Southwark Canada Water Masterplan

18 July 2018

<u>https://planning.southwark.gov.uk/online-</u> applications/applicationDetails.do?activeTab=externalDocuments&keyVal= STHWR DCAPR 957831 <u>1</u> and <u>http://www.canadawatermasterplan.com/planning-application/</u>

About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 20,000 supporters of whom over 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

This response was developed with input from LCC's borough groups and is in support of the response from the local group Southwark Cyclists.

General comments about the application:

- This application features far too little detail on the roads in and around the edges of the scheme, far too little clarity on, provision for and prioritisation of cycling (and walking) on those roads and through the scheme, and far too much prioritisation for motor vehicle traffic, given the location and accessibility of the site.
- This is particularly an issue for cycling, given the location of major strategic cycling routes planned in the area, the highlighting of the area on TfL's Strategic Cycling Analysis as being one of the areas with the highest potential growth and demand for cycling in London and the highlighting of several corridors in the areas as featuring the highest potential for cycling along in London.
- This response neither supports nor opposes the Canada Water Masterplan application, but should be used by officers to determine items required for approval, reserved matters elements etc., as the current proposals in the masterplan and detailed development applications jeopardise local objectives for modal shift, car parking etc. from the London Plan and Mayor's Transport Strategy over the lifetime of the site.
- This response is based on study of the many documents in the application thus far and understanding of them. It is likely Southwark Cyclists (and potentially London Cycling Campaign) will put in a further, and more detailed response before the officer's report is finalised and goes to the planning committee.

Specific points about the scheme:

• "6.5.1 Although there are several proposals to improve conditions for pedestrians, cyclists and drivers in the area, none of these are currently committed and as such the 2031 future baseline tested through the STS and used within this assessment does not include any changes to the pedestrian, cycle or highway networks." (See also "9.9.1 The STS has not assessed cycling in the same way that it has addressed public transport and highways capacity, and given that development of proposals for CS4 and other new cycle routes in the area, the future baseline is uncertain.") This implies strongly that development design and highways design for Canada Water is predicated on no real changes to the highways around the site, to cycling, walking and motor vehicle flows. That is directly against the new Mayor's Transport Strategy, TfL's Strategic Cycling Analysis, the general trends visible on London's roads and Southwark's Transport Strategy etc. Within the lifecycle of this development, the developer must assume rising cycling flows, lower motor vehicle flows; and design assuming that the roads around the scheme will see far more people cycling – with key cycling routes planned for Lower Road (Cycle Superhighway CS4), and Salter Road (Canary Wharf – Rotherhithe bridge approach and strategic route linking that to Peckham). Officers should ensure therefore that any car parking, highways changes proposed and routes into and through the site are designed to enable currently planned cycling and walking schemes to go ahead without any compromise on quality and that all routes in and through the site are designed with far higher levels of cycling in mind.

- As well as the designs being amended where necessary to reflect planned cycle routes, the application must be amended to bring it into line with both the new London Plan (on car and cycle parking, for instance) and the new Transport Strategy (on modal shift away from private motor vehicles).
- The applicant, borough and indeed TfL should also be paying careful attention to how the Silvertown Tunnel and other roads changes in the vicinity could impact this application and seek to avoid providing incentives to drive to and from the scheme as a priority. Again, officers should be recommending amendments etc. to ensure the site does not incentivise driving in the area.
- "7.6.6 It is anticipated that a requirement to submit a detailed Town Centre Parking Strategy • will be secured as part of any planning consent for the site. This is in recognition of the fact that in the short to medium term an appropriate level of car parking is vital to support the area's town centre role and to encourage retail and leisure operators to relocate to Canada Water." The provision for car parking "up to 1,000 spaces" should be rejected and heavily reduced. This scheme is located in an area with high levels of public transport accessibility, and which is already suffering significant levels of congestion. Although the developers argue the scheme reduces car parking, it does not reduce car parking enough. Car parking at this site for visitors should likely be restricted to disabled bays only, and housing developments should be "car free" (again, apart from necessary disabled bays). 7.6.6 makes an argument car parking is needed for the economic viability of the site. But car parking here is a) likely to not be needed for a viable site, in reality and b) could well reduce the economic viability of much of the surrounding area. Officers should reject such levels of provision and be mindful of likely impacts it would bring not just to walking and cycling amenity, but the economic viability of existing local etc. shops in the area – as it is highly unlikely car drivers arriving at this site will then choose to leave it on foot to shop nearby etc.
- Detailed proposals and modelling for the key junctions in and around the site, up to date with current TfL models for mode share and journeys in the next 20 years, appear to be missing. These are vital for the applicant to demonstrate that their designs will not significantly affect the walking, cycling and public transport amenities in the area over the lifecycle of the development, will enable and encourage mode shift to active travel modes and not affect the amenity of planned cycling schemes mentioned above. Provision of or need for any turn lanes for car parking, signals phasing, cycle track space etc. should be clearly explained by the developer. Officers should ensure that any development that does move forward will not, as detailed plans advance, require changes to the highways that negatively impact cycling and walking and/or planned schemes for these modes in the area.

- The development of the site should be as a "low traffic neighbourhood" (see https://lcc.org.uk/pages/low-traffic-neighbourhoods), with no through motor vehicle routes (excepting buses, possibly) through the site, but cycling and walking enabled throughout and with a site that is permeable to both, to and from all directions. Officers should ensure proposals achieve this.
- The application is hostile towards the provision of what is considered high quality, international standard cycling infrastructure throughout, for instance repeatedly proposing "shared space" rather than protected cycle tracks. Internally to the site and via any amendments to external Highways proposed or later required, officers should ensure that cycle provision is of high quality and generally separates flows of those cycling from other modes, including pedestrians. And that sufficient space is provided on the basis of growth of cycling modelled in the Mayor's Transport Strategy and London Plan for this area over the lifetime of the development.
- Whatever happens with the application, this major development is likely, without careful planning, to negatively impact cycling and walking through the area throughout construction. It should be a condition of any approval that a detailed construction impacts mitigation plan is developed, including ensuring cycle and walking safety through temporary roadworks and from construction vehicle movements etc. This could include using developer-associated funding to advance planned works such as CS4 more rapidly to ensure physically-protected cycle routes are in place before the bulk of construction begins.

General points about cycling schemes:

- LCC requires schemes to be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key.
- As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys with links to nearby amenities, residential centres, transport hubs considered from the outset.
- Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport mode for return on investment according to a DfT study. Schemes which promote cycling meet TfL's "Healthy Streets" checklist. A healthy street is one where people choose to cycle.
- All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people.
- LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLoS) rating of 70 or above, with all "critical issues" eliminated.