

MAYOR OF LONDON

Jacob Jaarsma

Royal Borough of Greenwich
Development Planning
Directorate of Regeneration, Enterprise & Skills
5th Floor, The Woolwich Centre
35 Wellington Street
London
SE18 6HQ

Our ref: D&P/3283/02

Your ref: 13/3285/O

Date: 9 April 2014

Dear Jacob,

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

IKEA Bugsby's Way: Site of Former Sainsbury's and Former Comet Units, 55 & 57 Bugsby's Way, Greenwich SE10
Local Planning Authority Reference: 13/3285/O

I refer to your letter of informing me that Greenwich Council is minded to agree a dual recommendation resolving to grant permission but giving delegated authority for officers to refuse permission if the Section 106 agreement is not signed within a specified date. I refer you also to the notice that was issued on 2 April 2014 under the provisions of article 5(1)(b)(i) of the above Order.

Having now considered a report on this case I am content to allow Greenwich Council to determine the case itself, subject to any action that the Secretary of State may take, and do not therefore wish to direct refusal or to take over the application for my own determination.

Yours sincerely



Boris Johnson
Mayor of London

cc Len Duvall OBE, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
Ms Sally Miles, CgMS Consulting, 140 London Wall, London EC2Y 5DN

IKEA Bugsby's Way: Site of Former Sainsbury's and Comet Units

in the Royal Borough of Greenwich

planning application no. 13/3285/O

Strategic planning application stage II referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

The application proposes the demolition of an existing former Sainsbury's Store and a unit formerly occupied Comet. The store and retail unit will be replaced by one large 33,000 sq.m. (gross) IKEA store. The application proposes the demolition of an existing former Sainsbury's Store and a unit formerly occupied Comet. The store and retail unit will be replaced by one large 33,000 sq.m. (gross) IKEA store. The application proposes the demolition of an existing former Sainsbury's Store and a unit formerly occupied Comet. The store and retail unit will be replaced by one large 33,000 sq.m. (gross) IKEA store.

The applicant

The applicant is **IKEA Properties Investment Ltd**, and the agent is **CgMs Limited**.

Strategic issues

This application has raises concerns in relation to **out of centre retail, sequential test and retail impact**. Other issues to be addressed relate to **urban design & access, sustainable energy and transport**.

The Council's decision

In this instance Greenwich Council has resolved to grant permission.

Recommendation

That Greenwich Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 16 January 2014 the Mayor of London received documents from Greenwich Council notifying him of a planning application of potential strategic importance to develop the above site

for the above uses. The application is referable under Category 1B of the Schedule to the Order 2008:

“(b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within any of the following classes in the Use Classes Order: (1) class A1 (retail).”

2 On 25 February 2014 the Mayor considered planning report PDU/3283/02, and subsequently advised Greenwich Council that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 81 of that report; but that the possible remedies set out could address these deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor’s concerns (see below). On 3 March 2014 Greenwich Council decided that it was minded to grant planning permission, and on 27 March 2014 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Greenwich Council under Article 6 to refuse the application or issue a direction to Greenwich Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application. The Mayor has until 9 April 2014 to notify the Council of his decision and to issue any direction.

4 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

5 At the consultation stage Greenwich Council was advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 81 of that report; but that the possible remedies set out could address these deficiencies.

- **Principle of development:** The principle of a retail development on the site is acceptable, however further discussion is required in relation to the 24,300 sq.m. up-lift in retail floorspace.
- **Retail:** The retail impact and sequential test appear to be thorough and the impact show the expected trade draw will not exceed 2% on any town centre this indicates that the proposals will not have a significantly averse impact on any town centre. GLA officers would like to discuss the findings of the retail tests with Greenwich Council who can provide local knowledge and understanding of sites, development proposals and town health to check the robustness of this conclusion.
- **Regeneration:** The Council should secure local employment and training initiatives.
- **Urban design/access:** The applicant has provided a very short design & access statement, but there is sufficient information to understand the general layout, mass and architectural form the proposed IKEA store building. Although in outline it will be similar to previous corporate branded architecture of previous IKEA stores in London. In relation to the loss of green space to the rear of the existing Sainsbury’s store, the applicant should further

mitigate the loss of the existing green space by commitment to enhancing the green spaces in vicinity of the new store.

- **Access:** The applicant should provide further assurance on inclusive design principles to be included in the building design.
- **Sustainable energy:** Based on the energy assessment submitted at stage 1, a reduction of 324 tonnes of CO2 per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected, equivalent to an overall saving of 40%. The carbon dioxide savings meet the targets set within Policy 5.2 of the London Plan, however the comments above should be addressed before compliance with London Plan energy policy can be confirmed.
- **Transport:** Overall, TfL has no significant objections to the principle of the proposed development. However, the applicant should ensure that the issues raised are clarified and addressed. It is requested that any resolution to grant permission should be subject to the conditions and section 106 obligations as requested.

