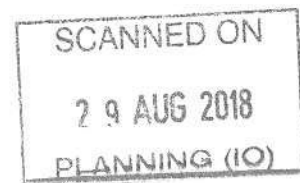


TP/468-6



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Our Ref: Let/JL/ LBS/21.08.2018  
Your Ref: 18/AP/1604  
Email: [jason.larkin@canarywharf.com](mailto:jason.larkin@canarywharf.com)

**Sent by Recorded Delivery**

21<sup>st</sup> August 2018



Dear Sir,

**CANADA WATER MASTERPLAN (REF: 18/AP/1604) - PLANNING APPLICATION  
CONSULTATION RESPONSE**

Canary Wharf Group have been following the proposed redevelopment of Canada Water closely and have, along with our consultants Steer, carried out a detailed review of the Canada Water Masterplan Transport Assessment undertaken by Arup, dated May 2018, which was submitted as part of planning application ref: 18/AP/1604. We consider that there are significant inadequacies in how the Transport Assessment has been undertaken which is detailed in the attached Technical Note. In summary our main areas of concern are:

1. Lack of Mitigation – Despite the size of the development, almost no transport improvements have been identified.
2. Jubilee Line – The transport impacts on the Jubilee line have not been properly assessed and crowding impacts have been significantly under-reported.
3. Trip Generation – The Transport Assessment underestimates potential trips due to questionable methodologies used to calculate trips, mode shares, and various other discounts to minimise impacts.
4. Public Transport Modelling – Insufficient consideration is given regarding impacts on the public transport network away from Canada Water.
5. Inconsistencies/Omissions – There are several areas where inconsistencies or omissions lead to a likely under-estimation of trips.

For these reasons, we wish to formally object to the application at this time. We would welcome the opportunity to discuss the issues leading to our objection with officers from London Borough of Southwark (LBS) and representatives from British Land, and their technical consultants.



## CANARY WHARF

In considering the Canada Water Masterplan proposals, we would like to remind you of our previous proposal to extend the Bakerloo Line from Elephant & Castle to Charlton via Surrey Quays and Canary Wharf. This scheme would provide significantly improved public transport capacity to the area around Canada Water and on the Isle of Dogs, and would help the development aspirations of both LBS and London Borough of Tower Hamlets. We have also developed a scheme to provide a new link from Canary Wharf to Euston via the City as part of the DfT's recent call for market-led rail proposals. This scheme would also support growth in Southwark by helping relieve congestion on the Jubilee Line.

We look forward to receiving notification of receipt of this consultation response.

Yours faithfully,



**JASON LARKIN**

Associate Director – Planning



Date 17 August 2018



# Canada Water Masterplan

## Introduction

1. This Note has been prepared by Steer on behalf of Canary Wharf Group to provide a technical review of the Transport Assessment (TA) prepared by Arup for the Canada Water Masterplan, dated May 2018. The review has focused on matters of most interest to the Canary Wharf Group – namely impacts on public transport services which also serve Canary Wharf.

## Background

2. According to the Transport Assessment, the Canada Water Masterplan proposals include:
  - 656,200 m<sup>2</sup> GEA of mixed use development with a maximum office floor area of 282,500 m<sup>2</sup> GEA (equivalent to c20,600 jobs)
  - Up to 4,436 residential units
3. The size of the Canada Water Masterplan development makes it similar in size to the Battersea Power Station development. The Canada Water Masterplan development can therefore be expected to have a very significant impact on all the surrounding transport infrastructure, and it should be noted that the £1 billion Northern Line Extension is being constructed to help manage the transport impacts of Battersea Power Station.
4. Outline planning permission is being sought for the entire site, and concurrently full permission is being sought for three development plots which are subject to separate Transport Assessments.

