

Mr Christopher Lenon comments

Page: [Introducing the Plan](#)

Section: [0.0.1](#)

The profile section does not recognise resident organisations so only allows individual residents to respond. As resident groups have a significant interest in and role in the development of their locality this is a major omission.

The plan is also both too long for most people to read and too vague in what it proposes - what does intensification really mean. There should be an executive summary of the key issues with reference to where the detail appears in the Plan.

Consultation is only as good and valid as the understanding that the users of the Consultation have - this document could be significantly improved.

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

Section: [1.0.5](#)

The plan is based on forecast London population of 10.8m in 2041. This forecast has not been updated for the effect of the UK leaving the EU. Are updated forecasts available?

What will the quality of life be in London with this population for Londoners? The plan calls for 1.32m new homes in the next 20 years - where will these homes be? The plan calls for intensification as the answer, have local communities been told what intensification will mean for them and their locality? How will the social infrastructure be paid for in terms of new schools, doctor surgeries, hospitals etc. Where will this infrastructure be located? Providing the social infrastructure for this population increase is a major task, I struggled to find how this would be done in the Plan.

Can London sustain this level of population increase, in such a short period of time, without degrading the quality of life for residents? Its interesting that the drop down menu for areas does not include quality of life - it should do. I fear that the push for population growth, will change London for the worse.

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

Section: [1.2.5](#)

The answer to increasing population in 1.0.5 is “intensification”. Do Londoners want to live in increased density housing? Do they want taller building to achieve this?

The consequences of intensification need to be spelled out to Londoners if this consultation is to be valid. Does this mean higher buildings, which is the logical conclusion given available space? Locally residents would be opposed to this in my borough.

It would also be helpful if the plan could spell out existing density of housing against what is proposed so that users of the plan could understand it.

Page: [Policy GG4 Delivering the homes Londoners need](#)

Section: [1.4.3](#)

The plan calls for 1.32 million more homes in the next 20 years. 66,000 per year. Table 4.1 shows the target by borough for 10 years totalling 649,350. These targets are ambitious, are they attainable?

Where are the targets for additional social infrastructure to support these increases? Who is going to find the land and pay for the social infrastructure of hospitals, GPs, Nurseries, Schools and Police and Fire Services? The current policy of closing Police and Fire services appears short sighted in the light of future population growth.

Page: [Policy GG5 Growing a good economy](#)

Section: [1.4.13](#)

The impact of Brexit is mentioned. There is no work on the impact of Brexit on population figures. This should be provided to validate the plan.

Figure 2.14 shows the annual gross migration flows 2016 - 2041. These show net outflows to other parts of the UK from London where the figures are split out. Since 1999, London has had a net outflow of population to the rest of the UK, more people have left London to go to other parts of the UK than have come to London from the UK. London is becoming isolated from the rest of the UK as fewer people come to settle in London than happened in the past. The country is becoming disconnected from London and vice versa - this is not a positive trend.

From 1999, London's population growth has been from immigration from outside the UK and birth rate. This should be made clear in the plan. Some of the policies in the Plan are predicated on these continued immigration levels. Is this realistic?

Londoners leave London from the age of 30 because the cost of living and quality of life are poor. The Plan should be addressing this issue.

Page: [Crossrail 2](#)

Section: [2.1.19](#)

No Opportunity Area is identified for Chelsea / King's Road. There is no justification for a Crossrail 2 station on the King's Road given the criteria for Crossrail 2. The Plan still shows the station despite this and overwhelming opposition in the 2016 Public Consultation and the fact that a station does not meet the criteria set for Crossrail 2. It is 2 years since the Public Consultation

Why is the "new" route not being made public?

Page: [Central London](#)

Section: [Figure 2.11](#)

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Page: [Policy SD4 The Central Activities Zone \(CAZ\)](#)

Section: [Figure 2.16](#)

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Page: [Policy SD7 Town centre network](#)

Section: [Figure 2.17](#)

Object - The map shows King's Road East and West as District shopping centres. There is no justification for a Crossrail 2 station on the King's Road given the criteria for Crossrail 2. The Plan still shows the station despite this and overwhelming opposition in the 2016 Public Consultation.

Page: [Policy SD10 Strategic and local regeneration](#)

Section: [Figure 2.19](#)

Object -

The map shows the social housing at the Cremorne and Lots Road estates as Strategic areas for regeneration. Local residents are opposed to the regeneration of these estates and have not been consulted about their inclusion.

Given the recent issues with regeneration, the Plan needs to be more specific about what Resident led regeneration looks like and the impact on density of housing,

Page: [Policy D9 Basement development](#)

Section: [D9](#)

Policy D9 is needed.

Basement developments should require Planning permission given the impact on other residents both structurally but also during construction.

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

Section: [10.3.4](#)

There is a case for Crossrail 2 but there is no justification for a Crossrail 2 station on the King's Road given the criteria for Crossrail 2 in terms of relieving crowding on specific lines and as a generator of new housing.

The Plan still shows the station despite this and overwhelming opposition in the 2016 Public Consultation. The Mayor and TFL should confirm as soon as possible that the proposed station is no longer part of Crossrail 2 as currently proposed to the Government. Given the other demands for infrastructure in London, wasting £1.2bn on a King's Road station should be unthinkable.

A.1.3 shows King's Road growth as a shopping centre as "incremental". The King's Road already has a PTAL score of 6.