

4 Humber Road, Blackheath, London SE3 7LT

7 May 2014

Mike Hale
Senior Planning Manager - South
Senior National Planning Casework Unit
5 St Philips Place
Colmore Row
Birmingham
B3 2PW
Tel: 0303 444 8050

Email: mike.hale2@communities.gsi.gov.uk

Request to Call in the Decision of Greenwich Council to grant Outline Planning Consent to IKEA for a site on Bugsby's Way, Greenwich SE10 (Local Planning Authority Reference 13/3285)

We write further to and in support of Daniel Brown's email of 28 April 2014 to Eric Pickles, to refer for calling in by the Secretary of State for Communities the decision of Greenwich Council on 3 March 2014 that it is "minded" to grant outline planning consent to IKEA for a new store in Greenwich.

IKEA is a warehouse-style, flat-pack furniture retail giant of a unique scale¹ and business model. This would be the first IKEA store in a congested urban area in the UK and this would be an experiment in planning with potentially very serious implications in an area of historical and international importance, with impact on one of London's strategic river crossings (the Blackwall Tunnel), in a key area of the strategic road network.

This decision requires a public inquiry, as it was rushed through in 9 weeks without proper scrutiny or consultation. Before conducting such a planning experiment, it would be prudent to speak to and learn from planners in Australia and Hong Kong, who have insisted that IKEA adapt and scale down its business model in inner urban areas (see section 5 below). A public inquiry would ensure that this planning proposal can be fully evaluated to ensure that it is appropriate for London as an "*exemplary, sustainable world city*".

IKEA has been battling planners all over the country, most recently in Sheffield, because of planners' concerns over traffic. If IKEA wishes to expand the number of its stores in the UK, it needs to be willing to adapt its business model. As we explain below, the proposed development has potential impact on up to 9 other London boroughs and other regeneration areas. It is of national significance as it would

¹ GLA Report on IKEA Bromley, (para.111, planning report PDU/0453a/01; planning application number C/04/00221/LBC)

impinge on the strategic road network and the UNESCO World Heritage Site in Greenwich and further puts the government in breach of EU law on emission levels.

1. Legal and Planning Grounds for Calling In

1.1. Under the Town and Country (Consultation) (England) Direction 2009, Greenwich Council should have notified you of their decision to grant outline planning consent to IKEA in Greenwich as it is:

1. 5,000 square metres or more (the proposed store will have a gross floor area of up to 33,000m²);
2. On land which is edge of town-centre;
3. Would have an adverse effect on the World Heritage Site of Greenwich Park/town centre;²
4. Is in a flood-risk area.³

1.2. Under Section 77 of the Town and Country Planning Act 1990, the Secretary of State has the power to call in the decision of Greenwich Council and this is clearly justified in this case, based upon the “Caborn principles” (please see below).

1.3. Alternatively, we ask that the Secretary of State issues a holding direction, to delay the grant of planning permission, under Section 25 of the Town and Country Planning (Development Management Procedure) (England) Order 2010 (SI 2184).

2. “Caborn Principles”

2.1. The planning decision relating to IKEA should be called in because it is of more than local importance and is likely to have significant effects beyond the immediate locality of Greenwich for the following reasons:

2.1.1. The proposed development could have a significant long-term impact on economic growth in strategic regeneration areas in London due to the increased congestion it is likely to generate. This includes the new London Legacy Development Corporation (“LLDC”) regeneration area (formerly known as the Olympic Park regeneration area)⁴. The London Plan describes this as London’s “*single most important regeneration project for the next 25 years*”, being “*at the fulcrum of two nationally important growth corridors: the London-Stansted-Cambridge-Peterborough corridor to the north and the Thames*

² The site is within one mile of the UNESCO World Heritage Site; main access roads to the proposed IKEA site pass directly through the World Heritage Site. Please see map, Appendix 1.

³ The proposed IKEA site is located on the Greenwich Peninsula in an area designated as Flood Zone 3a.

⁴ The 2012 Olympic site is 4.8 miles away from the proposed IKEA site and accessed via the Blackwall Tunnel, A102 and A12.

Gateway to the east". An IKEA store in the proposed Greenwich site is likely to have significant impact on the strategic road network and, in particular, on the Blackwall Tunnel, a major crossing under the River Thames which is already over capacity.⁵ The proposed IKEA store is likely to significantly increase traffic through the tunnel, leading to congestion north and south of the River Thames, along the A2 into Kent and along the A12 and A13 through East London and the LLDC regeneration area. The congestion is likely to impact upon at least 9 London boroughs⁶ in total, both north and south of the river. Bearing in mind the proximity of the site to London Docklands, London City Airport, and the 2012 Olympic site at Stratford, this planning decision is of more than local importance.

2.1.2. The development would have significant impact on the World Heritage Site of Greenwich which is only a mile away from the site. PPG15 *"Planning and Historic Environment"* states that the inclusion of a site on the World Heritage List highlights its *"outstanding international importance"*. We attach a map at Appendix 1 showing the location of the proposed IKEA store relative to the World Heritage Site and "buffer zone" around it. We have marked in blue the proposed location of the IKEA store and the major access roads to the site, including the A2 over Blackheath common, one of the major routes into central London. We are writing to the Secretary of State for Culture, Media and Sport and English Heritage to draw this to their attention.

2.1.3. The development would put the Government in breach of European law, in particular EU Directive 2001/81/EC, as it will increase air pollution in an AQMA (Air Quality Management Area) where emission levels are already close to 3 times European limits.⁷ We have written to the House of Commons Environmental Audit Committee who are investigating this.

⁵ The Blackwall Tunnel is a notorious traffic blackspot with many online sites featuring a Blackwall Tunnel Watch. North of the River Thames, traffic regularly queues from Stratford or beyond. South of the river, traffic regularly queues as far back as Bexley, with consequent queuing throughout Bexley, Eltham, Lewisham, Woolwich, as well as Greenwich. As a result of the congestion which already exists, the London Plan includes a suggested additional tunnel from Silvertown; this proposal has significant opposition and is currently unfunded, with estimated funding requirements in the region of £100million - £1billion.

⁶ This strategic crossing acts as a conduit for traffic from a variety of areas, but the following are the immediate London boroughs that are already regularly affected by traffic attempting to pass through the Blackwall tunnel: Greenwich, Lewisham, Bexley, Tower Hamlets, Newham, Hackney, Waltham Forest, Redbridge, Barking & Dagenham

⁷ <http://www.silvertowntunnel.co.uk/our-study/2014-silvertown-tunnel-pollution-study-results/>. Study conducted in February 2014 found nitrogen dioxide levels of 104 microgrammes per cubic metre, well over two and half times the EU limit of 40 ug/ms (Bramshott Avenue, Charlton) and levels twice EU limits in Greenwich Millenium Village, a major residential regeneration area, through which traffic to IKEA will be routed.

- 2.1.4. There are also significant architectural and urban design issues. The proposed development involves the demolition of an award-winning environmentally sustainable Sainsbury's building with a curved roof design, which echoes the design and size of other buildings in the area. Due to its architectural and design significance, the 20th Century Society has applied to English Heritage for the building to be Grade II listed. The site backs onto Greenwich Millennium Village, a major residential regeneration area, where the existing residential units follow a compatible and complementary design. The site is also within 500 metres of the Westcombe Park Conservation Area and a mile of the UNESCO World Heritage Site.
- 2.2. The Mayor of London's vision, expressed in the London Plan and supporting strategic policy documents, echoes central government guidance contained in PPG1 and is to "make London an exemplary, sustainable world city". London's national and international importance is clear – it is the capital city of England and Wales. Greenwich is part of the Thames Gateway, a Central Government priority area for regeneration⁸ and home to an internationally important World Heritage Site. Across the river is Docklands, a major international financial centre and London City Airport, an international airport.
- 2.3. The proposed development is therefore not only of national, but also international significance and clearly requires a public inquiry.

