

## Cabinet

Tuesday 15 October 2024

11.00 am

Rooms GO2A, B and C, Southwark Council, 160 Tooley Street, London  
SE1 2QH

## Appendices – Part 2

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Webpage:

Date:



Old Kent Road Area Action Plan  
 Proposed Submission Version  
 October 2024

**Consultation Plan**

Old Kent Road Area Action Plan 2024 appendices: Document Locator	
No.	Title
Appendix A	Old Kent Road AAP 2024
Appendix B	Consultation Plan
Appendix C	Consultation Report
Appendix D	Integrated Impact Assessment
Appendix E	Habitats Regulations Assessment
Appendix F	Equalities Impact Assessment, comprising:
	- EQIA Document 01: Executive Summary
	- EQIA Document 02: Summary of the EQIA
	- EQIA Document 03: Equalities Impact Assessment
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Appendix G	Health Impact Assessment

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## 1. Introduction

- 1.1. The Old Kent Road Area Action Plan (AAP) is a plan to regenerate the Old Kent Road and surrounding area. It sets out a vision for how the area will change over the next 20 years, delivering a healthy, safe and prosperous community and a fairer future for all in the Old Kent Road area with 20,000 new homes and 10,000 additional jobs.
- 1.2. The AAP shall have a clear strategy, policy designations, site allocations and masterplans to make sure that we achieve this vision over the next twenty years. It will be an addition to the Councils framework of planning documents, and a material planning consideration in deciding planning applications within the opportunity area. As an opportunity area planning framework (OAPF) it will also be endorsed by the Mayor of London.

### The Purpose and Objective of this consultation plan

- 1.3. The process of reviewing the AAP needs to involve local community groups, residents, landowners, developers and businesses at each stage to ensure that the plan meets the needs of those living in, working in and visiting the Old Kent Road area.
- 1.4. The purpose of this consultation plan is to make sure that we strategise to involve local people in preparing these documents in a way that considers their needs. There are minimum legal requirements for consultation we need to follow which you can read about in sections 2 and 3 below.
- 1.5. We have been engaging and consulting the local community and businesses groups over the past four years as set out in the table below and through this Consultation Plan we will demonstrate how we will continue to do so during this formal stage of public consultation on the AAP.

<b>Consultation</b>	<b>Timetable</b>
Informal consultation	2013 - Spring 2016
Consultation on Integrated Impact Assessment Scoping Report	12 February 2016 - 18 March 2016
Consultation on AAP: Old Kent Road Area Action Plan Preferred Option	June 2016 – November 2016
Consideration of responses and developing the draft Old Kent Road Area Action Plan	Autumn 2016
Consultation on AAP: New and Amended Policies Preferred Option	June 2017 – September 2017
Consultation on AAP: Further Preferred Option	December 2017 - March 2018
Consultation on AAP: December 2020 draft	11 January – 5 April 2021
Consultation on AAP: Proposed Submission version 2024	November 2024-January 2025



Examination-in-Public	2025
Adoption of the Old Kent Road Area Action Plan	2025

## 2. How we are consulting?

- 2.1. We carry out consultation in accordance with our adopted Statement of Community Involvement (SCI) 2022, which explains how we will consult the community in the preparation of planning policy documents.
- 2.2. The following section sets out how we plan to meet the minimum statutory consultation requirements and how we will exceed these requirements where appropriate. Tables 1 & 2 of this Consultation Plan captures how we will consult on the Old Kent Road AAP September 2024 draft.
- 2.3. This Consultation Plan should be read alongside the AAP and its supporting documents which is available on our websites:
- <https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/area-action-plans-section/old-kent-road-aap>
  - [www.oldkentroad.org.uk](http://www.oldkentroad.org.uk)

## 3. Consultation timetable and methods of consultation

### Consultation timeframe

- 3.1. Consultation will last for at least 6 weeks in accordance with our SCI.

### Consultation methods

- 3.2. Table 1 below sets out the different consultation methods we propose to use. Throughout preparing the Old Kent Road AAP we have sought to consult with as many people as possible so that the plan reflects the needs and aspirations of the area's diverse community.
- 3.3. We set out the minimum Town and Country Planning (Local Planning) Regulations 2012 requirements – Regulation 19, in addition to the Council's SCI requirements that we will carry out, alongside the additional consultation methods we propose to deliver. We set out dates where these are already agreed.
- 3.4. Table 2 aligns with the draft Old Kent Road Engagement Strategy 2024 (Appendix A). This table is not exhaustive and throughout the consultation period we will look at ways in which to carry out different types of consultation approaches with as many different groups as possible.

**TABLE 1: MINIMUM CONSULTATION AS REQUIRED BY THE 2012 REGULATIONS<sup>1</sup> AND NATIONAL POLICIES IN ADDITION TO CONSULTATION REQUIRED BY OUR ADOPTED STATEMENT OF COMMUNITY INVOLVEMENT 2022**

Method of Consultation	Consultee	Date	Comments
As per Regulation 3:  Comments to be accepted by email and by letter	All	Until xxx 2024 11.59pm	Comments can be emailed to <a href="mailto:oldkentroad@southwark.gov.uk">oldkentroad@southwark.gov.uk</a>  Comments can be posted to Planning and Growth Finance Department Southwark Council FREEPOST SE1919/14 London SE1P 5LX  We will check all post received addressed to Planning Policy at the above address at the end of the consultation period.
Statement of Community Involvement (SCI) 2022 requires for an online questionnaire via the Consultation Hub to be set up with links to where the Old Kent Road AAP and accompanying documents can be found on the council's website.	All	The Consultation Hub will be live from xxx until xxx 2025 11.59pm	Consultation Hub access shall be available for the consultation period and will be advertised on all Council online platforms.

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<sup>1</sup> Town and Country Planning (Local Planning) Regulations 2012

Method of Consultation	Consultee	Date	Comments
<p>As per Regulation 35(1)(b):</p> <p>The plan and accompanying documents are to be displayed on the council's website.</p>	All	<p>The plan will be available online as part of the Cabinet papers at least one week prior to the meeting of 15 October 2024. It will subsequently be reported to council assembly on 20 November 2024.</p>	<p>The AAP document and associated documents will be available on our websites:</p> <ul style="list-style-type: none"> <li>• <a href="https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/area-action-plans-section/old-kent-road-aap">https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/area-action-plans-section/old-kent-road-aap</a></li> <li>• <a href="http://www.oldkentroad.org.uk">www.oldkentroad.org.uk</a></li> </ul>
<p>As per Regulation 35(1)(a):</p> <p>Hard copies of the plan are to be placed in local libraries and in the council office.</p>	All	<p>Physical copies of the Old Kent Road AAP will be available to public to view from xxx</p>	<p>The chosen locations for the Old Kent Road AAP to be viewed shall continually be monitored to ensure we keep up with demand and restock where necessary.</p>

Method of Consultation	Consultee	Date	Comments
<p>As per Regulation 18(1):</p> <p>Mail outs to all the statutory prescribed bodies and consultees as listed under Regulation 4(1)</p>	<p>All consultees defined as statutory consultees in the SCI and all the prescribed bodies and neighbouring boroughs referred to in the Duty to co-operate.</p>	<p>Emails will be sent before the start of the consultation period on xxx 2024.</p>	<p>Notification of the Old Kent Road AAP consultation will be sent to the bodies identified as statutory consultees in the SCI, all the prescribed bodies as set out in the Localism Act and that we are required to consult with as part of the Duty to co-operate, including all our neighbouring boroughs. This will be done through our planning policy mailing database (including any superseded bodies to any defunct organisations specified within the SCI).</p>
<p>As per Regulation 18(1)(b):</p> <p>Invite people to make representations on the Old Kent Road AAP and accompanying evidence base documents</p>	<p>All on planning policy consultee database</p>	<p>Emails will be sent before the start of the consultation period on xxx 2024.</p>	<p>An email will be sent to the 15,000+ contacts signed up for planning policy email notifications and updates via MySouthwark.</p>
<p>SCI 2022 Requirement:</p> <p>Place a press notice in the local newspaper to advertise the start of the formal consultation period.</p>	<p>All</p>	<p>Xxx 2024</p>	<p>This will be in the Southwark News.</p>
<p>SCI 2022 Requirement:</p> <p>Advertise the consultation through posters in libraries and community centres</p>	<p>All</p>	<p>Posters will be sent out to local libraries before the start of the consultation</p>	<p>The locations of active libraries and community centres are as follows:</p> <ul style="list-style-type: none"> <li>• Southwark Council offices, 160 Tooley Street</li> <li>• 231 Old Kent Road</li> </ul>

Method of Consultation	Consultee	Date	Comments
		period on xxx 2024.	
SCI 2022 Requirement:  Advertise the consultation through council social media	All	Before the start of the consultation period on xxx 2024 and throughout the consultation period.	Send out regular updates and reminders through council social media pages in addition to the 6-month pilot OKR team social media pages

**TABLE 2: FURTHER CONSULTATION AS REQUIRED BY THE DRAFT OKR ENGAGEMENT STRATEGY 2024**

Method of Consultation	Consultee	Date	Comments
Exhibition to be held at 231 Old Kent Road	All	tbc	The council will hold an exhibition of the proposals with officers on hand to answer questions and provide further information
Coffee morning drop-in sessions at 231 OKR with local residents, community groups & TRA.	All	Weekly sessions to commence from xxx 2024	An opportunity for those who wish to meet with the OKR team and discuss the AAP to drop in during any of the set sessions.

Method of Consultation	Consultee	Date	Comments
Further engagement to be confirmed, including presentations to residents and civic groups as required.	All	Xxx 2024	

#### 4. How to comment on the Old Kent Road AAP

##### How to comment on this document

This Old Kent Road AAP September 2024 draft has been prepared in response to the previous consultations and is being consulted on to ensure that all residents and visitors have an opportunity to provide final comments on all policies before the Examination-in-Public stage.

We welcome your comments on the Old Kent Road AAP and on the supporting documents. Please contact us if you would like to know more about the documents or to find out more about our consultation.

All comments must be received by midnight on **xxx** 2024. Comments received after this date may not be taken into consideration.

Representations can be made by:

- Visiting our consultation hub: <https://consultations.southwark.gov.uk>
- Sending an email to [oldkentroad@southwark.gov.uk](mailto:oldkentroad@southwark.gov.uk)
- Alternatively you can send your response to:

Old Kent Road Planning and Growth Team  
 Finance Department  
 Southwark Council  
 FREEPOST SE1919/14  
 London SE1P 5LX

Tel: 0207 525 4929

#### 5. Monitoring and reporting

- 5.1 The outcomes of this consultation and the council's response to consultation will be published before or alongside the Proposed Submission Version of the plan. This will then be submitted to the Secretary of State who will appoint an independent inspector to hold an Examination-in-Public into the soundness of the plan. The plan will then be adopted, subject to any modifications recommended by the inspector.



Old Kent Road Area Action Plan  
Proposed Submission Version  
October 2024

**Consultation Report**

Old Kent Road Area Action Plan 2024 appendices: Document Locator	
No.	Title
Appendix A	Old Kent Road AAP 2024
Appendix B	Consultation Plan
Appendix C	Consultation Report
Appendix D	Integrated Impact Assessment
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Appendix F	Equalities Impact Assessment, comprising:
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Appendix G	Health Impact Assessment



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## 1. Introduction

### What is the Old Kent Road AAP?

- 1.1. The Old Kent Road Area Action Plan (AAP) is a plan to regenerate the Old Kent Road and surrounding area. It sets out a vision for how the area will change over the period leading up to 2040. This includes delivering 20,000 new homes and 10,000 additional jobs. The vision is supported by a strategy with policies we will put in place to deliver it. The AAP will make sure that over the next twenty years we get the right development needed to support a healthy, safe and prosperous community and a fairer future for all in the Old Kent Road area.
- 1.2. The AAP will be part of our framework of planning documents. It will be a material planning consideration in deciding planning applications in the opportunity area. It will help ensure that we make decisions transparently, providing clarity for members of the public and giving more confidence to developers to invest in the area. It will also be an opportunity area planning framework (OAPF) endorsed by the Mayor of London.

### What is this consultation report?

- 1.3. The purpose of this report is to summarise the consultation carried out to date. After each stage of consultation we will update this report to reflect the most recent consultation.
- 1.4. At each stage of consultation we carry out activities in accordance with our Statement of Community Involvement (SCI) 2022. The SCI sets out how the council will consult on all of our planning policy documents. The SCI refers to a number of legal and regulatory requirements, both in terms of methods of consultation and also particular bodies that we must engage with, and sets out how we meet these requirements. When the SCI was produced it was done so with regard to the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.5. The Localism Act 2011 introduced the “duty to co-operate”, which requires us to engage with a range of bodies on an ongoing basis as part of the production of planning policy documents. Much of the process that is required by the duty is already covered in our SCI and has been an integral part of the preparation of new planning policy in the borough. We will ensure that we meet the requirements of the duty to co-operate at every stage of consultation. This involves writing to and where appropriate meeting and working with our neighbouring boroughs, the Greater London Authority, Transport for London and other prescribed bodies such as Historic England.

