



TfL Spatial Planning Reference: STWK/22/11  
- by e-mail only -

Transport for London  
City Planning

5 Endeavour Square  
Westfield Avenue  
Stratford  
London E20 1JN

Phone 020 7 222 5600  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

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Dear Thomas,

## **RE: Avonmouth House, 6 Avonmouth Street – TfL Comments**

Thank you for consulting TfL Spatial Planning on this application. From the submitted material, it is understood that the proposed development is:

Demolition of existing building and structures and erection of a part 2, part 7, part 14, and part 16 storey plus basement development comprising 1,733 sq.m. (GIA) of Class E employment use and/or community health hub and/or Class F1(a) education use, and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and associated infrastructure.

TfL write to provide detailed strategic comments on the above application. These provide more detail on the matters raised in the GLA Stage 1 Planning Report GLA/2022/0221/S1/01, dated 3<sup>rd</sup> May 2022. Please note that these are additional also to any response you may have received from my colleagues in infrastructure protection and property interest.

### Site Description

The site is on Avonmouth Street, which is borough highway. The nearest section of the Transport for London Road Network (TLRN) is approximately 170m away on A3 Newington Causeway.

There are 25 bus routes within a reasonable walking distance of the site with the nearest stops being about 70m away. Notable destinations include: London Bridge Station, Shoreditch, Aldwych and King's Cross Station.

Elephant and Castle LU station is approximately 280m from the site, providing Northern and Bakerloo Line services. The Elephant and Castle National Rail station is approximately 350m from the site, providing Thameslink services to South London, Hertfordshire, Bedfordshire and Kent. Termini include: London Blackfriars, Sutton, Luton and Sevenoaks.

Consequently, the site has the highest possible Public Transport Access Level (PTAL) of 6b (on a scale of 1-6b).

Cycleway 17 is approximately 320m from the site on Falmouth Road. The nearest section of the National Cycle Network is over 1km away on Park Street. Thames Path, the nearest section of the strategic walking network, is over 1km.

### Healthy Streets

All developments proposed should support the Mayor's Healthy Streets approach in line with Policy T2 of the London Plan. From the submitted ATZ assessment, the route between the site and Elephant and Castle Underground Station needs the most improvement. It has narrow footways, a lack of lighting and indiscriminate parking which creates pinch points along the route. This area should be improved to meet Vision Zero and Healthy Streets policies. As this is borough highway, these improvements should be agreed with the Council and secured through a S278 agreement.

Whilst there are existing Legible London signs in the wider area, a new Legible London sign at a decision point close to the site and a contribution to any necessary amendment of any existing signs to incorporate this proposed development will be welcomed.

It is expected that this development will create a greater demand on the Santander Cycle Hire scheme. Cycling is a fast way to travel in central London. Whilst there are two nearby cycle hire docking stations, additional provision is needed to mitigate the demand from this development in the context also the growth in patronage generally and within this area of cumulative growth. Taking account of the nature and size of this development, a s106 contribution of £120 000 is requested in line with Policy T4. This will help facilitate a strategic modal shift at this site, in line with Policy T1.

### Cycle Parking

200 long-stay and 10 short-stay cycle parking spaces have been proposed, which aligns with the minimum standards of Policy T5. This quantum has been calculated based on the commercial element being for office use. However, it should be noted that the cycle parking provision required will depend on the end use of the flexible commercial use proposed.

The cycle parking is not in accordance with the London Cycle Design Standards (LCDS), which is a requirement of Policy T5. Areas of non-compliance are as follows:

- It is welcomed that 36 cycle parking spaces will be on Sheffield stands at normal spacing, this equates to approximately 17 per cent of stands.

- Eight spaces have been provided on Sheffield stands wider spacing. In order to achieve five per cent of spaces at Sheffield stands at wider spacing, as required by the LCDS, two additional spaces on a Sheffield stands at wider spacing is required.
- The proposed spacing of stands does not meet LCDS minimum requirements. In order to meet LCDS requirements, wider access Sheffield stands should be at least 1.8m and normally spaced Sheffield stands and two-tier racks are recommended to have 1.2m between stands, with an absolute minimum spacing of 1m.
- The aisle width in the ground floor store is 2.1m. The LCDS is clear that a minimum aisle width of 2.5 metres beyond the lowered frame is required to allow cycle to be turned and loaded and it is recommended that an aisle width of 3.5 metres is provided where two-tier racks on either side of the aisle are provided.
- While it is welcomed that two lifts to the cycle store are being provided, in order to comply with the LCDS, these need to be 2.3m x 1.2m with a minimum door opening of 1m. This is to ensure that those with wider cycles can access the cycle parking store.
- Access to the ground floor cycle store is through the public realm, which raises concerns over the personal security of users who could easily be followed into these stores or, given that there is only one door, pushed back in when they try to exit. The way to resolve these concerns is to provide access to cycle stores through the residential lobby or office space of each building. This provides a space, with a high probability of passing foot traffic, for a cyclist to wait before entering the cycle store, affording cyclists the same level of personal security as residents without cycles, or allows them to escape from the store if tailgated in. If this is proved not to be possible at least two access points to each cycle store should be created to provide a cyclist with an escape route and a choice of access points into the store. This is relevant to crime and disorder as well as planning considerations.
- Ten short stay spaces will be within the public realm at street level. It is understood that this is within private land owned by the applicant and so will not reduce the pavement width. Any reduction to the pavement width would not support the expected pedestrian flow along this street.
- It is noted that access to the cycle parking stores includes going through five or six doors. In order to facilitate easier access to the cycle parking and align with the LCDS, the number of doors to the cycle parking should be reduced where possible.