3. Precedent Decisions for Calling In

- 3.1. Applications for IKEA stores have been rejected in Bromley, Sheffield and Stockport, all on the grounds of the traffic they generate. A directly comparable calling-in decision is that of John Prescott in 2004, when he called in the decision of Stockport county council and refused planning consent to IKEA.
- 3.2. The Stockport decision was referred to in the report of the GLA on the Bromley proposal (planning report PDU/0453a/01; planning application number DC/04/00221/LBC) at paragraphs 96-97. Paragraph 97 observes that *"the Stockport site is within one mile of the town centre and eight bus routes pass near to the site.....therefore the SoS comments can be applied to this proposal."* The Greenwich site is also out of town centre/edge of town and within one mile of Greenwich town centre. It is served by 6 bus routes and the nearest London Underground station is 1 mile away. It is therefore directly comparable with Stockport and Bromley.
- 3.3. We understand and agree with local and national policy to discourage large out of town retail centres and to encourage retail back into town centres. The intention of this policy is to regenerate town centres that have suffered due to the construction of out of town shopping districts. The presence of IKEA in this edge of town centre site, within a mile of Greenwich town centre, can only damage local trade. In the GLA report on the Bromley scheme IKEA was described as a *"potential category killer"*, *"verging towards a monopoly in the*

⁸ <http://www.lbbd.gov.uk/Regeneration/LondonRiverside/Pages/ThamesGateway.aspx>

way it will dominate its market area". In addition to flat pack furniture, IKEA sells smaller items (such as frames, candles and rugs) which are likely to damage the business of local retailers and the independent stall-holders in the world-famous Greenwich market.

- 3.4. The main problem with IKEA is the enormous scale and car-dependency of its business model which makes it completely inappropriate for congested inner-city areas. The GLA's report on the Bromley scheme contains many references to the car-dependent nature of the IKEA business model:

Paragraph 27: "...a retail business model of IKEA type whose function and appeal is based solely on private car ownership...raises significant tensions with other planning policies."

Paragraph 36: "It is overwhelmingly car based. In terms of its essential scale, operational and locational requirements it raises serious tensions with ambitions to secure the development of London as an exemplary, sustainable world city."

Paragraph 63: "The car-orientated nature of IKEA stores is largely because their typical trading format reflectsinternal customer management....Many IKEA products are traditional "flat-pack" goods that are easily transportable by the average family car...."

- 3.5. The GLA's conclusion on the Bromley scheme (para. 111) was that: *"In strategic terms, the proposal for a car-dependant IKEA store in this location is in conflict with emerging and established national and regional policy by virtue of its location relative to the town centre and public transport, its high level of car dependence and its unique scale".*

- 3.6. We recognise that the Greenwich site is better connected by public transport than the Bromley site. However, IKEA proposes exactly the same business model as for Bromley and, indeed, as for all the other IKEA stores in and around London and the rest of the UK. As recognised by the GLA report (in particular para. 82), experience of other IKEA stores has proven that they attract a large number of car journeys:

Paragraph 82: "Experience of other IKEA stores in London suggest that it will attract a large number of car based trips throughout the week that could have a significant impact on the adjacent road network as well as raise sustainability issues."

- 3.7. The availability or proximity of public transport will not *of itself* make any difference to this underlying business model which actively encourages car use and discourages travel by public transport.
- 3.8. It is not appropriate to invite an out of town warehouse giant of the unique scale and business model of IKEA into a congested inner city area unless IKEA scales back its model and adapts to the constraints of the location. This

would be the first IKEA store in a densely developed, major urban area in the UK, so this would be an experiment in planning. This experiment has potentially very serious implications in an area of historical and international importance, with impact on one of London's strategic river crossings, in a key area of the strategic road network.

4. IKEA's Car Dependant Business Model

- 4.1. The trading model adopted by IKEA is necessarily car-centric because of the size, bulk and weight of furniture. As the GLA Bromley report recognises, flat-pack furniture is easily transportable by private car. However, it would be very difficult to carry on public transport due to its bulk and weight.⁹ Transport for London's "Conditions of Carriage" (dated 19.1.14) prevent the carrying of items that passengers are unable to carry themselves or that can cause damage to other customers on the bus. London buses have restricted luggage space wholly unsuited to the transport of furniture.
- 4.2. The IKEA business model encourages car journeys as it enables IKEA to keep costs down. Delivery charges are disproportionately high, discouraging orders for delivery, for example a £35 Billy bookcase incurs a £35 delivery charge.¹⁰ As noted in the GLA report on the rejected Bromley store, IKEA offered free delivery from that store. IKEA has vigorously rejected this suggestion in Greenwich, informing the planning board that its delivery charges have to be consistent across all stores and that this is fundamental to their business model. IKEA has since suggested to the press that the £750,000 contribution offered towards a Section 106 agreement might include an element of subsidised delivery charges for users of public transport. However, this is a very limited fund and there is no commitment or legally enforceable obligation to continue this for the lifetime of the store. In any event, in the GLA report on Bromley, the GLA concluded that free delivery would not, in practice, encourage greater use of public transport.
- 4.3. IKEA's trading model is unique. Unlike other furniture retailers, where furniture has to be ordered in advance for delivery at a later date (and delivery is usually free), IKEA invites customers to check stock online before driving to the store to collect it. It is the immediate availability of furniture that makes IKEA so popular.
- 4.4. IKEA admits this in the Design and Access statement which formed part of its application for outline planning consent in Greenwich:

⁹ For example, a standard Billy bookcase weighs 37.5kg. A Pax wardrobe has various modular parts, some weighing around 86kg. The PAX gloss white weighs 132.5 kg! Many are significantly heavier and carry health warnings, requiring trolleys and the help of several people to carry.

¹⁰ Online delivery charge to Kent (CT14 8EU) which would fall within the catchment of this IKEA, as it is 1 hour 15 minutes drive away (standard IKEA catchment area is a 2 hour drive).

"2.5. Customers form an intrinsic part of this ... business model by employing their own resources in transporting their purchases home, which flat pack enables, and assembling the furniture themselves. "

- 4.5. The use of customer driven vehicular transport is integral to IKEA's business model. For example, a question to IKEA's virtual shop assistant "Anna" asking why delivery charges are so high elicits the following answer:

"At IKEA we prefer to offer our products at the lowest possible price so if you are able to fit the products in your vehicle you are not paying for hidden delivery costs you may not be using." [emphasis added]

5. Sequential Approach

- 5.1. PPG 6 and related statements indicate that, in assessing potential sites, operators should consider disaggregating the proposal onto a number of smaller sites and authorities should seek flexibility from developers to adjust their formats. Greenwich Council appears to have failed to press for any flexibility from IKEA.

- 5.2. As recognised in para. 64 of the GLA Bromley report, IKEA has offered a more flexible approach in Australia and Hong Kong. In Hong Kong, 2 out of 3 stores offer the furniture showroom and a "market place" from which smaller items, easily transportable by public transport, can be purchased. Heavier items, such as flat-pack furniture, are available for delivery only.

- 5.3. If IKEA offered this Hong Kong/Australian model in Greenwich, it would encourage visits by public transport. As recorded on the GLA Bromley report (para.64) IKEA "*vigorously resisted*" a planning decision which required it to adopt a more flexible model. The GLA commented:

"If a consistent planning approach is taken to this model based on the central concerns of PPG6, PPS6 and the London Plan the applicant may wish to develop a more sustainable format better suited to a densely developed, major urban area where public transport must be encouraged if it is to function effectively.

The car-orientated nature of bulky goods stores...is largely because their typical trading format requires a large floorspace, and a lack of flexibility on the part of the operators to adapt to the more sustainable patterns of activity advocated in PPG6."

- 5.4. In Greenwich, IKEA has again shown no willingness to adapt its business model, requesting permission for a development of a furniture warehouse almost 4 times the size of the existing units on the site.
- 5.5. A more sustainable development would involve the use of the existing buildings on site or at least a smaller building, which retains the existing community park behind the building (and was demanded as "mitigation land"

when Sainsbury's was originally granted planning consent). IKEA could achieve this more sustainable format, better suited to a densely developed, major urban area, if it were willing to consider the flexible format adopted in Australia and Hong Kong.

- 5.6. IKEA is battling planners all over the country, most recently in Sheffield because of planners' concerns over traffic. If IKEA wishes to expand the number of its stores, it needs to be willing to adapt its business model. Traffic congestion is unwelcome everywhere. However, it is particularly detrimental in such a densely developed area as Greenwich, with potential impact on up to 9 other boroughs and strategic regeneration areas. This is of national significance as it would impinge on the strategic road network and the World Heritage Site in Greenwich and further puts the government in breach of EU law on emission levels.

