

# Mr Roger Lawson comments

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

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## **Good Growth and why the London Plan is strategically flawed.**

NHS in crisis (queues in A&E, operations postponed and delays getting to see your GP), road network suffering from worse congestion, overcrowded trains and underground in London, air pollution still a problem, not enough schools to accommodate growing numbers of children and simply not enough houses to meet the demand for homes. These are simply symptoms of too many people and not enough infrastructure.

The population of the UK has been growing rapidly and particularly in London and the South-East. The latest figures from TfL show that the number of trips by London residents grew by 1.3% in 2016, up by 19.7% from the year 2000. The population of London grew by 21.4% in that period.

Forecasts for the future are for it to grow from the level of 8.8 million people in 2016 to 10.8 million in 2041 according to the Mayor's London Plan, i.e. another 22%.

More people means more housing demand, more businesses in which they can work, more shops (or more internet shopping deliveries) to supply them, more transport to move them around and more demand on local authorities to supply services to them.

In addition more people means more air pollution – it's not just transport that generates air pollution and even if every vehicle in London was a zero emission one we would still have major emissions from office and domestic heating, from construction activities, and from many other sources.

The London Plan and Mayor Sadiq Khan talk about “good growth” but unfortunately the exact opposite is likely to be the case. It will be “bad” growth as the infrastructure fails to keep up with population growth even if we could afford to build it.

In London we have not kept up with the pace of population growth for many years and the future will surely be no different.

London residents have suffered from the problems of past policies which condoned if not actually promoted the growth of London’s population. Indeed Mayor Khan insists London should remain “open” which no doubt means in other language that he is opposed to halting immigration – for example he opposes Brexit and any restrictions on EU residents moving to London which has been one source of growth in the population in recent years.

There are of course several policies that wise politicians might adopt to tackle these problems. Restrictions on immigration and the promotion of birth control are two of them that would limit population growth. China is a great example of how a public policy to discourage children has resulted in dynamic economic growth whereas previously China suffered from population growth that outpaced the provision of resources to support them – result: abject poverty for much of the population; that is now receding into history.

The other answer is to redistribute the population to less crowded parts of the country. It is easier and cheaper to build new infrastructure and homes in less populous parts of the country than London. Back in the 1940s and 1950s there was a national policy to encourage businesses and people to move out of London into “New Towns” such as Bracknell, Basildon, Harlow, Stevenage, Milton Keynes and even further afield.

Government departments that were based in central London were moved to places such as Cardiff or the North of England. The population of London fell as a result.

One way to solve the problems of traffic congestion and demand for housing in London would be to encourage redistribution. This could be encouraged by suitable planning policies, but there is nothing in the proposed London Plan to support such measures. In the past, businesses and people were only too happy to move to a better environment. Businesses got low cost factories and offices. People got new, better quality homes and there were well planned schools and medical facilities.

Despite the attitude of many non-residents to the New Towns, most of those who actually live in them thought they were a massive improvement and continue to do so. It just requires political leadership and wise financial policies to encourage such change.

These are towns with few traffic congestion or air pollution problems even though some of them are now the size of cities – for example Milton Keynes now has a population of 230,000.

It is worth pointing out that past policies for New Towns and redistribution of London's population were supported by both Labour and Conservative Governments. But we have more recently had left-wing Mayors in London (Ken Livingstone and Sadiq Khan) who adopted policies that seemed to encourage the growth in the population of London for their own political purposes, thus ignoring the results of their own policies on the living standards of Londoners. So we get lots of young people living in poor quality flats, unable to buy a home while social housing provision cannot cope with the demand.

The Mayor's London Plan is an example of how not to respond wisely to the forecast growth in the population of London. His only solution to the inadequate road network and inadequate capacity on the London Underground or surface rail is to encourage people to walk, cycle or catch a bus. But usage of buses has been declining as they get delayed by traffic congestion and provide a very poor quality experience for the users.

The London Plan should tackle this issue of inappropriate population growth. The rapid population growth that is forecast is bound to be "Bad Growth", not "Good Growth" as the London Plan suggests. Population growth and its control should underpin every policy that needs to be adopted in the spatial development strategy of London.

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Para 1.0.6 refers to "increased car dependency". This is an objectional and emotive phrase to describe the rational choice people make about their personal transport mode. It is no more relevant than to talk about "cycle dependency". It also refers to the "failure to consider the wider implications of London's growth" as resulting in "significant congestion" and "poor air quality" which is not true. Those problems have been created by a failure to control population growth, or alternatively provide the transport infrastructure to support such growth.

Para 1.0.8 also refers to car dependency in a pejorative way and should be reworded.

Page: [Policy GG1 Building strong and inclusive communities](#)

Section: [1.1.2](#)

Para 1.1.2 shows how the population of London has grown rapidly by immigration. But the statement that London "must remain open and inclusive" suggests the Mayor wants more when past immigration has put a severe strain on the transport infrastructure, environment and other aspects of London. London needs to be "less open".

Para 1.1.3 suggests that "traffic dominates too many streets" that create barriers to "interactions". There is no evidence provided on this and we suggest it is simply not true.

Para 1.2.4 We do not agree with the Mayor's target for 80 percent of all journeys to be made by walking, cycling and public transport and it is not clear how that relates to "integrating land use and transport" in that paragraph, or how one justifies the other.

Para 1.3.4 refers to a "car dominated city" when there is no evidence provided of that. The objective stated there to make "streets become more social spaces" contradicts the basic function of streets which is to provide a transport network for people and goods.