### Where to get more information

- 1.6. The Old Kent Road Area Action Plan and associated documents can all be viewed on our website: <https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/area-action-plans-section/old-kent-road-aap/current-and-previous-versions-of-okr-aap>
- 1.7. There is also a dedicated Old Kent Road website: <http://www.oldkentroad.org.uk/>
- 1.8. Copies are also available by contacting the Planning Policy Team using the following methods:

- Email: [OldKentRoad@southwark.gov.uk](mailto:OldKentRoad@southwark.gov.uk)
- Post: Old Kent Road Planning and Growth team, Finance Department, Southwark Council, FREEPOST SE19/14, London SE1P 5LX

### What happens next?

- 1.9. The council has reviewed the comments made on the December 2020 Old Kent Road AAP and has produced a revised (Regulation 19) draft, known as the submission draft. The council will invite representations to be made on the submission draft and these, together with the plan will be submitted to the Planning Inspectorate for an examination in public led by an independent planning inspector. Participants of the final stage of consultation have the right to represent themselves at the public examination.
- 1.10. The inspector will prepare a report for the council and may require mandatory changes to be made to the plan. The final Old Kent Road AAP will then be adopted by the council. This is a decision taken by all councilors at the Council Assembly.
- 1.11. Table 1 shows the stages of preparation and consultation on the AAP leading up to its formal adoption.

*Table 1 - Stages of Consultation*

<b>Stage of consultation</b>	<b>Consultation timescale</b>
Informal consultation	2015-2016
Consultation on Preferred Option draft AAP, May 2016	June to November 2016
Consultation on new and amended policies Preferred Option (June 2017)	June to September 2017
Consultation on Further Preferred Option draft AAP, December 2017	December 2017 to March 2018
Consultation on draft AAP December 2020 (Regulation 18)	January 2021 to May 2021
Publication/submission version of AAP (Regulation 19)	November 2024 to January 2025
Submit to the Secretary of State	April 2025
Examination in Public	2025
Adoption	2025

## 2. STAGES OF CONSULTATION

- 2.1. We have been engaging and consulting with the local community and business groups over the past nine years. We consulted residents and businesses by establishing a community forum which focused on different topics related to the regeneration and planning of Old Kent Road, sharing ideas through workshops and helping to inform the draft of the plan.
- 2.2. Since engagement began in 2014, the Council has held 91 events and received 2,138 detailed consultation responses on the Old Kent Road Area Action Plan.
- 2.3. We published the **Preferred Options draft AAP (May 2016)** and undertook extensive consultation between 17 June and 4 November 2016, receiving over 1,000 responses. We consulted on the plan alongside a change to the Community Infrastructure Levy (CIL) charging schedule and Section 106 Planning Obligations and CIL Supplementary Planning Document addendum. This increased the rate paid by residential developments towards important infrastructure including the Bakerloo line extension. Consultation responses to this document were reported on separately and were available for the public examination on the CIL changes. These came into force on 1 December 2017.
- 2.4. In February 2017 we published a summary of the consultation responses we received on our website following the close of the consultation on the first full draft of the plan in November 2016. This Consultation report can be viewed here: [OKR AAP responses summary Feb2017.pdf](#)
- 2.5. Between 13 June 2017 and 13 September 2017 an 'interim' consultation, took place on **New and amended policies preferred option (June 2017)**. An interim consultation report, which can be accessed with the link below was published in June 2017. This report expands on the February 2017 report and explains how the changes proposed responds to representations made on the first Preferred Options draft AAP (May 2016).  
<https://www.southwark.gov.uk/assets/attach/3650/OKR-Interim-Consultation-Report.pdf>
- 2.6. Following the 2016 and 2017 consultation, we consulted on **the Further Preferred Option of the AAP (December 2017)** between 13 December 2017 to 7 March 2018. At the point of publishing the document we also issued a full consultation report which summarised the representations received in 2016 and 2017, and explained how the Further Preferred Option of the AAP (December 2017) addressed the representations made.  
<https://www.southwark.gov.uk/assets/attach/5734/D-Consultation-Report.pdf>
- 2.7. The consultation responses for the December 2017 document are set out in our January 2019 'You said, We did' report. This OKR consultation summary document explains the consultation that has been undertaken since 2013 in preparation of the Old Kent Road Area Action Plan. It also anticipated further changes that would be made in response to comments made on the December 2017 AAP. This summary document can be viewed here:  
<https://www.southwark.gov.uk/assets/attach/29922/OKR-Consultation-Summary.pdf>
- 2.8. In December 2020, the council published further iteration of the **Preferred Option AAP, December 2020**. All consultation on the Further Preferred Option of the AAP (2017) has thoroughly been documented in the December 2020 Old Kent Road Area Action Plan Consultation Report which can be viewed here:

[https://www.southwark.gov.uk/assets/attach/29914/Appendix-C\\_Consultation-Report\\_Dec-2020.pdf](https://www.southwark.gov.uk/assets/attach/29914/Appendix-C_Consultation-Report_Dec-2020.pdf)

- 2.9. The preferred option 2020 AAP was subject to public consultation between 11 January 2021 to 10 May 2021. The outcomes of the 2021 consultation are summarised in section 3 of this report.

#### Who was consulted and how?

- 2.10. At each stage of consultation, the council consulted a range of local groups, interested individuals, statutory consultees and important stakeholders through a variety of different engagement methods (see below for more information). These included:
- Local residents
  - Local businesses
  - Local community and special interest groups
  - The Mayor of London, Transport for London and neighbouring boroughs
  - Landowners, developers and their representatives
  - Statutory consultees such as the Environment Agency, Historic England, Natural England
  - Non statutory but important stakeholders such as Thames Water and Network Rail
- 2.11. Appendix A shows a log of all consultation actions undertaken relating to the OKR AAP since the beginning of engagement in 2013.
- 2.12. Over the plan preparation period the council sought to reduce the number of letters sent out to contacts on our planning policy mailing list in order to reduce financial and environmental costs of our outreach and to maximise the efficiency and effectiveness of our engagement. We undertook a thorough review of the contacts in our Statement of Community Involvement. We made sure to contact any new groups and organisations that we identified that may be interested in receiving planning policy notifications including on the Old Kent Road.
- 2.13. In 2020 the council established an Old Kent Road Community Review Panel to further involve the local community in the planning process. The panel gives independent advice on planning in the Opportunity Area, discussing important regeneration issues relating to housing, transport, public space, and the environment. The panel meets once a month to discuss proposals. These discussions are written up as formal reports and feed into the decisions made by the Council. All of the panel's recommendations are given serious consideration and form part of the formal planning process. [Community Review Panel - Old Kent Road](#)
- 2.14. In compliance with the Regulations the council's Statement of Community Involvement (SCI), at each stage of consultation we published the consultation on the platforms set out below. The appendices provide the documents relevant to the consultation on the December 2020 draft AAP.
- On the council's website (see Appendix F)
  - Through mailouts to statutory consultees and mailouts to consultees on Southwark's Planning Policy mailing list (over 15,000 people sign up to receive updates) (see Appendix G)

- In Southwark News (see Appendix H)
- On the council's Consultation Hub
- Through social media
- Through hard copies and posters in local libraries and in the council's office at 160 Tooley Street (this was not possible in 2021 due to COVID restrictions).

2.15. During the 2021 consultation period the Examination in Public of the New Southwark Plan was going through the public hearing stage. At the request of community members, the consultation period for the AAP was extended so that issues brought up at the hearings could be better addressed in the consultation. This resulted in the consultation lasting from 11 January to 10 May 2021, a period of 17 weeks. This is compliant with the SCI which requires a minimum of 12 weeks at Regulation 18 stage. Representations were accepted by email and by letter.

### 3. SUMMARY OF CONSULTATION ON THE DECEMBER 2020 DRAFT AAP

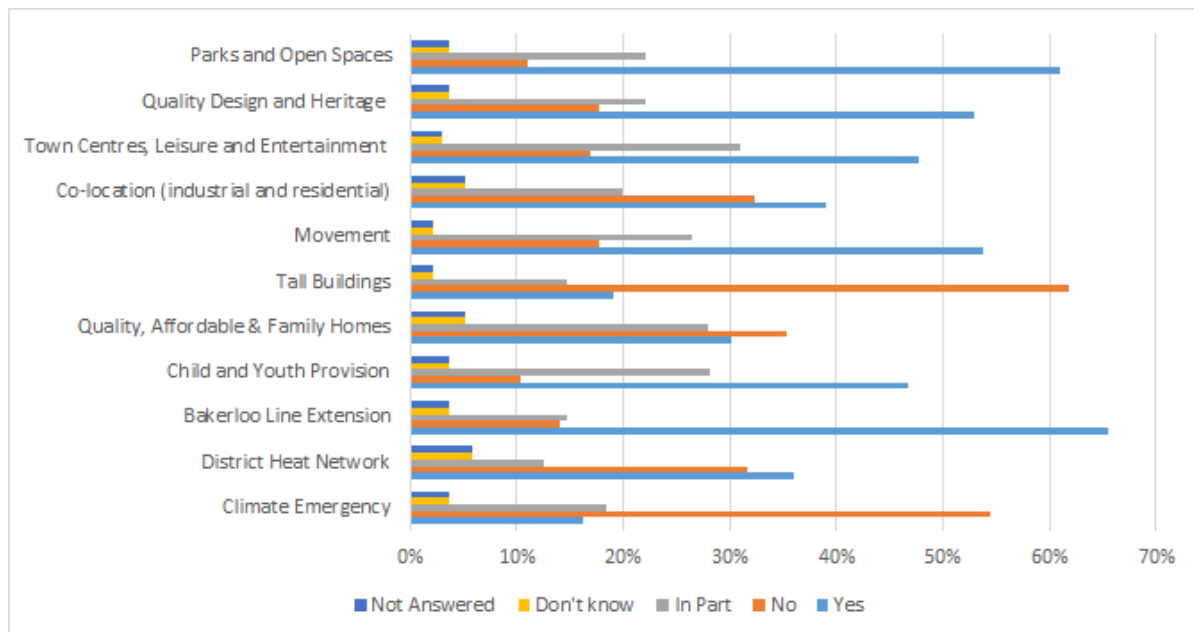
#### 2021 Consultation headline figures

- 3.1. 183 formal representations were received from statutory consultees, community groups and members of the public.
- 3.2. The breakdown of who responded to the consultation and how is set out in Table 2 below. Further details on all representations are attached in the appendices.

*Table 2 – Breakdown of who responded and how*

	No. of responses	Statutory consultees	Businesses and landowners	Individuals	Community groups etc
Emails	47	11	23	8	4
Hub	136	0	1	122	13
Total	183	11	24	130	17

- 3.3. Below are the responses from the Consultation Hub Questionnaire on support for the main themes of the AAP.



- 3.4. More detailed summaries for hub responses to the questionnaire can be found in Appendix B alongside the raw data informing the headline figures chart.
- 3.5. The detailed summaries of written representations received via email can be found in Appendix B. It identifies where respondents have made representations to previous consultations, but only summarises comments on the latest and ongoing submissions.
- 3.6. Summary of key issues raised in consultation responses to the survey questions from community groups are reported in Appendix C.
- 3.7. In addition to the written representations and questionnaire responses, 8

consultation events were held, mostly in the form of roundtable discussions. These were held on Zoom due to COVID-19 restrictions preventing in-person meetings. Appendices D and E. The focus of these groups included:

- Businesses
- Landowners
- Youth
- Retail
- Residents/Community

Summary of key themes from consultation and the council's response

- 3.8. Table 3 below provides a high-level summary of the main issues raised under each consultation theme, relatable to an AAP policy.
- 3.9. Various inaccuracies and inconsistencies have been raised in the written representations. These have been noted and will be corrected during the preparation of the next draft of the plan in order to ensure clarity and that the AAP is factually accurate.

