

**01 March 2019**

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

**TRANSPORT**

**Matters 76 – 80: Transport Schemes and Development**

---

**Matter 76**

**M76. (a) Are all of the transport schemes set out in Table 10.1 necessary and adequate to deliver the development proposed in the Plan?**

**(b) In the context of the identified funding gap of £3.1billion per year, is there a reasonable prospect that the transport schemes set out in Table 10.1, and any other essential strategic transport schemes, will be delivered in a timely fashion in relation to the timing of development proposed in the Plan?**

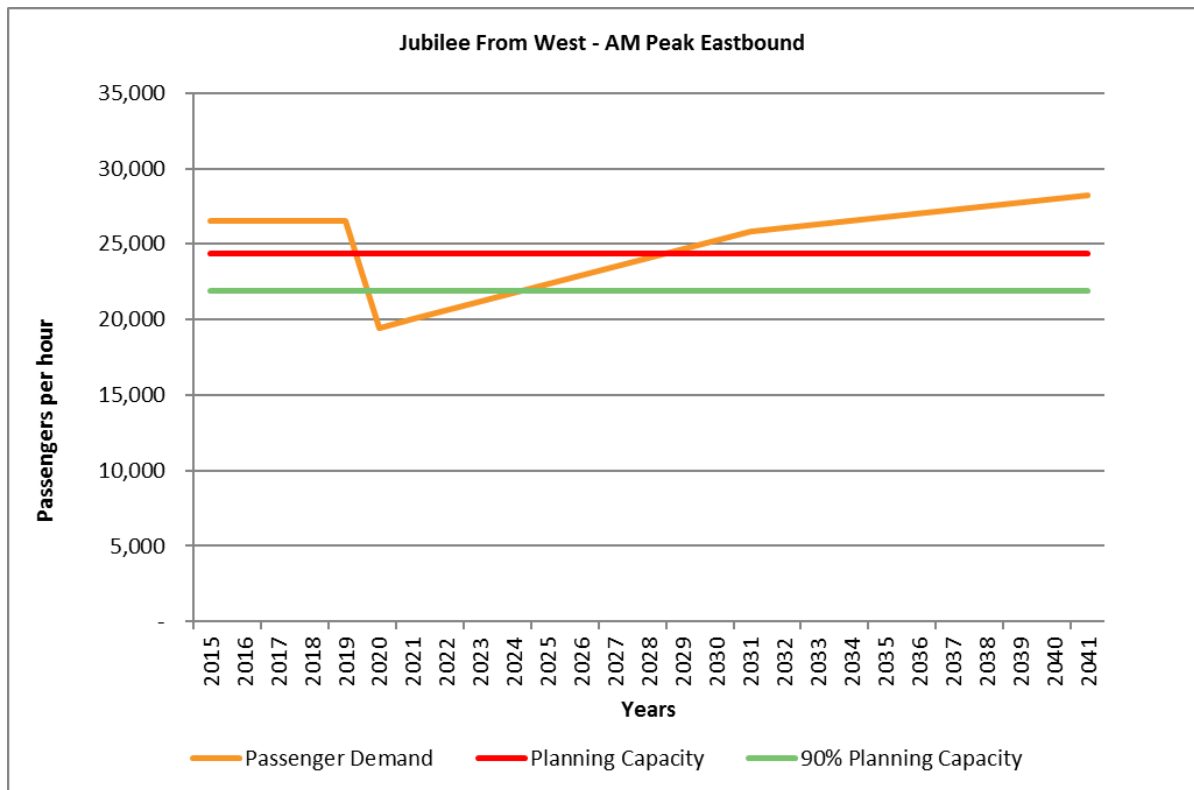
---

1. We do not believe that the implementation of the relevant transport schemes set out in Table 10.1 would be adequate to deliver the development proposed in the Draft London Plan for East London in general and the Isle of Dogs in particular.
2. In paragraphs 16 and 17 of our Representations to the ‘New Draft London Plan Consultation: December 2017 (dated 2 March 2018) (“March 2018 Representations”), concern was expressed about the employment targets (Table 2.1 of the Draft London Plan) for the Isle of Dogs Opportunity Area (ODOA) not reflecting jobs growth since the employment target was introduced in the 2008 London Plan. We also note that whilst the homes target in Table 2.1 is set at 29,000 for the ODOA the Draft Isle of Dogs & South Poplar OAPF (Consultation May 2018) (Evidence Base document reference NLP/AD/13) considers three scenarios for dwelling numbers - 31,000 (baseline), 38,000 (high growth) and 49,000 (maximum growth) all of which are higher than the 29,000 new homes stated in Table 2.1 of the Draft London Plan. The transport infrastructure required to support 29,000 new homes would be significantly different from the transport infrastructure required to support 49,000 new homes. Clarity on a target is essential to enable the required transport infrastructure to be planned and implemented in step with future development and to understand the effectiveness of the transport schemes set out in Table 10.1 as well as what further interventions would be required.
3. We have strong concerns with the capacity of the Jubilee Line over the Plan period, even with the Elizabeth Line in place. Figure 1 below, extracted from the Canary Wharf Transport Capacity Study (2018) produced by Steer, shows there will initially be spare capacity on the Jubilee Line following the opening of the Elizabeth line (now assumed to be 2020). However, by 2024 the Jubilee line will be at over 90% capacity for eastbound journeys to Canary Wharf based on current committed

developments for the Isle of Dogs. This conclusion is confirmed in TfL’s ‘Forecasting the Impacts of the Elizabeth Line: August 2018’ report which states:

