Please reply to [environment@westcombesociety.org](mailto:environment@westcombesociety.org)



11 February 2014

Mr Jacob Jaarsma  
Planning Department  
Royal Borough of Greenwich

Ref: 13/3285/O | Outline planning permission (all matters reserved except access and layout) for the redevelopment of the site to provide one non-food retail unit (Class A1) of up to 33,000 sqm. gross floor area, service yard and associated infrastructure. | Sainsbury's and Former Comet Stores, 55 & 57 Bugsby's Way, Greenwich, SE10

Dear Mr Jaarsma,

The Westcombe Society objects to the current proposals. Transport issues are of particular concern, and in addition we also have comments on the loss of the Sainsbury’s store building and the potential architectural design of any replacement.

The **Transport Assessment** is an often confusing document. We have serious reservations about some of the arguments used to generate the likely trip data, and we find that some of the parking data may be a serious underestimate.

**Parking:**  We note that whereas the car park on this site holds in all 1100 spaces, shared with the B&Q and a busy cinema, IKEA’s other London-area stores have sole use of parking areas of at least 1300 spaces, with Lakeside and Croydon both over 1500 spaces. While IKEA are arguing that a higher proportion of trips will be by public transport at this store, we believe that its placement on the A102 (M) corridor, with poor public transport links to this site for most of that catchment area, will encourage shoppers from a large area to drive to the store. In addition, IKEA’s stock profile is more likely to persuade shoppers to drive to the store. We therefore argue that the number of car parking spaces on this site is inadequate for the size of store proposed.

Furthermore, our own partial check on the parking data strongly indicates that the true situation is even worse. We undertook a manual count on Monday 10th February between 8.00 and 9.00, to compare with the corresponding data for Tuesday 18 June given in appendix O of the outline planning application. The data for total parked, for all zones combined, are as follows:

IKEA Westcombe Soc.

18/6/13 10/2/14

8.00 185 224

8.30 252 388

9.00 294 479

During our survey, the overwhelming majority of people leaving their cars were heading for the two bus stops towards N. Greenwich, and the parking itself was heavily concentrated around these stops. It thus seems very likely that the majority of cars parking in the early morning are there for the whole day, a factor entirely overlooked in the Transport Assessment, and one which leads to a substantial further increase in the likelihood of the car park becoming full.

The K&M Traffic survey of the car park was done during the summer at a time when the Comet building was empty. If the proposed IKEA development goes ahead the retail space would increase 3 fold as compared to the time of the surveys and it is therefore quite possible that, even though the London Plan recommends slightly fewer spaces for non-food retail outlets, the demand for parking will also increase by at least 2.4 times compared to the demand when the survey was done. (London Plan figures are 1 space per 40-60 sqm as opposed to 1 space per 25-38 sqm for a food superstore therefore we estimate that there would have been about 110 fewer cars in the car park had Sainsbury’s been a non-food outlet).

Thus in busy times, there may well be queuing both to enter and leave the car park. In particular, any queues to enter could lead to serious build-up of traffic at the surrounding road junctions, putting stress on local traffic patterns and impacting the flow of car journeys to other local stores, including those in Charlton such as the Asda, the new Sainsbury’s and Marks and Spencer, and the new development around the old Matalan site which has recently been approved. All this would also have an impact on air quality, as exhaust-based pollutants are highest when traffic is not moving.

**Estimation of trip data**: As an example of the use of dubious arguments, we take the derivation of table 6.10 on the “Proposed Greenwich Mode Split” for customers arriving at the store. This data is then used in deriving the number of car trips to the store. Whilst it is reasonable to argue (para 6.48) that car occupancy will tend to be higher for IKEA trips than for general non-food retail, the overall impact must surely be to increase the number of car passengers, whilst leaving the number of car drivers unchanged. However, the implication of % calculations in table 6.10 is that increase in passengers is exactly matched by a decrease in the number of drivers!

Because of the defects in the current version, we believe that the Transport Assessment requires significant revision, and further urge that this process should include open public discussions, both to address serious concerns about the implications for local traffic, public transport and pedestrian access, and to take advantage of local knowledge. Outline planning permission should be not be considered until there is satisfactory completion of this process.

**Store design and proposed demolition of the existing buildings**: The proposed new store would be replacing an award-winning curvilinear building with a high degree of environmental sensitivity, which is much less conspicuous in the setting than the new design. We note that the proposal to demolish the Sainsbury’s store building has been opposed, with a well-supported petition. We support this and object to the demolition of the Sainsbury building. Surely a suitable use can be found for the existing building that would not attract the level of traffic demand that seems likely with the IKEA proposal. We do not object to the demolition of the Comet building if a suitable replacement is proposed.

Turning to the appearance of the proposed new store, we believe that its height, bulk and massing are out of scale with the buildings currently on the site, some of which would remain after the proposed demolition. Should this proposal be approved we regard it as essential that it blends more closely with the remaining B&Q store to which it will be immediately adjacent. In our view, the bulk of a standard IKEA bright and prominent rectangular building next to the more subdued and curved features of the existing B&Q could look hideous and would certainly do nothing to enhance IKEA’s reputation for good design. We would also ask that careful attention be paid to its illumination and signage to ensure that its impact on the surrounding area is minimised.

In addition, the proposed design removes the dedicated nature park on the north-east corner of the site, which was, we understand, a condition of planning for the current Sainsbury’s building. Here, the trees are reaching the point of becoming useful natural habitat. This loss of green space, in an area which is shortly to become much more built up, is regrettable, and we would ask that plans be changed to preserve the area.

We note that while the IKEA proposal discusses the relation of the design to its immediate surroundings, and to the historic Greenwich centre, it takes no account of the relationship to or impact on the Westcombe Park Conservation Area, and we would ask planners to consider this factor in their considerations.

Yours faithfully,

Anne Robbins

On behalf of the Westcombe Society Environment Committee