*Table 3 – Summary of representations by policy themes from the consultation*

<b>Policy theme</b>	You said.....	We did ....
<b>AAP 1: The Masterplan</b>	Developers and landowners want to see a sufficient flexible and not too prescriptive masterplan in order to guide a comprehensive and phased approach to development.	<p>The council has sought to balance prescription and flexibility, with an indicative masterplan, which can provide certainty for investors and transparency for local residents, while also providing some flexibility to enable designers to respond and allow the plan to adapt over time.</p> <p>This policy has been updated to ensure conformity with the Southwark Plan 2022, our adopted local plan. Therefore enabling us to assess schemes in line with adopted policy. In addition to this, the policy has also been updated to align with the AAP masterplan and design codes, which was consulted on from July 2021 for Sub Area 1 and 3 to provide detailed design guidance.</p>
<b>AAP 2: Bakerloo Line Extension and Infrastructure</b>	There is strong support for the Bakerloo Line Extension amongst most respondents and it is considered that the extension is vital to connect the southeast to central London and	The support for the BLE is noted. The council has sought to address uncertainties over delivery through a phasing policy which caps residential growth at 9,500 homes without the extension. Changes



	<p>intrinsic to justifying the mass development of the area. However, concerns are raised over the uncertainty of impacts of the line extension, and the delivery of the extension in light of TFL's funding constraints.</p>	<p>made to the policy have sought to clarify this approach and update timelines for the construction of the BLE.</p>
<b>AAP 3: Climate Emergency</b>	<p>74 of the respondents to the council's consultation survey disagreed with the policy, while 47 agreed or agreed in part.</p> <p>Reasons for disagreement included:</p> <ul style="list-style-type: none"> <li>• The council has placed too much reliance on district heating</li> <li>• Car free development and over-reliance on cycles will make life harder for residents</li> <li>• Taller buildings generate more emissions in construction than lower rise. More account should be taken of embodied energy.</li> <li>• Taller buildings have higher operational emissions than lower rise buildings.</li> <li>• There should be more emphasis on reuse rather than demolition.</li> </ul>	<p>The policy has been amended to make it more focused on delivering a district heating system. The council's district heating feasibility study indicated that of the technologies currently available, district heating has the greatest impact on reducing operational emissions in buildings. This is the case with both taller and lower rise buildings. "Be seen" requirements in the Southwark Plan require developers to monitor emissions post construction.</p> <p>The London Plan and Southwark Plan require submission of whole life carbon assessments to understand the embodied energy in development.</p> <p>Where buildings are of good quality and are robust, the council has sought to ensure that these are incorporated into development, through identification of buildings of townscape merit and through local listing.</p>
<b>District Heating Network</b>	<p>43 respondents to the council's consultation survey were opposed to the strategy of building a district heating network, while 66 were in agreement or part agreement. The reason why many were opposed is that they consider district heating to be unreliable.</p>	<p>Most the objections were coloured by the respondeees experience of communal heating systems on Southwark estates. Across the UK district heating is proving to be a reliable source of heat and hot water. Recent government consultation on heat network zoning suggests that district heating will have an important part to play in addressing the climate emergency. While only a small number of homes are currently connected, government modelling suggests it could reach 1 in 5</p>

		homes by 2050. The Mayor of London also considers that connection to district heating will be a vital part of achieving carbon neutrality. Connected homes will be metered, with residents having control of heating within their home. In 2012 the council connected around 2,700 homes in Bermondsey to district heating and the service to date has been very reliable.
<b>AAP 4: Quality Affordable Homes</b>	<p>79 of the respondees to the consultation survey were in agreement or part agreement with the policy approach. 43 were opposed. While it is acknowledged that there is a need for affordable homes in the Old Kent Road, there is concern whether the homes being built will actually be affordable to local people. Concerns are also raised about the delay in the delivery of the Bakerloo Line Extension will mean that the target of 20,000 homes will not be achieved.</p> <p>In addition to this several respondees had an issue with the local lettings target of 50% for new council homes being let to local residents in the existing community, as this set target does not deal with the problem of council waiting list; the number of new homes being insufficient; and appropriate housing needs.</p>	<p>The policy has been amended to account for the fact that the Southwark Plan has been adopted. The majority of homes completed, under construction and in the pipeline on the Old Kent Road are affordable (within the Southwark Plan definition of affordability).</p> <p>The local lettings policy is currently being amended by the council.</p>
<b>AAP 5: Business and Workspace</b>	<p>Although most respondees were supportive of the policy there is concern over co-location of industrial and residential uses and the conflicts this will pose in regards to noise, pollution, and servicing and access. There is concern regarding there being enough greenspaces in this mixed-use environment.</p>	<p>The AAP design policy (AAP12) has been updated to provide additional guidance on colocation, including the need for adequate separation between industrial and residential use, containment of noise and pollution and identifiable residential entrances.</p> <p>The sub area servicing plans also show in more detail the way in which plots should be serviced to help reconcile residential and</p>

		<p>commercial use.</p> <p>Policy AAP 9 sets out the strategy for increasing public open space by 10ha and improving accessibility to parks.</p>
<b>AAP 6: Town Centres, Leisure and Entertainment</b>	<p>Most respondees supported the council's approach. those who raised concerns stated that they favoured small, independent shops over bigger chains on the high-street. More is needed in protecting pubs and theatres and the lack of sports facilities was also an issue.</p>	<p>Policy AAP7 indicates that the council is seeking a range of shop unit sizes. As well as smaller units the council is sought to ensure that larger units can be reaccommodated as consultation has also shown support for supermarkets and the retail ware houses such as B&amp;Q and Petsathome.</p>
<b>AAP 7: Movement</b>	<p>There was an overall supportive response to predestination and public transport. However, there were concerns on car free proposals on local people especially working-class community, less able bodied and the elderly. There is also reliance on delivery and servicing (e.g. plumbing, electrics and building maintenance), which is facilitated by vans and trucks.</p>	<p>The overall support is noted. Alongside restricting parking, the council is also promoting a healthy streets approach on the Old Kent Road itself and is aiming to improve links between the Old Kent Road and surrounding residential communities.</p> <p>The servicing plans and design codes are seeking to ensure that the distribution of space within streets can be optimized to provide space for cycle lanes, greening as well as additional on-street loading.</p>
<b>AAP 8: Tall Buildings Strategy</b>	<p>This was one of the most contested policy. 84 respondees to the consultation survey stated they were opposed to the policy. 46 stated they were in agreement or part agreement. The main concerns were the negative effects of cooler microclimates created by tall buildings on biodiversity; the lack of greenspaces; loss of character and the safety of tall buildings.</p> <p>Those in agreement considered that the policy would have a beneficial impact on the local skyline and that increasing</p>	<p>Policy AAP10 directs the tallest buildings to areas which can be best served by public transport. The benefits of taller buildings is that they can enable higher densities, including more homes and affordable homes and help deliver infrastructure, including new parks and open spaces.</p> <p>The policy notes that proposals for tall buildings should carefully consider their environmental impacts and consider their impacts in long, mid range and immediate views. The masterplanning has taken account</p>

	<p>density of population in areas with good public transport capacity represented a sustainable pattern of development. Several respondees indicated that support was subject to microclimate testing, good design and ensuring that tall buildings did not dominate key views eg from Burgess Park.</p>	<p>of strategic views in London, as well as local views, including from Nunhead Cemetery.</p>
<p><b>AAP 9: Character and Heritage</b> <b>AAP 10: Design</b></p>	<p>The strategy is supported but there are doubts raised over the effectiveness of safeguarding heritage assets. The new conservation areas and local listing is supported. There is concern over the quality of design of new developments.</p> <p>Retrofitting should be the strategy used instead of a demolition-led scheme was a main theme. There were concerns over the loss of heritage assets and high-rise developments will create characterless places.</p>	<p>Through the recent designation of conservation areas and identification of locally listed buildings and buildings of townscape merit, the council is aiming to ensure that good quality buildings are maintained and incorporated into new development.</p> <p>Examples include the partial retention of industrial units on Glengall Road and their incorporation into new development, together with retention of the chimney, retention of the chimney within the Malt Street scheme, retention of former warehouse buildings on Crimscott Street and the Article 4 Direction placed on the former Southern Railway stables and forge on Catlin Street.</p>
<p><b>AAP 11: Parks and Healthy Streets</b></p>	<p>The majority of respondents are in support of the strategy to increase the quality and number of parks and would like it to go further than the proposals set out in the AAP. There is concern over the infill of green spaces on Council Estates and the impacts that shadowing from tall buildings will have on open space and biodiversity.</p>	<p>The overall support is noted. Consideration of the distribution and height of development in relation to open space is a requirement of policy AAP10. There are two estates in the opportunity area which are being rebuilt and both have been subject to ballots. Other council home building schemes, for example on the Rennie Estate and Astley Cooper estate have been subject to extensive consultation.</p> <p>Through the AAP the council is seeking to increase open space provision by around 15ha and ensure that every homes is within 280m of a park.</p>

		<p>We have a programme to improve open spaces across the Opportunity Area allowing for organic growth in the Old Kent Road area and to enable interlinking of. For example projects such as Bramcote Park and Greening Rotherhithe New Road showcase ways we have identified how we can do more to connect greener spaces beyond the master plan.</p> <p>More information on the consultation of these projects is set out in the 'Engagement and consultation' section of this table.</p>
<p><b>AAP 13: Best Start in Life</b></p> <p><b>AAP 14: Child and Youth Provision</b></p>	<p>Questions are raised over the proposals for new schools in the AAP when existing schools have been closed.</p> <p>The addition of Child and Youth provision in the AAP is supported and it is strongly emphasized that this needs to be truly inclusive and accessible to all. It is also considered that future provision of facilities needs to replace facilities which have already been lost. There needs to be more engagement with young people.</p>	<p>Pupil school rolls in the opportunity are falling and the policy has been amended to recognize this. While there is capacity currently, the plan covers a 15 year period and at some point pupil numbers are expected to rise. In order to address this together with growth in population, the council has identified some capacity to expand existing schools. Should the need arise, the council would also be able to build a new school on Sandgate Street.</p> <p>The need for improved facilities for children and young people is noted and plans are in train to improve facilities in parks (Brimmington, Bird in Bush and Bramcote) and provide new indoor facilities at Leyton Square. In addition to this a <i>Youth engagement commitment</i> has been included in our Old Kent Road Engagement Strategy to ensure we a prioritising how we engage with younger generations.</p>
<p><b>AAP 15: Sub Areas and Site Allocations</b></p>	<p>Landowners and developers had various comments on specific site allocations, mostly relating to increasing flexibility on requirements for their respective sites and not placing restrictions on development for</p>	<p>The council is amending the sub area guidance to provide additional guidance on design codes to help ensure that the vision of the plan is delivered. These design codes respond to national policy around coding in</p>

	viability reasons.	<p>new development and have also enabled local people to have a say in their preparation.</p> <p>Further information on the Design Codes consultation and consultation of Old Kent Road regeneration projects is set out in the 'Engagement and consultation' section of this table.</p>
<b>Engagement and consultation</b>	There is a concern coming from the consultation that not enough involvement of local people and that engagement is lacking in relation to new developments and the preparation of the plan.	<p>The Council's approach to consultation is in line with the SCI which sets out clear requirements on how we should consult all stake holders during the planning application stage for developments, in addition to the preparation of a plan.</p> <p>Since 2021 we have continued extensive consultation on the AAP through the design codes of Sub Area 1, 3 and 4 in addition to consultation on regeneration projects. The consultation feedback and our responses is set out below.</p> <p><b>Design codes</b> The masterplan in Sub Area 1 has been updated specifically on sites OKR 2 Crimscott Street and Pages Walk, OKR 3 Mandela Way and OKR 4 Dunton Road (Tesco Store) and Southernwood Retail Park, based on feedback received during public consultation. This consisted of one to one meetings with businesses and stakeholders, a public exhibition at the Drawing Room - Tannery Arts, and the proposal being presented at Community Review Panel. As a result of consultation further design work was undertaken to refine the masterplan and produce a design code to guide development.</p> <p>The masterplan for Sub Area 3 has also seen several updates following in-depth consultation to</p>

		<p>create a design code for OKR13. This included a number of public meetings engaging with local residents including the Bonamy and Bramcote TRA and local businesses, a workshop with Pilgrims Way Primary School, one to one meetings with businesses and stakeholders, a public exhibition at the local brewery and a CRP meeting. Engagement findings resulted in the proposed primary school has been removed from the site to reflect changes in pupil projections, a logistics centre has been introduced on Verney Road following a planning application, which has meant some of the capacity of the site has had to be redistributed amongst other plots. The linear park has also been relocated to allow for more realistic access and servicing.</p> <p>Regeneration Projects</p> <p><b>Bramcote Park-</b> The council worked with New London Architecture (NLA) to launch a London-wide competition to appoint a masterplanner for Bramcote Park.</p> <p>The competition was launched in September 2021 and interested design teams were given 4 weeks to respond. A total of 31 teams responded and 6 teams were shortlisted and asked to develop proposals and exhibit these locally. The public exhibition was held for a week in early December, where the views expressed by local residents were taken into account in selecting the appointed design team. This ended up being a collaboration design team that consisted of Assemble Architects, Local Works and Webb Yates.</p> <p>Since their formal appointment in January 2022, the lead design</p>
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		<p>team has held several events and created many engagement opportunities to understand what residents want in their local park. This consisted of;</p> <ul style="list-style-type: none"> <li>• door-knocking days;</li> <li>• two community design forums;</li> <li>• a Neighbourhood Meet-up &amp; Play Day in Bramcote Park coordinated by Assemble Play themed around play for all ages;</li> <li>• a Youth event workshop held at The Blue Youth and Community Centre;</li> <li>• Presenting at the first CRP meeting of 2023;</li> <li>• a drop-in session at Bramcote Park to discuss the stage 3 design options (2023);</li> <li>• a Community Gardening and Planting Workshop (2023);</li> <li>• another play event hosted by Assemble Play (2023); and</li> <li>• finally an online consultation to review the stage 3 design which concluded on 29 September 2023.</li> </ul> <p>Greening Rotherhithe New Road- The Council received development funding from the GLA's Green and Resilient Spaces fund to prepare an exemplar design for greening and SuD's that could be taken forward to implementation stage.</p> <p>Consultation undertaken that helped inform the proposal included:</p> <ul style="list-style-type: none"> <li>• door-knocking days;</li> <li>• a joint Neighbourhood Meet-up &amp; Play Day in Bramcote Park coordinated by Assemble Play themed around play for all ages;</li> <li>• John Keates Primary School drawing workshop;</li> <li>• Circulation of consultation boards to local businesses via email for feedback;</li> </ul>
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		<ul style="list-style-type: none"> <li>• Presenting the consultation boards at the Bonamy and Bramcote TRA;</li> <li>• Hosting a Christmas consultation event to gain final comments alongside bringing the community together; and</li> <li>• Presenting the stage 3 design at CRP.</li> </ul> <p>The Bridge project- In 2022 a series of art workshops for the local community in conjunction with a number of different artists and creatives took place over a period of 12 months to inform the Bridge Project, a new public art project taking shape beneath the railway bridge on Old Kent Road by Brimington Park.</p> <p>The first engagement event was photography, poetry and collage workshops with year 4 pupils that took place over a period of four weeks. The outputs of these workshops formulated the first exhibition under the bridge.</p> <p>Activation the billboards under the bridge through these workshops lead to the Southwark Council seeking a creative design team through a competition to prepare a public art and lighting scheme for the Old Kent Road Railway Bridge.</p>
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## **Appendix A:**

Log of consultation actions to date

Old Kent Road Area Action Plan: Consultation Report

October 2024

## Introduction

This Appendix is a summary a log of all consultation actions undertaken relating to the OKR AAP since the beginning of engagement in 2013 and projects within the OKR opportunity area that contributes to the strategic vision of the AAP.