6. Flaws and Inconsistencies in IKEA's Traffic and Environment Reports

- 6.1. There are several obvious errors in the methodology and statistics used in IKEA's traffic reports. For example:

- 6.1.1. IKEA's traffic and air quality reports are modelled upon an assumption that between 35%-42% of customers will travel by public transport, with no allowance for variables from this figure. As outlined above, it is unrealistic to assume that the proximity of public transport will lead to a decrease in car use, when the business model of IKEA is inherently car-dependent and delivery charges are prohibitive.¹¹ The closest London Underground station is over 1 mile away and IKEA admits most people would need to catch a bus to connect to the station. It is wholly unrealistic to expect customers to transport furniture by public transport, let alone bus. Indeed, buses are unlikely to let them on. See also paragraph 4.1 above on the bulk and weight of IKEA furniture.

- 6.1.2. IKEA has significantly under-stated the catchment area for the Greenwich store, stating that it would not extend into Kent (where no IKEA store exists), although the store is within an hour's drive of most of Kent (and IKEA generally use a 2 hour driving time to measure their catchment area). The catchment area for the Greenwich store is, in fact, likely to overlap significantly with the rejected Bromley site. In addition, it is likely to draw significantly more additional visits from inner London boroughs because of the proximity to the Blackwall Tunnel.

¹¹ Non-car owners borrow or rent a car to collect IKEA furniture because it is cheaper than IKEA delivery charges. For example, "Zip vans" can be hired locally for £10 per hour, considerably cheaper than the £35 delivery charge for a Billy bookcase. Car sharing facilities are now required at all new large scale residential developments and it is patently obvious that non-car owners would use these types of transport rather than arrange and wait for delivery.

- 6.1.3. IKEA has understated the parking provision in its other London stores. The average number parking spaces in other London stores is 1,500¹². In its traffic report to Greenwich council, IKEA stated that its stores have an average number of 1,000 parking spaces. The Greenwich site suffers from significant under provision of parking spaces, offering only 609 spaces¹³, between a third and half the number offered by other London IKEA stores. This is significant as it is likely to lead to queuing in neighbouring roads and tailbacks onto strategic roads, including the Blackwall Tunnel Approach (part of TLRN) and the A206 Woolwich Road (on the SRN), (see further section 8 below). Greenwich Council's planning officer recognised this and, in his report, said that, after an *"initial settling in period"* this might put people off driving to the store. This is not responsible planning; this is planned chaos!
- 6.2. The catchment area for the Bromley site was described in the GLA report as extending *"well into Kent as well as into the more heavily populated south London"*. The Bromley store expected 44% of its trade to be diverted from existing stores at Croydon, Thurrock and Brent Cross. Further it was noted that the store was expected to draw customers from the Medway towns of Chatham, Rochester, Gillingham and Gravesend, described as *"large conurbations within 30 minutes' drive"*.
- 6.3. Please see the attached map at Appendix 2 which shows the location of the proposed Greenwich site relative to the Bromley site. The sites are only 9 miles apart and Google Maps estimate driving time between the two sites at 20 minutes. We have compared the relative driving times between the Greenwich site, Bromley site and the Medway towns. Driving times are broadly comparable, with a 7 minute differential¹⁴, yet IKEA informed the planning board meeting that customers in Kent would not use the store and would choose Thurrock or Croydon over Greenwich. It is therefore to be assumed that Kent has not been considered in the catchment area for their traffic reports. Note, however, that online commentary received in response to news coverage of the proposed store has already confirmed that visitors from Kent would prefer the Greenwich site as it saves paying Dartford crossing toll charges.¹⁵

¹² Thurrock 1,200; Edmonton 1,300; Wembley 1,577; Croydon 1,900 (source: <http://www.ikeafans.com/directory>)

¹³ 2/3rds of total number of spaces on the car park which is shared space with a 18 screen multiplex cinema, B&Q and 3 restaurants.

¹⁴ Based upon Google Maps estimated driving times, which ignore the fact that the M25 south-easterly section between the A2 and A20 is frequently congested, with the result that it no doubt underestimates travel times to the Bromley site.

¹⁵

[http://www.newshopper.co.uk/news/11177332.POLL Greenwich Ikea a retail boost or a traffic disaster /](http://www.newshopper.co.uk/news/11177332.POLL_Greenwich_Ikea_a_retail_boost_or_a_traffic_disaster/)

- 6.4. Two experts are currently evaluating the methodology used by IKEA's traffic consultants on our behalf and have identified numerous flaws in the methodology adopted in the reports which vary significantly from best practice for consumer research. There is insufficient time to include the details of their analysis in this submission. We will forward a separate report if this would be helpful.
- 6.5. Based upon these flawed assumptions and methodology, which is out of line with best practice, IKEA's traffic reports have drawn the conclusion that their store will actually *reduce* traffic compared with the existing Sainsbury's and Matalan store which are a quarter of the size of the proposed IKEA store.
- 6.6. This is an absurd and manifestly wrong proposition, but IKEA have tried to make this argument before – in relation to their Stockport application. The Secretary of State's response to this in 2004 was:
- "he (the SoS) is not wholly persuaded that there would be a net reduction in travel, given the likely attraction of the store over a wide area."*
- 6.7. IKEA is a commercial organisation and can only be expected to present its case for planning consent in the best possible light. No doubt it learnt from the rejections in Bromley and Stockport and hung its case on the public transport provision in Greenwich. However, it is the job of the local planning authority, Transport for London ("TfL") and the Greater London Authority ("GLA") to exercise an independent assessment of the proposal in line with local plans, planning laws, local knowledge and plain common sense.
- 6.8. We have attempted to clarify how IKEA's reports were evaluated and tested. Attached at Appendix 4 is a series of emails recording conversations between Daniel Brown and various employees of the GLA, TfL and Greenwich Council. The picture that has emerged is that it was left to TfL and the local transport officer to test IKEA's traffic reports. Mr Brown has spoken to both of them and they have so far not offered any explanation and appear to have missed obvious errors in the reports. As a result, the manifestly absurd proposition in IKEA's report that their store will *reduce* traffic has been accepted by everyone in the decision-making chain. This, in turn, has led to the waiver of other processes which would normally be used to scrutinize and test a proposed development of this scale.
- 6.9. For example, because IKEA claim that they will *reduce* traffic, their air quality report claims they will *improve* air quality. Having accepted IKEA's own propositions, there has then been a series of rubber-stamping by various officers involved. Given the very short time in which the planning application was processed to outline consent (9 weeks), this is not surprising. A development of this magnitude, with such far-reaching consequences, needs time to be considered thoroughly.

7. Lack of independent scrutiny by Greenwich Council/GLA

- 7.1. As noted above, there are obvious errors in IKEA's traffic reports, resulting in the absurd conclusion that an IKEA store would *reduce* traffic in the area. This is a conclusion no reasonable planning authority would accept and it appears that Greenwich Council failed to take into account all the relevant factors that ought to have been taken into account.¹⁶
- 7.2. Had Greenwich council applied its mind to understanding IKEA's business model, it would have realised that it is entirely unsuited to the already heavily congested and populated Royal Borough of Greenwich.¹⁷ The proposed store is less than a mile from the Greenwich Park UNESCO World Heritage Site and will generate hundreds of thousands more car journeys directly through the site. On the map at Appendix 1 (which shows the area of the World Heritage Site and the proposed location for the store), we have highlighted the already congested roads which would carry much of the traffic to IKEA. Traffic is at crawling speed and regularly at a standstill both along Trafalgar Road, directly through the World Heritage Site, and along the A2, a major route into central London.
- 7.3. The World Heritage Site Management Plan for the park, written only last year in 2013, recognises that "*traffic is the single greatest problem affecting*" Greenwich town, yet Greenwich Council approved an IKEA store which is expected to generate around 2.5 million visitors a year. The IKEA Croydon store is a prime example of the likely impact on traffic – the A23 and all surrounding roads are regularly grid-locked with IKEA visitors, despite the fact that there is a tram stop next to the store (which should, in theory, encourage the use of public transport).
- 7.4. The local roads, infrastructure and public transport to the Greenwich site already suffer from significant traffic pressures, including visitors to the O2 (the location of North Greenwich Station, the only London Underground station in the area) and to Charlton Athletic Football stadium, only a mile away. The wide-spread and frequent logjam on local roads regularly impedes access to people dependent on public transport. There is concern that additional pressure on the roads and public transport will reduce accessibility in the area. This affects people trying to reach their place of work and study, as well as emergency services.

