Transport for London

Our ref: 18/2011
Your ref: 18/AP/1604

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By email

6 July 2018

Dear Michael

Canada Water Masterplan – TfL initial comments

The comments below represent an officer level view from Transport for London Spatial Planning and are made entirely on a "without prejudice" basis. These comments do not necessarily represent the views of the Greater London Authority.

Thank you for consulting TfL Spatial Planning. You will no doubt be aware that we have been in discussion with the applicant and Council officers extensively in the run up to submission, including a series of formal pre-application meetings. This is reflected in many area of the Masterplan application, however issues remain outstanding and I highlight those in particular below that will need addressing prior to a planning determination.

Site Context

Canada Water is an area of high interest for TfL. Canada Water station itself is a key bus/London Underground (LU)/London Overground (LO) interchange in inner south London. Lying between the CAZ and Canary Wharf, and the City and south London residential areas, demand for travel in the vicinity is extremely high, particularly in the weekday peak hours. Demand is forecast to increase to 2041(the Mayor's Transport Strategy timeframe) as London's population grows.

Similarly, the local road network experiences high levels of demand, particularly given the proximity of the Rotherhithe Tunnel which is one of only three 'fixed link' Thames river crossings east of Tower Bridge.

Lower Road forms part of the Strategic Road Network (SRN), so the Council and TfL have a joint network management duty for this road 'to ensure expeditious movement of traffic, although of course the Council is the Highway Authority.

Jamaica Road forms part of Transport for London Road Network (TRLN). The roundabout where Jamaica Road, Lower Road and the Rotherhithe Tunnel Approach road meet is obviously a critical junction in terms of TLRN performance.

In addition, TfL has a more general interest in the local road network in terms of bus journey time reliability and operational performance, notably Redriff Road, Surrey Quays Road, Brunel Road and Rotherhithe New Road. The operation of Surrey Quays Road in particular is critical, as it is the access route to Canada Water bus station, which is served by six daytime bus routes, two night bus and two 24 hour routes.

Given the proximity to Canada Water interchange and Surrey Quays London Overground station, the Masterplan site area generally has a high public transport accessibility level (PTAL) of 5-6 (on a scale of 1 – 6 where 6 is classified as 'excellent') albeit that small portions of the eastern side of the Masterplan area have a PTAL of 4.

In terms of future plans for the transport network, the Canada Water area will benefit directly or indirectly from a number of TfL-promoted schemes; however not all are committed.

The Elizabeth Line (opening fully in 2019) will provide some relief (in the short to medium term) on the Jubilee Line. The proposed Bakerloo Line Extension to Lewisham, proposed to be operational in the late 2020's, is expected to relieve London Overground services north of New Cross Gate, and reduce the interchange demand at Canada Water station.

TfL has had a long standing aspiration to increase train frequencies on LO through Canada Water and Surrey Quays, in order to address the capacity constraints from the south in the AM peak and vice versa in the PM peak – train lengths are constrained by the platform lengths at some of the underground stations, including Canada Water, and frequencies are constrained by signalling and therefore train path availability. We are working with the GLA on various bids for funding to allow for this frequency uplift, including the national Housing Infrastructure Fund (HIF). If successful, frequencies could be increased to 20 trains per hour (tph) with the potential for further increases subsequently.

Cycle superhighway 4 (CS4) is proposed to provide a high quality segregated cycle route along Jamaica Road and Lower Road, linking London Bridge to Deptford, Greenwich and Woolwich. The detailed proposals were recently

published for public consultation, and the results of this consultation are currently being considered by TfL. In addition the Council are developing plans for the removal of the Lower Road gyratory (LRG). TfL and the Council are working closely to enable these two schemes to coordinate. These will add to the existing provision on the Rotherhithe Peninsula and along the Thames.

TfL is also working on developing a pedestrian and cycle crossing between Rotherhithe and Canary Wharf (R2CW), which would have complimentary cycle accessibility improvements, such as to and from Peckham. A recent public consultation on the broad principle and locations of the crossing gained strong support (93%) for a new/improved river crossing.