Policy GG3 - C refers to the "Healthy Streets Approach" without defining what that is (perhaps it's in the Mayor's Transport Strategy but if so it needs to be spelled out here also to avoid any misunderstandings about what this Policy implies.

## Policy T1

Para 10.1.1 refers to "Londoner's dependency on cars" - an emotive phrase which is inappropriate when referring to people's personal and often rational choices about the mode of transport. There is no cost/benefit justification provided for forcing mode shift. It alleges that "Without this shift away from car user, London cannot continue to grow sustainably" for which no evidence is provided and we would argue is not true.

Para 10.1.2 argues that a shift from car use is the only solution to traffic congestion which is not true. Development of a good strategic road network (which London does not have) could solve that problem plus many environmental issues - but there is nothing in this document that proposes this. It is a major omission. In essence only more of the same policies that have failed in the past are proposed. Namely more restrictions on vehicles and more parking restrictions. That is despite the fact there are no current viable alternatives for local transport deliveries where LGVs are the current dominant mode, nor for certain journeys performed by car users.

## Policy T2

The "Healthy Streets" approach is very poorly defined. There are lots of fine phrases in this section but little practical definition of what it means. Certainly policies to improve the street scene, to encourage walking and cycling, so long as it does not reduce road space for others, we would favour. Likewise improving road safety, reducing noise and pollution, we would also support but only so long as they are cost effective, i.e. the benefits outweigh the costs.

We would like the whole of Policy T2 to be rewritten so it more clearly explains what is proposed. At present such phrases as "reduce the dominance of vehicles on London's streets whether stationary or moving" could be interpreted by those who oppose the use of vehicles to advocate bans or aggressive measures against cars, PHVs, LGVs, etc. This is not acceptable.

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [N/A](#)

We object to the proposals listed in Table 10.1 that cover:

- Borough-led traffic reduction strategies (including workplace parking levies) in the period 2017-2030. Such strategies impose enormous costs on those affected or major inconvenience when there are better approaches available to reduce traffic congestion.
- Road pricing and next generation charging (subject to further assessment).

The above two items should be removed from the London Plan unless there is much more cost/benefit information provided. We do not believe such proposals can be justified on economic or other grounds.

Page: [Policy T6 Car parking](#)

Section: [N/A](#)

Policy T6

Para A - Car parking provision should not be related to public transport levels. It should be provided on the basis of what users want (i.e. the likely demand). There is no rational reason and no cost/benefit justification provided for such a policy.

Para B. Car free development should not be a presumption.

Para C. Maximum car parking standards should not be applied.

Para H. There should be no "borough-wide" or "area-based" car free policies allowed. All boroughs should be permitted to adopt minimum standards for parking provision.

There is no justification for any of these policies which would make many parts of London inaccessible to disabled people, those from other parts of the country, etc. The majority of Londoners do not wish to live in a "car-free" world and revert to a Victorian life style.

Para 10.6.1 It states "As the population grows, a fixed road network cannot absorb the additional cars that would result from a continuation of current levels of car ownership and use". No evidence is provided to support this statement and we believe it is not true.

Policy T6.1

Para E - There are many "retirement" developments for residents that are over 60 that do require parking provision. Many occupants of such developments own cars and use them, often into their 90s.

Table 10.3 Maximum residential parking standards. These are hopelessly inadequate to cope with the demand for parking by residents, thus leading to on-street parking which creates obstructions, road safety problems, and "severance" which other parts of the Transport Policies are opposed to. In effect these proposals are inconsistent with other policies and irrational.

Policy T6.2 Office Parking.

Table 10.4 These provisions are inadequate. We object for the same reasons we object to the proposed residential parking standards above. Car free provision for central London offices simply will not meet the needs of some businesses - for example because of the lack of 24/7 public transport in London.

Policy T6.3 Retail Parking.

Table 10.5 We see no justification in restricting the provision of parking in retail developments. No developer is going to provide for more than the likely demand.

Policy T6.4 Hotel and Leisure uses parking. We see no justification in restricting the provision of parking in such developments. No developer is going to provide for more than the likely demand.

Policy T8 Aviation

Para D. We support the Mayor's opposition to the expansion of Heathrow Airport. It is already a major source of air pollution and noise and we believe any development of that facility can only worsen those matters. There are better options which would have less impact on traffic congestion.

Page: [Chapter 11 Funding the London Plan](#)

Section: [The Funding Gap \(173\)](#)

We note the "funding gap" of over £3billion per annum. We suggest that the Mayor's London Plan should be amended so that he stays within his resources. Plans and their associated budgets should be based on reality, not aspirations.

Para 11.1.13 We are opposed to devolution of fiscal powers to the Major. The Mayor needs to stop empire building and live within his financial resources. We do not want the Mayor to be raising taxes, or diverting what are national taxes to local needs.



11.1.23 and 11.1.26 We suggest the Mayor should also use compulsory purchase powers to develop a proper strategic road network in London. This document suggests that the Mayor has limited sources of funding, but in reality public transport users are massively subsidised. If such subsidies were removed so that users of such transport paid the real cost of travel, then the Mayor would have no difficulty with his budget, and the "funding gap" would disappear.

11.1.33 We oppose any suggestion that Vehicle Excise Duty should be devolved to TfL. That would create lots of anomalies between those who live in and out of London, while the latter use roads in London and vice-versa. The argument that it would enable investment in the road network is specious - there are no proposals in the London Plan whatsoever to invest in the road network and there have not been for the past 20 years. Any such funds obtained would simply be diverted to other purposes.