¹⁶ In our view, Greenwich Council's acceptance of IKEA's proposition is "So outrageous in its defiance of logic or accepted moral standards that no sensible person who had applied his mind to the question to be decided could have arrived at it" *Council of Civil Service Unions v Minister for the Civil Service* [1983] UKHL 6 at para. 410

¹⁷ It was admitted by various members of the Planning Board that they had never personally visited an IKEA store and were therefore blind to IKEA's business model and traffic issues these stores uniquely generate.

- 7.5. Emergency services (police, fire engines and ambulances) are regularly stuck in traffic, as local roads are narrow, confined by Victorian shop-fronts and housing. This has significant public health and safety implications and we are writing to local emergency services to make them aware of our referral.
- 7.6. Only the minimum of research and due diligence would have been required for Greenwich council to realise the problems with the IKEA business model on this site. For example, planning officers could have referred to the GLA report on the Bromley site and spoken to Bromley Borough Council.
- 7.7. When Bromley Borough Council received an indication of interest from IKEA, it engaged Helper Dixon as independent retail consultants to critique the planning/retail statement lodged by IKEA. Greenwich council did not commission any external report, choosing to rely on IKEA's own self-serving reports. Greenwich Council ignored all its local knowledge about the existing strain on the road network to push through IKEA's application to the Planning Board in 9 weeks.
- 7.8. Greenwich council went further than this, because it also chose to waive the need for an Environmental Impact Assessment ("EIA"), in breach of the Town and Country Planning (Environmental Impact Assessment) Regulations 2001 (2011, No.1824). This point was drawn to Greenwich Council's attention before and at the meeting of the Planning Board on 3 March 2014. I attach for your reference at Appendix 3 "Opposition to Planning Application 13/3285/O References and Supporting Documentation" and the outline speech of Daniel Brown, which he presented at the Board. An EIA should have been demanded because:
 - 7.8.1. The area of the development exceeds 0.5 hectares (it is in fact almost 7 times the size).
 - 7.8.2. The development "may have significant adverse effects on the environment".
 - 7.8.3. The development is in an area in which environmental quality standards laid down in EU legislation have already been exceeded.
- 7.9. Moreover, in addition to taking IKEA's own reports at face value and apparently accepting that an IKEA store would attract fewer visits than 2 stores less than a quarter the size, Greenwich Council failed to take into account the cumulative impact of the proposed IKEA store with other developments in the area.
- 7.10. The existing Sainsbury's store which IKEA intend to demolish and replace, is in fact moving less than 1km down the road, to a store almost 3 times the size, where there will also be a new Marks & Spencer. Both will be accessed by the A206 Woolwich Road (on the SRN).The combined effect will paralyse the local and strategic road network.

8. Lack of proper scrutiny by the local transport department and TfL

- 8.1. The proposed IKEA site is adjacent to a “key area”¹⁸ of the Transport for London Road Network (TLRN) and the Strategic Road Network (SRN). It is adjacent to the A102 Blackwall Tunnel Approach (part of TLRN) and the A206 Woolwich Road (on the SRN). Both these roads are primary approach/access roads to the site.
- 8.2. Despite this strategically important position of the site, the local transport officer and TfL have not provided any explanation for how they tested the traffic assumptions made in IKEA’s traffic reports. In the absence of any explanation from them, it appears that they accepted at face value IKEA’s claims that its store will produce fewer car journeys than the existing stores on the site (which are a quarter of the size).
- 8.3. On 23 April 2014 Daniel Brown spoke to Mark Page at Greenwich council (who was responsible for highways guidance on the IKEA application). Mark Page advised that he and his colleagues would “use all available sources” to scrutinise IKEA’s reports, but he was unable to say what these were.
- 8.4. Also on 23 April, Daniel Brown spoke to Paul McGartoll at Transport for London, who requested that the request for information be put in writing. The email to Mr McGartoll is attached as Appendix 4. No response having been received, Daniel Brown chased for a reply on 6 May 2014.
- 8.5. As Transport for London and the local transport officers will be well aware, there are already significant problems with traffic congestion in the area. This congestion already leads to the following problems:
 - 8.5.1. Any problems in the Blackwall Tunnel lead to tailbacks on the A2 and traffic diverting onto local roads, London-bound along Trafalgar Road (through the World Heritage Site) or the A2 (on the Blackheath common “buffer zone” and part of Lewisham borough) and Kent-bound through Eltham, Bexley and Sidcup. In total this has impact on at least 3 boroughs south of the river. Tailbacks north of the river regularly go back along the A12 as far as Stratford and the Olympic Stadium, and along the A13 to the intersection with the A406 North Circular affecting potentially 6 London boroughs north of the river.
 - 8.5.2. The O2 is the busiest live music venue in the world. Events at the O2 regularly lead to gridlock on the Peninsula, around the roundabout proposed as the main junction over which IKEA traffic should be directed. A primary school immediately abuts this roundabout. This gridlock leads to tailbacks onto the A102 Blackwall Tunnel Approach Road, sometimes all the way through the tunnel, as far back as the London 2012 Olympic site at Stratford, affecting access to 6 London boroughs.

¹⁸ Paragraph 5.4 of the report to the Greenwich Council Planning Board dated 3 March 2014.

- 8.5.3. Congestion on local roads frequently leads to tailbacks on the A2, particularly at the Woolwich flyover. It is also a cyclist blackspot and on the list of roads requiring improvement by TfL following the death of a cyclist. This already has significant safety implications. Greenwich Council accepts that the roundabout underneath the Woolwich flyover cannot take additional traffic and hence has recommended that traffic is routed via the next junction, the last junction before the Blackwall Tunnel which also serves the O2. It hopes to achieve this through signage, ignoring that Satnav applications ignore signs and simply direct vehicles along the shortest route.
- 8.6. Greenwich Council's solution to the risk of increased traffic congestion was to demand a Traffic Management Plan. This is, of course, like trying to "close the door after the horse has bolted". If a full-size IKEA were to be built, no "plan" could discourage people driving to the store. IKEA has also offered only £750,000 towards a Section 106 agreement. This is less than 1% of the first year's projected turnover¹⁹ and, of course, a drop in the ocean compared with the costs of adapting local roads and infrastructure to provide access to the store, let alone to adapt traffic mitigation measures to address increased congestion.

9. Lack of Proper Scrutiny by the Local Council's Air Quality Officer

- 9.1. Attached at Appendix 4 is Daniel Brown's exchange of emails with Chris Banks, Greenwich Council's air quality officer, requesting information over the checks he conducted in relation to this proposed development in an area where emission levels are already significantly in excess of EU limits.
- 9.2. Chris Banks explained that he would investigate a planning application if an impact on air quality is predicted. In this case, as explained above, IKEA predicted no impact on the basis of its own (manifestly absurd) conclusion that its store would reduce traffic. The local air quality officer therefore took IKEA at its word and there was no independent scrutiny to determine impact on air quality.
- 9.3. Mr. Brown also asked Chris Banks why no Environmental Impact Assessment was demanded. Chris Banks referred this question to the local planning officer, Jacob Jaarsma, and quoted Mr Jaarsma's reply. Again this is an example of one officer rubber-stamping the decision of another.
- 9.4. This failure to exercise independent scrutiny of IKEA's own self-serving reports shows a total disregard for the health and well-being of local residents and the environment. IKEA's store would have significant impact on the local environment because:

¹⁹ Projected turnover for the Bromley store was around £84 million per annum. The projections for the Greenwich store may be higher, but we are not aware that these are publicly available.

9.4.1. It is not a sustainable development, involving the demolition of an existing award-winning and environmentally sustainable supermarket building, less than 15 years after it was built.

9.4.2. It involves the demolition of a community eco-park, a much-needed green space demanded as "mitigation land" when planning consent was granted to Sainsbury's. This is clearly in breach of Policy O1 which provides as follows:

"Public and private open space areas defined as Community Open Space on the Proposals Map will be safeguarded from built development. New buildings and extensions to existing buildings will only be permitted where they are ancillary to the existing land use, are limited in size and extent, sensitively sited, and are compatible with neighbouring development. Changes of use of existing buildings in ancillary use will be considered in the light of Policy O1. Where existing built development within parks and public open spaces becomes surplus to demand, the Council may allow the sites to be redeveloped for specialist sporting development (which combine the use of outdoor and indoor space), subject to the criteria set out in Policy O1.