Principle of development

6 At stage 1 the principle of a retail development on the site was viewed as acceptable subject to further discussion on the 24,300 sq.m. up-lift in retail floorspace. In this instance GLA accept Greenwich Council's opinion that the up-lift in floorspace in this established retail store location is acceptable.

Retail

7 At stage 1 it was accepted that the expected trade draw would not exceed 2% from any town centre due to the extensive catchment area of the IKEA and this indicated that the proposals would not have a significantly adverse impact on any town centre. The Greenwich committee report supports this opinion and acknowledges that the store development would help retail expenditure that is currently being lost to competing centres outside the borough and the store development would not have a significant impact of the aspiration for Woolwich to upgraded to a Metropolitan centre in the long term. Furthermore it is of the view of the Council that given the store location town centres within the catchment could benefit from linked trips by virtue of the site location having a high level of public transport connectivity

8 At stage 1 concern was raised that the sequential site options tested were limited and that Greenwich Council should provide a lead on the robustness of this assessment. Greenwich Council has not identified any alternative sites that are capable of accommodating the size of store proposed and the committee report is supportive of the stores site location. The sequential assessment is therefore viewed as being compliant with the London Plan.

Regeneration

9 At stage 1 it was requested that local employment and training initiatives be incorporated within the development delivery process. This commitment is included within committee report with the applicant being required to use Greenwich Local Labour and Business Scheme and Job Centre Plus to ensure a large number of Greenwich based construction workers are employed.

Urban design/access

10 At stage 1 the IKEA store design was viewed as appropriate to the location in terms of both scale and mass with the corporate branded architecture viewed as being of acceptable quality. It was however requested that in context of the loss of green space to the rear of the existing Sainsbury's store, the applicant should further mitigate the loss of the existing green space by commitment to enhancing the green spaces in vicinity of the new store. The applicant since stage 1 has responded to this requirement by agreeing to contribute to projects that enhance the surrounding landscape and local ecology including the local Ecology Park and this enhancement scheme will be secured in the s106 agreement and this is welcome.

Sustainable energy

11 At stage 1 the energy strategy was viewed as being compliant with London Plan 40% reduction target required by the London Plan, but additional verification information was required from the applicant in relation to how the demand for cooling will be minimised in line with policy 5.9; copies were required of correspondence with the Greenwich Peninsula district heating network provider Eon demonstrating on-going discussions have been undertaken; and information on the floor area and location of the energy centre should be provided. All of the information required to verify that the energy strategy is compliant with the London Plan has been provided.

12 It is noted in the committee report conditions and reason under condition 4 renewables that the finalised energy strategy shall provide no less than 25% reduction of the developments overall carbon dioxide emissions. This condition should be changed to 40% reduction to be compliant with the London Plan.

Transport

13 At Stage 1 TfL raised a number of issues which have now been resolved. The applicant is to install 20 active electric vehicle charging points (EVCP) and TfL welcomes this provision given that there are currently only two in the same size car park. The car park management plan has also been secured by condition. It will ensure that the operation of the surrounding highway is not affected by queuing for the car park and will prevent commuter parking. Again this commitment is welcomed by TfL

14 The applicant has undertaken to include the following obligations in the section 106 agreement, in line with requests made at stage 1:

- £250,000 for local pedestrian and cycle accessibility which will be divided between 'quick wins' identified in the PERS audit and improvements to the public realm at Westcombe Park station and its walking and cycling links with the site.
- £50,000 for signage for the surrounding road network, which will assist in rebalancing of traffic in the area identified as necessary at stage 1.
- £479,400 for bus service improvements. The nature and timing of mitigation measures will be agreed following further assessment by London Buses but will comprise links with North Greenwich and/or Blackheath which would also increase weekend frequency and capacity. The sum is paid on a similar basis and pro rata to that secured for the new Sainsbury's development.

- £750,000 for Travel Plan measures to support, inter alia, achievement of a 35% public transport mode share, such as discounted delivery charges for public transport users and to encourage other sustainable travel, eg a car club scheme and more electric vehicle charging points if monitoring shows demand.
- Work in kind and/or a financial contribution for highway impact mitigation to address safety and operational problems identified at Stage 1. The details of these works will be agreed subsequently by all parties.

15 It has been agreed with the Royal Borough of Greenwich (RBG) and the applicant that TfL will be involved in detailed section 106 negotiations. The above figures represent minimum sums with which TfL is satisfied but which may be increased consequent upon RBG's local requirements to mitigate impact.

16 The applicant has also agreed to install real time passenger information in the store and at the bus stops to improve user experience.

17 Before changes are made to the Millennium Busway necessary to implement the scheme and allow opening of the store, a new legal agreement will be required between the long leaseholder (who is not the applicant) and London Buses. This agreement is being negotiated currently and will also resolve existing issues arising from the busway being a private road.