INFORMAL CONSULTATION 2015 -2016		
Date	Method of consultation	Comments
July 2013	Two walkabout sessions and a workshop	Full report available on our website
October – November 2014	Business engagement and flyers	Together with the Greater London Authority (GLA), the council walked around the Old Kent Road Opportunity Area and knocked on every business' door to tell them about our aspirations for the future of the area and find out more about the businesses present, their current and future business needs and perceptions of the area. This has informed our evidence base and the results are published in the Old Kent Road Employment Study 2016.
Roughly every 4 to 8 weeks between February 2015 and September 2016.	Old Kent Road Community Forum	11 meetings were held in different venues around the Old Kent Road opportunity area. The forum was set up to start a dialogue between the council local residents, businesses owners and employees, community groups and any other interested stakeholders thought about the Old Kent Road. We wanted to gather views and gain understanding of why people felt the Old Kent Road was unique and what could be improved. We published the feedback and presentation material from each forum <a href="#">on our website</a> .
12 and 13 October 2015 were held for	Further business engagement through presentations and workshops with local business owners and	The presentation and report on the feedback gathered during these sessions is available <a href="#">on our website</a> . This has also informed our evidence base for the <a href="#">Old Kent Road Employment Strategy 2016</a> .

	operators	
CONSULTATION ON FIRST DRAFT OLD KENT ROAD AAP (JUNE 2016 PREFERRED OPTION)		
Date	Method of consultation	Comments
14 June 2016	Meeting/ presentation /Q&A/workshop	Future Steering Board at Bells Garden Community Centre.
16 & 23 June 2016	Press advertisements in Southwark News	
17 June 2016	Consultation hub page	Online platform for viewing and providing comments on the plan.
28 June 2016	Meeting/presentation/Q&A/workshop	Southwark Tenant Council meeting at Bells Garden Community Centre.
29 June 2016	Faith Open Day workshop and community outreach	Hosted at the Somali Relief and Welfare Association Mosque at 94 Old Kent Road.
29 June 2016	Announcement and stall at Borough, Bankside and Walworth Community Council	Hosted at Amigo Hall, St George's Cathedral, SE1
4 & 14 July, 22 August and 9 September 2016	Mailouts	To our database of residents, interested persons, community groups, employers, other interested persons, housing providers, planning professionals, the Mayor of London and other London Boroughs and statutory and other important consultees.
July 2016	Summary and leaflet questionnaire	This was sent out to 15,000 residents and businesses in the Old Kent Road opportunity area explaining the consultation and how to respond.
July - November 2016	Dialogue – online ideas sharing platform.	We set up a series of online discussion pages using the dialogue online discussion platform to help gather views and generate ideas across a range of themes including homes, jobs, transport, parks and green spaces and local facilities and services.
From July 2016	Libraries	Copies of the draft Old Kent Road AAP and key supporting documents were made available to view in all the local libraries around the opportunity area including

		Peckham, SE15, Camberwell, SE5, East Street (Walworth/Old Kent Road) SE1, the Blue (Bermondsey), Canada Water, SE16 as well as the council's offices on Tooley St, SE1.
From July 2016	360 degree aerial photography	To aid discussion and show a new perspective on the Old Kent Road and surrounding neighbourhoods, we had drone aircraft take 360 degree aerial photos from Burgess Park and Bridgehouse Meadows (in the London Borough of Lewisham).
6 July 2016	Stall, flyering and engaging local residents	Eid Festival, Burgess Park
7 July 2016	Design Review Panel	Regular panel of built environment professionals providing comment and critique of the draft plan.
7 July 2016	Meeting/ presentation/ Q&A/ workshop	Walworth Society meeting at St Peter's Church, SE17
11 July 2016	Presentation/Q&A	Ledbury Estate Tenants and Resident's Association Annual General Meeting
11 July 2016	Presentation/Q&A	Peckham Area Housing Forum at Bells Garden Community Centre.
12 July 2016	Announcement at planning committee	Held at Southwark Council Offices, Tooley Street, SE1.
13 July 2016	Presentation/Q&A	Bermondsey East Area Housing Forum - Marden Square Tenants and Residents Association Hall.
13 July 2016	Presentation/Q&A	Southwark Tenant Management Organisation Committee meeting, hosted at the Leathermarket JMB office, SE1.
14 July 2016	Old Kent Road Walking Tour	Organised jointly between Southwark Council and New London Architecture, with conference hosted at London South Bank University.
18 July 2016	Presentation/Q&A	Camberwell East Area Housing Forum hosted at the Marie Curie Tenants and Residents Association Hall, Sceaux Gardens Estate, SE5
19 July 2016	Presentation/Q&A	Aylesbury Area Housing Forum hosted at Aylesbury Neighbourhood

		Housing Office, SE17
20 July 2016	Presentation/Q&A	Bermondsey West Area Housing Forum hosted at Neckinger Tenants Hall, SE16.
23 July 2016	Stall, flyering and engaging local residents	Pembroke House street party
26 July 2016	Cultural workshop	We held a consultation event specifically for businesses and practitioners who work in the cultural sector. The workshop provided the opportunity to give feedback on how cultural provision should align with development and growth in the Old Kent Road.
27 July 2016	Old Kent Road Heritage Walk	We led a walking tour around the Old Kent Road to explore the area's history, its heritage assets that remain and have been lost, and how we can best ensure a heritage-led regeneration of the area respects and enhances the Old Kent Road's unique history.
4 August 2016	Presentation/Q&A	Walworth East Area Housing Forum hosted at Salisbury Tenants and Resident's Association Hall.
9 August 2016	Presentation/Q&A	Rotherhithe Area Housing Forum hosted at the Silverlock Tenants and Resident's Association Hall.
3 September 2016	Stall, flyering and engaging local residents.	Tustin Estate Funday
7 September 2016	Young people's workshop	We invited young people between 11 and 24 who live, go to school or visit the Old Kent Road and surrounding area to take part in a workshop to discuss what they thought the future of the Old Kent Road should look like, and how it should accommodate the needs of young people better.
13 September 2016	Announcement & questions	Bermondsey and Rotherhithe Community Council hosted at the Oxford and Bermondsey Club, SE1
15 September 2016	Press advertisements in Southwark News	

21 September 2016	Presentation/Q&A	Northfield House Tenants and Residents Association.
21 September 2016	Presentation/Q&A	Southwark Homeowner Council meeting hosted at 160 Tooley Street.
21 September 2016	Announcement & questions	Peckham and Nunhead Community Council hosted at Rye Church Hall, SE15.
21 September 2016	Announcement & questions	Camberwell Community Council hosted at Employment Academy, SE5.
21 September 2016	Presentation/Q&A	Southwark Travellers Action Group meeting hosted at the Soujourner Truth Centre.
21 September 2016	Presentation/Q&A	Borough and Bankside Housing Area Forum.
29 September 2016	Presentation/Q&A	Big Local Partnership South Bermondsey sub group.
5 October 2016	Announcement & questions	Borough, Bankside & Walworth Community Council hosted at New Covenant Church, SE1
10 October 2016	Presentation/Q&A / workshop	For residents living near the northern end of the Opportunity Area centred around the Bricklayers Arms, hosted at the Roundhouse Hall, SE1.
February 2017	Old Kent Road Business Network and further engagement	In February 2017 we set up the Old Kent Road Business Network to continue our earlier information gathering about businesses in the Old Kent Road, establish their needs for the future and how they can be effectively involved in the regeneration of Old Kent Road. We sent out a letter inviting businesses to join the Network as well as a FAQ's document about our consultation. The Business Network is ongoing and is still <a href="#">available to join online</a> .
25 February, 9, 21 and 29 March and 1 April 2017	Council officer posted at TfL Bakerloo line extension drop in session to answer questions about the AAP.	Transport for London held several drop in sessions across the opportunity area during the consultation on the Bakerloo line extension. Due to the intrinsic link between the aspirations of the AAP and the Bakerloo line extension, officers were on hand to answer any planning/AAP related questions. These sessions were hosted at the East Street Library, Christ Church

		(Old Kent Road) and Artworks (Walworth Road).
INTERIM CONSULTATION ON OLD KENT ROAD AAP: NEW AND AMENDED POLICIES PREFERRED OPTION (JUNE 2017)		
Date	Method of consultation	Comments
21 June 2017	Consultation hub page	Online platform for viewing and providing comments on the new and amended policies proposed for the plan.
22 June 2017	Mailouts	To our database of residents, interested persons, community groups, chairs and secretaries of TRAs and TMOs, local businesses and employers, other interested persons, housing providers, planning professionals, the Mayor of London and other London Boroughs and statutory and other important consultees. See appendix 6.
29 June 2017	Press advertisements in Southwark News	
CONSULTATION ON THE OLD KENT ROAD AAP/OAPF (FURTHER PREFERRED OPTION VERSION 2017) 2018 VERSION		
Date	Method of consultation	Comments
15 Dec 2017	Presentation/Q&A	NLA Launch breakfast meeting hosted at the Building Centre, WC1E
9 January 2018	Announcement & questions	Borough, Bankside and Walworth Community Council hosted at St Peter's Church, Walworth
10 January 2018	Announcement & questions	Bermondsey and Rotherhithe Community Council
12 January 2018	Presentation/Q&A	Southwark Pensioners Fourm hosted at Southwark Pensioners Centre, SE5
16 January 2018	Meeting/ presentation	Southwark Future Steering Board hosted at Bells Gardens Community



	/Q&A/workshop	Centre, SE15
17 January 2018	Announcement & questions	Peckham and Nunhead Community Council
18 January 2018	Presentation/Q&A	Tustin Estate Tenants and Residents Association hosted at Tustin Estate TRA Hall, Ilderton Road, SE15
19 January 2018	Creative Enterprise Zone (CEZ) meeting	Talk with cultural organisations within the Old Kent Road hosted at Southwark Council Offices, Tooley Street, SE1
22 January 2018	Group discussion	Youth Council hosted at Southwark Council Offices, Tooley Street, SE1
22 January 2018	Announcement & questions	Tenants Council hosted at Southwark Council Offices, Tooley Street, SE1
24 January 2018	Announcement & questions	Dulwich Community Council hosted at Herne Hill Baptist Church, SE24
30 January 2018	Announcement & questions	Camberwell Community Council hosted at The Employment Academy, SE5
6 February 2018	Q&A	Old Kent Road drop-in session 1 hosted at the Rich Estate, SE1
8 February 2018	Presentation/Q&A	Nunhead and Peckham Rye Area Housing Forum hosted at Harris Academy, SE15
12 February 2018	Presentation/Q&A	Peckham Area Housing Forum
12 February 2018	Presentation/Q&A	Ledbury TRA
13 February 2018	Presentation/Q&A	Rotherhithe Area Housing Forum
13 February 2018	Presentation/Q&A	Walworth West Area Housing Forum hosted at Pelier TRA Hall, SE17
14 February 2018	Presentation/Q&A	Bermondsey West Area Housing Forum
15 February 2018	Presentation/Q&A	Dulwich Area Housing Forum, Lordship Lane and Melford Court TRA Hall, SE22
20 February 2018	Presentation/Q&A	Conservation Advisory Group