Canada Water is designated an Opportunity Area in the London Plan and, as such, the principle of a large mixed use development here is supported. In order to understand the transport requirements for the area, in 2017 we jointly commissioned, with the Council, a Strategic Transport Study (STS), which has only recently been completed but has yet to be published (expected later in the summer). The STS is intended as an updated transport strategy for the Area Action Plan (AAP) area/OA, as the level of development proposed has increased from that envisaged in the original AAP (subsequently designated an OA), for example that it now includes the 'Printworks' part of the application site. The applicant has been closely involved in this study and has provided data and funding to enable assessment of the impacts of their development.

Format of response
Given the amount of material in the Masterplan application, I will focus on key comments on the outline part of the Masterplan and design guidelines - Masterplan public realm. Later in the response letter, I provide comments on the detailed applications. TfL intends to provide further comments on the proposals on the application prior to determination and in response to comments by the applicant and others.

Trip generation/approach to modelling
We have a number of detailed comments and requests for further information on the modelling within the transport assessment (TA) that we will provide separately to you and the applicant. Although the TA regularly cites the STS, we need to ensure that the additional modelling presented is validated and robust.

Impact on public transport
Notwithstanding the need to verify the robustness of the modelling, the TA shows that there will, inevitably, be additional demand on the public transport network due to the Masterplan, so identifying the appropriate mitigation package will be crucial.

In terms of intra-station demand, some Legion modelling of Canada Water station was undertaken for the STS; however the TA has not taken this further. We will therefore need to discuss this further with the applicant, and agree an appropriate way forward.

Surrey Quays station shows a large increase is demand, particularly with the 'max office' scenario. Given the existing capacity constraints at this station, which was not designed for high levels of demand, mitigation will inevitably focus on increasing intra-station capacity here for both the morning and evening peaks and addressing impacts of line capacity constraints. TfL is currently working with the Council and applicant to identify a preferred option to deliver capacity improvements and, potentially, a development agreement will need to be drawn up in parallel with the s106 agreement to enable delivery.

The public transport line capacity assessment shows that there is, unsurprisingly a significant increase in demand on key links into Canada Water, from Bermondsey on the Jubilee line eastbound and from the south on London Overground northbound in the morning peak, in the order of 1-2,000 people per peak three hours in the 'max office' scenario. Note that only AM peak was modelled, in line with the STS – this was agreed with the applicant at the pre-application stage.

Paragraph 9.5.5 of the TA highlights that there is an increase in crowding on northbound LO services into Surrey Quays in the AM peak. A similar issue would arise in the PM peak when LO trains leaving Canada Water and Surrey Quays can be at capacity towards Queens Road Peckham and New Cross Gate. There is generally spare capacity on service to/from New Cross. As mentioned earlier, TfL is bidding for GLA and Government funding to deliver frequency increases on LO services on the most crowded routes (20 tph from the current 16 tph).

Buses are crowded coming into Canada Water station in the AM peak and vice versa in the PM peak, as people interchange onto the LU network in particular. The development, particularly the 'max office' scenario, will inevitably increase demand on local bus routes.

The two bus corridors identified in the TA as needing improvement to mitigate impact are broadly in line with the TfL's own assessment of need as necessary to support the development (routes B and C in the Southeast Riverside Study, at 5 buses per hour and 7.5 buses per hour respectively). This would form the basis of a 'bus strategy'. Further information on this can be provided, and we will meet the Council and applicant to discuss this further, including funding.

The existing bus interchange on Deal Porters Way outside the existing Tesco's store will obviously need to be retained/re-provided. Improvements may also be

required to Canada Water bus station along with new stops and other infrastructure within and servicing the application site.

Impact on the road network
Further information on the local highway modelling has been provided to TfL, so this has yet to be verified. The summary of findings for this modelling, which used static modelling tools such as LinSig, shows that the modelled junctions operate within capacity. However, observation, as acknowledged in the TA (for example 5.4.14, 5.4.15, 5.14.18, 5.4.23, and summarised in 5.4.26) shows that this is not always reflected in journey time reliability. TfL has consistently considered the application should be accompanied by a microsimulation model, such as VISSIM, so that network effects, including impacts on bus journey times, can be captured. We will therefore need to discuss how to take this forward with the Council and applicant.

