

Land between Woolwich Road, Gallions Road, Bugsbys Way and Greenwich Shopping Park

in the Royal Borough of Greenwich

planning application no. 12/0835/F

Strategic planning application stage 1 referral (new powers)

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

The proposal

Demolition of existing buildings and construction of a mixed use development comprising Class A1 (13,189 sq. m. & 7,698 sq. m.), flexible Class A1/A3 (473 sq. m.), Class A3 (150 sq. m.) and Class D2 (473 sq. m.) units, internet distribution facility, associated servicing, car parking, landscaping and access arrangements.

The applicant

The applicant is **LXB RP (No.16) Ltd** and the architect is **UNIT Architects**.

Strategic issues

The principle of the redevelopment of the site to provide retail led mixed-use development is questionable, In addition, further information is required with regards to **urban design, inclusive access, climate change and transport**.

Recommendation

That Greenwich Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 96 of this report; but that the possible remedies set out in paragraph 98 of this report could address these deficiencies.

Context

1 On 01 May 2012 the Mayor of London received documents from Greenwich Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 12 June 2012 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

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

Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings:

“outside Central London and with a total floorspace of more than 15,000 square metres.”

3 Once Greenwich Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

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

Site description

5 The application site is 6.12 hectares and is located in an out of centre location to the north of the London Borough of Greenwich. The site currently comprises 17, 791 sq.m (approx) of retail and business units, including the Maritime Industrial Estate, Bugsbys Way Retail Park and Wickes DIY store.

6 The site is bounded to the north and east by borough roads (Bugsby’s Way and Gallions Road) and to the south by the A206 Woolwich Road, which forms part of the Strategic Road Network (SRN). The nearest section of the Transport for London Road Network (TLRN) is the A102 Blackwall Tunnel Approach, located approximately 750m to the west.

7 Five bus routes (plus a night bus) are located within an acceptable walking distance of the site, with the nearest stops being on either Bugsby’s Way or Woolwich Road. Charlton rail station is within 600 metres of the site, and provides regular services between central London and Kent. As such, it has been demonstrated that the site records an average public transport accessibility level (PTAL) of three, rising to four on the Woolwich Road frontage, on a scale of one to six where six is the highest.

8 The area to the south of the site and south of Woolwich Road is predominantly residential, to the north, east and west of the site; the land use is predominately commercial in character comprising large retail and industrial units. There is a safeguarded wharf to the north of the site. To the west of the site lies Greenwich Shopping Park.

9 The site fall within the Charlton Riverside Opportunity Area as designated by the London Plan (2011), which identifies the opportunity to deliver a minimum 3,500 new homes and 1,000 jobs.

Details of the proposal

10 The applicant proposes the demolition of the existing buildings and erection of a new retail development and car park. The application proposes the redevelopment of the Gallions Road site for retail uses to include the relocation of the existing Sainsbury’s store from 55 Bugsby’s Way, a new Marks and Spencer, retail units fronting Woolwich Road, and associated servicing, car parking and landscaping. As part of the Sainsbury’s store, a dedicated ‘Goods on Line’ service is proposed, with the capability of accommodating up to 42 goods on line vans, which will deliver groceries to the local area.

11 The breakdown of the proposed floor space at the site is as follows:

- A Sainsbury's super market consisting of 13,189 sq. m. **(gross)**
- Sainsbury's goods – online (42 loading bays)
- A Marks and Spencer store comprising 7,698 sq. m. (gross)
- Three small high street units measuring 946 sq. m. in total
- A cafe unit measuring 150 sq. m.
- A leisure unit (D2) measuring 473 sq. m.
- Parking for 695 vehicles
- 54 cycle parking spaces
- Associated servicing access and landscaping.

12 Given the loss of existing units at the site, the total increase in floorspace (GIA) will be 3,022 sq.m. equating to an increase of retail net floorspace of 1,954 sq. m.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

- Economic development *London Plan; the Mayor's Economic Development Strategy; Employment Action Plan*
- Urban design *London Plan;*
- Mix of uses *London Plan*
- Regeneration *London Plan; the Mayor's Economic Development Strategy*
- Parking *London Plan; draft Early Minor Alteration to the London Plan; the Mayor's Transport Strategy*
- Retail/town centre uses *London Plan*
- Employment *London Plan; Industrial Capacity SPG; draft Land for Industry and Transport SPG*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2006 Unitary Development Plan 'saved policies', and the 2011 London Plan.