20 February 2018	Presentation/Q&A	Aylesbury Area Housing Forum
21 February 2018	Presentation/Q&A	Camberwell West Area Housing Forum
26 February 2018	Big Local Meeting	Hosted at Avondale Community Hall, Avondale Square Estate, SE1
7 March 2018	Q&A	Old Kent Road drop-in session 2 hosted at Christ Church Peckham, SE15
7 March 2018	Presentation/Q&A	Borough and Bankside Area Housing Forum
9 March 2018	Primary school workshop	Phoenix Primary School Visioning workshop (see Appendix 7)
12 March 2018	OKR Business Workshop	Hosted at New Covenant Church, SE1
14 March 2018	Presentation/Q&A	Southwark Housing Action Group hosted at Southwark Council Offices, Tooley Street, SE1
19 March 2018	Old Kent Road Retail Workshop	Hosted at Southwark Council Offices, Tooley Street, SE1
21 March 2018	Presentation/Q&A	Bermondsey East Area Housing Forum
23 March 2018	Presentation/Q&A	Meeting with Page's Walk residents
26 April 2018	Presentation/Q&A	Walworth East Area Housing Forum
<b>CONTINUOUS ENGAGEMENT CONTRIBUTION TO 2018 AAP</b>		
<b>Date</b>	<b>Method of consultation</b>	<b>Comments</b>
6 June 2018	Secondary school workshop	Charter Secondary School workshop (Year 9) (See Appendix 7)
6 June 2018	Presentation/Q&A	Southwark Housing Association Group hosted at Southwark Council Offices, Tooley Street, SE1
15 July 2018	Presentation Q&A	Action OKR hosted at Treasure House at the former Livesey Museum
8 September 2018	OKR Forum Session 1: Introductions and general discussion	Hosted at Christ Church Peckham, SE15
17 October 2018	Presentation/Q&A	Stephenson Crescent residents

		meeting hosted at Links Community Centre, SE16
20 October 2018	OKR Forum Session 2: Transport	Hosted at Christ Church Peckham, SE15
17 November 2018	OKR Forum Session 3: Business and workspace	Hosted at Christ Church Peckham, SE15
5 December 2018	Meeting with Northfield House residents	Berkeley Homes (applicant for Malt Street) presented their scheme, of which residents asked a number of questions around building heights, affordable housing, design quality and cladding, car parking.
27 December 2018	Meeting with Glengall Road residents	Berkeley Homes (applicant for Malt Street) presented their scheme, of which residents asked a number of questions around building heights, overshadowing, construction impacts, parking, wind impacts, fire policy.
15 December 2018	OKR Forum Session 4: Tall buildings	Hosted at Christ Church Peckham, SE15
9 January 2019	Presentation/Q&A	Unwin and Friary Tenants Residents Association hosted at Friary and Unwin TRA Hall, SE15
19 January 2019	OKR Forum Session 5: Open Space	Hosted at Christ Church Peckham, SE15
28 January 2019	Presentation/Q&A	Canal Grove Residents Meeting hosted at Christ Church Peckham, SE15
29 January 2019	Presentation/Q&A	Tustin Estate TRA hosted at Tustin Estate TRA Hall, SE15
30 January 2019	Meeting with Pastors/Community leaders	Hosted at Victory House, SE17
31 January 2019	The Ark Globe Academy Youth Networking Event	Hosted at The Globe Academy, SE1

2 February 2019	Q&A	231 Old Kent Road drop in session 1 hosted at East Street Library SE1
5 February 2019	Presentation/Q&A	Friends of Burgess Park meeting hosted at Burgess Park Community Sports Centre, SE5
5 February 2019	Discussion	Christ Church Peckham meeting with Vicar
6 February 2019	Presentation/Q&A	Space Studios Launch
7 February 2019	Q&A	231 Old Kent Road drop-in session 2 hosted at Christ Church Peckham, SE15
12 February 2019	Presentation/Q&A	Radford Court residents meeting hosted at Radford Court, SE15
14 February 2019	Secondary School workshop (Year 9 feedback session)	The Charter School, East Dulwich, SE22 (See Appendix 7)
16 February 2019	OKR Forum Session 6: S106 and CIL	Hosted at Christ Church Peckham, SE15
4 March 2019	Presentation/Q&A	Meeting with Astley and Cooper Road TRA hosted at Wessex House, SE1
16 March 2019	OKR Forum Session 7: Design Quality	Hosted at Christ Church Peckham, SE15
25 March 2019	Q&A	Canal Grove residents Meeting
25 March 2019	Meeting with Penarth Centre artist	Hosted at Southwark Council Offices, Tooley Street, SE1
25 March 2019	Youth Council meeting	
26 March 2019	Youth Voice Event	Hosted at Ministry of Sound, SE1
1 April 2019		Meeting with Church Pastor at Redeemed Christian Church of God, SE1
4 April 2019	Community Hub Launch at 231 Old Kent Road	
5 April 2019	Old Kent Road Community Hub Drop-in session	2 Week drop in session from 5 April to 18 April

5 April 2019	Youth outreach programme	5 April to 18 April
18 April 2019	Youth Event	
26 April 2019	NLA Breakfast Talk	Hosted at the Building Centre, WC1E
7 May 2019	Q&A	Radford Court residents meeting hosted at Radford Court, SE15
13 May 2019	Q&A	Canal Grove residents meeting hosted at Southwark Council Offices, Tooley Street, SE1
17 May 2019	Q&A	Pages Walk residents meeting hosted at Christ Church Peckham, SE15
1 June 2019	231 Reopening	
17 February 2020	OKR Business Meeting	Hosted at Southwark Council Offices, Tooley Street, SE1
<b>2021 CONSULTATION</b>		
<b>Date</b>	<b>Method of consultation</b>	<b>Comments</b>
11 January 2021	Consultation Hub page	
11 March 2021	OKR Business Roundtable meeting	Held virtually over Zoom due to COVID-19 restrictions
18 March 2021	OKR Residents/Communities Roundtable	Held virtually over Zoom due to COVID-19 restrictions
18 March 2021	Walworth Society	Held virtually over Zoom due to COVID-19 restrictions
22 March 2021	OKR Community Review Panel	Held virtually over Zoom due to COVID-19 restrictions
23 March 2021	OKR Developers and Landowners Roundtable meeting	Held virtually over Zoom due to COVID-19 restrictions
13 April 2021	Youth Roundtable	Held virtually over Zoom due to COVID-19 restrictions
22 April 2021	Retail Roundtable	Held virtually over Zoom due to COVID-19 restrictions
27 April 2021	Tenants Resident	Held virtually over Zoom due to

	Association Roundtable	COVID-19 restrictions
	Ledbury RPG	Held virtually over Zoom due to COVID-19 restrictions
26 July 2021	Meeting with Thompson Engineers and Than Clark about emerging Design Code for OKR13	Hatcham Road
5 August 2021	Bramcote Paark door knocking-meeting residents to complete short survey and highlight the park project	Bonamy and Bramcote estate
2 September 2021	Online presentation and discussion with businesses and developers on Design Code for OKR13	Online
3 & 5 September 2021	Public exhibition on the Design Code for OKR13	Penarth Centre, Hatcham Road
6 September 2021	Presentation and discussion with Bonamy and Bramcote on Design Code for OKR13	Links Community Hall
7 September 2021	Presentation to OKR CRP on Design Code for OKR16 <a href="#">Microsoft Word - 210907 Hatcham Road Design Code report.docx (oldkentroad.org.uk)</a>	Held virtually over Zoom due to COVID-19 restrictions
3 December 2021	Bramcote Park Exhibition	Links Community Hall
21 July 2022	Bramcote Park COMMUNITY DESIGN FORUM 1 with Bonamy and Bramcote TRA	Links Community Hall

8 September 2022	Meeting with Canal Grove residents to discuss findings of AAP Microclimate study	Treasure House
13 September 2022	Door knocking to inform about neighbourhood meet up with Rotherhithe New Road project team– Bramcote Park	Bonamy and Bramcote estate
15 October 2022	Bramcote Park NEIGHBOURHOOD MEET-UP / Assemble Play event	Bramcote Park
20 October 2022	Bramcote Park COMMUNITY DESIGN FORUM 2 with Bonamy and Bramcote TRA	Links Community Hall
7 November 2022	Update to Bonamy and Bramcote TRA about Bramcote Park	Links Community Hall
17 November 2022	Bramcote Park YOUTH DESIGN MEETING,	THE BLUE YOUTH CLUB
5 December 2022	Presentation to Bonamy and Bramcote TRA about Greening Rotherhithe New Road	Links Community Hall
12 December 2022	Presentation to OKR CRP on Greening Rotherhithe New Road and OKR13 <a href="#">Microsoft Word - 221212_CRP_Rotherhithe New Road Greening_report.docx (oldkentroad.org.uk)</a>	Links Community Hall
20 December 2022	Christmas fair with workshops and	Bramcote Park

	stalls on Greening Rotherhithe New Road and Bramcote Park projects	
20 February 2023	<p>Presentation to OKR CRP Bramcote Park</p> <p><a href="#">230220 CRP20 Bramcote-Park_report.pdf (oldkentroad.org.uk)</a></p>	231 Old Kent Road
6 March 2023	Presentation to Bonamy and Bramcote TRA about Bramcote Park	Links Community Centre
3 May 2023	Teams call with Kaymet about emerging Design Code for OKR13	Teams
4 May 2023	Teams call with Constantine about emerging Design Code for OKR13	Teams call
4 May 2023	Teams call with Wilkinson Say about emerging Design Code for OKR13	Teams call
11 May 2023	Meeting with N Okwulu to discuss OKR13 Design Code	Livesey Exchange
11 May 2023	Site visit to meet businesses in OKR13 area	T Marchant Trading Estate, Capital Industrial, Ruby Lounge, Kaymet
16 May 2023	Meeting with BL about emerging Design Code for OKR13	BL offices
5 June 2023	<p>Presentation on OKR13 Design Code to Bonamy and Bramcote TRA</p> <p>Presentation and discussion on Bramcote Park</p>	Links Community Hall, Rotherhithe New Rd



	design	
7 June 2023	Meeting with Safestore about emerging Design Code for OKR13	Teams meeting
11 June 2023	BRAMCOTE PARK COMMUNITY GARDENING & PLANTING WORKSHOP	
12 June 2023	Drop in and discussion about Design Code for OKR13 for residents of Bermondsey Works and Canal Grove Cottages	Links Community Hall, Rotherhithe New Rd
13 June 2023	ASSEMBLE PLAY DAY	Bramcote Park
19 June 2023	Presentation to OKR CRP on Design Code for OKR13 <a href="https://oldkentroad.org.uk/wp-content/uploads/230619_OKR13_masterplan_designcode.pdf">https://oldkentroad.org.uk/wp-content/uploads/230619_OKR13_masterplan_designcode.pdf</a>	231 Old Kent Road
18, 19 July 2023	Public exhibition on the Design Code for OKR13	Small Beer Brewing Co. 70-72 Verney Rd
27 June 2023	Meeting with Kent Park Industrial Estate owner about emerging Design Code for OKR13	Teams meeting
8 September 2023	Bramcote Park stage 3 design-Consultation Hub	On-line
19 September 2023	Bramcote Park door knocking to announce stage 3 design online consultation	Bonamy and Bramcote estate
10 October 2023	Update on AAP to Ledbury RPG	Ledbury Estate TRA hall

November 2023	Workshops with Pilgrims Way primary school to inform OKR13 Design Code	Pilgrims Way primary school
13 November 2023	Presentation to OKR CRP on Design Code for OKR2, 3 & 4 <a href="#">231113 Mandela-Way-Masterplan-and-Design-Code_report.pdf (oldkentroad.org.uk)</a>	Treasure House
14 November 2023	Meeting with John Lyons Trust about emerging Design Code for OKR2, 3 & 4	Teams
11 December 2023	Public exhibition on the Design Code for OKR2, 3 & 4	The Drawing Room, Crimscott Street
20 March 2024	Meeting with John Keats school to discuss Verney Road and OKR13	John Keats primary school
May 2024	Workshops with Treasure house School informing design of Murdock Street pocket park	Treasure House
24 May 2024	Meeting with Tate about emerging Design Code for OKR2, 3 & 4	Teams
4 June 2024	Attend Ledbury RPG to present masterplan for Murdock St pocket park	Ledbury TRA Hall
24 June 2024	Presentation to OKR CRP on Design Code for Murdock Street pocket park <a href="#">240624_CRP_Murdoc k Pocket Park.pdf</a>	Treasure House

	<a href="http://oldkentroad.org.uk">(oldkentroad.org.uk)</a>	
5 August 2024	Meeting with Duchy of Lancaster about emerging Design Code for OKR2, 3 & 4	Teams



## **Appendix B:**

Summary of key issues raised in consultation responses to the survey questions & Consultation Hub Questionnaire data

Old Kent Road Area Action Plan: Consultation Report

October 2024

## Introduction

This document is a summary of the consultation conducted in 2021 with residents, businesses and interest groups regarding the draft Old Kent Road Action Area Plan (OKR AAP). All comments received from Southwark's Consultation Hub are summarised and analysed below. For email representations please see Appendix 2.

### Composition of respondents

The below shows most of the representations received from the Consultation Hub were from residents.

Total	Unknown	Businesses and landowners	Residents	Community/ Interest groups
136	---	1 (0.7%)	122 (89.7%)	13 (9.6%)

### Summary of key issues raised in consultation responses

The Consultation Hub questionnaire asked respondents to state if they agreed, disagreed, agreed in part or didn't know with the strategy in the AAP for each of the themes listed below, in addition to providing further comments. The table shows this data in raw form and relates to the bar chart in section 2.3 Headline figures.

Total 136	Yes	No	In Part	Don't know	Not Answered
Climate Emergency	22	74	25	10	5
District Heat Network	49	43	17	19	8
Bakerloo Line Extension	89	19	20	3	5
Child and Youth Provision	63	14	38	15	6
Quality, Affordable & Family Homes	41	48	38	2	7
Tall Buildings	26	84	20	3	3
Movement	73	24	36	0	3
Co-location (industrial and residential)	53	44	27	5	7
Town Centres, Leisure and Entertainment	65	23	42	2	4
Quality Design and Heritage	72	24	30	5	5
Parks and Open Spaces	83	15	30	3	5

### **Do you agree that Old Kent Road Area Action Plan will address the Climate Emergency?**

Yes	No	In part	Don't know	Not Answered
22	74	25	10	5
<ul style="list-style-type: none"> <li>Fourteen representations were received in support of the question two but only two comments were submitted. One representation stated that urban densification is one of the best strategies for improving carbon efficiency. They were glad that the council are replacing space intensive car parks with homes especially close to</li> </ul>				

public transport. The second representation stated that the OKR AAP will only address climate emergency if net zero is achieved by “2020.”