9.4.3. IKEA's traffic reports are clearly flawed. As is proved by IKEA stores all over the country, they attract significant additional car journeys. This is in fact actively encouraged by IKEA's own business model. It is because of the level of traffic generation that proposed IKEA stores have been rejected in Bromley, Stockport and Sheffield.

9.4.4. Local emission levels are almost 3 times European limits and the proposed store is within a few hundred metres of 2 primary schools. The health of local residents is already affected by this. Local doctors recommend that people with breathing and chest problems should move out of the area.

10. Lack of scrutiny by the Royal Borough of Greenwich in its role on the Steering Committee for the UNESCO World Heritage Site

10.1. In the Greenwich Unitary Plan, Greenwich Council state (paragraph TC8) as follows:

"The Council will preserve and promote the enhancement of historic Greenwich town centre. Refurbishment or new development in Greenwich must be appropriately scaled, respect existing form and character, and demonstrate the highest standards in design, landscaping, detailing and finishing."

10.2. The proposed IKEA store is almost 4 times the size of the existing stores on site and, as explained in paragraph 2.1.4 above, it is out of keeping with the scale and design of existing buildings that complement the millennium development around the O2.

10.3. Moreover, Greenwich Council has failed to adequately assess the likely increase in traffic through the World Heritage Site, although recognising in the

2013 Site Management Plan that “*traffic is the single greatest problem affecting*” Greenwich town.

11. Extensive Local Opposition

- 11.1. The Department for Communities and Government's website states that his job is to “*create great places to live and work, and to give more power to local people to shape what happens in their area.*”
- 11.2. The proposed IKEA store in Greenwich was rushed through by Greenwich Council who called a previously unscheduled meeting only 6 days after the GLA wrote to the Council advising that the application did “*not comply with the London Plan*”.²⁰ The meeting was held on 3 March – a matter of weeks after IKEA lodged its planning application with the council on 30 December 2013. Planning applications for small domestic loft conversions can take a year or more to process, yet an application of this scale, with serious strategic implications for London, has been rushed through in 9 weeks.
- 11.3. There are questions over the extent of public consultation. Greenwich Council allowed IKEA to hold an event in November in which IKEA advertised itself for its “sustainability” and said this would be the store in the UK “best connected by public transport”. It decorated the room with pictures of towering pine trees and handed out free Daim bars. Greenwich Council then allowed IKEA to move this display to a local library, essentially allowing free advertising for IKEA.
- 11.4. Despite this very short notice and lack of proper public consultation, there was extensive opposition with many local residents and residents associations vehemently speaking out against the application. The Planning Board meeting was packed out with all seats taken and many objectors having to stand. None of them were listened to and the proposal was voted through on strict party lines; all the Labour councillors voting in favour and the two Conservative councillors voting against. The Conservative councillors (Dermot Poston and Geoffrey Brighty) said that IKEA’s traffic estimates “*defy intellectual analysis*” and described them as “*laughable*”. There is cross-party opposition to the proposals. Two long-serving Labour councillors attended the meeting and spoke out against the proposal.
- 11.5. Since then, we have joined together with other concerned residents to raise awareness of this fundamentally flawed planning decision. We have a website www.noikeagreenwich.weebly.com and have launched an online petition which has gathered almost 500 signatures since it was first launched in a community event on 26 April. We are raising awareness through Facebook and Twitter and our community event has featured on the front pages of the News Shopper and the Mercury, the two leading local papers for Greenwich

²⁰ Planning report D&P/3283/01 by the GLA dated 25 February 2014 advised Greenwich Council that the application did not comply with the London Plan, but that possible remedies set out in paragraph 81 of the report could address these deficiencies.

(each with a circulation of around 500,000). We are also in contact with national press.

12. The proposed Development is in breach of Development Plans

- 12.1. We believe that the proposed development is in breach of the London Plan, the Greenwich Unitary Development Plan Policy TC16 and the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The Council has recklessly chosen not to exercise a key power: the right and duty to conduct its own Environmental Impact Assessment, despite this being a major development, almost 4 times the size of the existing development, with a major impact on the local infrastructure and environment. See paragraph 7.9 for reasons why an EIA should have been demanded in relation to this development.
- 12.2. Not only has Greenwich Council failed to listen to its community, its decision is procedurally flawed. We are considering the use of Freedom of Information Act requests to understand why Greenwich Council failed to exercise proper due diligence and consultation and rushed through this application ignoring local objections and initially adverse advice by the GLA, shortly before local elections.

13. The GLA is not impartial: the Secretary of State is the only independent review body

- 13.1. Freehold title to the site of the proposed store is owned by GLA. This puts GLA in a position of conflict as a review body. Whether or not GLA was influenced by this conflict of interest, *"not only must Justice be done; it must also be seen to be done."*²¹ It is a well-founded principle in judicial review cases that the mere appearance of bias is sufficient to overturn a public decision. The Mayor of London chose not to call in the decision of Greenwich council on the basis of a recommendation to him by the GLA.²² This gives the clear appearance of bias and leaves only the Secretary of State as an independent review body.
- 13.2. There are also questions to be asked of GLA as freeholder and landlord. For example, one of the factors taken into account by the Planning Board was whether any other retailer was interested in taking over the site. At the request of Sainsbury's a restrictive covenant has been granted, prohibiting the existing supermarket building being used as a food store. With the number of additional residential units approved for construction in the immediate vicinity of the store, this would be the most appropriate use of the building and the most sustainable solution, given that the building was built less than 15 years ago. The restrictive covenant appears anti-competitive and contrary to local development plans encouraging sustainable development.

²¹ *R v Sussex Justices, Ex parte McCarthy* ([1924] 1 KB 256, [1923] All ER Rep 233)

²² Planning report D&P/3283/02 by the GLA, dated 9 April 2014.

We sincerely hope that the Secretary of State will exercise his powers to call in this flawed decision of Greenwich Council to enable IKEA's application to be subjected to proper scrutiny in a public inquiry.

We look forward to hearing from you.

