



Our ref: 14/0143

-by email only-

██████████
Directorate of Regeneration,
Enterprise & Skills
Woolwich Centre, 5th Floor
35 Wellington Street
London
SE18 6HQ

12 February 2014

Dear ██████████

**Sainsbury's and Former Comet Stores, Bugsby's Way, SE10
Royal Borough of Greenwich**

Thank you for inviting Transport for London (TfL) to comment on the above application. Please see my response below.

Please note that these comments represent my own officer level view from Transport for London and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this project. These comments also do not necessarily represent the views of the Greater London Authority, which should be consulted separately.

Should this application be granted planning permission, the developer and their representatives are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.

Site Description

The site is located within the existing Millennium Retail Park. It is bounded by Peartree Way to the east and Bugsby's Way to the north. To the south it is bounded by Millennium Bus Way (a private internal road within the retail park) and to the west by the existing B&Q store, which will remain fully operative.

The site is located adjacent to a key area of the Transport for London Road Network (TLRN) and the Strategic Road Network (SRN). Skirting the south and west of the site is the A102 Blackwall Tunnel Approach, a part of the TLRN. Just further south, crossing the A102, is the A206 Woolwich Road (on the SRN).

The nearest London Underground station is North Greenwich, on the Jubilee line, 1.5km to the north. The site is more closely served by National Rail stations, namely Westcombe Park (600m to the south) and Charlton (1km to the south east). The stations provide direct services between south east London suburbs and two central London termini (London Bridge and Cannon Street).

Six bus routes serve the site – the 108, 129, 132, 161, 472, 486. All routes stop immediately adjacent to the site on Millennium Bus Way. Several important towns in east and south east London are directly served, namely North Greenwich, Stratford, Lewisham, Bexleyheath, Thamesmead and Welling.

Given the range of public transport services in the area, particularly the extensive bus service, the site registers a Public Transport Accessibility Level (PTAL) score of 5 (out of a range of 1-6, where 6 is the most accessible).

Car Parking

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.

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.

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.

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.

Cycle Parking

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.

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, offer cycle to work schemes etc.

Underground and National Rail

TfL does not foresee this development having an unduly large impact on rail services and will not be seeking mitigation measures.

Buses

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.

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 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.

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.

Highway

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.

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.

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.

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 RBG 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.

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

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. 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

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.

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 RBG prior to commencement of development. These should follow TfL best practice guidelines and should be secured by condition.

Community Infrastructure Levy (CIL)

In accordance with London Plan Policy 8.3, *Community Infrastructure Levy*, the Mayor agreed to commence CIL charging for developments permitted on or after 1 April 2012. It is noted that the proposed development is within Greenwich, where the Mayoral charge is £35 per square metre Gross Internal Area (GIA). The applicant is required to contribute to CIL for the increase in floorspace of the new development compared to the existing uses.

The levy will raise £300 million towards the delivery of Crossrail. Further details can be found at:

<http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>

Summary

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.

If you have any questions with regard to these comments, please do not hesitate to contact me.

Yours sincerely,

Paul McGartoll
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Email: [REDACTED]