The new signalised junctions proposed (section 7.5) are not modelled for impacts on bus journey times, so it is difficult to assess if bus priority facilities may need to be provided. Redriff Road is also a key access route towards the proposed Rotherhithe to Canary What (R2CW) crossing and potentially forms part of the Rotherhithe to Peckham cycle route announced by the Mayor earlier this year. Any new junctions should include high quality provision for cyclists, which may have implications for design and signal timings, acknowledging this will need to consider bus and pedestrian movements also. The junction improvements/new junctions will need to be identified and secured in the s106 agreement.

The highway impacts are assessed assuming that CS4 and LRG removal scheme are not in place; these are currently under development with designs due soon. These will need to be taken account in assessment of the application proposals.

Cycle parking
Given the long build out time for the outline elements of the Masterplan, and the desirability for an exemplar cycling-led development, it would be expected that subsequent plots are subject to at least the policies in the draft new London Plan (or successor document adopted at the time of RMA submission) or adopted Southwark Local Plan standards (at the time of RMA submission), whichever are higher. The cycle parking design will need to accord with London Cycle Design Guidance, or successor document. We will need to discuss with you how this could be secured in any subsequent planning permission for the Masterplan.

Car parking
Under the car parking standards in the draft London Plan, which has been subject to public consultation but not yet Examination in Public (though this is scheduled for later this year), the Masterplan should be ‘car free’ bar disabled

provision, given the inner London location, high PTAL and status as a central London Opportunity Area. Given the existing Tesco's store relocation and complexities of lease requirements, it is acknowledged that there may be a need for some retail parking to be retained, although the overall quantum of car parking at the outset and over time will need to be discussed further with the Council and GLA. Other elements of the scheme should be car free from the outset except for disabled provision.

Car free development should be supported by car club provision and 'locked in' through a permit free agreement and by provision of controlled parking zone (CPZ) expansion where necessary, noting that some roads in the vicinity of the site are not currently in a CPZ.

In terms of electric vehicle charging point provision and disabled car parking again it would be expected that future phases in the outline application meet draft new London Plan standards, or Southwark Local Plan standards, whichever are higher.

Pedestrian and cycle routes

There is no assessment of the impact of the pedestrian movements/routes identified in figures 7.1, 9.16-9.19, for example impacts on crossing Lower Road by Surrey Quays station or Surrey Quays Road by Canada Water station. If mitigation, particularly off-site is required e.g. new/wider crossings, it will need to be identified at the outline stage, rather than at detailed RMA stage.

Delivery of any pedestrian improvements will need to be 'in kind' or through the s278 works, and identified/secured in the s106 agreement. This will be informed by the current study on options for improving Surrey Quays station which include consideration of an additional northern ticket hall within or adjacent to the development, and the design work underway on CS4 and the LRG removal schemes.

A signage strategy, for example using Legible London sings, should be required and funded/secured through the s106 agreement.

The approach to cycling within the site will need to be secured 'in principle' in the s106 agreement, for example by appending the cycle route plan such as figure 7.1 on page 86 of the TA, with the detailed RMAs adhering to this plan unless otherwise agreed with the Council (in consultation with TfL). TfL would support a general 'default' approach of a 'cycling allowed on all links'. Where cycling is proposed not to be allowed, attractive alternatives should be provided along with robust justification.

It would be expected that the local CIL receipts provide a significant contribution to R2CW crossing, and potentially cycle links to/from the crossing, given the benefits of this project to the area in terms of supporting mode shift to walking

and cycling. Cycle routes within the application site should be provided as part of the development and must link with those existing or proposed in the wider area.