Yours sincerely,



Sophie & Michael Howard

020 8293 4789

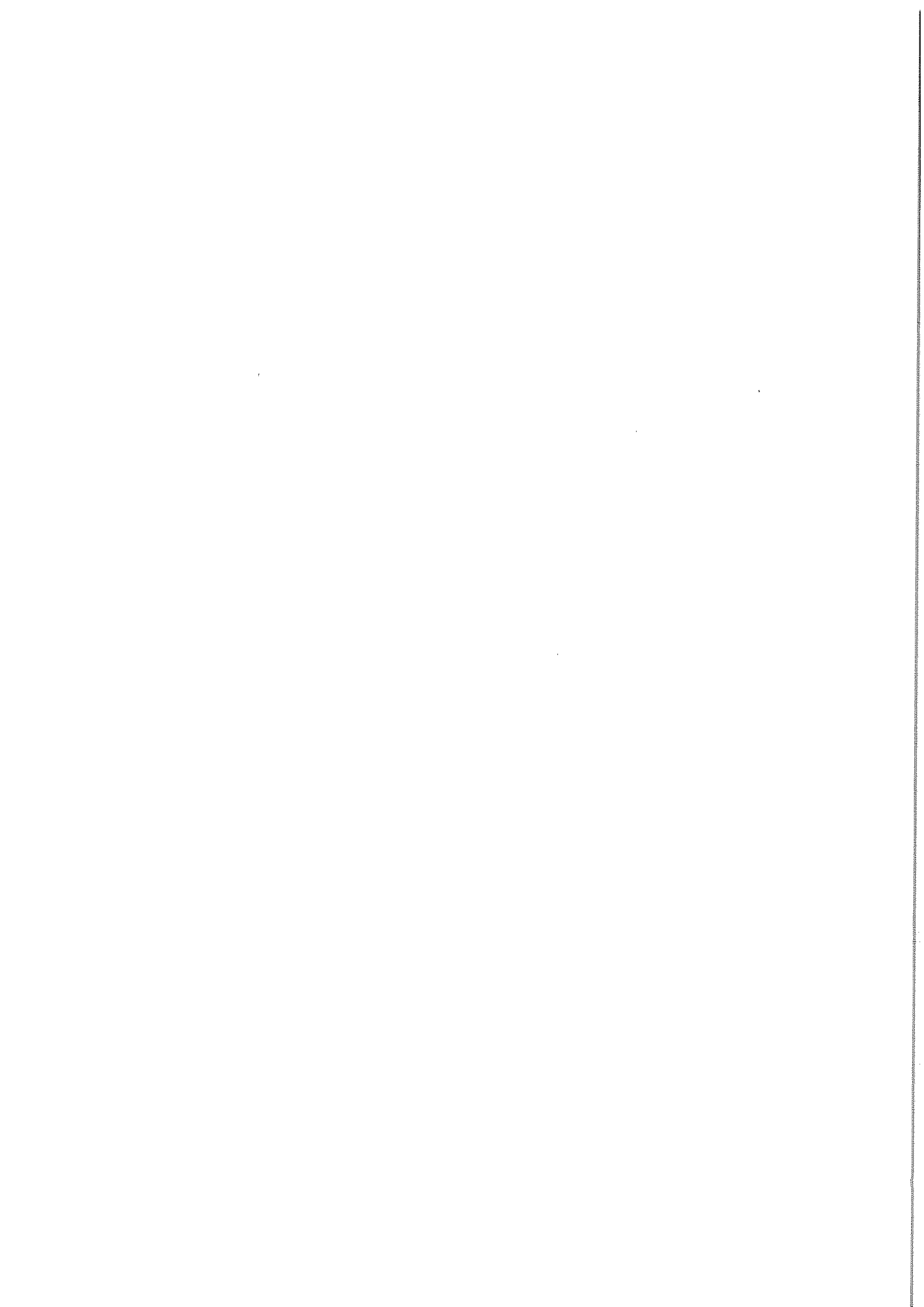
07876 114530

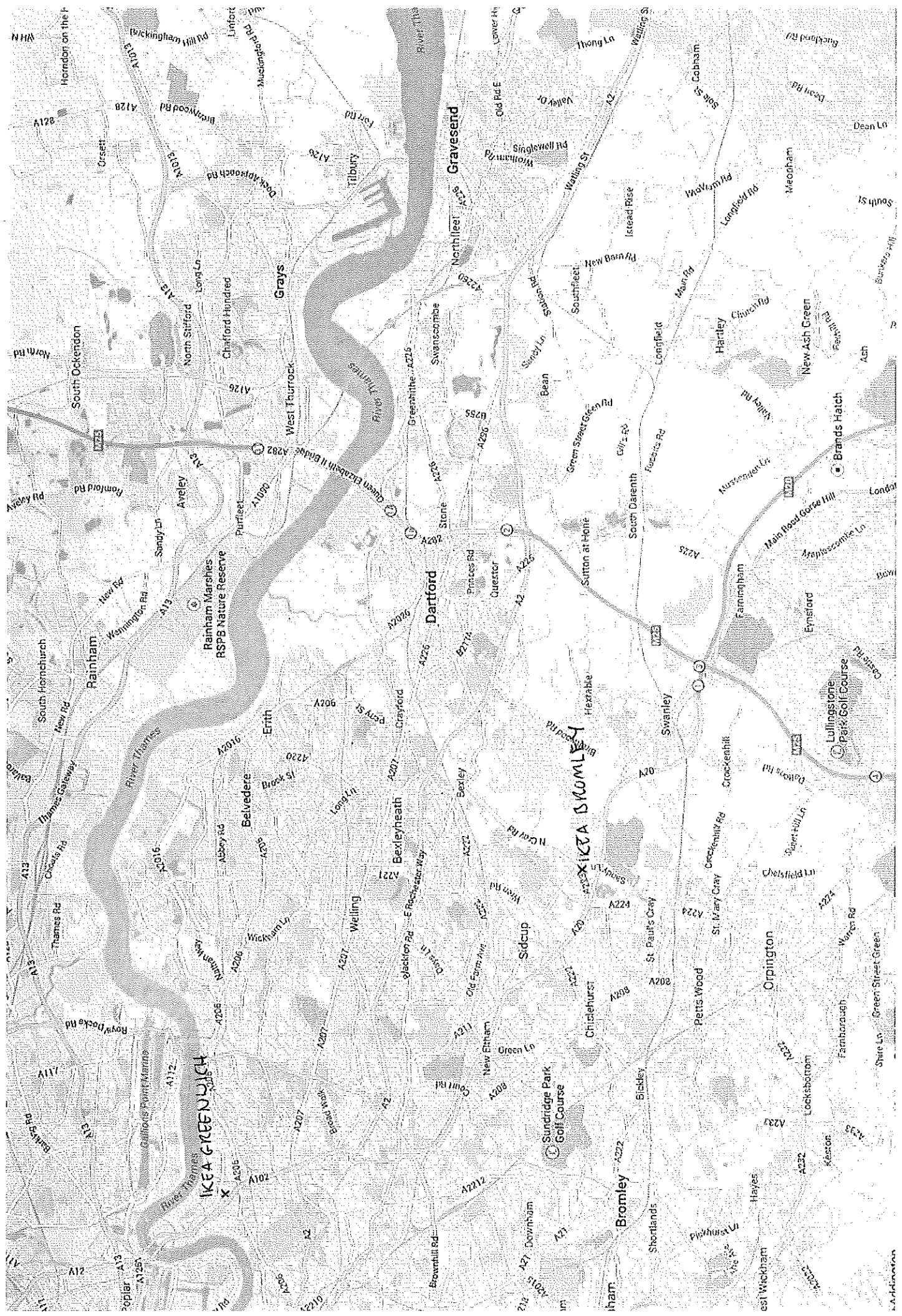
noikeagreenwich@gmail.com

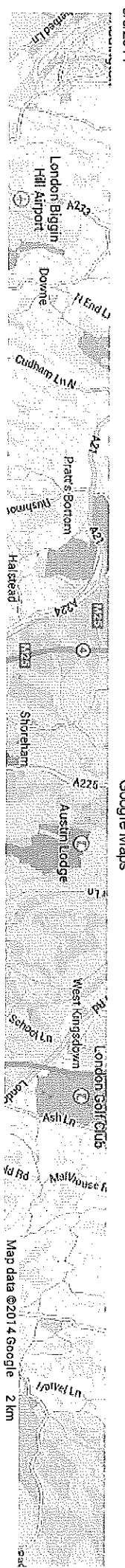
Enclosures:

List of Appendices

1. Appendix 1: map of UNESCO World Heritage Site, with proposed location of store and local access roads marked in blue.
2. Appendix 2: map showing position of the Greenwich site, relative to the Bromley site (rejected as a site for IKEA in 2004).
3. Appendix 3: "Opposition to Planning Application 13/3285/O References and Supporting Documentation" and outline speech of Daniel Brown, which he presented at the meeting of the Board on 3 March 2014.
4. Appendix 4: copy emails from Daniel Brown to Paul McGartoll at TfL dated 23 April 2014 and 6 May 2014.







Opposition to Planning Application 13/3285/O
References and Supporting Documentation

**Royal Borough of Greenwich – Unitary Development Plan
Policy TC16 refers to retail:**

“Retail or indoor leisure developments or extensions on edge-of-centre or out-of-centre sites will only be acceptable where:

- iv. Proposals are, or will be made, conveniently accessible by a choice of modes of transport including walking and cycling.*
- v. The proposal would not unacceptably impact on residential amenity, the environment, traffic patterns or road congestion.*
- vi. Parking provision is consistent with the relevant standards and principles in Policies M23, M24 M26 and M27.*

http://www.royalgreenwich.gov.uk/downloads/file/752/unitary_development_plan_2006

**The Town and Country Planning (Environmental Impact Assessment) Regulations 2011
2011 No. 1824**

SCHEDULE 2

Descriptions of development and applicable thresholds and criteria for the purposes of the definition of “Schedule 2 development”

10. Infrastructure projects

- b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas;*

Where –

The area of the development exceeds 0.5 hectare.

13. Changes and extensions

- b) Any change to or extension of development of a description listed in paragraphs 1 to 12 of column 1 of this table, where that development is already authorised, executed or in the process of being executed.*

Either –

- vii. The development as changed or extended may have significant adverse effects on the environment; or*
- viii. in relation to development of a description mentioned in column 1 of this table, the thresholds and criteria in the corresponding part of column 2 of this table applied to the change or extension are met or exceeded.*

<http://www.legislation.gov.uk/ukSI/2011/1824/schedule/2/made>

SCHEDULE 3

Selection criteria for screening Schedule 2 development.

