

Weaver, Thomas

From: Weir Alexandra <v_AlexandraWeir@tfl.gov.uk>
Sent: 22 July 2022 11:10
To: Weaver, Thomas
Cc: Leah Moniz
Subject: 21/AP/4297 Avonmouth House
Attachments: Avonmouth House - Applicant response to GLA Stage 1.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Thomas,

Please see below for a TfL response to the applicant for their response to the GLA Stage 1 Report for 21/AP/4297 Avonmouth House. The applicant's comments are attached.

Trip Generation

In our previous comments, we stated that the worst-case (highest trip generation) use that would be allowable should planning permission be granted should be assessed in respect of the proposed flexible ground floor unit. Logically, the commercial element should be the 'worst-case' scenario but could the applicant please confirm this. We also asked for TRICS sites with a PTAL of 6a/6b be used within the trip generation for all scenarios, rather than PTAL 4-6. This has not been provided. The applicant has also not provided the modal split of trips, including splitting of public transport into bus, tube etc. This is a basic approach that most referable planning applications provide within the transport assessment.

Assuming the commercial use has the highest trip rate, we consider that the trip rate provided for this use is underestimating the likely trip rate. For example, the nearby consented Heygate Estate Masterplan (Elephant Park) (2012) proposed a commercial trip rate of 1.995 in the AM peak and 2.781 in the PM peak. This is significantly higher than the 0.474 AM peak and 0.342 PM peak proposed by the applicant's trip generation assessment.

Prior to determination, an updated full trip generation assessment of the commercial and student accommodation uses should be provided. This should include the number of trips proposed by mode (split by bus, tube, national rail etc.) and split by direction. We would expect mode split to reflect consented developments in the Elephant and Castle area, of which there are a number of recent examples and the methodology for deriving modal share should be provided.

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.

Car Parking

TfL welcomes that the space will be leased if demand arises rather than attached to a specific room.

TfL welcomes that an electric vehicle charging point for the disabled persons' parking space has been provided.

Cycle Parking

TfL welcomes that design amendments have been made to the cycle parking to improve compliance with the LCDS.

- TfL welcomes that the proposed aisle widths meet minimum LCDS standards.
- We welcome that the spacing between the Sheffield stands at wider spacing and those at normal spacing meet LCDS requirements.

- It is recognised that some of the doors to the basement cycle store are required for the fire strategy. We would welcome if some of these doors were open on hold backs and only closed in the event of a fire as the applicant has suggested.

However, the plans proposed still do not meet LCDS requirements:

- As mentioned previously, an additional Sheffield stand (two spaces) at wider spacing is required for five per cent of spaces to be Sheffield stands at wider spacing. This is in order to provide sufficient spaces for those who use adapted cycles, such as cargo bikes or tricycles.
- While the Sheffield stands meet LCDS spacing requirements, we recommend that the spacing between the two-tier racks is increased. The very tight spacing proposed will make using the cycle spaces more challenging and raises concerns about security. With this spacing, it is likely that handlebars will get caught with the handlebars, brake cables or gear cables of the bikes either side. It also makes it more difficult to lock a bike on the lower tier, as the cyclist will have to squeeze between other bikes to get the lock through the stand.
- We note that two-tier racks with Sheffield stands on the bottom rack are being used on the ground floor. We recommend a 1.2m spacing between these types of racks to ensure that a cyclist has sufficient space to lock their front wheel and frame to the stand with a shackle ('D') lock.
- The applicant has stated that the cycle lifts are 2.3m x 1.3m wide. However, the plans provided do not show the cycle lift cab to be 2.3m x 1.3m. This is required by the LCDS to ensure that those with wider cycles can access the cycle parking store. The plans should be updated to demonstrate this.

Design amendments are required to align with the LCDS. These should be shown on an updated plan.

Student Move In/Out arrangements

It is welcomed that a booking system will be implemented to reduce the impact upon the highway network. No information surrounding where vehicles will be directed to after their 30-minute slot has been provided, or the procedure if a vehicle arrives earlier than their slot time. There is concern that vehicles will be waiting/parking on the highway network outside of their slot times, which would be a concern to TfL if this affected buses and stops and/or the TfL road network. It is recommended that space is provided on the ground floor to allow students to drop off their belongings during their unloading slot.

The Student Move In/Out Plan secured through condition should consider other student accommodations in area, including those currently in the planning system, such as on Tiverton Street (22/AP/1068).

Construction

Our concerns relating to construction have not been addressed. These are summarised below for reference, and should be covered in the Construction Logistics Plan (CLP) that should be secured for approval by condition/planning obligation:

- 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, for example the on-going shopping centre (Elephant and Castle Town Centre) redevelopment and, adjacent proposal for student accommodation on Tiverton Street which is subject to a planning application referenced above. Therefore, it is recommended that consolidation and collaboration with other sites coming forward in the vicinity is explored.

- The submitted CLP (Construction Logistics Plan) 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.

We're happy for these to be passed onto the applicant. Please let me know if you have any queries.

Many thanks,

Alexandra Weir (she/her)

Assistant Area Planner – East Team | TfL Spatial Planning

Transport for London 9B5, Endeavour Square, Westfield Avenue, London, E20 1JN

Email: v_AlexandraWeir@tfl.gov.uk

This message has been scanned for malware by Forcepoint. www.forcepoint.com