18 In summary TfL is now satisfied that the proposals are compliant with the transport policies of the London Plan.

Response to consultation

19 Greenwich Council consulted 2,597 occupants of neighbouring properties as well as statutory and non-statutory organisations. A number of objection letters were received by the Council as a result of the wider consultation process and concerns raised were in relation to the following:

- Concern over increase congestion at the Blackwall Tunnel and the surrounding road network.
- Increase in traffic related air pollution.
- Concern over public transport capacity.
- Insufficient car parking
- The existing Sainsbury's store building should be retained due to its high quality award winning eco-design and should be reused by alternative retailer.
- The proposed big box IKEA store design is not of good quality design compared to the existing Sainsbury's store.
- Loss of Sainsbury's will remove local accessible shop.
- The site is too small to accommodate the size of unit proposed.
- IKEA store should have equal energy efficiency as the Sainsbury's store.
- Ikea should adopt an alternative format.

20 Objections were received from Greenwich Conservation Group, The Westcombe Society, The Charlton Society and Greenwich Millennium Village Management Limited all raised the same objections in letters.

21 The Mayor received two letters directly and GLA Planning Unit received a further seven e-mail objections and these related to road traffic impact, impact on air quality, suitability of the type of store proposed and the demolition of the Sainsbury's store.

Petition

22 A petition of 776 signatures has been received objecting to the IKEA store proposal and the demolition of the Sainsbury's store building.

Jenny Jones (Baroness Jones of Moulscroomb) Green Party Member of the London Assembly

23 Raised concern on behalf of local residents on potential increase in road traffic should the scheme be approved in addition to the already proposed doubling of the local population from 10,000 to 25,000.

Twentieth Century Society

24 Twentieth Century Society have raised concerns over the loss of the existing Sainsbury's store because of its award winning design that merits retention due its pioneering and innovative eco-led supermarket architecture. The society has approached English Heritage for the building to be listed for its architectural merit and a 1,000 person signed on-line petition to save the building has been put together. They are requesting deferral until English Heritage has had the opportunity to assess the building.

25 These issues are of a local nature and have been addressed in the Council's Committee report. As set out in this report TFL are of the view that the transport impact of the store is manageable and negative impacts can be mitigated by improvements to the strategic road network and public transport improvements that will be funded by the applicant in the s106 agreement.

Supporting letters/ e-mails

26 A total of 36 letters/e-mails supporting the IKEA store were received by Greenwich Council, this support related to appropriate use of the site and increased employment opportunities.

Statutory organisations

27 Representations were also received from the following statutory organisations and bodies: .

- **Environment Agency:** No objection subject to conditions and informatives in relation to flood risk, surface water drainage, groundwater and piling. These conditions are included in the draft decision notice.
- **Thames Water:** No objection subject to conditions and informatives in relation to surface water drainage, sewage infrastructure capacity and piling. These conditions are included in the draft decision notice.
- **Natural England:** No objection subject to conditions and informative that are included in the draft decision notice.
- **Metropolitan Police:** require secured by design condition which is included in the draft decision notice.

Article 7: Direction that the Mayor is to be the local planning authority

28 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage 1, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

29 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

30 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (*Costs Awards in Appeals and Other Planning Proceedings*) emphasises that parties usually pay their own expenses arising from an appeal.

31 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

32 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

33 Having regard to the details of the application, the newly submitted information regarding retail impact, design & access, sustainable energy, transport and the matters set out in the Council's committee report and representations received, the application is considered acceptable in strategic planning terms.

for further information, contact GLA Planning Unit (Development & Projects Team):

Colin Wilson, Senior Manager – Development & Projects

020 7983 4783 email colin.wilson@london.gov.uk

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Jonathan Aubrey, Case Officer

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25 February 2014

IKEA Bugsby's Way: Site of Former Sainsbury's and Comet Units

in the Royal Borough of Greenwich

Planning application no. 13/3285/O

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

The application proposes the demolition of an existing former Sainsbury's Store and a unit formerly occupied Comet. The store and retail unit will be replaced by one large 33,000 sq.m. (gross) IKEA store.

The applicant

The applicant is **IKEA Properties Investment Ltd**, and the agent is **CgMs Limited**.

Strategic issues

This application has raises concerns in relation to **out of centre retail, sequential test and retail impact**. Other issues to be addressed relate to **urban design & access, sustainable energy and transport**.

Recommendation

That Greenwich Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 81 of this report; but that the possible remedies set out in this paragraph could address these deficiencies.

Context

1 On 16 January 2014 the Mayor of London received documents from Greenwich Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 26 February 2014 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1B Development of the Schedule to the Order 2008:

- (b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within any of the following classes in the Use Classes Order: (1) class A1 (retail).

3 Once Greenwich Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is in the Royal Borough of Greenwich and located at the Greenwich Peninsula Retail Park, which is off Peartree Way and Bugsby's Way. The site is currently occupied by a comparison floorspace unit (formerly occupied by Comet) and a foodstore (Sainsbury's supermarket).

