

Avonmouth House (LPA ref: 21/AP/4297)**Applicant team's response to GLA Stage 1 Report (ref: GLA/2022/0221/S1/01)****Contributors: *Stitch, Ardent, Clarke Banks, JAW Sustainability*****27 May 2022**

	GLA Stage 1 comment	Applicant response
1	Para 43 - ground floor design should be reconsidered to maximise active frontage (consider if substation, bin, and cycle stores could be relocated).	<p>Given the constrained nature of the site, the frontage available for servicing and refuse access is limited. To create defined corner entrances at the ground floor, some of the elevation along Avonmouth Street needs to be utilised for the servicing of refuse stores, cycle stores and substation which all require direct access from the street. By using basement levels for plant, this avoids the need for a further service entrance to face the street.</p> <p>The tall floor to ceiling heights at ground and first floor ensure the street is well overlooked and give a new active frontage replacing the currently unwelcoming façade of the existing building.</p>
2	<p>Para 48 - kitchenettes for the studios considered far too small.</p> <p>The scale of some cluster units also raises concerns, especially the cluster units located in the north eastern corner of the site, which appear to be quite cramped.</p>	<p>The kitchen size of the studios has been consented in the plans of other student housing schemes in LB Southwark, for example 671-679 Old Kent Road. The kitchen layouts allow enough space for sink, hob and fridge as well as storage at high level. Students will also have access to catering facilities on the nearby campus of London South Bank University.</p>

	<p>The student ensuite bedrooms are all at least 12sqm with a bedroom area, excluding the ensuite, of over 7.5sqm which the minimum size of a single bedroom set out in Nationally Described Space Standards and London Plan Policy D6 Housing Quality and Standards.</p> <p>The layouts in the student rooms allow a clear access zone of at least 750mm around and between furniture which is the standard set out in Building Regulations Part M(4)2 deemed sufficient for circulation space within bedrooms. Although the student accommodation does not have to comply with this policy it is recognised as the standard for allowing a wide range of people to access and use residential spaces.</p> <p>Notwithstanding the above, the following minor amendments have been made to the furniture layouts in response to the comments received (as per the updated plans enclosed):</p> <ul style="list-style-type: none">• The entry door position and desk in ensuite type 04 on the typical floor has been moved to improve internal circulation.• Ensuite type 06 and 07 on the upper floors now indicates a single 900mm wide bedspace to give a 750mm clear access zone along the side of the bed. All other bedrooms have been provided with a larger 1200mm/4ft wide bed.
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3	<p>Para 55 - The submitted HTVIA does not include any long-range views and therefore officers cannot conclude whether the development would make a positive contribution to the existing and emerging skyline.</p>	<p>The modest height of the building means that long range views are less significant than for the higher buildings in the area, the latter being those which do contribute to the skyline. The LVMF view conditions illustrate this.</p> <p>Separately, an addendum to the DAS has been prepared (see enclosed) to comment specifically on how the proposed development meets the criteria of London Plan Policy D3 (Optimising site capacity through the design-led approach) as well as Southwark Plan policies P13 (Design of place) and P14 (Design quality).</p>
4	<p>Para 66 - Whilst the site itself is not located within any of the key strategic viewing corridors or protected vistas identified in Policy HC3 or the LVMF, the application should provide a view showing its impact on Protected Vista 23A.1 - Centre of Bridge over the Serpentine to the Palace of Westminster, given the site's location bordering the Wider Setting Consultation Area.</p>	<p>In the view from the Serpentine Bridge, LVMF 23A.1, there would be no visibility. The site is to the north of Eileen House, a much higher building which is also not visible in this view. The scheme is therefore some way outside of the backdrop consultation area of the strategic view. Its height is also well below the LVMF development threshold which for this site is at 63 m AOD, the building being a modest 58.23 m AOD and 16 storeys high whereas Eileen House is 35 storeys high. This exercise eliminates the need for an AVR to prove the matter.</p>
5	<p>Paras 67 and 68 - confirmation is needed that the author of the Fire Statement is suitably qualified as is evidence of the competency of the author (by way of an amendment to the Fire Statement introduction). Further detail is needed in the FS to address Part B of Policy D12.</p>	<p>Please see amended Fire Statement enclosed.</p>