Cycle Hire
TfL would support provision of Santander Cycles cycle hire docking stations in the masterplan area, as well as off-site, to help 'link' to the current central London zone at London Bridge, acknowledging that further contributions from other developments in Canada Water and Bermondsey will be required to do this.. With the opening of R2CW crossing, there will be an obvious link with the current zone in Canary Wharf. We have identified six broad locations for cycle hire docking stations, so these will need to be safeguarded where they are within the Masterplan area, along with funding for delivery, to be secured within the s106 agreement. The applicant should also commit to providing all households with a cycle hire membership fob, for three years, following introduction of the Santander (or successor) scheme to the area.

The TA mentions 'dockless' cycle hire schemes (7.7.5). TfL Santander Cycles provides access to a reliable TfL-backed network of around 800 docking stations and 12,000 regularly serviced bikes at fixed locations. Dockless bikes, in contrast, have no fixed location, are highly mobile and the companies are only present in boroughs under a trial agreement, if at all. As private companies the dockless providers have the ability to withdraw from the market at any time, which we have recently seen examples of. As such, the presence of dockless bikes in a borough therefore does not, we believe, constitute the provision of transportation facilities to a development, nor provide an alternative mitigation to the Santander Cycles scheme of a development's transport impacts.

Travel Plan
The travel plan should cover all the land uses, and should accord with the latest TfL guidance. Given the weekday peak capacity constraints on the LU/LO networks in particular, travel plan measures should focus on encouraging bus use, cycling and walking, and to reduce the need to travel especially at peak times. Given the proposed CS4, Rotherhithe – Peckham cycle route and R2CW crossing, existing links and the physical characteristics of the wider area, cycling potential in particular could be very high. Measures that could be included in the travel plan are:

- LU/LO crowding information provision
- Initial cycle hire membership for each household
- Corporate cycle hire membership
- Pool bikes for employees
- Flexible working for employees
- Interest free bike loans/cycle to work scheme membership for employees
- Financial incentives to walk/cycle to work/shops
- Home delivery, free for local residents – retailers

- Convenient package pick up/drop offs locations for residents and others, to support and mitigate the impacts of on-line shopping
- 'Last mile' deliveries by bike

Mode share targets for cycling in particular should be stretching, given the high cycling potential here.

The travel plan should be supported by a financial bond for monitoring and performance against agreed targets, as the Council has secured in other developments in the borough. Any surveys for monitoring should be suitable for inclusion in the TRICS database.

Deliveries and servicing

Given the scale and mixed-use nature of the development, there will inevitably be a generally high level of servicing required. There is also an opportunity, with a single land owner, for significant consolidation and control in types, numbers and timing of servicing trips. The fundamental principles of the delivery and servicing plan (DSP) should be to:

- Avoid peak hour vehicle servicing
- Encourage/require alternative means of deliveries, particularly intra-development ('last mile'), such as by bike
- Minimising the number of vehicle movements, through consolidation and occupier restrictions such as no personal deliveries in the workplace.

The site-wide DSP, to which all subsequent plots should adhere to, should accord with the latest TfL guidance and should be secured by condition/s106 agreement, for approval by the Council in consultation with TfL.

Construction

Similarly to the DSP, construction logistics plan (CLP) should accord with the latest TfL guidance and minimise the number of vehicle movements, particularly in peak times. Maintaining public transport passenger, pedestrian and cycle movement and safety during construction will of course be paramount, through using FORS or equivalent registered haulage contractors, and requiring the latest, highest lorry safety standards (e.g. DVS – Direct Vision Standard[1]). Additional operating costs due to any temporary changes to bus routes will need to be funded by the applicant.

The site-wide CLP, to which all subsequent plots should adhere to, should be secured by condition/s106 agreement, for approval by the Council in consultation with TfL. A construction management plan (CMP) will also be required to mitigate other impacts of site clearance and construction works on pedestrians, cyclists, buses and general traffic.

[1] https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles

TfL infrastructure protection
LU and LO tunnels/in-cutting - run under and adjacent to the site. Where any development plots lie over/adjacent to this infrastructure, the applicant must consult directly with the relevant TfL Infrastructure Protection team (LUIP or LOIP)[2]. LUIP/LOIP must have right of approval of the foundation design/load bearing/construction methodology to ensure the integrity of the tunnels/cuttings is maintained; this should be a condition of any subsequent planning approval.