TfL does not consider it to be appropriate to leave these matters to be addressed via condition as design changes is likely to be required to address the above. The applicant should therefore seek to review and revise their cycle parking provision accordingly prior to the determination of this application.

### Car Parking

It is welcomed that this development is car-free, except for disabled persons' parking, in line with Policy T6. This should be subject to a permit-free agreement, secured through condition, alongside funding towards a review of the timing of on street controls in the area recognising that an office use is being replaced by primarily student housing.

Only one on-site disabled persons' parking space is proposed, which equates to less than one percent of dwellings having a disabled persons' parking space. Given the location and PTAL of the site, this it is considered acceptable, in line with similar applications. However, increased provision to facilitate travel for disabled residents should be made including a contribution towards station improvements and more than the minimum provision for active travel. Furthermore, the universities to be attended by the students living in the development should be asked to confirm alternative accommodation arrangements for disabled students to show that there is good choice.

The disabled persons' parking space is proposed to be allocated to a specific dwelling. This is contrary to Policy T6 H which states that such parking should be allocated on the basis of need and not tied.

Given that only one car parking space is proposed, this space should have active electric vehicle charging provision in line with Policy T6.

### Trip Generation

To determine the trip generation rates, sites with a PTAL 4 have been used and some of the sites are not car-free. It is unclear how this has been dealt with to suit the characteristics of this site. Given the high accessibility of the site, it is recommended that only sites with a PTAL 6a/6b are used. The mode split would also appear to underestimate trips by cycle and on foot and this needs to be addressed.

Once this information is available, TfL will be able to assess whether any further mitigation additional to those mentioned above will be required in line with Policy T4.

The worst-case use should be assessed and mitigated for in respect of the proposed flexible ground floor unit.

### Delivery and Servicing

Only smaller delivery vehicles will be able to be accommodated on-site. Further information is required to show how the larger vehicles will be accommodated and how all the demands will be managed. The use of sustainable modes such as cargo bikes is encouraged.

The swept path analysis for delivery and servicing to the site shows vehicles manoeuvring onto the wrong side of the road at the Avonmouth Street and Newington Causeway junction and hitting kerbs along Avonmouth Street. This is contrary to the Mayor's Vision Zero approach and could increase the risk of collisions between vehicles and pedestrians and cyclists. This could also have an impact on buses in the bus lane on Newington Causeway and traffic flows along Avonmouth Street. Further consideration of this aspect of the proposals to mitigate these risks is therefore required.

Controls on servicing to avoid times when there are many pedestrians and cyclists in the area should be imposed and consideration given to only night time/early morning activity. Appropriate facilities for charging electric vehicles and parking cargo bikes should be secured.

It is noted that a wide range of uses could be made of the ground floor commercial unit. At this stage it should be demonstrated that the servicing demands of the worst-case use can be accommodated.

A full Delivery and Servicing Plan (DSP) is required by Policy T7. This should be secured through condition and developed in line with TfL guidance. The DSP should contain targets to minimise large service vehicle movements and encourage smaller and sustainable means. Consolidation/sharing of deliveries should be included. A concierge system would also assist.

#### Student move in/out

It is noted that students move in/out will be managed through a booking system and that the intention is that loading/unloading for students moving in/out will be on street where parking but not loading is restricted. With the limited space available and the proposed quantum of student bedrooms, further information is required on the measures that are to be implemented to minimise the impact that this would have on the surrounding road network and in particular upon pedestrians and cyclists and buses. This should be provided prior to determination.

The Council should secure a move-in/move-out plan through condition.

#### Construction

An outline Construction Logistics Plan (CLP) has been provided. Further thought is required on vehicles manoeuvring into Avonmouth Street and on-street offloading and the potential impacts of this on bus services and traffic flows along Newington Causeway, Avonmouth Street and on pedestrians and cyclists. Further discussion with TfL on this is requested as there may be an opportunity to change signal timings to identify a safe opportunity for large vehicles to turn from Newington Causeway and into Avonmouth Street.

It is understood that there is a potential overlap in construction timeframes with other developments coming forward in the immediate vicinity. Therefore, it is

recommended that consolidation and collaboration with other sites coming forward in the vicinity is explored.

The submitted CLP shows vehicles routing via Meadow Row to egress the site. It should be noted that Meadow Row is a signed cycle route and so the safe movement of cyclists along this route should be prioritised.

As with servicing, controls on vehicle movement to avoid times when there are many pedestrians and cyclists in the area should be imposed and consideration given to only night time/early morning activity. This request is in line with Policy T7.

Given that local roads are not suitable for HGVs, it should be demonstrated that their use is limited to only essential movements and how the safety and comfort of pedestrians and cyclists would be maintained.

It is noted that a footpath closure is required on Avonmouth Street. In line with Vision Zero, it must be ensured that safe pedestrian and cyclist movement is maintained and with adequate space to ensure pedestrian and cyclist comfort and convenience alongside enough room for other vehicles.

After discussion with TfL and the Council, a full Construction Logistics Plan should be secured through condition, in line with Policy T4. In the CLP it should be demonstrated how deliveries to the development through sustainable modes of transport, such as smaller electric vehicles and cargo bikes will be maximised. This is in line with Policy T7. Cargo bike facilities should be provided to support this.

#### Travel Plan

A full travel plan should be secured through condition in line with Policy T4. The Travel Plan should provide targets to increase active travel in line with the Mayor's Strategic Mode Shift target. These targets should be over a five-year period, with interim targets in years 1, 2 and 3 in line with TfL guidance. Measures to support these targets should also be included.

I trust that the above provides you with a clear overview of TfL's current position on this application. However, should you have any questions or would like to discuss the above further please do not hesitate to contact me on the following e-mail address: [v\\_AlexandraWeir@tfl.gov.uk](mailto:v_AlexandraWeir@tfl.gov.uk)