6	Para 71 - clarification of the width of the proposed footway on the site frontage is required in relation to inclusive access.	<p>Revised ground floor plan drawing 21235-STCH-XX-DR-A-1102-B has the footpath widths dimensioned.</p> <p>Footway width is unchanged from the existing situation at 1500mm. The Department for Transport's 'Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure' document states that '<i>a minimum width of 1500mm could be regarded as the minimum acceptable under most circumstances, as this should enable a wheelchair user and a walker to pass each other. Where there is an obstacle, such as lamp columns, sign posts or electric vehicle charging points, the absolute minimum width should be 1000mm, but the maximum length of such a restricted space should be 6 metres</i>'. Furthermore, the footway width along the southern boundary of the site has been widened considerably.</p>
7	Para 72 - an inclusive design statement is required (to comply with Policy D5C).	See enclosed (prepared by Stitch Architects).
8	Para 84 - 86 - clarification and further information needed regarding the trip generation data/comparables used.	<p>Experience dictates that 'Total person' trip rates don't differ greatly based on PTAL or amount of car parking, PTAL and car parking provision affects the modal share rather than the total requirement to undertake a journey.</p> <p>Notwithstanding this, a TRICs exercise based on only sites with a PTAL of 6a/6b (and no parking) results in two way 'Total person' trip rates of 0.099 in the AM peak and 0.119 in the PM peak. This compares to the trip rates used in the</p>

		<p>TA of 0.098 and 0.117. The trip rates are therefore considered comparable. Please see TRICs sensitivity test enclosed.</p> <p>The modal split was set out in a scoping note issued to TfL and discussed at a GLA pre-app meeting with no objections raised. The modal share was agreed separately with highway officers at LB Southwark.</p>
9	Para 88 - further information is needed on the student moving in/out booking system in terms of impacts on the surrounding road network/pedestrians/cyclists/buses.	<p>The Student Management Plan sets out the booking system to be implemented and also details required number of slots, and number of slots available based on amount of available safe loading space. Booking slots will be strictly managed to ensure that loading only takes place during identified times and therefore impact on the local highway network will be minimised.</p> <p>This approach mirrors the approach taken on similar schemes in Southwark at Old Kent Road and Ilderton Road (refs 20/AP/2701 and 20/AP/1329) both approved by LBS and TfL with the same level of detail.</p>
10	Para 92 – the disabled persons' parking space is proposed to be allocated to a specific dwelling, contrary to Policy T6H, which states that such parking should be allocated on the basis of need and not tied.	<p>The space is not allocated to a single room/dwelling but issued on a lease basis to maintain flexibility which is consistent with the London Plan.</p>
11	Para 93 - an EVCP should be fitted for the one car parking space.	<p>See revised ground floor plan drawing 21235-STCH-XX-DR-A-1102-B which has the electrical vehicle charging point identified by the single parking space.</p>

12	Para 94 - the design of the cycle parking doesn't meet London Cycle Design Standards and thus Policy T5.	<p>Minor changes have been made to the cycle parking stores to ensure they are LCDS compliant in line with the more detailed comments received from TfL, as follows:</p> <ul style="list-style-type: none"> • Drawings 21235-STCH-XX-DR-A-1100-A, and 21235-STCH-XX-DR-A-1102-B confirm the ground floor and basement cycle storage provisions with dimensions of stands and aisle widths as per London Cycle Design Standards. • The ground floor plan has been revised to allow a secondary internal entrance in the commercial long stay cycle storage. • The two lifts into the cycle store meet the required 2.3mx 1.2m carriage size. • Some of the doors into the basement cycle storage area are required as part of the fire strategy. Some doors will be allowed to be open on hold backs and only closed in the event of a fire.
13	Para 95 - concern regarding the width of the footway and the provision of short-stay cycle spaces on the footway without justification.	There are no short-stay cycle spaces on the footway. Short-stay parking is located outside the concierge.
14	Paras 96, 97 and 99 - further information required to show how larger delivery vehicles will be accommodated and, on the delivery, and servicing strategy generally. At this stage	The DSMP demonstrates that the site is expected to generate a low number of servicing movements, with only 5 vehicles expected per day. The vast majority of these