## Headline Issues

5. **Lack of Mitigation** – Despite the size of the development, almost no transport improvements have been identified.
6. **Jubilee Line** – The Transport Assessment assumes 34 trains per hour on the Jubilee Line by 2031. This is an increase of four trains per hour from existing levels and this increase has not been confirmed by TfL nor does it have funding. How such an increase in frequency would work in reality is also questionable. Furthermore, the Transport Assessment states that the impacts of the development on the Jubilee Line will be negligible. The modelling analysis assumes c1,400 peak hour Jubilee line or Overground passengers have to find longer routes to avoid Canada Water. In our view, the transport impacts on the Jubilee line have not been properly assessed and crowding impacts have been significantly under reported.
7. **Trip Generation** – The Transport Assessment underestimates potential trips due to questionable methodologies used to calculate trips, inappropriate application of a “rail” mode share, various other “upside” estimates of residential unit size, and allowance for internal trips. Much of the evidence used to make assumptions and calculations is old and outdated (e.g. 2011 for crowding on Jubilee line, traffic surveys from 2014).
8. **Public Transport Modelling** – Insufficient consideration is given to impacts on the public transport network away from Canada Water.

9. **Inconsistencies/Omissions** – There are several areas where inconsistencies or omissions lead to a likely under-estimation of trips.

## Detailed Review of Masterplan

### Jubilee Line

10. The TA states that crowding on Jubilee Line services departing Canada Water will be lower in 2031 compared to a no-development baseline scenario. This is very hard to believe given the widely known overcrowding issues that affect the line every day at present.
11. The assessment suggests that as crowding increases on the Jubilee line downstream of Canada Water (due to more trips being generated at Canada Water), passengers will divert to other routes. As more passengers alight at Canada Water as a result of the new development, crowding is forecast to decrease upstream of the Canada Water station in most development scenarios. This means that the development at Canada Water will have impacts on the Jubilee Line which forces passengers to spread to other routes around London. No assessment of the impact of these diverted trips is provided.
12. The size of this effect can be quantified by examining Table 9.5 'Uplift in trips to 2031 associated with the maximum employment scenario'. This table shows that 3,208 additional AM peak hour trips are expected on the LU/LO mode travelling towards Canada Water. This is equivalent to 7,100 additional trips in the 3-hour AM peak period (assuming that the AM peak hour is 0.45 of the 3-hour AM peak period – standard LUL calculation). Even then these trips only represent 35% of the expected employees at the Canada Water development, not allowing for any trips associated with land uses other than office. This seems low.
13. Figure 9.4 then provides the net change in trips on the LU/LO network and shows an additional 5,700 trips travelling towards the Canada Water station over the 3-hour AM peak period (1,569+1,897-142+2,410). This suggests 1,400 Jubilee Line/Overground trips have been diverted elsewhere (7,100-5,700). A high proportion of these trips can be expected to have a destination or origin at Canary Wharf.
14. It is considered that these impacts are not being assessed properly as it is assumed that the other routes will have sufficient spare capacity to deal with the diverted passengers. No mitigation is proposed and this means that potentially thousands of trips to Canary Wharf each day are diverted via longer routes.
15. The report assumes an increase of trains per hour on the Jubilee Line by 2031 (up to 34). This is not funded and therefore there is an over-estimation of capacity and under-reporting of impacts in 2031, two years prior to the development opening year of 2033.
16. Furthermore it is not known how 34 trains per hour could work in reality given the long dwell times of trains at Canary Wharf in the peak hours at present due to large volumes of passengers boarding and alighting. This almost always results in a queue of trains waiting to enter the station in the peak hours under the current timetable.
17. There has been no assessment of how Canada Water station will cater for increased passengers when there is clearly a problem at present with over-crowding. No mitigation is proposed.

### Trip Generation Issues

18. Chapter 8 of the Transport Assessment focuses on forecasting trip generation, however there are a number of issues arising with the assumptions made in the report which act to reduce future trip estimates.
- All predicted trips have a mode share of "rail" which is separate to that of Overground/Underground. There are no railway stations within walking distance of the site (South Bermondsey is the closest station at c2km) and therefore this is under-estimating trips significantly across all proposed land uses given some are predicted to have 20%+ mode share of rail. 2011 Census data for Super Output Areas 007 & 008 indicates that 49% of journeys to work were completed using the Underground with only 5% is completed by Rail, even then those travelling by rail would need to transfer to another mode before/after the rail journey in order to complete a journey to/from Canada Water. Rail trips should

therefore be combined with the Overground/Underground mode shares for each land use to ensure all trips are captured. This will result in a significantly higher demand on the Jubilee Line.