Characteristics of development

1. *The characteristics of development must be considered having regard, in particular, to—*

- a) *the size of the development;*
- b) *the cumulation with other development;*
- c) *the use of natural resources;*
- d) *the production of waste;*
- e) *pollution and nuisances;*
- f) *the risk of accidents, having regard in particular to substances or technologies used*

Location of development

2. *The environmental sensitivity of geographical areas likely to be affected by development must be considered, having regard, in particular, to—*

- a) *the existing land use;*
- b) *the relative abundance, quality and regenerative capacity of natural resources in the area;*
- c) *the absorption capacity of the natural environment, paying particular attention to the following areas—*
 - ix. *wetlands;*
 - x. *coastal zones;*
 - xi. *mountain and forest areas;*
 - xii. *nature reserves and parks;*
 - xiii. *areas designated by Member States pursuant to Council Directive 2009/147/EC on the conservation of wild birds(1) and Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora(2);*
 - xiv. *areas in which the environmental quality standards laid down in EU legislation have already been exceeded;*
 - xv. *densely populated areas;*

Characteristics of the potential impact

3. *The potential significant effects of development must be considered in relation to criteria set out under paragraphs 1 and 2 above, and having regard in particular to—*

- a) *the extent of the impact (geographical area and size of the affected population);*
- b) *the transfrontier nature of the impact;*
- c) *the magnitude and complexity of the impact;*
- d) *the probability of the impact;*
- e) *the duration, frequency and reversibility of the impact.*

<http://www.legislation.gov.uk/ukxi/2011/1824/schedule/3/made>

What is the procedure for deciding whether a Schedule 2 project is likely to have significant effects?

However, it should not be presumed that [...] those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits.

Annual mean NO2 concentration for development site:

2012: 71 micrograms per metre cubed

2013: 64 micrograms per metre cubed

2014 to date: 75 micrograms per metre cubed

Table 1.1 in the mayor's air quality strategy gives the compliance date for the 40 microgram per metre cubed limit as 1st Jan 2010:

[https://www.london.gov.uk/sites/default/files/Air Quality Strategy v3.pdf](https://www.london.gov.uk/sites/default/files/Air_Quality_Strategy_v3.pdf)

NO2 data obtained from London Air, with validation and assistance from the Environmental Research Group at Kings College London:

<http://www.londonair.org.uk/LondonAir/Default.aspx>

DIRECTIVE 2008/50/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 21 May 2008 on ambient air quality and cleaner air for Europe:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:152:0001:0044:EN:PDF>

Parking Provision

Thurrock 1,200

Edmonton 1,300

Wembley 1,577

Croydon 1,900

Source:

<http://www.ikeafans.com/directory/>

Planning report PDU/0453a/01

Klinger Works, Edgington Way,

Foots Cray, Bromley

27 October 2004

http://legacy.london.gov.uk/mayor/planning_decisions/strategic_dev/2004/oct2704/ikea_klinger_works_report.pdf

Firstly I am disappointed to see that not only is this proposal recommended for approval, but that the scheme did not even warrant an Environmental Impact Assessment. Schedules 2 and 3 of The Town and County Planning Regulations state that an impact assessment is required:

- for retail developments in excess of 0.5 hectares;
- where changes to a development may have adverse effects on the environment; or
- in environmentally sensitive areas, in particular areas in which the environmental quality standards laid down in EU legislation have already been exceeded.

Not only is the proposed development in excess of 0.5 hectares, but statistics from the environmental research group at King's College London show that mean NO₂ concentration for 2014 year to date for the site is 75 micrograms per cubic metre – almost double the legal 40 microgram limit imposed by the European Parliament.

It has been suggested that the proposal 'is unlikely to give rise to significant environmental effects' because of the site's established use as a supermarket and electrical goods store. However, the established and proposed schemes are only similar in that they are both retail, but are likely to vary greatly in the volume, type and pattern of customer transport.

Firstly, the parking available to customers is 1,017 spaces shared with a DIY warehouse, three restaurants and a 2,500 seater cinema. A figure of 609 spaces is quoted in the transport assessment included in the proposals, and there would be no scope to increase parking for the scheme, given the site's location within a low emission zone. Compare this 609 with the 1,500 spaces available at the Wembley store, or 1,900 spaces available at the Croydon store. Clearly, were it not for the restrictions in place, Ikea would ordinarily factor in three times as many parking spaces for a comparable store, yet we are supposed to believe that the existing provision is adequate and that the impact on parking and the knock-on effect on traffic congestion here will be negligible.

Secondly, customers at the existing Sainsbury's tend to have travelled only from the immediate area (due to its close proximity to alternative Sainsbury's stores and comparable supermarkets) and by the nature of the goods sold and its location close to residential areas, customers can and do arrive by walking, cycling and public transport.

In addition, electrical retailers generally offer free home delivery, as the majority of customers cannot transport a washing machine or freezer home in their car.

By contrast, the Ikea business model is heavily reliant on the customer driving to the store to purchase and collect their goods, and the proposed store would expect to attract customers from as far as one to two hours' drive away.

This fundamental change in customer base will undoubtedly have an impact on traffic patterns and road congestion. A similar Ikea proposal was rejected in Bromley in 2004 precisely because of the car-dependent nature of Ikea stores and the negative impact the scheme would have had on the local road network, yet the proposal claims that this scheme in a more central, more congested and more polluted site, will have minimal impact.

Despite this dependence on cars, the proposal actually claims that the scheme will somehow reduce traffic levels, yet the logic used to determine predicted car numbers in section 6.52 of the transport assessment report provided seems to me to be flawed. Instead of using the 78% of customers arriving by car observed at the Tottenham store as a good indication of predicted traffic volumes, it is used to suggest that volumes at the Greenwich store will undoubtedly be much less than this, because this site is more accessible by public transport. I would suggest that Ikea customers are not dependent on cars because of a lack of public transport provision, but rather the inherent difficulty in transporting a Billy Bookcase home on the bus. If these higher, but arguably more realistic, estimates are used, the negative impact on transport and congestion becomes apparent.

Finally, the scheme will involve the demolition of a building constructed only fifteen years ago and still regarded as one of the most eco-friendly and sustainable buildings of its kind in the country.

Given the negative impact that the scheme is likely to have, I believe that the proposal should be rejected. However whatever your views I strongly urge that this scheme should not be approved at least until a full environmental impact assessment is undertaken; given that this is a car-dependent scheme proposed for one of the most polluted parts of one of the most polluted cities in Europe.

Sophie Howard

Subject: FW: Review of Ikea transport report

From: Daniel Brown <dancharbrown@gmail.com>
Date: 7 May 2014 02:27:39 BST
To: McGartoll Paul <PaulMcGartoll@tfl.gov.uk>
Subject: Re: Review of Ikea transport report

Paul,

I was wondering if you yet had any information on the below?

Thanks,

Daniel Brown

Sent from my iPhone

On 24 Apr 2014, at 06:28, McGartoll Paul <PaulMcGartoll@tfl.gov.uk> wrote:

Hi Daniel,

Thanks for your email – I'll be in touch shortly.

Regards,
Paul

From: Daniel Brown [<mailto:dancharbrown@gmail.com>]
Sent: 23 April 2014 12:17
To: McGartoll Paul
Subject: Review of Ikea transport report

Hi Paul,

Thanks for talking to me earlier. As I mentioned, I'm a Greenwich resident and I'm currently questioning the recent approval by Greenwich Council and the GLA of planning permission to replace a Sainsbury's building in Bugsby's Way, SE10 with an Ikea store.

The reason I'm questioning this decision is that the proposed development is in an Air Quality Management Area which means that, because of the high air pollution levels and high traffic volumes already in the area, special care should be taken in matters such as planning to ensure that this situation is improved (or, at least, not worsened) by additional development. Most people are aware of the car-dependent nature of an Ikea store (i.e. customers are actively encouraged to drive to the store to pick up furniture to save on delivery costs), so I was surprised

to read Ikea's traffic report and see that it claims that traffic will actually be reduced by the introduction of the store (the Sainsbury's and Matalan that the store would be replacing are being moved and enlarged less than half a mile away, meaning no net reduction in traffic even before the introduction of an Ikea).