15 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- The Early Minor Alteration to the London Plan
- The draft 2010 Greenwich Core Strategy with development policies DPD (preferred options)

Principle of development

16 The site is identified as Strategic Industrial Land (SIL) as set out in London Plan policy 2.17 and Annex three. The wider area including the application site falls within the Charlton Riverside Opportunity Area set out in London Plan Map 2.4 and Annex one. With regard to Opportunity Areas, London Plan policy 2.13 seeks development in such areas to maximise residential and non-residential output and densities and contain a mix of uses.

17 With particular relevance to Charlton Riverside, Annex one of the London Plan states that new developments in the Charlton Riverside Opportunity Area have the scope to deliver an indicative capacity of 1,000 new jobs and a minimum of 3,500 new homes over the plan period to 2031. Annex one also states that any managed release of surplus industrial land should be set in a wider sub regional context as part of the planning framework for the area, taking into account the existing safeguarded wharves. The draft Greenwich Core Strategy with Development Management Policies DPD (2010) acknowledges the Opportunity Area strategic designation in paragraphs 3.1.6 and 3.1.7.

18 Locally, in terms of adopted policy, the site falls within Charlton Business Park (saved UDP policy J3) where any increase in retail floorspace would not be acceptable unless proposals meet criteria set out in saved UDP policy TC16, which includes the need for a sequential approach to be taken.

19 Specifically, the proposal site is designated in Greenwich's UDP as development site MU29 where proposals should comprise floorspace for bulky goods retailing (reconfiguration without increase of existing net retail area) and industrial / business units. It is understood that the proposal will include the replacement of retail floorspace in this out of town location and will create an uplift of retail floorspace, which, in line with adopted local policy would not be acceptable.

20 In addition, Greenwich's draft Core Strategy states that the preferred spatial strategy includes substantial release of under-used industrial land and intensification of employment use at Charlton Riverside. The document highlights this area for mixed use development and the objective to deliver an urban quarter at Charlton Riverside; incorporating around 6,000 new homes involving substantial release of SIL.

21 The GLA have raised non-conformity objections to the draft Core Strategy's proposal of SIL de-designation in Charlton Riverside as follows:

"Whilst some consolidation of the Charlton Riverside SIL may be acceptable, given the non-industrial uses currently included in the SIL and subject to strategic and local assessments, the level of consolidation implied by the Key Diagram would almost certainly exceed the strategic monitoring benchmarks for release.

22 As such the proposals in the draft core strategy to de-designate SIL at Charlton Riverside are not in general conformity with the London Plan policy 2.17

23 Greenwich have adopted an SPD for the Charlton Riverside area (April 2012). The SPD sets out the following vision for Charlton Riverside:

'By 2027, Charlton Riverside will be transformed into a new urban quarter connecting Greenwich Peninsula to Woolwich Town Centre. It will comprise of a sustainable mix of uses including substantial residential use in a high quality environment focussed around an enhanced Thames Barrier Park. There will be a thriving education and creative industries hub in the eastern historical quarter surrounded by a mix of high quality, residential led uses including high quality business space. The retail and industrial uses will be consolidated and rationalised within a much improved environment and the area overall will be serviced by new and improved public transport links plugged into the transport network and will have benefitted from improvements to the Thames Path. The growth will have been supported by infrastructure that will have been provided in a co-ordinated and timely manner to meet the physical and social needs of new development and regeneration. Charlton Riverside will be a flourishing industrial, business and retail area contributing to the success of the Thames Gateway and a great place to invest, live and work.'

24 Within the GLA response to this consultation it was made clear that the level of SIL release proposed and the phasing of the release of industrial land needs to be considered further. The amount of development capacity being brought forward at one time is significant and even if the land uses were to be agreed would take a considerable amount of time to deliver. This may have the consequence of existing sites being vacated, jobs lost and a considerable gap occurring before development. Further discussions are needed regarding these matters including the deliverability of the proposals before they can be considered acceptable. In essence the SPD was found to be in non conformity with the London Plan.

25 It is acknowledged that both Charlton Riverside is an opportunity area and has the potential for substantial development, however, careful forward planning for this area is needed and a suitable balance needs to be struck between housing development, the retention of SIL and the delivery of any other uses including retail.