6 Peartree Way and Bugsby's Way link to A102 Blackwall Tunnel Approach Road, which forms part of the Transport for London Road Network (TLRN). The nearest section of TfL's Strategic Road Network (SRN) is A206 Woolwich Road, located 300 metres away. TfL has proposed that one of the Mayor's Cycle Superhighways will run along Woolwich Road by 2015. The Millennium Busway runs through the site, as well as dedicated cycle and pedestrian routes. TfL understands that an additional bus priority scheme has been proposed for Bugsby's Way.

7 The site scores a public transport accessibility level (PTAL) of 5, on a scale of 1-6 where 6 is excellent.

Details of the proposal

8 The application proposes the demolition of and existing former Sainsbury's Store and a unit formerly occupied Comet. The store and retail unit will be replaced by one large 33,000 sq.m. (gross) IKEA store.

Case history

9 The application was subject to the GLA pre-application meeting process and the advice report (D&P/3283/pre-app) was issued on the 5 December 2013.

Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- | | |
|---------------------------|--|
| • Retail/town centre uses | <i>London Plan</i> |
| • Urban design | <i>London Plan;</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy;</i> |
| • Crossrail | <i>London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG</i> |
| • Parking | <i>London Plan; the Mayor's Transport Strategy</i> |
| • Access | <i>London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)</i> |

- Sustainable development London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Greenwich Unitary Development Plan 2006 and the London Plan (with 2013 Alterations).

12 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.
- Greenwich Council's draft Core Strategy and Development Management Policies
- Draft Further Alterations to the London Plan

Principle of retail development

13 The site is currently occupied by two retail units an existing 5,200 sq.m gross (3,205 net) Sainsbury's food store and a 3,500 sq.m, gross (2,821 net) former Comet retail unit and are located on an established out of centre retail park. The application proposals are for a 33,000 gross (c21,450 net) IKEA store, a comparison led floorspace development that will utilise the sites of the two existing retail stores. In seeking approval the applicant requires a 24,300 sq.m. gross (15,424 sq.m.) net up-lift in retail floorspace.

14 The principle of the redevelopment of both sites for retail development is therefore accepted, but there are issues to resolve in relation to justifying the 24,300 sq.m. gross (15,424 sq.m.) net up-lift in retail floorspace and the change to retail use from mix convenience/ comparison retail across two sites to a single large 33,000 sq.m. gross comparison floorspace retail unit.

Retail assessment

15 London Plan policy 2.15 (Town Centres), policy 4.7 (retail & town centres) and policy 4.8 (supporting a successful & diverse retail sector), provide the strategic policy context in which the applicant's proposals are considered. The applicant has completed a retail impact assessment and has worked with Greenwich Council on defining the parameters of the assessment and this is welcome.

16 The proposals as stated in the applicant's Retail Assessment are for an out of centre retail development. It should therefore be assessed in context of the impacts of the additional floorspace on metropolitan, major and district retail centres identified in the London Plan town centre classification. Such an assessment would bring forward policy issues raised in both the NPPF and London Plan in relation to:

- The need for a sequential test.
- Impact on the vitality and viability of centres in the London Plan hierarchy.
- Impact on proposed investment in existing centres.

17 The applicant has completed a sequential test and retail impact assessment that has responded comprehensively to the information requested at the pre-application stage and this is welcome.

Sequential test

18 London Plan policy, in line with the NPPF, places a requirement that retail development should be subject to a sequential test with policy 4.7b stating:

“Retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport.”

19 It is accepted in this instance that the size and operational requirements of the proposed IKEA unit will limit site options and the reasoning behind the site requirements are comprehensively set out in the retail assessment.

20 The applicant sequential assessment has been undertaken through analysis of the established catchment area and has used the retail health check process to analyse and identify development proposals and sites across a range of in centre, edge of centre and out centre locations. Due to the size of unit (33,000 sq.m.) and related car parking requirements the applicant set out to identify sites over 5ha, which is 2 ha less than the application site.

Table 1: Sequential assessment sites

Site name	Borough
Billingsgate Market, Canary Wharf	Tower Hamlets
Wood Wharf, Canary Wharf	Tower Hamlets

21 The applicant identified only two site development options that could accommodate its requirements these being Billingsgate Market and Wood Wharf, both sites were assessed as not being suitable, available or viable to accommodate the proposed development. The Billingsgate Market site was rejected for availability and suitability reasons because the site would not be available until 2020-2025 and the scale of development would not fit with predominantly residential led development proposals. Whilst, the Wood Wharf site was rejected because of site availability (it is not available until 2020-2025) and the suitability due to the large development unit proposed by IKEA would not to fit with the form of development proposed which is based on a fine grained development around a market square for festival style shopping.

22 It is requested that Greenwich Council provides a review of the sequential site assessment and discusses with GLA officers whether any other suitable sites are available with the borough where the IKEA site could be relocated. Furthermore it is requested the Council discuss with adjacent boroughs the findings of the sequential test.