- Majority of the responses were skeptical about whether the OKR AAP addresses the climate emergency and whether carbon neutrality can be achieved by 2030. Issues shared by the majority objecting to question 2 expressed problems surrounding tall buildings, reduction of open spaces, the scale of the project, the level of carbon footprint produced by construction and the unsustainable materials used during construction.
- The current method of construction is demolition-led, contributing to carbon footprint. Representations suggest it should be retrofitting-led, make full use of empty buildings and more alternative sustainable materials should be used including Hempcrete.
- The scale of the development is so huge at every stage was also a concern. Construction and cumulative development in general have an influence on air quality.
- A representation stated that XR Southwark Lobbying group think that the scale and massing of the development proposed is incompatible with Cleaner, Greener, Safer policies outlined in AAP12.
- The problems with high-rise buildings conveyed by residents and community groups said that cooler microclimates were created, which in return affects the local biodiversity and heightens heating consumption. They state tall buildings also consume more resources to build and energy – e.g., with the use of elevators. Loss of sunlight, unable to garden, influences physical and mental wellbeing. The wind tunnels created by tall buildings will also make it difficult to cycle.
- There is a reduction of open spaces. For example, OKR 12 seeks to build an OOS, which conflicts the NSP and previous plans maintain amenity land for residents.
- A respondent stated that Fossil Fuel District Heating System is costly and that the council makes no attempt to utilise modern renewable modes of heating and encourage use reduction. However, a representation welcomes the introduction of the District Heating System but should not be the main solution to the AAP3.
- There is still some support for the use of cars and one representation expanded that car-free will affect the working-class population.
- Southwark Law Centre state there is no evidence-based targets included nor a monitoring structure.

**Do you agree with the AAP3 proposals to connect to the District Heat Network?**

Yes	No	In part	Don't know	Not Answered
49	43	17	19	8

- Majority of respondents were in agreement or part agreement of the district heat network, but those who opposed it considered district heating to be unreliable based on existing social housing estates experiencing long standing problems.
- A representation stated the waste used in making the heating network has to be brought in from other boroughs causing more traffic and more congestion and is not automatically a clean energy supply. If waste and recycling rates are to increase this is not deemed as a long-term solution.
- There also doesn't seem to be evidence to suggest this can be supported safely and cost effectively for residents. The system will potentially be out of date before its finished.
- Those in support believed it's a great idea in theory, but a greater discussion should be had with the community as to the benefits of the system.

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**Do you support the plans for the Bakerloo Line Extension with two stations along Old Kent Road?**

Yes	No	In part	Don't know	Not Answered
89	19	20	3	5

- Most of the comments in favour state that the BLE has been over-due and is critical in the development of Old Kent Road. This will ensure the area is not “left-behind” and is connected to the rest of London, which will bring further investment, generating benefits to residents and businesses. Further comments also suggest that the BLE will reduce traffic flow.
- However, 20 representations were in part as although benefits of the BLE were recognised, representations do not support the mass development of the area without the initial development of the BLE first as the current transport infrastructure is failing to support the growing population and is doubtful of the scale of the project and the proposed timescales. Further work is needed to support current transport infrastructure, including bus services, dedicated carriageway and tram and these should be delivered first.
- The representations that were unsupportive of BLE highlighted that there is uncertainty with the impacts of the line extension.
- Representations had concerns about the recent news that TfL announced of mothballing the BLE and other transport infrastructure, such as Crossrail 2 is behind schedule.

**Do you agree with the proposed AAP14 for the provision of facilities and spaces for children and young people (Child and Youth Provision)?**

Yes	No	In part	Don't know	Not Answered
63	14	38	15	6

- Almost half of the respondents to this question support the proposals for facilities and spaces for children and young people
- Respondents recognise the need for more youth facilities in the area and that this should not be at the expense of upkeeping existing facilities
- Many respondents support youth provision but want to see replacement of facilities which have already been lost and for the policy to be able to provide for an increasing population
- Many respondents do not think the proposals for 231 Old Kent Road and two new schools will meet the needs of the existing community or future population growth
- The sale of Bermondsey Library, Bermondsey, Peckham and Walworth Town Halls, a number of schools and a homeless hostel are cited many times as big losses to the community
- Multiple respondents point to the need for park improvements and the importance of outdoor facilities to create safe spaces for young people and reduce youth crime
- Burgess Park is highlighted several times as an opportunity for improvements for young people
- Smaller open spaces around the Old Kent Road are also recognised as playing a vital role for children and young people e.g. Galleywall Nature Reserve, Nile Terrace and Ekington Gardens

- Several respondents would like to see the protection of casual recreational play areas used by children and young people such as ball courts, open areas and green space
- One respondent suggests the integration of sports facilities into development not just in parks and green spaces
- There are objections to the proposals for two new schools when existing schools are facing closure
- The proposals should be brought forward designing with and for such people, using consultants and design teams that reflect the diversity of the demographic of Old Kent Road.
- There is a need to create inclusive, multi-cultural spaces and facilities which are integrated into the communities and resounding cries that proposals are truly accessible to all
- There are concerns about the location of these facilities in relation to road safety and how this will relate to minimising traffic
- There is concern that there is not enough being done to provide for older children and young adults and that the policy is too focused on young children
- Two respondents would like to see more connections to training and job opportunities in the proposed facilities
- One respondent points to encouraging youth to start their own businesses through affordable workspace and wants to see development providing more mixed-level, mixed-use community facilities with affordable workspace and youth training facilities, where young people could be provided mentorship and work experience / overshadowing opportunities by local businesses renting workspace
- There are concerns about who will take ownership of the spaces and how valuable it will be if there is no clear ownership
- Southwark Law Centre suggest that the policy could be improved by further effective consultation and a map of the current and proposed youth provision so people can clearly visualise the plans

**Do you support the proposals to provide 20,000 new homes, including Affordable and Family Homes?**

Yes	No	In part	Don't know	Not Answered
41	48	38	2	7

- Respondents in support of question 3 commented that there should be more family homes especially 3-4 beds, as well as accommodate people with disabilities and individuals from a lower income background. One emphasised that only 8% of Southwark's existing can afford homes at full property value price
- If possible, taller buildings should be built as they house more homes.
- More information needed of the percentage of affordable homes built.
- New council homes should go to those already in the waiting list and favour key workers with an emphasis of keeping communities together
- Disagrees with the provision to allow developers to pay instead of providing affordable housing as this dilutes the provision of affordable housing
- Provision of affordable without the BLE is unthinkable and retrofitting empty homes should be an option, as 1 in 24 homes in Southwark are empty.
- Disagrees - increasing the number of private sale homes and unaffordable shared ownership homes will force both private rents and commercial rents up as landlords cash in. This will displace existing poor local people
- Already overpopulated – noise



- Not about quantity but the design – tall buildings issue
- 13,000 of the new homes will be unaffordable to Southwark and London resident - long existing residents will be priced out, for example, in Elephant and Castle.
- The current climate should be considered in the plan. For example, the negative migration due to crippling housing prices, desire for green space, working from home, reduction in student influx and migration to Europe following Brexit.
- Not enough affordable social rent
- The housing does not justify the scale of the development.
- It must be truly affordable and not luxury homes, bought by overseas investors.
- Pages Walk believes 20,000 is too many for the area - destruction of communities by development, new homes should provide social regeneration
- Old council homes removed
- Too much without the necessary transport and social infrastructure
- It should be 50% social rent and the rest to be affordable
- More acknowledgement needed accommodating Gypsy and Travellers.

#### Do you know how to find affordable housing built in the area?

Yes	No	In part	Don't know	Not Answered
26	81	18	6	5

- There seems to be confusion about 'affordable' rent as opposed to social rent.
- A representation stated that as developers increase house prices within their development and the area, more assurances is needed to ensure 'affordable rent' will be capped at London Living Rent.
- Rent capped at London Living Rent was a common theme among the respondents.
- A respondent claimed it was easy for them as they own a leasehold property
- Some needed more information on this as they could not find
- A dedicated website or social media was suggested
- Needs to be easily and quickly available
- £60k isn't affordable.

#### Could the council do more to inform people of its approach to local lettings?

Yes	No	In part	Don't know	Not Answered
93	8	4	24	7

- Majority of respondents were in agreement of learning more on local lettings, but have understood this consultation question to be related to the policy targets in AAP 4: Quality Affordable Homes
- The recurring representation made by several respondents wanted to address the local lettings target of 50% new council homes being let to local residents in the existing community.
- The set target does not deal with the problem of council waiting list, the number of new homes being insufficient and appropriate housing needs (unaffordable to existing communities and often of the wrong type).
- A representative suggested a local office serving the community to be located

within the development area, as information is only online.

- Wanting to see a physical model showing all the maximum height that you have envisioned for this area.
- A respondent stated a dedicated social media page/website may help.

**Do you agree with the new Tall Buildings plan?**

Yes	No	In part	Don't know	Not Answered
26	84	20	3	3

- The majority of respondents do not support the tall buildings plan
- Concerns over the harm caused to the London skyline and the impact of wind tunnels on the Old Kent Road
- Many respondents are worried about the loss of natural light and the shadowing of open spaces caused by tall buildings
- Concerns over the safety of tall buildings planned as single stair buildings with no alternative means of escape in the event of fire
- Grenfell is cited many times as a reason not to have tall buildings
- Studio flats are sub-standard accommodation and should not be permitted
- Tier 1 buildings feel claustrophobic, intimidating and impact poorly on mental health – human scale development is more favorable
- Although tall buildings signify strategic points it is considered that the buildings proposed at tube stations are too high
- Tall buildings are too bland and not architecturally distinct
- The high-rise housing provision of social and affordable housing will create a character-less development which will alienate the local community
- STAG reported that Gypsies and Travellers feel oppressed by tall buildings overlooking their sites
- Shadowing negatively effects biodiversity
- Concerns over the impact which tall buildings have environmentally during construction and the higher use of energy during occupation - office and residential buildings use more energy per square meter, the taller they are
- The size and massing of the buildings is continuously increasing despite assurances given to existing residents and there is worries over the loss of character of the local area
- Lack of outside space and being able to relate to the scale of the people in the street lead to feelings of separation, isolation and depression. This is particularly acute within families especially where young children are involved. Numerous studies illustrate tall buildings are detrimental to individuals and society/community. The majority of those studied experienced greater mental health problems; higher fear of crime, fewer positive social interactions and more difficulty rating children and depression.

**Do you agree with the strategy to ensure (Movement) public transport, cycling, walking and scooting are the first choices of travel for local residents?**

Yes	No	In part	Don't know	Not Answered
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73	24	36	0	3
<ul style="list-style-type: none"> <li>• Majority of the respondents in favour of the strategy commented on the positive approach of cycling and would like to see connective cycle lanes to central London.</li> <li>• However, there should be more consideration of cycle movement and improved road crossings at Burgess Park. Friends of Burgess Park recommended an orbital route along Albany Road and St George's Way.</li> <li>• Prioritisation of pedestrians and public transport users over cyclists.</li> <li>• Safety measures set in place for such infrastructure needed - e.g., walking can be dangerous and especially for children.</li> <li>• Cycle theft is a huge problem.</li> <li>• Further development of electric charging points was recommended.</li> <li>• Concerns over the delivery of a "Healthy Highstreet" for the whole of OKR without the delivery of the BLE.</li> <li>• Representations were concerned on the effect of car free proposals upon local people especially the working-class community, less able bodied and elderly.</li> <li>• There is still a reliance on deliveries and servicing (electrics, plumbing, building maintenance etc.,) all of which means trucks and vans.</li> <li>• Respondents that were against the transport strategy stated that the pedestrian crossings were "staggered" and would like to have a "simple, and plain, direct pedestrian crossings"</li> <li>• More clarification the segregation of bus lanes and cycle lanes – whether if this is for the whole of OKR.</li> <li>• Problems with e scooters being dangerous and illegal.</li> </ul>				

<b>Do you agree with the strategy to mix industrial uses with new homes (Co-location)?</b>				
<b>Yes</b>	<b>No</b>	<b>In part</b>	<b>Don't know</b>	<b>Not Answered</b>
53	44	27	5	7
<ul style="list-style-type: none"> <li>• There is lack of high street shops but respondents like the OKR's business park as it includes large supermarket stores, pet and garden centres.</li> <li>• "Retaining industrial uses in the Old Kent Road area is unquestionably necessary in order to retain the character of the area and continue to support the large number of businesses to continue to provide essential services to central London and beyond.</li> <li>• However, only 10% of redevelopment industrial land and workspace will be affordable. This percentage should be increased to at least 50% to ensure that local businesses can afford to remain in the area.</li> <li>• Open to the mix of uses as focused on non-cars, that drives local communities and local businesses as we meet, eat, play in local parks, cafes and restaurants we build together.</li> <li>• Delivery access and sufficiently sized space needs to be provided to ensure industries old and new can thrive. To provide for only maker spaces would be a mistake.</li> <li>• People need jobs near to where they live.</li> <li>• Majority of the respondents had Issues on co-location: e.g., safety, noise, cleanliness, unpractical– in reality, who would like to live in this sort of environment.</li> </ul>				

- Also depends on what type of industrial it is.
- Careful planning is needed.
- There is a requirement of servicing of industrial – lorries and vans and this should be researched more.
- There is no requirement of office space – many are now empty due to the pandemic.
- Questions around enough greenspaces in this mixed-use environment
- John Bussy response -
- Mixing is counterproductive. There are many unkept and ugly industrial land.
- Questions how industrial land can thrive with the high street and how to make the high street become more attractive.
- Constantine, Martin Speed, Jayhawks, Blue Apron plus Tate Store and White Cube store. All these companies are being forced out through compulsory purchases. Zone 2 is close enough to service the art galleries and museums in central London. By taking the action of removing this industry from the area, there will be job losses and storage facilities will have to move further out, increasing the carbon footprint and pollution.
- Local people should be able to purchase homes before anyone else. - should not be in this section.
- Respondents in part stated that it depends if it works favour on the environment and the type of industrial use is proposed.