26 Whilst the production of an SPG for the area is welcomed it does not go far enough in specifying the exact quantum of SIL release and the exact location and nature of subsequent mixed use development. Discussions are on going with the Council regarding its evidence base and plans and rationale for implementation. Without further details and discussions on the wider plans for Charlton Riverside it is not possible at this stage for the Mayor to conclude that the principle of this development is acceptable in strategic policy terms.

27 The loss of housing as proposed by the scheme is also not in line with the London Plan and will only be acceptable if this loss of provision is replaced within the wider area.

Retail

28 London Plan policy 4.7 makes it clear that retail development should be focussed on sites within town centres and that proposals for new, or extensions to existing, edge or out of centre development will be subject to an assessment of impact. In addition, it states that Local Authorities should resist out of town retail development; as stated in paragraph 19 of this report, the current adopted UDP 'saved' policies makes it clear that there should be no increase of retail floorspace within the area of which this application is located.

29 The application material states that in total the development proposals will result in the difference in the make up of the existing (or permitted) floorspace at the site as follows:

- Open A1 retailing – decrease of 5,228 sq. m
- Open A1 non-food retailing – increase of 7,053 sq. m

- C3 residential units – decrease of 25 units (5 existing, 20 with permission)
- B1c / B2 industrial – decrease of 6,715 sq. m

30 However, the above figures include outstanding permissions which have not been implemented.

31 The applicant also states that the overall increase in retail floorspace on the site itself is therefore 1,826 sq. m; the site is currently occupied by 11,077 sq. m of retail floorspace (as stated in the Planning Statement page 16), the proposals include a total of 21, 983 sq. m. retail floorspace (including the café) which equates to an uplift of 10,906 sq. m of retail floorspace on the site. The 1,826 sq. m. figure will need further explanation and justification.

32 In addition, Appendix 2 of the Planning Statement demonstrates that there is an overall reduction in the retail floorspace within the wider area of 1,059 sq. m.; further clarification on the figures is needed and in essence, a wider land use strategy in terms of type of use and quantum for the site and wider area is needed ; a clear indication of existing floorspace compared to that proposed should also be included and submitted before the Mayor can accept a retail application of over 21,000 sq. m. in this location.

Retail impact and sequential test

33 The NPPF states that planning authorities should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. As such, a sequential test should be carried out and preference should be given to accessible sites that are well connected to the town centre. London Plan policy 4.7 also requires an impact of assessment on out of town centre retail developments.

34 A retail economic statement has been submitted as part of the planning application submission which includes in part a sequential test and a retail impact assessment.

35 In particular, the statement concludes that the enhancement of the retail facilities at Bugsby's Way will not affect Woolwich's status as a Major Centre, nor its prospects of being re-designated as a Metropolitan centre in the long term; however, the justification for this is not robust for the short to medium terms; the catchment areas and retail assessment are also be questioned. Given this, before the scheme is referred back to the Mayor at stage 2 further discussion is needed on the assessment.

Urban design

36 Good design is central to all objectives of the London Plan (2011) and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage and World Heritage Sites, views, the public realm and the Blue Ribbon Network. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood as set out in London Plan policy 7.4.

37 The proposal for retail development on this site is not objectionable in urban design terms; however although it is surrounded by 'big box' type retail at present, there is a finer grained

townscape to the south, and future potential for the same to the north. As such, development on the site must respond to this potential development, while responding more positively to the townscape; this is something that similar, previous development within the area has failed to do, but which the current development proposals manage to achieve by providing a new street frontage to Woolwich Road.

38 The demolition of the existing industrial buildings on the site will be beneficial in townscape terms, but a row of terraces on the north side of Woolwich Road would also be demolished. The terrace is one of the few remnants of the area's original built form, on this side of the road in the immediate area. The applicant's heritage assessment states that there is no heritage value in these buildings, and the Council has not identified these as heritage assets. While the loss of the terrace is regrettable, the proposed development would present a relatively high-quality face to the street scene, albeit at a different scale from that existing at present.

39 The site and its surroundings currently have a broken urban form which the site has the potential to repair. The general layout is supported, with the exception of the northern edge. The additional permeability which will result from the new north-south routes is welcomed. With regard to the site edges, the proposed treatment on the southern frontage would be successful; this would provide a high street-type response and potential for an appropriate amount of activity. The development would allow glimpses through to the car park; it is appreciated that this is a useful attractor for passing trade.