Assessment of impact

23 The London Plan, in coordination with the NPPF, requires an assessment of impact and states under policy 4.17 *“(c) proposals for new, or extensions to existing, edge or out of centre development will be subject to an assessment of impact.”*

24 The assessment of impact is required to have particular focus on the impact of new proposed floorspace on the vitality and viability of retail centres in the London Plan town centre

classification and smaller neighbourhood centres. A further requirement is an assessment of the impact on proposed investment within the town centre classification.

Health check

25 As requested at the pre-application stage the applicant has completed an extensive retail health check of town centres in the catchment of the proposed store and the London Plan retail hierarchy and has utilised these studies in the assessment of retail impact and this is welcome.

26 The retail health check provides information on the existing catchment centres in relation to the amount of comparison/convenience floorspace, retail attractors and national operators, it also provides a breakdown of IKEA store operations across the catchment. The only information missing is trend data to understand the health of the centre over time to help evaluate the retail impact findings.

Vitality and viability

27 The applicant has completed a thorough assessment of retail impact and it is accepted that an IKEA store of the size proposed will have a trade draw taking in a number of retail centres and it is further accepted that the focus of the analysis is on comparison retail turnover impacts. The identified impacts across the catchment area centres are:

Centre	Impact 2019 %	Centre	Impact 2019%
Woolwich	1.0	Bromley	0.3
Eltham	1.0	Thamesmead	1.2
Greenwich	0	Peckham	0.4
Lewisham	0.6	Canada Water	0.5
Barking	1.3	Catford	0.5
Bexleyheath	0.4	Stratford	0.5
Welling	1.6	Beckton	0.2
Erith	1.2	Canning Town	0
Sidcup	1.2	Brixton	0.3
		Ilford	0.4

28 The applicant assessment concludes that the likely trading effects on retail turnover of existing centres by 2019 will be not exceed 2% in any town centre within the catchment. The highest level of trade draw impact will be on Welling (1.6%). It considers that the proposals will have a trade draw across a wide catchment area and this means the IKEA store will not have a detrimental impact on the vitality and viability of any individual centre within the defined store catchment. Furthermore, it states that an outcome of the proposals will be the drawing of trade from existing IKEA stores by reducing the numbers currently travelling from south-east London

29 As requested at the pre-application stage the applicant has established the impact of the store in monetary and percentage terms and analysed the store development in relation to how these figures impact on the health of existing centres and this is welcome. This helps in gaining an understanding whether the store would result in loss of market share that impact on rental levels making developments less viable or dilute retailer demand or redirect retailer interest that underpin investment.

30 It is GLA officer's opinion that due the size of IKEA store proposed and wide catchment the trade draw impact on existing centres are not significantly averse and are therefore acceptable in

relation to London Plan strategic planning policy. GLA officers however would like further discussions with Greenwich Council on the retail impact assessment findings and whether an accumulative impact assessment that combines the IKEA store with any other major comparison retail proposals is required.

Impact on investment

31 The applicant has completed a comprehensive review of 45 applications/investment proposals within catchment area of the proposed IKEA store, 24 of these are either in centre/edge of centre schemes. It concludes that the IKEA store development will not have significant adverse impacts on any proposed in centre development applications and proposals. It is requested the borough liaise with surrounding boroughs in relation to this aspect of the impact assessment and discuss with GLA officers any significant concerns raised in relation to investment within retail centres identified in Annexe B of the London Plan and priority regeneration area projects.

Conclusion

32 The applicant has provided all of the information requested at the pre-application stage in relation to the sequential test, retail centre health checks and assessment of retail impact. GLA officers would like to further discuss the findings of these retail tests with Greenwich Council to provide local knowledge and understanding of sites, development proposals and town health to check the robustness of the conclusions

Regeneration impacts

33 The development proposal will have potential regeneration benefits of creating a projected 400 jobs (gross) with a further 80 associated jobs (cleaners, creche workers, security guards). The Council should secure local training and employment initiatives.

Urban design

34 The proposals are for a new IKEA store which will occupy the sites of the existing Sainsbury's store and former Comet unit, it is noted that the existing units form part of a linked development that includes with the B&Q and Odeon Cinema this gives a unified architectural form. The applicant has provided a very short design & access statement, but there is sufficient information to understand the general layout, mass and architectural form the proposed IKEA store building.

Layout and context

35 The proposed layout orientates the store to match that of the previous occupants of the site and the retained B&Q and Odeon Cinema buildings. This provides a main frontage and entrance facing the A102 and the extensive car parking, whilst servicing is from Bugsby's Way. This layout responds to the commercial requirement to have the IKEA branded frontage being prominent from major transport route of the A102 and respond practically to the existing set of car parking that is already established. This layout approach raises no strategic design concerns.

Scale and massing

36 The mass and scale of the 33,000 sq.m. of the development is substantial given the commercial operational requirements of IKEA. The scale of the development mass is much greater than building it is replacing, but given the open nature of the site and location away from more dense and structured residential neighbourhoods is suitable to its location.

Materials and design detailing

37 The information provided on the design is limited, although it is clear that the design will fit with the common branded IKEA store architecture taking yellow and blue cladding systems with areas punctuated by glazing and a clearly defined entrance.

