



Our ref: 18/0211
Your ref: 18/AP/1604

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By email

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Dear Mike

Canada Water Masterplan planning application amendments

Thank you for your email dated 30 July consulting TfL Spatial Planning on the minor amendments to the Canada Water Masterplan (CWMP) planning application referenced at the top of this letter, and addendum to the transport assessment (TAA). As the original application was referred to the Mayor, the comments below should not prejudice any subsequent Mayoral planning decision.

No changes to the Detailed Proposals in the original application for the CWMP are sought which impact transport. The TAA does contain further information and proposes changes related to the Outline Proposals that do impact on transport, and are thus the focus of this response.

Residential car parking provision

The applicant now proposes that no car parking, other than for disabled people with Blue Badges, will be provided for the residential element of the proposed development. The elimination of general residential car parking is strongly supported and is fully in line with draft London Plan and Mayor's Transport Strategy policy, particularly in terms of mode share targets and Vision Zero, and reflecting Canada Water being an Opportunity Area in inner London.

The TAA now proposes that residential car parking is restricted to the equivalent of 10 per cent of homes to have disabled car parking i.e. circa 300 car parking spaces on full build out. In order to better reflect draft London Plan policy, we would prefer that this was a maximum provision, and that the actual

level of disabled car parking provided is reviewed in each reserved matters application. This will reduce the risk of overprovision, noting that the Canada Water area is, and will be more so with the Masterplan, one of the more accessible locations in London in terms of local public transport and facilities. We also recommend that a parking design and management condition is included in any permission which, inter alia, ensures the allocation of these disabled spaces on the basis of need and not tied to a particular dwelling nor allocated on a long term or permanent basis.

Highway modelling update and additional highways measures

As you will be aware from the Mayor's Stage 1 report, the provision of car parking for the retail element of the CWMP does not meet draft London Plan policy. However, the report also acknowledged that certain specific commercial and contractual requirements that would allow the CWMP to be delivered dictated that a level of car parking will be required to be maintained, stated by the applicant to be 1000 spaces, roughly split 50:50 between podium and bespoke multi-storey car parking (550 and 450 spaces respectively), albeit this somewhat less than the existing provision of 1337 spaces.

Initial static modelling by the applicant, submitted as part of the original masterplan application in 2018, assumed a base network 'as is'. However, since the original application, TfL has begun construction of Cycleway 4 (CW4) along Jamaica Road, and the council is currently consulting on the complimentary designs for Lower Road gyratory (LRG) removal, including continuation of CW4 and a new segregated cycle track on Redriff Road, part of the funded 'cycle future route' to Old Kent Road and Peckham. These schemes will fundamentally change the road network to prioritise active travel, so the council and TfL requested that the applicant undertook further modelling with this base network.

The results of the modelling showed that there could be some local impacts, particularly at the Redriff Road/Lower Road and Surrey Quays Road/Lower Road junctions. To address these impacts, we have been in discussion with the council and applicant to identify measures that could allow, with the LRG and the cycle schemes in place, further retail build-out over the existing level of floorspace, whilst mitigating traffic impacts and protecting bus journey times. It is understood the latest position of the applicant on this to be, following meetings post-submission of the TAA:

1. No restrictions on build out of the retail element of the masterplan up to the current floorspace (36,494 m²), plus 10 per cent uplift (41,988 m²) to allow a managed decant and retention of existing occupiers, within a 1000 car parking space cap.
2. Modelling of potential network interventions, focussing on bus journey time reliability and further supporting active travel, and agreement of plan

of delivery of agreed measures, to allow up to 53,612 m², again within the 1000 car parking space cap.

3. A commitment to reduce car parking to 800 spaces (reduced from the 831 in the TAA) to allow a full retail build-out to 84,894m². This could be done by reconfiguring parts of the MSCP whilst retaining all proposed spaces under the podium at the intended relocated Tesco store.

Our position on these three points is as follows:

1) This seems a reasonable approach to us.

2) This approach also seems reasonable to us, subject to the scope of the modelling and adequate funding to deliver the identified and agreed interventions being secured in the s106 agreement, but see point 3) below. The council will clearly need to agree, not least as the highway impacts and interventions in question will be predominantly on borough roads.

More generally, as well as promotion of active travel, our primary interest in the local road network is the impact on bus services. We would therefore support the requirement for a 'bus service delivery plan', suggested in the TAA, that ensures that the timing of highway and other works (such as the new Surrey Quays station entrance) is aligned with the development's impact upon bus services, assuming that the full CW4 and LRG schemes are implemented (subject to consultation) and taking into account the introduction of the additional bus services proposed to be funded through the CWMP s106 agreement.

We would also support the requirement for the applicant to provide an appropriate set of management strategies for the car parking and delivery and servicing which could form an integral part of the mitigation package.

3) The principle of reducing car parking is obviously strongly supported, and will better reflect draft London Plan policy. However the council is the highway authority for the roads that would be most affected by any intensification of retail and leisure trips associated with full floorspace build out and we would support the requirement to show how parking and vehicle management strategies can be an integral part of the mitigation package.

The applicant has, subsequent to the TAA being submitted, committed to an earlier review of retail car parking, prior to submission of the reserved matters application (RMA) for the multi-storey car park (MSCP). We strongly support this earlier review as we are seeing shopping patterns fundamentally change, particularly in inner London, for example the recent discussion session at the draft London Plan examination-in-public showed that food retailers are seeing a reduced demand for car parking at their stores.

Bearing in mind the likely timeframe of the mid 2020's for the MSCP RMA, whilst we acknowledge the specific commercial and contractual requirements as mentioned above, we believe an evidence-based review, for example using data from regular car park accumulation surveys throughout the build-out of the masterplan and experience elsewhere at similar stores, could allow the size of the MSCP to be reduced at the outset, or even remove the need for it. The MSCP could then be reconfigured from the outset, or replaced with more appropriate land uses, which potentially has commercial benefits for the applicant, as well as policy and regeneration benefits.

Public transport analysis update

We are satisfied that all the mitigation justified and required from British Land to satisfactorily accommodate the growth predicted from the CWMP has been identified, and will be included in the s106 agreement, which is being finalised now. You will also be aware of the Government announcement at the weekend (17 August) of the award of £81m Housing Infrastructure Funding (HIF) which will further support improvement of public transport serving this area.

The mitigation package funded through the s106, and wider improvements funded through HIF, will include a substantial contribution towards bus service enhancement, capacity and management measures at Canada Water station, capacity and step free access improvements at Surrey Quays station, including a second entrance/ticket hall adjacent to the site, and a higher frequency train service on the London Overground East London line. This will be complemented by active travel improvements to be delivered directly by the application scheme and through legal obligations, and through the various management strategies.

I hope you find these comments useful and trust you will fully consider them when determining this planning application. If you have any questions or require further clarification please do not hesitate to contact me.

Yours sincerely



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