

Examination of the London Borough of Tower Hamlets Local Plan

Schedule of Matters and Issues for the Examination

Matter 11, Issue 11

Representor ID: 624580/Canary Wharf Group Plc

27 July 2018

Hearing Statement on behalf of Canary Wharf Group Plc (“CWG”)

Matter 11: Transport, Monitoring and Other Matters

**Issue 11: Does the LP set out a clear framework for monitoring the implementation of the policies?
Does the LP adequately address transportation issues across the borough?**

11.1 Is the approach to transportation matters justified and effective? Is the approach adopted accepted by Transport for London?

1. The approach to transportation, and specifically public transport infrastructure, taken in the draft Local Plan (LP) is considered unsound. This is due to the lack of justification provided for the level of development planned during the draft LP timeframe, without the necessary associated transport infrastructure.
2. As per Figure 1, although there will initially be an increase in spare capacity on the Jubilee line following the introduction of the Elizabeth line, by 2024 the Jubilee line will be at over 90% capacity for eastbound journeys to Canary Wharf based on current development plans in the Isle of Dogs (IoD) area.



Figure 1 - Demand Projections for Jubilee Line service at AM peak Eastbound

3. Policy 1 of the Mayor of London’s Transport Strategy¹ (MTS) will also indirectly put additional pressure on public transport by seeking to achieve 80% of all trips by 2041 on public transport, walking or cycling².
4. The draft LP states the resident population growth in the borough is set to increase by approximately 30% by 2031 (pg16, 3.1) and that *‘the majority of new housing and employment provision within the borough will be focussed within the Isle of Dogs (IoD) and South Poplar opportunity area’* (policy S.SG1, pg. 26). The draft LP also notes that due to workers travelling to employment areas such as Canary Wharf, the borough’s daytime population is 42% larger than its residential population (Chapter 2, paragraph 2.9). In order to support the levels of growth described in the draft LP and prevent overcrowding in the IoD area, significant investment in additional rail infrastructure is required to meet future demands and growth projections. This is supported through policy S.SG2 (pg29) of the draft LP which states that future growth will be managed and its delivery will *‘not resulting in unacceptable impacts on...transport capacity and infrastructure’*.
5. The draft LP should acknowledge this need to review strategic rail capacity from Canary Wharf to the west. As outlined in the draft IoD Opportunity Area Planning Framework Transport Strategy (2018), which has been produced to support the Opportunity Area Planning Framework, the draft LP should support and promote the TfL-led study to review the need for further strategic public transport capacity across inner-east and south-east London, including supporting the Isle of Dogs.
6. In regard to the cycle parking standards within Appendix 3 of the draft LP, a more flexible approach on the IoD would be appropriate whereby lower levels of cycle parking could be provided initially with space safeguarded to provide further cycle spaces in accordance with observed demand as monitored through the Travel Plan and up to the minima set out in the draft LP. The suggested level of cycle parking within the draft LP is not justified based on historic evidence of cycling at Canary Wharf and the IoD. As shown in Table 1, the historic mode share for cycling has not exceeded 5% in the last 5 years of recording³.

Table 1 – Bicycle mode share in Canary Wharf 2013-2017⁴

Year	% mode share
2013	4.7
2015	4.7
2017	4.1

Using the draft LP cycle parking standards, and HCA assumptions for employees per sq.m. of office floorspace⁵, enough cycle spaces for 17% of all employees would have to be provided in all new office developments which significantly exceed what the current mode share evidence shows.

¹ Mayor’s Transport Strategy (2018)

² Ibid (pg20)

³ Canary Wharf Cordon Surveys (2012-2017)

⁴ Canary Wharf Employee Survey (2012-2017)

⁵ HCA Employment Densities Guide (2010)

7. As per Figure 2, only 15.5% of all employees travelling to Canary Wharf live within a 20-minute cycle journey of the IoD. The proposed draft LP cycle parking standards would require developers to provide sufficient cycle parking spaces for 91% of these employees. Given the mode share history on the IoD, this assumption seems unjustified.

Respondents living within 20 minute cycling distance

Response	Count	%	Employees
<20 mins	1,203	15.5%	18,600
>20 mins	6,541	84.5%	101,400
SUBTOTAL	7,744	100.0%	120,000
TOTAL	9,896		

Figure 2- Employees living within a 20-minute cycling distance

Source: 2017 Employee Survey

8. The above reinforces the need to adopt a more flexible approach with regard to the provision of cycle parking. Although the cycle parking standards within the draft LP cannot be inconsistent with national or regional policy, it must be allowed to be locally specific and to make justified, evidence-based decisions in regard to local requirements. In this regard, we would request that for new developments, appropriate space for cycle parking is safeguarded in line with the draft LP standards, but that this space can be used for different purposes until such time that a local need arises for additional cycle parking up to the full minimum standards in the draft LP. This local need can be captured through the additional monitoring policies suggested in paragraph nine. It is recommended that the cycle parking standards in Appendix 3 of the draft LP are modified as follows:

- 50% (say) of proposed minimum provision to be provided upon first occupation of the development
- Space equivalent to the remainder of the proposed minimum provision is safeguarded within the development to cater for any further increases in cycle usage.

9. We would also question the effectiveness of the monitoring policies located within Part 5 of the draft LP. Table 10 (pg. 266) lists key monitoring indicators to ensure the success of the draft local plan implementation. Within this table there is no inclusion of monitoring indicators for public transport capacity. Canary Wharf Group undertakes bi-annual travel and cordon surveys to monitor resident and employee travel movement. We would strongly urge LBTH to include public transport monitoring indicator, such as periodic surveys of public transport usage and capacity within their monitoring system, to enable early identification of any routes likely to operate at or above capacity and thereby prioritise the implementation of further transport improvements. This recognises the key role that transport plays in growth and the importance of the Canary Wharf commercial development to the economy of LBTH.