38 In response to the loss of an existing green space and pond at the rear of the Sainsbury's store, the applicant has indicated it will introduce a green wall on the eastern elevation of the building and explore potential for a green roof. These features are supported but the applicant should further mitigate the loss of the existing green space by commitment to enhancing the green spaces in vicinity of the new store.

Public realm/building interface

39 The public realm proposals are limited and indicate the emphasis on the established pedestrian routes facing the car park which has been supplemented with a new pedestrian crossing point to the store entrance. Given the limited scope for public realm the adopted approach is reasonable.

40 At the pre-application the applicant was encouraged to explore options to locate the IKEA restaurant on the ground floor facing the car park to enhance the public realm interface of the building. This position remains unchanged and this option should be explored or explanation provided for such an option not being feasible or viable.

Access

41 It is welcomed that the planning statement identifies the inclusivity of the IKEA Greenwich store will be exemplary and the DAS identifies that the store design will ensure inclusive access to all parts of the store for both customers and staff. However the design and access statement does not provide the required level of detail to neither demonstrate these statements nor address issues raised in the pre-application advice letter in regards to inclusive design.

42 The expectation is that any proposal referred to the Mayor will aim for the highest standards (not just the minimum) and the accompanying design and access statement should illustrate how the proposal meets these requirements and justifies the decisions taken, especially any deviation from accepted good practice.

43 The design and access statement submitted with the planning application should demonstrate how the principles of inclusive design, including the specific access needs of disabled people, have been integrated from the outset into the design of the proposed development and how inclusion will be maintained and managed. Guidance on what the GLA would expect to be provided is available from www.london.gov.uk/sites/default/files/Access%20statement%20content%20guidance_0.pdf.

Public Realm

44 The DAS acknowledges that the car park layout is to remain largely as existing. All bays are at grade, with dedicated pedestrian routes and signage guiding customers to the store. However it does not identify all the pedestrian routes to the new store. As per the pre-application advice it is recommended an access audit of the area should be carried out to identify any barriers to disabled people and should make recommendations as to how any barriers are to be removed or altered to ensure that the routes are fully accessible to disabled people. This information should be clearly detailed in the DAS

Accessible facilities

45 The access statement notes that within the store, lifts are provided to allow movement between levels. Access throughout the store is level, with routes clearly marked to aid orientation and movement of customers. However it does not clarify what design standards are to be applied and how this will be addressed and as such more detailed information is required.

46 The applicant does not respond the recommendation to provide facilities such as a 'Changing Places' WC which provides accessible WC facilities for people with profound and multiple disabilities will also help to ensure that this new store is accessible to a wide and diverse range of people.

Sustainable development

47 The applicant has broadly followed the energy hierarchy to reduce carbon dioxide (CO₂) emissions. Sufficient information has been provided to understand the proposals as a whole. Further revisions and information however is required before the proposals can be considered acceptable and the CO₂ savings verified.

48 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and controls and high efficiency heating. The applicant should provide further information on how the demand for cooling will be minimised in line with policy 5.9.

49 The development is estimated to achieve a reduction of 166 tonnes per annum (21%) in regulated CO₂ emissions compared to a 2010 Building Regulations compliant development. BRUKL sheets have been submitted to evidence the savings claimed.

50 The applicant has identified that the Greenwich Peninsula district heating network is planned within the vicinity of the development and has provided a summary of recent discussions with the network developer (Eon) to assess the feasibility of connection to the network. Connection to the network should continue to be prioritised and copies of correspondence with the network developer should be provided.

51 The applicant has provided a commitment to ensuring that the development is designed to allow connection to a district heating network now or in the future.

52 The applicant is proposing to install a site heat network. The site heat network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided.

53 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 395kWp (2662 sq.m.) of solar photovoltaic on the roof. An indicative floor plan showing the proposed location of the PV has been provided.

54 A reduction in regulated CO₂ emissions of 159 tonnes per annum (25%) will be achieved through this third element of the energy hierarchy.

55 Based on the energy assessment submitted at stage 1, a reduction of 324 tonnes of CO₂ per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected, equivalent to an overall saving of 40%. The carbon dioxide savings meet the targets set

within Policy 5.2 of the London Plan, however the comments above should be addressed before compliance with London Plan energy policy can be confirmed.

Transport

Car parking

56 The car parking provision of the Millennium Retail Park will remain at 1017 spaces, including 46 disabled and 24 parent and toddler bays. Under the London Plan, the maximum parking provision for a 33,000 sqm store such as Ikea is 825 spaces; however given that the retail park will continue to house a B&Q store and multiplex cinema, TfL accept the parking provision remaining the same. TfL recommends the internal layout of the car park is reviewed alongside the management regime. Safe access to and from the site for pedestrians and cyclists should also be included.

57 The current level of electrical vehicle parking, with just two spaces on site, does not comply with the current standards set out in the London Plan (which state that 10% of spaces should accommodate active provision, and 10% accommodate passive provision). The applicant is advised to increase the existing provision, as the usage of electric vehicles on London's roads has increased hugely since the retail park was built.