Other comments on the outline element
The floorspace parameters (table 7.2) should also be specified in terms of numbers of homes (maximum and minimum) for the C class uses, as there is potential for changes with smaller (or larger) average home sizes, which would affect the trip generation and therefore impact on the transport network.

Any subsequent planning permission will need to consider how the relative proportion of office floorspace to homes is controlled for each zone, and therefore overall i.e. that at a maximum residential build out, there is a corresponding limit on office floorspace which may well be less than the applied for maximum, and vice versa.

Clearly, given the very flexible nature of the outline application, much detail is left to reserved matters applications (RMAs). It would be expected that stakeholders such as TfL are given the opportunity to comment on these as and when they are submitted.

Given the long build out period of the masterplan, the mitigation measures funded by/delivered in kind by the development will need to be phased appropriately, for example triggers for bus service contributions. This will need to be addressed through the tri-party (The Council, applicant and TfL) s106 negotiations.

Comments on the design guidelines (Vol 2, public realm)
The design of the places and spaces within the masterplan area should be required to take fully into account the Healthy Streets Approach[3] and TfL's Streets Toolkit[4] (in particular the London Cycle Design Standards -LCDS), for example for the detailed design of 'estate roads' in the RMAs. The masterplan presents the opportunity to deliver a step change in street environment, for example by minimising or eliminating through-traffic through filtered permeability and provided 'home zones' from the outset, and not relying on retro-fitted traffic calming.

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[2] https://tfl.gov.uk/info-for/urban-planning-and-construction/urban-planning-and-construction-contacts

[3] https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets

[4] https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit

On-street car parking and servicing should be managed and minimised, so that the majority of estate roads are for people rather than motor vehicles. On-street car parking and servicing can have safety implications for cyclists, for example 'dooring'.

Appropriate provision should be made for bus services along the agreed corridors within the site, in line with TfL Streets Toolkit, and provision made within the s106 agreement for property and access rights in the event the streets not being adopted. This will also be required for the on-site cycle hire docking stations (off public highway) and potentially links to a new Surrey Quays station ticket hall entrance. 24/7 public access of all non-public highway routes should, unless robustly justified, also be secured.

Desire lines (pedestrian and cycle) should be identified early on and catered for in the design of, for example park areas and green spaces.

The choice and location of tree planting alongside roads that will be used by buses, for example the new high street, should be chosen to prevent future risk of hitting by double deck buses. Any new/relocated bus stops should be designed in line with TfL's Accessible Bus Stop Design Guidance in the TfL Streets Toolkit referenced above.

Cyclists in particular should be fully considered in the design of all streets from the outset, in the context of the use of that street and mix of uses, for example how they will be accommodated on the new high street (PR5, page 52) and Surrey Quays Road (PR7, page 70). Segregation and other cycle safety measures such as pre-signals and bus stop by-passes should be considered, where appropriate, in line with the LCDS. The risk of 'dooring' mentioned above should be minimised and, ideally, eliminated through design.

Crossing of trafficked roads by cyclists should be considered carefully also, particularly across roads with higher levels of vehicle movements such as Surrey Quays Road, through the provision of toucan/ tiger crossings, and/or direction of priority (example vehicles give way to cyclists rather than vice versa).

Adequate space should be provided, particularly where cyclists and pedestrians 'share' streets (e.g. PR6 Park Walk), taking into account street furniture, potential for café/restaurant 'tables and chairs' etc – the LCDS should be consulted in this respect. Footway 'tables and chairs' should be planned for, rather than 'squeezed in' as an afterthought; we find this is a significant issue, in terms of compromising pedestrian comfort, movement and safety, on the TLRN.

PR7 Surrey Quays Place (page 90) may need to take into account a new entrance to Surrey Quays station, should this option for capacity enhancements be preferred.

As mentioned earlier, the design of Redriff Road (PR8, page 76) will need to take into account the proposed Peckham- Rotherhithe cycle route. TfL, the Council and the applicant will need to work together to agree a suitable design and funding for this, for delivery through the s278 works/s106 agreement.