**Do you agree with the strategy to create a high street including new shops, restaurants, cafes, local services and leisure uses (Town Centres, Leisure and Entertainment)?**

Yes	No	In part	Don't know	Not Answered
65	23	42	2	4

- Strongly agree as this will attract more businesses and jobs in the area and increase for people to shop more locally and jobs should be for the local people.
- The majority would like to see small, independent shops (e.g., small boutique owners, artisan creators) but one respondent stated they only would like chain shops as they do not trust food hygiene in smaller restaurants.
- To provide affordable retail at the same time to incorporate human-scale design – it should facilitate for human interaction and community participation.
- A respondent asked whether there will be a council owned leisure centre and sports facilities.
- The main concern was the loss of pubs and no strategy for retaining pubs as many people these are social assets.
- No strategy that can create a high street and deliver a vibrant mix of shops restaurants, cafes etc. This happens organically over time where things naturally evolve in response to the needs of the local population. Pubs need to be
- Theatre Trust state within part 4, reference performance space in addition to cinema or museum as there is a shortage in the borough.
- To allow to develop shopping frontages into the way they would like
- More mention of pubs - pubs aren't listed amongst the figures on page 15 of the plan under "schools and communities", or on Page 50 under "High Street Character and Ground Floor Strategy". These buildings are communities too – especially for the elderly, and working class people; they are a key part of our social fabric, even if they are now a minority interest. By ignoring these important

buildings and the businesses within them, further anger and division is caused.

- OKR is home to a rich mix of ethnic minorities. Much of the wide diversity already existing in terms of cafes and restaurants on OKR will be lost when rents increase as part of the regeneration/gentrification drive. We don't want another high street full of familiar chains, we wish to preserve the existing distinct mix.
- Majority of the respondents would like to keep the high street local
- Commercial rents need to be set at a level suitable for small business owners rather than large chains.
- One respondent said they would like to see light industrial on the high street

**Do you agree with the strategy to safeguard Heritage and deliver high quality design?**

Yes	No	In part	Don't know	Not Answered
72	24	30	5	5

- Respondents agree with the strategy but are skeptical that it is being achieved as in reality there is so much demolition and redevelopment of heritage assets
- There is much concern over the heights of buildings and how these should conform to the restrictions set out in the NSP
- The scale and height of development proposed is considered contradictory to the safeguarding of heritage assets and harms the settings of conservation areas and heritage assets with which they are in proximity of
- One respondent notes that the plans for OKR12 to preserve the existing stables and forge are at odds with the drawings which show 3 large multi-storey buildings where these assets are located
- There are multiple objections to the loss of the former Duke of Kent pub (now the Old Kent Road Mosque, no.365) and calls to see the existing building protected as a heritage asset
- Multiple requests to have the historic interior of the Thomas Beckett pub reinstated
- There are concerns that pubs are not listed under schools and communities or as part of the High Street and Ground Floor Strategy as they are important community assets
- Green Man pub (closed 2021) should be protected as a heritage asset and mentioned in the plan
- Retaining and retrofitting would be welcomed so many are concerned about the demolition led nature of the plan
- There is desire to see modernist buildings (the North Peckham Civic Centre) the same heritage significance as Victorian buildings
- There is severe concern from the residents of Page's walk that the proposed developments are going to cause considerable harm to the Conservation Area

**Do you agree with the strategy to increase the quality and number of Parks and Open Spaces in Old Kent Road?**

Yes	No	In part	Don't know	Not Answered
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83	15	30	3	5
<ul style="list-style-type: none"> <li>• The need for open space is acknowledged by most respondents</li> <li>• Respondents would like to see a much greater increase in the provision of open space in the plan as the proportion of open space is low compared to the number of new homes and to account for the future increase in population</li> <li>• Many respondents believe that the existing green space provision would need to be more than doubled for Southwark to retail its ranking as 5<sup>th</sup> worst borough in London for access to green space</li> <li>• Many people want to see small parks and open spaces connected</li> <li>• Suggestion for green routes to and from Burgess Park down Old Kent Road</li> <li>• Multiple concerns were raised that the current trend of Council infill schemes on their estates, the loss of green space and children's play areas means a continued loss and so any proposals for more green space is outweighed by the removal of current spaces</li> <li>• There is concern that there will be an overall loss of trees as the 3000 new trees committed for planting in the AAP is less than the trees already lost to development</li> <li>• There is concern that shadowing caused by tall buildings will have negative impacts on biodiversity and cast greater proportions of the street in shadow, creating dark alleyways where concentrations of stagnant air and pollution can be found</li> <li>• Some respondents raise concerns about the proposed Mandela Way Park and how this will affect existing road layout and accessibility</li> <li>• Many who express support the plans are still concerned about trees, loss of green space to infill schemes, the impacts of tall buildings on open space and the location of Mandela Way Park</li> <li>• One respondent does not support the strategy as they feel that there are enough parks already which are not looked after properly</li> <li>• One respondent points to the need for more sporting facilities as existing ones are oversubscribed and in poor condition</li> <li>• Green and open space is beneficial but not at the cost of having tall buildings which destroy the enjoyment of the open space</li> <li>• There is concern that much of the green space being proposed is for private use and not accessible to all</li> <li>• One respondent supports the strategy as long as carbon capture is implemented</li> <li>• There are concerns that the existing stock of parks and open spaces is not being safeguarded due to the volume of new development which is planned</li> <li>• There is approval for the proposal to create a new park at the gas works</li> <li>• It is important to make sure that these green spaces are not simply paved areas with a few trees and the occasional planter</li> </ul>				

#### **What do you think of development completed to date?**

- Representations received were largely skeptical or pessimistic about the developments completed to date. The only positive representations stated that developments were "good so far," "exceptional" and "attractive."
- The majority believed that the developments were impersonal, cold, too high, lack of greenspaces, low quality,
- Lack of greenspaces in developments and greenspaces in general are disjointed.

- Concerned in the reduction of community assets
- Developments concerned on the provision of housing and lack of local community facilities improvements.
- Communities unaware of proposed developments
- Problems with local government, little consultation for the general public,
- Slow development
- Expensive
- Against gated communities as it creates social exclusion
- Buildings fronting onto Crimscott Street should be between 6 - 8 storeys; yet we are already seeing the finished construction of 9 storeys as part of the London Square development which incidentally is one of the ugliest buildings to be constructed in recent years bearing more resemblance to a multi-storey car park or the recently demolished Heygate Estate rather than referencing existing builds in the area or working in any sympathy with the neighbouring Conservation Areas of Grange Road and Pages Walk.

**What could the council and developer do to make sure that you are kept up to date about the construction on site and dealing with disturbance?**

- Signage and letters in the post to residents, consultations and engagement
- Ensure that forums (like Next Door Neighbour) are regularly updated
- Create a text alert system for major works
- A web forum or Twitter feed
- More frequent emails and regular consultation
- A newsletter posted to residents
- Use the hoardings more effectively, not just for marketing
- Hold public information events – even online
- Organise virtual tours of what the development will look like
- Send leaflets
- Interactive map with the pipeline of work in progress and future stages of the masterplan - could also be used to consult on the design of each plot while still in the design stage
- Far greater openness and genuine consultation with residents. Go and talk to residents.
- Notification boards on site
- The council and developers need to do much more to engage, involve and inform Gypsy, Roma and Traveller communities in Southwark. A proper health and equalities impact assessments should be completed before all new constructions are started and Gypsies, Roma and Travellers should be specifically considered within these, as part of the Council's Public Sector Equality Duty.
- Bad practice of developers framing questions to ensure that existing residents can only give the answers that the developers need for the proposal to be approved
- The council has frequently extended construction working hours throughout the pandemic on many sites across Southwark. This is totally unacceptable with so many people in lockdown working from home and home schooling
- Many sites were also using floodlights to work these extended hours in the dark which created a light pollution issue on top of the noise nuisance.
- Many roads have been made difficult to access next to huge developments. This combined with LTNs has actually increased traffic and carbon emissions rather than addressing them.
- There is a total failure to work with the existing community in regard to developers

carrying out works with no notice being given as to when works are starting etc., generally it is left to the public to complain as and when things happen. More positive engagement needs to happen with such an ambitious building programme.

- Southwark Council have to do more to protect existing residents from unscrupulous developers working unlawfully. Currently residents have to take construction companies to court for damage to their property caused by construction.

**Do you have any other comments on the December 2020 draft Area Action Plan that you would like to share?**

- For many respondents the delivery of the Bakerloo Line Extension is critical for the success of the plan and there is concern that TFL do not have the financial means to ensure the project goes ahead
- The Council's desire to build buildings that are crafted to a high standard and the use of materials and construction that will last, weather well and stand the test of time is applauded
- There is a desire to see more bike hangars and recycling bins in the whole of the Old Kent Road
- Those who are supportive of the plan and its ambitions want to see development happening at a faster pace
- Some residents report that they feel disregarded and stepped on
- A common theme is more discussion and engagement with local residents
- Improved and extended cycle and routes and planting more trees to separate pedestrians and cyclists from traffic on Old Kent Road need to be the first step towards creating a high street that serves the local community and supports the local economy
- It is felt that the Bricklayers Arms site allocation is confusing





## **Appendix C:**

Summary of email responses to the consultation

Old Kent Road Area Action Plan: Consultation Report

October 2024

Below shows a breakdown of those who responded to the consultation by email. Most of the representations received by email were from Businesses/landowners, and all Statutory Consultees responded to the consultation through this method..

	No. Of responses	Statutory consultees	Businesses and landowners	Individuals	Community groups etc
Emails	47	11	23	8	4
Hub	136	0	1	123	12
Total	183	11	24	130	17

## 1) STATUTORY CONSULTEES

<b>Natural England</b>	
Written rep received previously	-
<ul style="list-style-type: none"> <li>Nothing to comment on this consultation</li> </ul>	

<b>Highways England</b>	
Written rep received previously	2018
<ul style="list-style-type: none"> <li>No comments or objections at this time.</li> </ul>	

<b>Historic England</b>	
Written rep received previously	2016, 2017 and 2018
<ul style="list-style-type: none"> <li>Their principal concern remains the tall buildings strategy and the potential impact on the setting of heritage assets and on local character.</li> <li>Historic England acknowledges that the taller elements will be limited to key junctions and transport heights, however they emphasise that it is vital that both taller elements and podium heights respect the significance of heritage assets and development preserves and where possible enhances this significance.</li> <li>The height and mass of proposed new development should also be informed by street widths and care will need to be taken to avoid an oppressive sense of enclosure - recommends the Allies and Morrison/Urban Practitioners research which concluded the importance of prioritising street structure and the need for scale to reflect street width</li> <li>Historic England urge the Council to explore alternative and innovative approaches which would help mitigate the need for extensive tall buildings within narrow street patterns and would enable "landmark" buildings to genuinely serve the purpose of the identification of key locations.</li> <li>Suggestion to amend policy of AAP8 'The design of tall buildings must' to include wording relating to the preservation and enhancement of heritage assets</li> <li>Figure 12 would benefit from being tested to conclusively demonstrate that the proposed heights will not cause harm to the strategic views or outstanding</li> </ul>	

universal values of world heritage sites.