**“after a reduction in Jubilee demand between 2018 and 2019, demand growth returns taking demand over today’s levels by 2026”.**

Figure 1: Demand Projections for Jubilee Line Service at AM Peak Eastbound



- Equally within the ‘Isle of Dogs and South Poplar OAPF Transport Strategy’ published for consultation alongside Evidence Base Document NLP/AD/13 the conclusion (page 21) relating to the future 2031 modelling is that:

**“Introduction of the Elizabeth Line helps to accommodate growth, but crowding patterns of today worsen...Severe crowding persists on the eastbound Jubilee Line towards the OA, and the equivalent link in the westbound direction worsens after experiencing 65 per cent increase in passengers.”**

- Our March 2018 Representations stated in paragraph 77:

**“The draft policy [T3 (Transport capacity, connectivity and safeguarding)] aims to provide good transport connectivity within London and also with the wider South East. We are surprised that the indicative list of transport schemes in Table 10.1 does not include further rail connections between South East London, the Isle of Dogs and Central London, as the Mayor’s Transport Strategy has highlighted that the Elizabeth Line and Jubilee Line through Canary Wharf will be operating above capacity before the end of the Plan period (2041). As a result, it is likely that the ability of Canary Wharf and the wider Isle of Dogs to accommodate significant growth will be constrained by a lack of public transport capacity. We would support**

**inclusion of a new rail link between Isle of Dogs and Central London rail link within Table 10.1.”**

6. We note that in the Draft London Plan minor suggested amendments ‘Crossrail 2 eastern branch (subject to further assessment): 2020-2041’ has been added as an amendment to Table 10.1, however the delivery of this scheme is far from certain given the delay and overspend on the Elizabeth Line (Crossrail 1). Our understanding of possible alignments for such an extension suggests that any relief to the Jubilee line would be limited and we would therefore still seek the inclusion of a new rail link between the Isle of Dogs and Central London identified in Table 10.1 to help to relieve evident rail capacity constraints.
7. The upgrades to the DLR and further improvements to the Jubilee line and Elizabeth Line are absolutely essential if the Mayor’s objective to deliver ‘good growth’ is to be achieved. This would include higher frequency services on the Jubilee Line and on the Elizabeth Line (over and above the initial 12 trains per hour service at Canary Wharf). The capacity of the DLR should be enhanced to accommodate growing demand with all branches operating at a frequency of 30 trains per hour in each direction at peak times with full train formations. Constraints on the Stratford branch should be addressed to also enable that branch to operate at a frequency of 30 tph. These crucial rail enhancements should be included in Table 10.1.
8. Clearly therefore the very ambitious growth targets for the Opportunity Areas served by the Jubilee line, in particular those for the IoDOA, could only be achieved by provision of additional rail capacity on this strategic growth corridor. It is our strong view that the transport schemes set out Table 10.1 do not go anywhere near far enough to support the growth in homes and jobs and as such Table 10.1 should also include:
  - Enhancements to the Elizabeth line services (over and above the initial 12 trains per hour service at Canary Wharf) via the Isle of Dogs;
  - Higher frequency services on the Jubilee line of at least 36tph during peak periods of demand;
  - DLR upgrades specific to the Isle of Dogs to enable 30tph to operate on all branches at peak periods of demand; and
  - New rail line between central London and the Isle of Dogs.
9. More river crossings in east London at Gallions Reach and/or Belvedere and more public transport crossings are needed to support the development proposals for the Thames Gateway. We are concerned about the proposed Walk and Cycle River Crossing between Rotherhithe and Canary Wharf. This is a very expensive and environmentally intrusive scheme and we believe the significantly cheaper ferry proposal should be properly considered as a more viable and attractive (to users) proposition. With public finances heavily constrained, it is vital that investment in infrastructure is spent wisely on the most important, beneficial and deliverable initiatives.
10. If developments in areas of capacity constrained public transport, for example along the extent of the Jubilee line, contributed to the proposed new transport infrastructure in a similar way to the funding of the Northern Line Extension, the funding gap could be reduced. This would also make it more likely that delivery of the schemes in a timely fashion in relation to the timing of development could be achieved.
11. In summary, we consider that as currently written, Table 10.1 which supports draft Policy T3 is unsound as it does not provide enough additional transport capacity to support new development in East London. However, we consider that draft Policy T3 could be made sound by including at least the following additional schemes in Table 10.1:
  - Enhancements to the Elizabeth line services (over and above the initial 12 trains per hour service at Canary Wharf) via the Isle of Dogs;
  - Higher frequency services on the Jubilee line of at least 36tph during peak periods of demand;

- DLR upgrades specific to the Isle of Dogs to enable 30tph to operate on all branches at peak periods of demand;
- A new rail line between central London and the Isle of Dogs;
- New river crossings at Gallions Reach and Belvedere; and
- An enhanced ferry service linking Rotherhithe and Canary Wharf.