In addition to tree planting on the high street and other bus routes needing to take into account double deck buses as mentioned above, the location/type of tree planting on other streets clearly should be planned to prevent future issues such as low hanging branches on cycle routes, narrowing of pedestrian space as the tree grows/due to suckering and/or above-surface roots presenting a trip/crash hazard.

Paving materials chosen should also be considered in terms of pedestrian and cycle comfort/safety, and future durability to reduce accident risk, for example I have observed people avoiding walking on the existing cobbled path on the western side of Canada Water lake.

Comments on the detailed applications

a) Plot A1

The 'car free' nature of the proposal is supported, in line with draft new London Plan policy, although no on-site disabled car parking is provided, which is contrary to this policy. It is noted that Canada Water is an accessible station for both LU and LO services and that that all buses are accessible and acknowledged that the proximity of the LO tunnel limits basement space in this particular case. The scheme should set out suitable proposals for drop off and pick up of disabled people and others with mobility issues.

The site lies directly over the shallow LO tunnel, so the approval of construction methodology/foundations/loading protection measures by LOIP should be a condition of planning approval.

The cycle parking to be provided has been calculated based on London Plan (2016) standards, not those in the draft new London Plan. Whilst it is acknowledged that the proximity of the LO tunnel limits basement space in this particular case, the applicant should consider how provision can be increased to better reflect the latter, for example by using a mezzanine floor. The access to the cycle parking should accord with LCDS, for example lift sizes and provision of power assisted stackers and doors.

b) Plot A2

The 'car free' nature of the proposal, bar disabled provision, is supported, in line with draft new London Plan policy.

The site lies directly over the shallow LO tunnel, so the approval of construction methodology/foundations/loading protection measures by LOIP should be a condition of planning approval.

The cycle parking to be provided has been calculated based on London Plan (2016) standards, not those in the draft new London Plan. Whilst it is acknowledged that the proximity of the LO tunnel limits basement space in this particular case, the applicant should consider how provision can be increased to better reflect the latter, for example by using a mezzanine floor. The access to the cycle parking should accord with LCDS, for example lift sizes and provision of power assisted stackers and doors.

c) Plot K1

The 'car free' nature of the proposal, bar disabled provision, is supported, in line with draft new London Plan policy.

The site lies directly over LU Jubilee line tunnels, so the approval of construction methodology/foundations/loading protection measures by LUIP should be a condition of planning approval.

The cycle parking to be provided has been calculated based on London Plan (2016) standards, not those in the draft new London Plan. The applicant should consider how provision can be increased to better reflect the latter. The access to the cycle parking should accord with LCDS, for example provision of power assisted stackers and doors.

Summary

The principle of a high density development in the Canada Water Opportunity Area is supported, in line with local and London Plan policy. However it is clear that there will be implications for the transport network from increased demand, and that mitigation is required to deliver transport improvements and, in particular, more capacity on public transport. The following conclusions can be drawn from reviewing the planning application material:

1. Further discussion is needed with the applicant on the validation of the modelling
2. Given the flexibility of the outline application, control of the relative development quantum (housing v employment) and consultation on the relevant RMAs is required
3. London Plan standards adopted at the time or, if higher, those in the Southwark Local Plan should apply to the outline application, and ideally draft new London Plan standards should be met for the first three plots
4. The development should as far as possible be 'car free', bar appropriate disabled parking provision. Any parking should be fully justified.

5. A phased mitigation package will need to be agreed and secured through the s106 agreement
6. Maximising cycle trips will be vital for the development to be a success, through travel plan measures, appropriately designed on-plot provision and street network, and s106/local CIL funding
7. The street network should deliver exemplar Healthy Streets
8. Deliveries and servicing, and construction activity will need to be carefully managed to minimise impacts on the local and wider highway network

I hope you find these comments useful and trust you will consider them fully when determining the planning application. Please do not hesitate to contact me if you have any questions.

Yours sincerely

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