58 This increase in electric vehicle charging points (EVCP) could be made in the same area as the provision of spaces for car clubs, many of which use electric vehicles. Car clubs are not mentioned in the TA, therefore TfL request that the applicant consider introducing spaces on site, particularly bearing in mind their aim for this Ikea to be their most sustainable store in the UK. Car club provision could meet the needs of customers who travel to the store by sustainable modes but who then need to get bulky items home.

59 TfL is concerned that car parking in the retail park is unregulated, as the car park management scheme which was once in place is no longer enforced. As a result, the car park is free to be used for non-retail purposes such as commuting, attending events at the O2 or football matches at Charlton; the effects of this could reduce customer parking allowance and cause traffic queuing onto the adjacent carriageway. Therefore TfL request that a new car park management plan is required by condition of any permission granted. The management arrangements should in particular address the issue of parking by drivers who are not customers at the store, B&Q and the cinema.

Cycling

60 TfL welcomes the provision of 30 cycle spaces on top of the 20 existing spaces, as well as a further ten spaces at the cinema. The provision for Ikea and the B&Q does not comply with the London Plan standards, which would require 66 spaces). However it is accepted that the trip generation of both stores is different to most other non-food stores when measured by floor area, given the warehousing element within the trading area. As stated in the travel plan, the applicant must monitor this closely and provide more cycle parking if the demand warrants it. As well as monitoring customer cycling, Ikea should make reasonable efforts to promote cycling to their customers. The store is well located for the network of cycle routes in the peninsula and beyond. Cycle Superhighway 4 is planned to go along Trafalgar Road and Woolwich Road to the north of the site.

61 In terms of staff cycle parking, the provision of secure spaces is welcomed. Secure should mean that they are both safe from potential theft and protected from the elements; this will encourage staff to cycle to work. The provision of shower, changing and locker facilities is welcomed. Again, Ikea should make reasonable efforts to promote cycling including working with

the Borough and TfL to promote local cycle links, administer maps, and offer cycle to work schemes.

Buses

62 TfL accepts that there is likely to be a net decrease in bus trips compared to existing use of a Sainsbury's supermarket. However, given the large proportion of customers who will be travelling to Ikea by Underground or NR services, there is likely to be a significant increase in bus trips between North Greenwich, Westcombe Park and Charlton stations and the site, particularly at weekends. TfL will conduct surveys of bus services at the weekends in order to ascertain current ridership data. Subject to further analysis being undertaken, it is likely that mitigation for both weekday and weekend services is required.

63 This can be secured within the section 106 agreement (S106) as a financial contribution to frequency increases on existing bus services or to help bring forward changes on local routes already partly secured through other planning obligations and for which a need has been identified locally. As an example, TfL calculated to extend the 202 from Blackheath to Bugsby's Way it would cost £440,000 per annum for 5 years i.e. £2.2 million. £300,000 was secured by RBG from Sainsbury's and Marks and Spencer site, 15% of the cost. As the Ikea is larger in floor area and in terms of regional attraction, a larger contribution of £900,000 would be reasonable.

64 As Millennium Bus Way is not adopted highway, there is currently a licence agreement between London Buses and Sainsbury's to operate routes along it. With Sainsbury's vacating the site, there is a renewed need to formalise the running of bus services. Furthermore the proposals for customers loading and unloading close to the exit could without good management impinge upon bus operations. As part of the S106, therefore, the applicant must enter into a legal agreement with London Buses which includes rights of way for buses and passengers through the site at no cost to TfL. London Buses should not have to contribute to repairs of Millennium Bus Way but would maintain the bus stop/shelter areas. The existing license is insufficient to safeguard future bus access to the site and does not place London Buses in an equivalent position to that which would apply if the highway was adopted. London Buses is not seeking a contribution towards bus stop improvements as the existing provision meets current guidance.

Servicing and construction

65 The site is adjacent to sections of the TLRN, SRN and borough road network where there are significant capacity constraints. Peartree Way and Woolwich Road roundabout are particularly busy, therefore TfL requests that where possible efforts are made to ensure highway traffic is directed towards the northern access of the site through on site signage, signage on the wider road network and through information provided to customers.

66 It must be noted that the Bugsby's Way access to the retail park has also been a difficult junction in the past, with two fatalities occurring in recent years, therefore TfL would welcome dialogue with the applicant on ways of improving the junction, both in capacity and safety terms.

67 Similarly, in order to further balance highway capacity in the area, traffic approaching the site from the A102 should be encouraged to use the Bugsby's Way access. TfL would welcome discussions with RB Greenwich and the applicant on how to manage this through a signing strategy. The applicant is also encouraged to liaise with sat nav and internet mapping providers in this regard.

68 TfL welcomes the modelling of local junctions, however it is noted that no wider modelling (eg VISSIM) has been submitted. Given that there is an existing large scale retail use currently operating on site, and the tight programme associated with this application, this is accepted.