	it should be demonstrated that the servicing demands of the worst-case use can be accommodated.	<p>vehicles are expected to be 3.5T small vans such as couriers and therefore on-street loading is expected to be minimal. Despite this, there is a significant amount of single yellow line kerb areas where safe legal loading can take place and a loading area could be specified on Avonmouth Street.</p> <p>The access in to Avonmouth Street by the refuse vehicle is an existing situation not exacerbated by the proposed development.</p>
15	Para 100 - Full DSP to be secured by condition as required by Policy T7.	Full DSMP to be conditioned would be expected and is agreed.
16	Paras 106, 111 and 114 - further information requested on the energy strategy, WLC assessment and circular economy statement.	<p>Responses provided on WLC and Circular Economy matters under separate cover on 13/05/22.</p> <p>Please see enclosed revised energy strategy, sustainability statement, overheating assessment and response sheet.</p>
17	Para 123 - drainage calcs need updating for consistency.	Amended calculations are enclosed.
18	Para 126 - further commitments requested on the inclusion of rainwater harvesting and additional above ground green SuDS e.g. rain gardens.	The two areas of street level planting (shown in enclosed updated drainage drawing no. 2102760-001A) are proposed as rain gardens. Additional rainwater harvesting measures will be determined at detailed design stage but

		will, as a minimum, take the form of water butts to aid the irrigation of the communal gardens at seventh floor level.
19	Paras 127-129 - further information is needed regarding the proposed water efficiency strategy to comply with Policy SI5.	<p>The development will ensure water fitting and fixtures achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)</p> <p>The commercial section of the development will aim to achieve BREEAM excellent standard for the 'Wat 01' or equivalent. Water fittings will be specified with the following or similar flow rates to meet the water consumption targets, and will be revised at the design stage to ensure relevant BREEAM credits are met:</p> <ul style="list-style-type: none"> • WC - 4 litre effective flush volume • Urinal - 3 litre/bowl/hour • WHB taps - 6 l/min • Showers - 8 l/min • Baths - 160 litres to overflow • Kitchen taps - 8.3 l/min • Kitchenette taps - 7 l/min • Commercial sized dishwashers - 6 l/rack • Commercial sized washing machines - 10 l/kg • Domestic sized dishwashers - 13 l/cycle • Domestic sized washing machines - 50 l/use <p>Building wide water use will be monitored by the BMS system, with separate meters for the student and</p>

		commercial section of the development, to allow constant monitoring of the water use.
20	Para 131- the FRA proposes FFLs of 'more vulnerable' uses 300mm above flood level and states these measures "should" be implemented. Clarify if they have been agreed with the project team and included within scheme proposals or simply recommendations	The FFLs are confirmed and are included in scheme proposals.
21	Paras 132-133 - Demonstrate how sensitive plant at lower floors is protected to ensure a safe haven can be provided at upper floors. In addition, the FRA should demonstrate that communal areas are available at upper floors for site users from the ground floor and basement.	Sensitive plant will be protected with suitable flood resistant measures to ensure they are watertight during a flood event. This will include flood doors with waterproof seals, sealing of any service entry points and location ventilation outlets for the plant room above the flood level.
22	<p>Para 135 - No discussion of any emergency generators is included (even if to say they are not included). Further information is therefore required to demonstrate compliance with London Plan Policy SI1B1a-b.</p> <p>Para 138 - Confirmation is required that no emergency diesel-fired generators will be installed in the proposed development. If generators are proposed, then the proposed maintenance and testing schedule will need to confirm that routine operation will not result in exceedances of the air quality objectives.</p>	<p>The proposed development includes the provision of an emergency diesel generator. The main pollutants of concern for such plant are nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}), emissions of which will be released during routine testing.</p> <p>The generator is anticipated to be located withing a packaged enclosure, on the second-floor roof of the development building, with direct flue output to the atmosphere (as informed by the project's M&E consultant; Taylor Project Services). The generator flue will discharge vertically at roof level at the highest point of the proposed</p>