I've so far spoken to the planning officer at City Hall, the local councillors and planning officers who approved the scheme, and the local highways representative to find out what scrutiny they each applied to the information in the Ikea report. Essentially, they've all said that they didn't scrutinise the report because they would take the views of TFL on this. What I'm interested in then is the process by which the numbers in the Ikea report were scrutinised and, ultimately ratified.

As an example, the Transport Assessment Report provided by Ikea states that *'Existing London Stores typically have in the region of 1,000 car parking spaces'* (section 6.32). This statement is made in the context of their only being 609 available spaces at the Greenwich site. However, I managed to find conflicting information on the actual number of parking spaces at Ikea's London stores:

Thurrock	1,200
Edmonton	1,300
Wembley	1,577
Croydon	1,900

Source: <http://www.ikeafans.com/directory/>

Which would mean that existing London stores actually have in the region of 1,500 car parking spaces. So, even before anyone looks at the wildly optimistic assumptions on traffic generation; the actual *facts* that, presumably, Ikea would have at their disposal can be shown to be incorrect (by a factor of 50%).

My question is whose responsibility is it to scrutinise these reports, given that it can be shown that the numbers in the reports have clearly been manipulated to show a more favourable impact than is actually the case?

Many thanks for your help on this.

Regards,

Daniel Brown

Sophie Howard

Subject: FW: Air quality

From: Daniel Brown <dancharbrown@gmail.com>
Date: 26 March 2014 12:24:32 AST
To: Chris Banks <Chris.Banks@royalgreenwich.gov.uk>
Subject: Re: Air quality

Chris,

Thanks for your response. Unfortunately, I already raised these matters with the planners, so I'd ideally like your view on the matter (not a regurgitation of theirs).

The point I raised was that the selection criteria for screening Schedule 2 development specifically refers to 'areas in which the environmental quality standards laid down in EU legislation have already been exceeded' [Schedule 3, Location of Development, section 2.c (xiv)]. Quite clearly, with regards air quality, this development lies within an already illegally polluted area. The planners have essentially taken the developers word for the proposal's apparent 'minimal' impact; however, I would have thought that the EHO would be particularly interested in investigating this, rather than take a steer from the planner involved.

There are numerous other criteria by which I also believe that an EIA would be required (conservation of natural habitats, cumulation with other developments, etc) but I still haven't received an adequate explanation as to why a huge development in an illegally-polluted area would not warrant a full impact assessment, when the only data used to make these decisions were estimates provided by the developer themselves claiming that impact would be minimal (as it doesn't take a genius to work out that they would say that, wouldn't they?).

I would have thought that, given the sensitive nature of the site, the EHO would be interested in any development in the area (rather than taking developer's claims at face value) and that developers would be required to back up their numbers. Otherwise, what's the point of having EU limits and a 'low emission zone' in the first place?

I would be interested to hear your views.

Many thanks,

Daniel Brown

Sent from my iPhone

On 24 Mar 2014, at 16:22, Chris Banks <Chris.Banks@royalgreenwich.gov.uk> wrote:

Daniel,

Please accept my apologies in this reply, I had to gain some details from the planning officer responsible for this case as you had asked questions on matters I wasn't able to fend.

Part of my role is to cross-assess air quality (AQ)(impact) assessments provided by developers as part of a planning application. From these assessments, our department then has a position to provide formal consultation comments to the planning officer who would take on-board comments from a vast manner of internal and external departments/bodies. The nplannign officer then provides a report to the planning board who take a decision based on the planning file recommendations (for approval or not). If no impact is predicted then mitigation is not normally required. If an impact is predicted then it is our role to ensure that this is mitigated as far as practicable, and if it isn't then we have reason to be able to make objections/representation (block) on the application.

The reason an environmental impact assessment (EIA) was not deemed necessary is provided below. I gained this information from our planning department.

The Council has given consideration to the question of whether the proposal constitutes a Schedule 1 or Schedule 2 development.

Schedule 1 developments are primarily classified as major developments of national importance such as airports, nuclear power stations etc. The proposal does not fall within any of the categories described by Schedule 1 where EIA is always required. Development listed in Schedule 2 requires an Environmental Impact Assessment if it is likely to have significant effects on the environment by virtue of factors such as its size, nature or location.

Schedule 2 development is development of a type listed in Schedule 2 which:

- a) is located wholly or in part in a 'sensitive area' as defined in regulation 2(1); or
- b) meets one of the relevant criteria or exceeds one of the relevant thresholds listed in the second column of the table in Schedule 2

In terms of development located wholly or in part in a sensitive area paragraph 36 of Circular 02/99 states that these are:

- a) Sites of Special Scientific Interest, any consultation areas around them, land to which Nature Conservation Orders apply and international conservation sites; and
- b) National Parks, the Broads, Areas of Outstanding Natural Beauty, World Heritage Sites and scheduled monuments.

The application threshold for section 2 is 'the area of the development exceeds 0.5 hectare'. The site is larger than the 0.5 hectare threshold (the site is approximately 7.19 hectares), as such, the main consideration is to determine if the proposed development would give rise to any significant environmental effects. The method of assessing the effect of projects is generally set out in Schedule 3 of the Regulations. The selection criteria on the need for EIA can be split into three components:

Characteristics of the development – is the development of more than local importance? Location of the development – is it located in a particularly sensitive or vulnerable location? Characteristics of the potential impact – are there potentially complex or hazardous effects?

Paragraph 34 of Circular 02/99 states that the basic test of the need for EIA in a particular case is the likelihood of significant effects on the environment.

The site is located within an established mixed retail area and within an area allocated as a 'Mixed Use Area' and 'Opportunity Area' – the site is therefore already allocated mixed use development. The appropriateness of this area for development has been considered and tested through the development plan process, and also through numerous applications including the application that originally granted planning permission for the retail park.

The proposed development is fully compatible with other existing and proposed developments in the area. In addition, a forthcoming planning application will include a full Retail and Transport Assessment that will list a number of recently permitted schemes that are located within the vicinity of the site and wider catchment area. In particular, given the location of the site, the planning application will be assessed in the context of the permission to develop Greenwich Millennium Village, which will see residential development built to the north of Bugsby's way.

As part of this screening opinion, consideration has been given to the nature of the proposed development, its location and the

characteristics of the potential impacts. The site is considered suitable for retail development of the type proposed. The scale and form of the developments is not considered to be out of context with the surrounding existing and proposed land uses and it is considered not to generate any direct significant environmental impacts or adversely affect the integrity of the local environment. In these and all other respects, the development cannot be said to trigger the thresholds which would indicate that an EIA is necessary.

The above is what has been provided to me by the planning department. If you have any further questions on planning matters such as this I would suggest you contact the planning department directly and if you wish I can help direct you on this

To answer the last point made in your email below, the Council operates an extensive air quality monitoring network which records concentrations of air quality, primarily from transport related sources. There are a number of locations nearby the site which we can view data.

Regards

Chris Banks
Lead Air Quality Officer - Pollution Control
Consumer Safety and Environment
Royal Borough of Greenwich
☎ 020 8921 8349
The Woolwich Centre, 35 Wellington Street,
London SE18 6HQ
www.royalgreenwich.gov.uk

-----Original Message-----

From: Daniel Brown [<mailto:dancharbrown@gmail.com>]
Sent: 17 March 2014 14:24
To: Chris Banks
Subject: Re: Air quality

Chris,

Thanks for your response.

I'm interested in what you can do to investigate and (if necessary) block proposals that may have an impact on air quality in the borough.

A recent planning application was approved to allow an Ikea to be built on the site of the current Sainsbury's on the peninsula. I have read the information supplied with the application and do not believe that the predictions for changes in traffic and air quality are correct. I actually spoke at the meeting to ask why an environmental impact assessment was deemed unnecessary even though the development was larger than the size required for exemption and is in an area already in breach of EU laws on air quality (I was not given an answer to this question).

Essentially, despite gaining planning approval, I believe that this will lead to an unacceptable level of traffic and pollution in an already illegally-polluted area. What powers do you have to investigate this?

Many thanks for your help.

Regards,

Daniel Brow

Sent from my iPhone

On 17 Mar 2014, at 12:31, Chris Banks
<Chris.Banks@royalgreenwich.gov.uk> wrote:

Daniel,

Apologies for the delay in replying. I am best to speak to regarding AQ and have been asked to respond to you.

How can I advise in respect to your below query?