However, the applicant must note that TfL will seek significant contributions through the S106 process for necessary highway improvements to mitigate the impact of the development, given the strategically important location of the site on the highway network. TfL wishes to work with RBC as highway authority for Woolwich Road to ensure that it can work safely for all road users including meeting the Borough and TfL aspiration to promote cycling locally, as well as more generally to manage the SRN in co-ordination with the TLRN. Neither the Borough nor TfL has an approved scheme for Woolwich Road/ Peartree Way junction – however, a contribution from IKEA would be in accord with Policy 6.9 (especially c), 6.10, 6.11 (especially b, d, h, i and j) and 6.12 and may help bring forward junction specific measures or measures on the linked corridor.

69 In terms of trip generation and mode share, following pre- and post-application meetings, TfL and the applicant are in agreement. TfL reminds the applicant that the ambitious mode share targets should be monitored through the travel plan.

Pedestrian environment

70 TfL welcomes the submission of the pedestrian environment review system (PERS) audit. It is requested that the applicant fund the 'quick wins' mentioned in the audit, the scope of which can be agreed through more detailed discussions. This would enable people living or working within walking distance of the store to access it more easily.

71 In accordance with London Plan policies, TfL deems the relocation of obstacles from cycle paths, the provision of tactile paving and improved pedestrian crossing facilities to be priorities. In terms of signage, TfL suggests that funding be sought for the extension of the Legible London. TfL recommends that the Borough or the applicant undertakes a post implementation audit to demonstrate improvements have been undertaken successfully. The Borough may wish to secure specific funding.

Travel plan, servicing & construction plan

72 TfL welcomes the submission of a travel plan. It is requested that this is monitored closely through the S106 agreement to ensure, for example, the aspirations for mode share are realised and the issues raised above on car and cycle parking are controlled. TfL is willing to focus on a target related to proportion of drivers. TfL would seek a progressive approach to targets, such that each year targets become more challenging – reporting is recommended at 1, 3 and 5 years. For staff it makes sense to organise an annual survey, for customers, it may be on a more ad hoc basis. Stated preference surveys should be cross checked with observed use of the car park and bus stops.

73 It is expected for a scheme of this size that a construction logistics plan and a delivery and servicing plan be submitted and this should be approved by RBC prior to commencement of development. These should follow TfL best practice guidelines and should be secured by condition.

Conclusion

74 Overall, TfL has no significant objections to the principle of the proposed development. However, the applicant should ensure that the issues raised here are clarified and addressed. It is requested that any resolution to grant permission should be subject to the conditions and section 106 obligations outlined above.

Community Infrastructure Levy

75 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into

effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail.

76 The Mayor has arranged boroughs into three charging bands. The rate for Greenwich Council is £35/sq.m. The required CIL should be confirmed by the applicant and council once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: <http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents> as amended by the 2011 regulations: <http://www.legislation.gov.uk/uksi/2011/987/made>

77 London borough councils are also able to introduce CIL charges which are payable **in addition** to the Mayor's CIL. Greenwich Council has yet to adopt a scheme. See the council's website for more details.

Local planning authority's position

78 The position of Greenwich Council on this application is unknown.

Legal considerations

79 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

80 There are no financial considerations at this stage.

Conclusion

81 London Plan policies on retail, urban design, sustainable energy, flood risk and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Principle of development:** The principle of a retail development on the site is acceptable, however further discussion is required in relation to the 24,300 sq.m. up-lift in retail floorspace.
- **Retail:** The retail impact and sequential test appear to be thorough and the impact show the expected trade draw will not exceed 2% on any town centre this indicates that the proposals will not have a significantly adverse impact on any town centre. GLA officers would like to discuss the findings of the retail tests with Greenwich Council who can provide local knowledge and understanding of sites, development proposals and town health to check the robustness of this conclusion.
- **Regeneration:** The Council should secure local employment and training initiatives.

- **Urban design/access:** The applicant has provided a very short design & access statement, but there is sufficient information to understand the general layout, mass and architectural form the proposed IKEA store building. Although in outline it will be of the previous out centre design and corporate branded architecture of previous IKEA stores in London. In relation to the loss of green space to the rear of the existing Sainsbury's store, the applicant should further mitigate the loss of the existing green space by commitment to enhancing the green spaces in vicinity of the new store.
- **Access:** The applicant should provide further assurance on inclusive design principles to be included in the building design.
- **Sustainable energy:** Based on the energy assessment submitted at stage 1, a reduction of 324 tonnes of CO2 per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected, equivalent to an overall saving of 40%. The carbon dioxide savings meet the targets set within Policy 5.2 of the London Plan, however the comments above should be addressed before compliance with London Plan energy policy can be confirmed.
- **Transport:** Overall, TfL has no significant objections to the principle of the proposed development. However, the applicant should ensure that the issues raised are clarified and addressed. It is requested that any resolution to grant permission should be subject to the conditions and section 106 obligations as requested.

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