	<p>development; this is considered to be an appropriate location and will allow for adequate dispersion of emissions.</p> <p>Taking into consideration the south-westerly prevailing winds in this area the plume is expected to travel predominantly to the northeast. The existing land uses directly to the northeast of the proposed flue location are predominantly government buildings and recreational green space and, therefore, are sensitive to the 1-hour mean NO₂ objective only. The proposed flue height is significantly greater than the maximum height of all existing sensitive areas that are located immediately downwind of the proposed flue, thus reducing the potential for an existing sensitive receptor to intersect the plume prior to adequate dispersion having occurred.</p> <p>Outside of emergency conditions, the generator plant will only be operational for the purposes of testing. It is estimated that the testing regime will be comprised of monthly testing with a duration of 15 minutes, or similar (The exact testing regime is yet to be confirmed and will be subject to the specific management routine, however, this assumed testing regime is considered to be reasonable for such plant, as confirmed by the project's M&E consultant (Taylor Project Services). As such, if the worst-case assumption was made that each 1-hour period in which testing occurred resulted in 1-hour mean NO₂ concentrations >200 µg/m³ and 24-hour mean PM₁₀ concentrations >50 µg/m³, then the maximum possible number of 1-hour mean NO₂ concentrations >200 µg/m³</p>
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	<p>and 24-hour mean PM₁₀ concentrations >50 µg/m³ that could occur as a result of the proposed generator plant would be 12 per year. The closest automatic local monitoring site operated by LB Southwark (urban background site SKW6), located approximately 560 m to the southwest of the Site, is considered to be reasonably indicative of likely concentrations within and immediately downwind of the development Site. In 2019 monitoring site SKW6 measured zero instances of 1-hour mean NO₂ concentrations >200 µg/m³ and 14 instances of 24-hour mean PM₁₀ concentrations >50 µg/m³. Therefore, based on the worst-case assumptions that the proposed generator plant may result in a total of up to 12 instances per year where the 1-hour mean NO₂ concentrations are >200 µg/m³ and the 24-hour mean PM₁₀ concentrations are >50 µg/m³, the maximum number of instances where the 1-hour mean NO₂ concentration would be >200 µg/m³ and the 24-hour mean PM₁₀ concentration would be >50 µg/m³ would be 12 and 26 respectively; i.e. below the relevant short-term national air quality objectives.</p> <p>Taking into consideration the comparatively low frequency and duration of emissions associated with the proposed generator plant as a result of the proposed testing regime and anticipated low baseline concentrations of pollutants within the Site and in the surrounding area (as discussed within the Air Quality Assessment (AQA)), it is considered that the contribution of generator emissions to annual mean concentrations of NO₂, PM₁₀ and PM_{2.5} will not result in any exceedances of the annual mean objectives.</p>
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		Overall, taking into consideration the location of the proposed generator flue, the proposed testing regime, prevailing wind conditions, the location of existing sensitive receptors and baseline air quality conditions, it is judged that the overall effect of the proposed generator plant will be 'not significant'.
23	Para 136 - Exposure of future users of the development is assessed quantitatively, using dispersion modelling. Predicted concentrations at worst-case proposed receptors were found to be below the objectives and therefore acceptable for the proposed use without mitigation – compliant with London Plan policy SI1B1c.	We are in agreement with this statement (i.e., that the proposed development is compliant in this respect and that there is no need for further mitigation).
24	Para 137 - The proposed development will not result in any building emissions, so development is better than air quality neutral for building emissions, and is 'car-free' so is considered air quality neutral for transport emissions. The development is therefore considered to be air quality neutral in accordance with London Plan Policy SI1B2a.	We are in agreement with this statement (i.e., the Air Quality Assessment adequately demonstrates that the proposed development is better than 'air quality neutral').