40 The northern edge is less successful. Notwithstanding the format constraints of planning for supermarkets, and the presence of a self-contained online shopping unit, the northern elevation of the building provides a negative response to the street scene, which is accentuated by the level change between the street and the paved service area. This is disappointing, as this site could be one of the first to contribute to an improvement of the Bugsby's Way streetscape. Additionally, given the potential for future mixed-use or residential development to the north, the improvement of the townscape here would be beneficial for future pedestrian access, routes and safety, as well as providing a more welcoming aspect to the supermarket. Neither the elevation nor the sunken servicing area provides a beneficial relationship or acknowledgement to Bugsby's Way.

41 The back-to-back servicing arrangement with the adjacent Greenwich Shopping Park is welcomed. The design and access statement should acknowledge the security/surveillance and Secured by Design aspects of the servicing areas.

42 The proposed materials are supported, as they would be both appropriate for the function and provide a natural-looking appearance. The number of openings within the eastern Sainsbury's elevation is generous for a supermarket and would improve the pedestrian approach and provide a more welcoming / less adversarial aspect to the store's main elevation. The entrance to the Sainsbury's store, and the glazing around the M&S store is supported, and would positively contribute to legibility by clearly identifying the store entrances.

43 The proposed landscaping layout is generally supported, and the additional tree planting to ameliorate the environmental, drainage and visual impact of the car park is welcomed. Improvements on the northern site edge would be welcomed in conjunction with revisions to the building layout as set out above.

Inclusive access and design

44 London Plan Policy 7.2 seeks to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum) to ensure that developments can be used safely,

easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances.

45 In addition, the design of the landscaping and the public realm is crucial to how inclusive the development is to many people. The provision of the car park, its layout, landscaping and the public realm outside the retail blocks will need to be designed to ensure full and easy access for all users. The design and access statement should show how disabled people access the buildings safely, including details of levels, gradients, widths and surface materials of the paths and how they are segregated from traffic and turning vehicles etc.

46 The Design and Access Statement submitted by the applicant provides detail of inclusive access, specifically how disabled people access the buildings safely, including details of levels, gradients, widths and surface materials of the paths and demonstrates compliance to DDA regulations.

47 Further information regarding how the detailed design takes into consideration inclusive access for the retail and public realm elements of the scheme will be needed to meet the objectives of London Plan policy 7.2. Further consideration should be given to providing public toilets and the demand for a 'Shopmobility' scheme before the planning application is referred back to the Mayor at stage 2.

48 As well as this the location of blue badge parking space should be redistributed to shorten the distances from the parking space and the entrance to both the Sainsbury's and Marks and Spencer retail outlet entrances.

Climate change mitigation

49 The London Plan climate change policies as set out in chapter 5 collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy. The policies set out ways in which developers must address mitigation of, and adaptation to, the effects of climate change.

50 Policy 5.1 and 5.2 of the London Plan seek to achieve an overall reduction in London's carbon dioxide emissions through a range of measures including using less energy, supplying energy efficiently and using renewable energy, improving on Building Regulations targets by 25% in the period 2010-2013.

BE LEAN

Energy efficiency standards

51 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include energy efficiency lighting and mechanical ventilation with heat recovery. The applicant should confirm the passive measures to be adopted to minimise the need for active cooling.

52 The development is estimated to achieve a reduction of 135 tonnes per annum (20%) in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant development. This appears very high and should be evidenced.

BE CLEAN

District heating

53 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

54 The applicant is proposing to install a site heat network which includes linking to a nearby hotel and retail unit. A drawing showing the route of the heat network linking all building uses both in the proposed and nearby development should be provided.

55 The site heat network will be supplied from a single energy centre located in the landlord plant area for Sainsburys and M&S (which would also serve the nearby hotel and retail unit). Further information on the floor area of the energy centre should be provided.

Combined Heat and Power (CHP)

56 The applicant is proposing to install a 105 kW_e gas fired CHP unit as the lead heat source for the site heat network. The CHP size has been increased to provide the domestic hot water as well as a proportion of the space heating load of the proposed development.

57 Based on this approach, an overall reduction in regulated carbon dioxide emissions of 97 tonnes per annum (18%) will be achieved through this second part of the energy hierarchy.

58 In addition, the total savings proposed for Phase 2 would be in the order of 45.1 tonnes of carbon dioxide per year. This is an increased saving of approximately 9.25% over and above that achieved for low carbon and renewable technologies.