- The Transport Assessment quotes floor areas as GEAs throughout, however most of the trip generation calculations have been based on GIAs, which are circa 5% lower than GEAs.
- It is assumed that 10,823 m<sup>3</sup> of the 85,021 m<sup>3</sup> of retail will be food related. No estimation has been made as to the proportion of retail that will be restaurant/take-away related which would alter the trip generation results significantly. This seems conservative and could be under-estimating trips. Sensitivity tests should be undertaken for different mixes of retail floorspace.
- In Chapter 9, a discount is made for “internal trips” within the site based on the LTS demand model, of which some are by “public transport”. However, this assumption is then transposed into Table 9.4 where internal journeys are shared between bus, Underground and Overground. However, internal journeys cannot be made by Underground and are very unlikely to be made by Overground, so this discount should be removed.
- The average unit size in the residential elements of the scheme is forecast to be 85 m<sup>2</sup>. As per other applications of a similar nature made in recent years, it is suggested that a sensitivity test is included to test the impacts if London Plan minimum space standards were applied to the residential units to ensure a robust assessment has been undertaken. This is likely to increase the number of units and hence residents, leading to an increased number of trips being generated by the new development.
- In Table 8.10, no residential trips to educational establishments are assumed to be completed using the Underground. This is unrealistic given two out of four closest secondary schools are in close proximity to Bermondsey Underground station. Furthermore, it is stated that a minimum of 85% of residents taking children to primary schools will walk, even though two of those schools are over 1km away. We consider that this is unlikely.
- In Table 8.12, residential trips for retail and leisure purposes are assumed to be only 3% by Underground and Overground combined and 68% on foot. We consider that this is unrealistic given the multiple leisure and retail destinations in the Inner London area which can be easily accessed by residents using Public Transport.
- The methodology used to calculate office trips applies assumed densities of employees per floor area (1 employee per 13.7 m<sup>2</sup> GIA). The rationale behind using this methodology was that no suitable office sites exist in TRICS. This is not the case, there are plenty of sites of a comparable nature contained in TRICS, thus this methodology could be under-estimating trips for the office land use.
- In paragraph 8.6.6 “other town centre retail” trip generation is reduced by 20% because of the presence of a nearby food store. This is not deemed appropriate given that the trip rates are based on a shopping centre with multiple tenants, thus we consider that further discounting for linked-trips to the food store is excessive.

#### **Modelling Issues**

19. 2031 is used as the future-year baseline whereas the development future-year is 2033. However, this is accepted by TfL and is a reasonable approach.
20. According to section 9.4, the development impact assessment was undertaken before the final floorspaces were established. This ultimately means that the assessment is inaccurate.

#### **Inconsistencies and Omissions**

21. The report contains a number of inconsistencies and omissions, these include:
  - Floorspaces in Tables 8.1 – 8.4 do not correspond to floorspaces used for trip generation sheets in Appendix B.
  - The Trip rates for the existing B2 use are missing from Appendix B, thus unable to verify appropriateness.
  - The maximum workspace floorspace in Table 7.2 is stated to be 282,500 m<sup>3</sup> GEA, whereas in Table 8.4 307,707 m<sup>3</sup> GIA is quoted.

- In section 8.11, the servicing trip rates include “restaurant” land use, which has not been considered anywhere else in the report.

## Summary

22. It is unusual for development proposals of this size and scale to provide no significant mitigation for transport impacts.
23. We consider that the Transport Assessment is significantly under reporting impacts by under estimating the trip generation across the site generally.
24. Furthermore the methodology used to assess impacts on the Jubilee Line simply displaces over-crowding elsewhere on the Underground network and uses assumptions which we consider are flawed. These diverted trips have not been assessed and the impact of passengers having to take long diversions to get to destinations either side of Canada Water due to the development have not been considered or mitigated.
25. In conclusion, we are of the opinion that the Canada Water Masterplan application has not properly assessed the impacts of the development on the surrounding transport network, and the application should be refused until more realistic assessment is undertaken and appropriate mitigation proposed.

