlier in the plan that London's population is projected to increase by 70,000 every year, reaching 10.5 million in 2041. You also state that this is a wave of growth "the likes of which we've not seen for a century".

Based on these comments and on the very real issues currently faced by the city, its inhabitants and its natural environment, we do not see how you can categorically state that London will sustain the level of population growth being forecast.

We accept that it is important to be optimistic and aspirational in such a strategic document but strongly feel that the plan must also be as accurate as possible without being misleading to the general public.

Page: [Chapter 1 Planning London's Future \(Good Growth Policies\)](#)

Section: [1.0.6](#)

We welcome the recognition of the failure to consider the question of growth appropriately. You explicitly mention car dependency and its associated ills, however we believe that a far wider number of issues are negatively affected by an increasing population. Associated increases in density, urbanisation, pollution, consumption and demand are rarely considered in the race for economic growth.

We accept that a strong economy is good when all else is equal, however we are cautious that often the longer term, complex effects of unchecked growth are not considered in a serious, evidence-based manner.

Page: [Chapter 1 Planning London's Future \(Good Growth Policies\)](#)

Section: [1.0.7](#)

We welcome the focus on health, quality of life and inequalities discussed in the plan. However, we are concerned about the fatalistic attitude expressed toward growth. Obviously our primary concern is around population growth and we understand the difficulties, both political and practical, in discussing this issue in a meaningful way. That being said, we do not believe that continued expansion and growth are inevitable, nor that they are desirable. We strongly believe that they come with significant negative effects to the population and the environment which policy makers and planners fail to address.

We also wish to express concern about the use of the term 'sustainable growth'. The definition of sustainability is often given as being the 'avoidance of depletion' or the 'ability to be maintained'. Growth in London is in no way sustainable based on this definition and we believe that the use of this term is misleading.

We welcome the aim to ensure that London is a fairer and more equal city. However, we do feel these aims gloss over the significant current issues already faced by London in the present day. We do not believe that sufficient evidence has been provided to make a convincing case that these issues will not worsen under the pressures of a further increasing population.

Communities in London already face significant challenges, particularly in accessing healthcare services. Whilst the emergency care provided by the NHS is currently in the news due to the struggles it is facing, we also point to the significant resource challenges faced by primary care, social care and public health. These issues have an unfairly weighted impact on some communities, of whom a large number have their issues further exacerbated by deprivation. This relates to the 'inverse-care law', the fact that healthcare provision is inversely proportional to its need. One need only read the Public Health England report 'Health Inequalities in London' to see some of the significant problems faced by sectors of London society. Ranging from homelessness (43,310 households in London were living in temporary accommodation), infectious disease (Incidence of TB in Newham is 16x higher than in Richmond upon Thames), respiratory disease (People in the most deprived decile in England are 2.2x more likely to die from respiratory disease under 75 years compared to people in the least deprived decile) and the list goes on.

The charity 'Trust For London' claim that 50% of London's wealth is owned by the richest 10% of its households. The bottom 50% own just over 5%. The gulf between rich and poor was made abundantly clear following the events in Kensington and Chelsea last June, highlighting the fractured and unequal society within the city.

The plan claims that London draws much of its strength from its diverse communities. A claim which we support, however London is failing to meaningfully support the very communities upon which it relies through ensuring that the services provided are fit-for-purpose in the face of continuing population growth.

In summary, London is already failing to provide for many of its poorer and more marginalised communities. We strongly believe that despite the admirable intentions outlined in this section, there is little evidence to suggest that the problems currently faced will be solved, let alone the problems of an even larger future population.

Page: [Policy GG2 Making the best use of land](#)

Section: [N/A](#)

Once again we object to the unrealistic expectations of the plan. Whilst we accept the pressures currently faced by housing, we do not believe that further intensification is the right answer. London is already struggling to improve air quality, not only will increased population density worsen this issue, it will in turn expose even more citizens to the negative health effects of London's air.

Increasing the population density in the city will lead to more pressure on an already-struggling transport infrastructure. A report by CapGemini discusses these issues (Martin. 2016. Just how overcrowded has transport in London become?) and claims that they are likely to worsen as the population rises ever higher and more people are directed away from cars to public transport.

We disagree with the fatalistic position that growth is inevitable and therefore requires the development of purely reactive policies which fail to address the root cause of many of the issues faced by services in London.

Page: [Policy GG3 Creating a healthy city](#)

Section: [N/A](#)

We support the positive and proactive attitude towards ensuring the health of London's population. However, we once again feel bound to highlight the obvious point that the health and wellbeing issues faced by London today are complex, pervasive and systemic. They are extremely challenging to solve in the current landscape and we believe that attempting to address them when the population has grown even larger will simply lead to an even greater challenge. We are therefore extremely sceptical that the plan has the teeth to back up its admirable intentions when health care, social care and public health budgets all face significant resource challenges.

Page: [Introduction to Chapter 2](#)

Section: [2.0.7](#)

Recognising the issues associated with growth is an important element of the plan and we believe it should be more prominent in the document. We believe that the continued reliance on ever-increasing growth sets an extremely dangerous paradigm, not just for London but for the wider global population. We are happy to see that issues with growth are recognised in some form but believe that more should be included in this document around the effect of population growth on already stretched resources. To say that some parts of the city have not benefited from the advantages of growth (we presume you mean the financial advantages) is something of an understatement. The statement also fails to highlight that many of those who have failed to reap the benefits of population growth have had to endure the negative aspects of growth (air pollution, public transport pressures, the housing crisis to name some of the most pertinent issues).

Page: [Policy D4 Housing quality and standards](#)

Section: [N/A](#)

We broadly support the setting out of minimum standards for residential developments but believe that the chances of these being adhered to are slim based on what has been observed from developers when it comes to affordable housing. How will it be enforced? How is it practical when we are failing to deliver many of these proposals *now*.