BE GREEN

Renewable energy technologies

59 A bio-fuel boiler is proposed to meet the site's renewables demand. The bio-fuel boiler is proposed to provide 20% of the hot water demand per annum. The bio-fuel would be fuelled from Sainsbury's recycled cooking oil.

60 Further details on the source and availability of fuel should be provided. An air quality assessment will also need to be provided for consideration by the GLA's air quality team.

61 A reduction in regulated carbon dioxide emissions of 16 tonnes per annum (3%) will be achieved through this third element of the energy hierarchy.

Overall Carbon Savings

62 The estimated regulated carbon emissions of the development are 438 tonnes of carbon dioxide per year after the cumulative effect of energy efficiency measures, CHP and renewable energy has been taken into account.

63 This equates to a reduction of 247 tonnes of carbon dioxide per year in regulated emissions compared to a 2010 Building Regulations compliant development, equivalent to an overall saving of 36%.

64 Based on the information provide, the carbon dioxide savings exceed the targets set within Policy 5.2 of the London Plan.

65 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. The proposals are broadly acceptable; however, further information is required before the carbon savings can be verified.

Climate change adaptation

66 The London Plan Policies 5.9 – 5.15 promote the key principles of climate change adaptation including overheating and cooling, urban greening, green roofs and water management.

67 Policy 5.9 seeks to deal with the issue of overheating and sets out a cooling hierarchy. Policy 5.10 promotes urban greening. Policy 5.11 seeks major developments to incorporate living roofs and walls where feasible. Policy 5.13 seeks to ensure that surface water run-off is managed as close to its source as possible and sets out a hierarchy of preferred measures to achieve this. Policy 5.15 seeks to ensure that new development has proper regard to the impacts on water demand and existing capacity by minimising the use of treated water and maximising rainwater harvesting. Further guidance on this policy is given in the London Plan supplementary planning guidance 'Sustainable Design and Construction'.

68 The Design and Access Statement submitted as part of the scheme highlights the sustainability measures which have been incorporated into the design, and notes that a rating of BREEAM Excellent is achievable; the proposals are found to be in full compliance with London Plan policy 5.3 and strategic guidance.

69 Further information and clarity is needed as to how the scheme will reduce surface water run-off and how it will provide for measures to ensure water efficiency and provision of green roofs.

Transport

70 As stated in paragraph 7, the public transport accessibility level (PTAL) rating of this site is a three to four on a scale of one to six where six is most accessible.

71 The Mayor has proposals for a Cycle SuperHighway, Route 4 (CSH4) between Woolwich and London Bridge. CSH4 would go along Woolwich Road past the site; the current programme is to implement these works prior to 2015.

72 In addition, Greenwich Peninsula is being redeveloped for mixed uses including 10,000 new homes, supporting infrastructure for this include bus priority on Bugsby Way.

Transport Assessment

73 The Transport Assessment shows a significant increase in traffic entering and exiting the site at the proposed Woolwich Road and Bugsby's Way junctions. TfL consider this increase may be a "worst case" assessment of traffic impact.

74 Route choice will partly depend on how both junctions operate as well as the wider network operation – therefore, the Borough's and TfL's advice is that sensitivity tests are needed to test preferences based on Woolwich Road and Bugsby's Way, which the developer's consultant has indicated it is willing to undertake.

75 The applicant will need to show that the scheme does not have a detrimental impact on Woolwich Road, (which forms part of the SRN) nor the nearest part of the TLRN - A102 Blackwall

Tunnel Approach. A summary of journey (bus and general traffic) times for signal and non-signal options should be provided to clarify these impacts; detailed advice has been provided to the applicant's consultants on this aspect.

76 TfL is concerned that the proposals as presented may not be in accord with London Plan Policy 6.11. The additional signals have not been fully justified by the TA. For TfL to have confidence in the traffic model results a model validation report is requested to show compliance with TfL Modelling Guidance and consideration of alternatives should be evaluated in further detail.

77 The proposed Bugsby's Way / Gallions Road junction (though not part of the SRN) is on a primary distributor route to the Blackwall Tunnel and the Greenwich Peninsula and will have implications for route choice. TfL is concerned that the proposed all movement signalised junction would have a detrimental impact on the local highway and bus network. However TfL may not be opposed to this proposal if it can be shown that the signalised junction would mesh with the existing signal junction operations and has nil detriment on bus operations and journey times.

78 TfL does not support the proposed signalised junction on Woolwich Road as it would not be beneficial to all users. However, it is important to consider this in the context of the Anchor and Hope Lane signalised junction and the need to create a safe and convenient place for pedestrians to cross Woolwich Road.

Bus Network

79 The use of bus services should be encouraged. Changes to the bus network, associated infrastructure (e.g. bus stops and real time information) and changes to the proposals themselves including the offsite junctions may be necessary to make the site fully accessible by bus in compliance with London Plan Policy 6.7. The proposals should be developed in discussion with London Buses and provision secured by condition or the section 106 agreement.

80 Whilst the site is generally well connected by buses, services are split between Bugsby's Way and Woolwich Road which is not ideal from a passenger's perspective when compared to the single access point at the current Sainsbury's supermarket. This could be mitigated to a certain extent by the provision of real time information within the entrances to each store, which should be secured by condition or in the section 106 agreement. Also, there are areas of Greenwich (e.g. Blackheath) that do not have a direct bus access to the relocated store which currently benefit from direct links to the existing Sainsbury's store on the Greenwich Peninsula. This may result in more car trips from these areas.

Walking and Cycling

81 TfL welcomes the provision for pedestrian wayfinding in the form of Legible London signage both on and off site. This should be secured by condition or the section 106 as appropriate. However TfL does not consider that the proposal fully accords with London Plan Policies 6.7 and 6.10, in terms of the design and layout of the development and associated highway proposals. TfL has provided detailed advice on these matters to the applicant.

Cycle Super Highway

82 In line with London Plan policy 6.9 the development scheme should be compatible with CSH4 and safeguard and where possible deliver those parts of CSH4 within the proposed off site junction works. The proposed signalisation of the Gallions Road / Woolwich Road junction and the operation of the proposed service yard accessed off Woolwich Road are both currently areas of concern.

Car and Cycle Parking

83 The overall amount of car parking is within London Plan standards. The provision for disabled motorists, enlarged standard spaces and cycle parking is set out in the application documents and TfL understands that as a result of negotiation, the number of electric vehicle charging points (EVCP) is now proposed in line with the London Plan minimum standards. TfL recommends that EVCPs will be fast charging points given the likely duration of stay at a supermarket. Cycle parking needs to be provided in a safe and secure location to reduce risk of theft, and be connected to the most convenient, safe and direct routes to the local cycle network. Additional facilities for staff such as lockers, drying rooms and showers should also be provided. This should be confirmed by the applicant within the Travel Plan and/or s106.

84 TfL would suggest reducing parking below the proposed level would not have a detrimental impact as we believe the car parking accumulation is based on a “worst case” assessment of traffic generation and may be necessary to ensure the layout of the site and adjacent roads are designed in accord with best practice.

85 The cycle, disabled and EVCP parking should be secured by condition. TfL welcomes the proposal for a Car Park Management Plan, which should also be secured by condition.

Travel Plan

86 An updated travel plan has been provided to take account of the TfL travel plan review. TfL considers the travel plan is now broadly in line with TfL Guidance. The preparation and implementation of a detailed Travel Plan should be secured through condition and the Section 106 agreement as appropriate.

Construction and Servicing

87 Given the scale of the development, a Construction Logistics Plan (CLP) and Delivery and Servicing Plan (DSP), should be secured by condition. TfL has been supplied with a Heads of Terms for a CLP, which is welcome.

Summary

88 TfL needs further information before it can be confirmed that the development is in accord with London Plan policy 6.1 and that there is sufficient integration with local transport provision as well as other transport aspects of the London Plan. The data requested includes:

- Model Validation report to show compliance with TfL modelling guidance
- Comparison of journey times for signalised and non-signalised options
- Revised proposals for the Woolwich Road signal access including review of the operation of the nearby Anchor and Hope Lane junction
- Further revisions to the design of the proposed Bugsby’s Way signal access is needed including bus priority on the western approach to the junction
- Sensitivity tests to reflect route choice between Bugsby’s Way and Woolwich Road.
- Revised/additional proposals to encourage use of bus services, walking and cycling, including the CSH4

89 The following should be should be secured by condition and/or the section 106 agreement as appropriate:

- Cycle, disabled and enlarged spaces parking, EVCPs to confirmed in line with London Plan standards
- Travel plan, car park management plan, delivery and servicing plan and a construction logistics plan.
- Enhancement of local bus services and upgrade of local bus stops including real time information (countdown)
- Incorporation of measures to promote walking and cycling including the CSH4 and wayfinding based upon the 'legible london' system.

Community Infrastructure Levy

90 In accordance with London Plan *policy 8.3*, the Mayor has introduced a London-wide Community Infrastructure Levy (CIL) that will be paid by most new development in Greater London. Any development that receives planning permission after the 1 April 2012 will have to pay, including:

- Cases where a planning application was submitted before 1 April 2012, but not approved by then.
- Cases where a borough makes a resolution to grant planning permission before 1 April 2012 but does not formally issue the decision notice until after that date (to allow a section 106 agreement to be signed or referral to the Secretary of State or the Mayor, for example).

91 The Mayor has arranged boroughs into three charging bands with rates of £50 / £35 / £20 per square metre of net increase in floor space respectively (see table, below). The proposed development is within the Royal Borough of Greenwich where the proposed Mayoral charge is £35 per square metre. More details are available via the GLA website <http://london.gov.uk/> .

92 Within London both the Mayor and boroughs are able to introduce CIL charges and therefore two distinct CIL charges may be applied to development in future. At the present time, borough CIL charges for Redbridge and Wandsworth are the most advanced. The Mayor's CIL will contribute towards the funding of Crossrail.

Mayoral CIL charging zones	London boroughs	Rates (£/sq. m.)
1	Camden, City of London, City of Westminster, Hammersmith and Fulham, Islington, Kensington and Chelsea, Richmond-upon-Thames, Wandsworth	£50
2	Barnet, Brent, Bromley, Ealing, Greenwich, Hackney, Haringey, Harrow, Hillingdon, Hounslow, Kingston upon Thames, Lambeth, Lewisham, Merton, Redbridge, Southwark, Tower Hamlets	£35

3	Barking and Dagenham, Bexley, Croydon, Enfield, Havering, Newham, Sutton, Waltham Forest	£20
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Local planning authority's position

93 Greenwich Council's position is unknown at this time.

Legal considerations

94 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application.

Financial considerations

95 There are no financial considerations at this stage.

Conclusion

96 London Plan policies on the principle of development, urban design, inclusive access, climate change, transport and CIL are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Principle of development:** The principle of a retail development is currently unacceptable in strategic terms; further justification and clarity as to the wider retail/commercial and planning strategy for the area is needed for the development to be in accordance with the London Plan policies 4.7, 4.8, 2.15 and 2.17.
- **Urban design:** Design revisions are sought for the proposal to be consistent with London Plan policies 7.4.
- **Inclusive design and access:** Further information is required in order to demonstrate that the scheme fully accords with the London Plan Policy 7.2 and 2.15.
- **Climate change mitigation and adaptation:** The scheme includes some measures that will need to be secured by condition to ensure the proposal complies with London Plan policies; however, further information is required before the scheme can be said to be fully policy compliant.
- **Transport:** Further information and discussion is needed for the scheme to fully comply with the London Plan.

97 The application does not comply with the London Plan.

98 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Principle of development:** The scheme does not comply with the London Plan in terms of the land uses proposed and further discussion is needed with the Council to resolve this issue.
- **Urban design:** The applicant needs to reconsider the northern edge of the development and provide further information with regards to the security/surveillance and Secured by Design aspects of the servicing areas.
- **Inclusive design and access:** Revisions are sought with regards to the location of the blue badge parking and further information is required as to how the landscaping and public realm area and the smaller retail, units, café and leisure units meet the priorities of policy 7.2. In addition, the applicant will need to provide further information regarding the shopmobility of the scheme in order to meet London Plan Policy 7.2 and 2.15.
- **Climate change mitigation and adaptation:** The applicant will need to submit further evidence regarding the commitment to achieve a reduction in carbon dioxide emissions. A drawing showing the route of the district heat network and confirmation of the floor area of the energy centre should also be provided. With regards to the bio-fuel boiler, the applicant should submit further details regarding the source and availability of fuel. An air quality assessment will also need to be provided for consideration by the GLA's air quality team. Further information is needed as to how the scheme will provide for measures to ensure water efficiency.
- **Transport:** The applicant will need to provide further information regarding traffic modelling, journey times, junction accesses and sensitivity testing. Further revisions to the design of the proposed Bugsby's Way signal access is needed including bus priority on the western approach to the junction.

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