- It is noted that the Tall Buildings Study referred to in the evidence base has not been published
- Would like to see more sound analysis of the impacts on the significance of heritage assets in relation to the concept of 'Stations and Crossing' and the three-tier approach to Tall buildings
- Encourages the Council to define a maximum height for Tier 1 buildings to give clarity to the vision and enable more effective planning of the surrounding townscape
- Historic England think that many of the proposed sites would benefit from more detailed illustrative masterplanning and design codes
- Supportive of AAP9 Character and heritage and the inclusion of the policy to safeguard historic street surfaces
- Historic England recommend early identification of "risk" and a strategy to address this to take advantage of the opportunities to enhance local character and refurbish and enhance buildings to successfully support the vision for revitalised local amenities and town centres.
- In SA1 new development fronting Old Kent Road should seek to reinforce the high street typology and to reintroduce a consistency of finer grain development through the design of the facades
- Recommend consideration be given to how new development can help promote improvements to physical condition and economic activity of the surviving historic high street section
- In SA2 the commitment to integrating heritage assets into new development and the proposal to introduce a linear park to reflect the former canal route is welcomed.
- The height and location of tier one and two buildings around Burgess Park has some cause for concern in order to avoid a wall of development create canyon like streets
- In SA3, the vision for reinstating an active high street frontage which better reflects the historic high street grain is to be welcomed, as is the intention to utilise designated heritage assets as a focus for local character by incorporating them into new public realms and parkland.
- It would be helpful to clarify the retained buildings in OKR13 Heritage section
- In SA4, it is recommended that the need to consider the impact of taller development on the heritage asset needs to be included in all the Sub Area 4 Site Allocations – references to tall buildings are too vague as to the numbers or locations of tall buildings
- In SA5, Historic England have no specific comments but encourage the Council

### Forestry Commission

Written rep received previously	-
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- No specific comments but encourages the use of green infrastructure and using locally sourced wood in construction

<b>Sport England</b>	
Written rep received previously	2016, 2017 and 2018
<ul style="list-style-type: none"> <li>• The location and strategic need for a new sports and leisure facility needs to be evidenced</li> <li>• Proposals for new public open space, green links and to make whole of the Old Kent Road a healthy Street are fully supported.</li> <li>• Recommend to reference Sport England's Active Design Guidance and suggest the concept of 'Active Design' be incorporated into policy</li> </ul>	

<b>Thames Water</b>	
Written rep received previously	2016, 2017 and 2018
<ul style="list-style-type: none"> <li>• The reference to the Integrated Water Management Strategy (IWMS) is welcomed.</li> <li>• Thames Water are in the process of creating long term drainage and wastewater management plans (DWMP) with objectives that overlap with those for Old Kent Road, such as being cleaner, greener and safer and supportive green open spaces.</li> <li>• They are also supportive of the inclusion of water efficiency measures, and surface and grey water reuse within developments and appreciate that Old Kent Road is committed to SuDS, parks, and grey water reuse and support the references to the IWMS in Policy AAP12 and the requirement to follow the SuDS hierarchy which builds on Policy SI13 of the London Plan.</li> <li>• Concerned about development along the Old Kent Road, specifically regarding the cumulative impact on the trunk sewer and that is being investigated through the DWMP</li> <li>• Would like to see SUDS included in the plans for new and redeveloped parks</li> <li>• In order to ensure that development is aligned with any water and wastewater infrastructure upgrades necessary to support the development Thames Water would like some wording added to AAP12: Cleaner Greener Safer advising applicants to seek pre-application advise from them. This can help reduce the need for phasing conditions to be sought on planning approvals to prevent the occupation of development ahead of the delivery of any necessary network reinforcement works.</li> <li>• To assist in network capacity assessments, all applications should include current and proposed drainage plans, including points of connection and estimations of flow rates.</li> </ul>	

<b>TFL Commercial Development</b>	
Written rep received previously	2016 and 2018
<ul style="list-style-type: none"> <li>• The inclusion of the Bricklayers Arms Roundabout as a site allocation is supported</li> <li>• Questions where the 400-600 capacity has come from and suggests that development capacity figure is not included in the site allocation until more detailed assessment has been undertaken.</li> <li>• If it is considered necessary to include a figure at this stage, TFL suggest that a lower range of 400 is used as a minimum rather than including a set range with a</li> </ul>	

limit of 600 homes.

- It is noted that in Figure 12 the Bricklayers Arms site has not been included as a site which may be suitable for Tier 1 to Tier 3 building heights.
- TfL CD consider that Bricklayers Arms should be identified as a suitable location for Tier 2 heights on the parts of the site not affected by the strategic views as it is considered that the Bricklayers Arms is a key junction within the AAP area.

### TfL Spatial Planning

Written rep received previously

-

- TfL Spatial Planning acknowledge the strong support and vision articulated in the AAP in support of the Bakerloo Line Extension.
- Given the position on funding for the BLE, more work needs to be done to support other transport improvements until the Bakerloo line arrives e.g. accelerating ambitions of Healthy Street project and improved bus services.
- There is a need to focus on improving pedestrian, cyclist, bus connectivity in the area, improving other rail-based transport and public realm environment.
- The AAP states that the BLE will be operational by 2031, which is no longer likely, given current funding constraints – more emphasis could be placed on the importance of improving pedestrian, cycle and bus connectivity in the area, improving other rail-based transport in the interim and to support the BLE once operational.
- Healthy Streets strategy and the Healthy Streets scheme for the Old Kent Road should be referenced
- It is suggested that the milestones for the BLE and the associated development phasing are given without specific dates in the AAP – TFL welcome further discussion as to how best communicate this
- It is recommended that the safeguarding directions for the BLE are set out within the policy maps in the AAP and referred to in policy AAP2.
- TFL welcome the new section on the COVID-19 response and the emphasis it places on pedestrian amenity and public space
- The importance of high-quality public space and provision for active travel in the AAP area could be more clearly underlined in the COVID-19 response
- In the Funding section, the cost of the BLE should be reviewed considering funding constraints and TFL would be happy to discuss further.
- TFL comment that the role of different stakeholders including, but not only, Southwark and Lewisham Council, landowners and developers in the planning and delivery of the BLE could be better communicated and more information on the safeguarding directions could be provided
- The Greener Belt Diagram (Figure 3) should show the alignment proposed TFL.
- In the plan objectives under the Movement section, TFL concur with the aim to create an exemplary Healthy Street, but are concerned that the wording proposed sets up the unrealistic expectation that there can be physically separated bus and cycle lanes through the whole length of OKR.
- The commitment 'to joint working with TfL, GLA and Lewisham Council to secure the BLE and delivery of at least two new stations on OKR' is welcomed but suggest that the words 'help deliver' in place of 'secure' would be better.
- TFL recommend specific wording relating to the safeguarding directions for the

BLE to be inserted into AAP2.

- The policy wording of AAP2 should explicitly relate development phasing in the AAP area to the letting of the BLE construction contract in accordance with the phasing agreements that were agreed between the Council, the Mayor and the GLA and TfL in 2018
- TfL suggest the addition of the wording 'improved bus services provided' when talking about the upgrade of physical infrastructure, in order to avoid overlooking the importance of increased bus capacity in the first phase of development.
- TfL suggest several minor amendments to the wording of the accompanying text in regard to the proposed route, correcting the dates and being clear that the Grampian condition would prevent development from proceeding until the construction contract for the BLE has been let.
- TfL welcome measures to achieve this including: car free development, safe and accessible walking and cycling routes, and walkable neighbourhoods – reducing the use of motor vehicles should be a priority.
- To reduce the share of commercial vehicle movements, last mile deliveries or collection on foot or by cargo cycle needs to be encouraged.
- TfL state that the Agent of Change principle should be applied when there is co-location of different uses and noise, air quality or vibration sensitive uses are introduced to industrial and related areas, including development sites that are close to transport infrastructure and services, or transport support functions.
- The requirement for development to create a pedestrian friendly and healthy environment on the high street and the relationship it sets up between ground floor land use, active frontages and high street public realm is welcomed.
- In AAP6 under the 'Development must' section, it is suggested that the reference to retaining or increasing the amount of retail uses may need clarifying in context of the changes to the Use Classes Order.
- Within policy AAP6, there may be an opportunity to require additional public cycle parking to support the proposed high street and the two district centres.
- TfL welcome the requirement for car free development in AAP7
- TfL suggest that the proposed exception for 'essential parking and deliveries for businesses to operate' should be clarified to ensure it is justified on a site-by-site basis and won't be used to provide general parking
- The intention to manage a reduction in parking on estate redevelopment is welcomed
- A stronger emphasis in AAP7 on the importance of providing capacity and infrastructure improvements, particularly in the early years leading up to the full opening of the BLE - development decisions will need to provide funding for new and enhanced bus services and help to create the conditions for an increased number of buses to operate effectively by providing improvements to supporting infrastructure and measures to improve journey times.
- TfL point to the need for additional bus capacity/connectivity between OKR and Canada Water using Rotherhithe New Road, for example a new bus route, is likely to be a key requirement to support both Opportunity Areas.
- The intention to maximise footway widths is welcomed and it is suggested that the Healthy Streets Approach in AAP11 is cross referenced here.
- The requirements for off street servicing where possible and electric charging points (where parking is provided) is supported and it is suggested that all disabled parking spaces should have active charging facilities from the outset
- TfL welcome the consolidation servicing which should apply to deliveries and

construction and suggest that consideration should be given to seeking rapid-charging facilities for operational vehicles where appropriate.

- TFL suggest that the list of financial contributions should be prioritised with the first call on funds for necessary bus capacity improvements followed by active travel improvements as part of the Healthy Streets scheme
- TFL do not consider a blanket requirement for a free three-year membership of a car club appropriate as it is likely to act as an incentive to greater car use over sustainable travel
- The aspiration to maintain 50 per cent less driving than before lockdown and to create a modal shift is welcomed and it is suggested to explain and provide justification for measures that will help to achieve this.
- TFL welcomes the requirements for Transport Assessments to include an Active Travel Zone Assessment – it is suggested the word ‘Survey’ is changed to ‘Assessment’ - and for the submission of Construction Environmental Management Plans (or Construction Logistics Plans) and Delivery and Servicing Plans.
- It is suggested that where parking is re-provided as part of estate regeneration, and in the event of parking being permitted elsewhere, a Parking Design and Management Plan should be submitted showing how parking will be allocated, monitored, and reduced over time.
- New Bermondsey Station should be referred to as Surrey Canal Station - this applies to several references throughout the document
- TFL suggest that clarity is needed in the targets section on whether the 4km refers to the total of separate bus and cycle lanes or whether it includes bus lanes which allow cycling.
- The proposed extension of the Controlled Parking Zone is welcomed but TFL have some concerns about the detail shown on Figure 11 including:
  - The location for proposed new cycle hire stations and improved pedestrian crossing facilities needs to be agreed with TFL
  - The map does not show how the movement for pedestrians and cyclists is intended to evolve over time including the phasing of works
  - The status of green links is unclear, and it is unclear why they are focused only in the central section
  - The proposed cycle network is confusing and appears only partial – it is suggested that to focus less on identified routes and more on the network of streets where people can safely and comfortably cycle, emphasising where change is needed
  - It is also unclear if the crossings are intended for cycle as well as pedestrian use
  - It is suggested a separate cycle network strategy drawing would be helpful
  - Liveable Neighbourhoods boundaries are difficult to see and there is no indication of what this means for the movement network
  - There are inconsistencies between Figure 11 and the sub-area drawings e.g. the East Street to Hendre Road crossing is highlighted as a key link on the drawing on page 111, which we support, but it does not appear on the Movement drawing as a crossing or junction that needs improvement
  - While the green link and crossing at the Olmar Street to Marlborough Road intersection is referenced in the sub-area section, the next green link crossing OKR to the east, before the St James’s Road junction, is not. It is not clear from the block form shown in the sub-area plan how this could be a green link.
  - An improved crossing should be shown in the vicinity of Hyndman Street

- There is a cycling link missing at Dunton Road between Lynton Road and Mandela Way, as well as Marcia Road and OKR to create direct connectivity
- Regarding AAP11, TFL welcome and actively support Southwark Council's aspirations to turn OKR into a Healthy Street by 2036, including prioritising people walking and cycling and improving crossings.
- It is suggested that cross referencing AAP11 in other policies would be helpful as the Healthy Streets Approach underpins many of the measures proposed under other policies, e.g. Movement and Design.
- TFL recommend that Specific guidance on how development can facilitate delivery of the OKR Healthy Streets project should also be included and suggest a three-pronged approach:
  - developer contributions (in kind and/or financial) We would suggest that as all developers will benefit from the HS scheme consideration should be given to how to secure contributions from those with sites not fronting the OKR;
  - safeguarding of land for local widening to create space for active travel or public transport, where required;
  - control of on-street servicing for developments fronting OKR or its junctions by requiring off-street/side street servicing and/or shared delivery consolidation areas.
- In AAP12, the requirement for development to be designed in line with Agent of Change principle is welcomed and it is suggested that it would be useful to cross reference this in other sections on Business and Workspace and Design
- TFL suggest that it would be useful for all sites and masterplan pages in the sub-areas section to reiterate the requirement of policy AAP7 that seven-metre wide footways/public realm should be achieved.
- In the sub-areas and site allocations, it would be preferable to TFL for the more flexible use of wording regarding road network changes as these are subject to design, modelling and approval by TFL which may evolve through the duration of the project.
- On OKR3 the dial-a-ride depot must be retained in line with the requirements of policy T3 of the London Plan unless a suitable alternative site with at least current capacity and allowing for expansion can be provided within the area.
- TFL would welcome a discussion with the Council to identify potential sites within the area for a bus garage with at least replacement capacity of the one previously located at OKR3 in order to support the expansion of bus services.
- TFL welcomes the proposal to use part of OKR3 for the relocation of Tesco in order to accommodate the BLE station at OKR4.
- The requirement for OKR4 to accommodate the new BLE station and associated works is supported but suggest that the dates in the phasing section should be removed and three additional bullet points are added to the 'Redevelopment must' section
- It is suggested at OKR1 that the AAP needs to reflect the fact that the Bricklayers Arms roundabout and flyover are part of the TfL Road network and can only be altered subject to funding and a full assessment of the impacts of any changes, particularly on buses and active travel.
- TFL are pleased that the reference to a potential BLE station at OKR1 has been removed
- Regarding the Servicing and road network for sub-area 1, TFL are recognise the benefits of the strategy but suggest it would be preferable convey more flexibility



about the exact form of these two junctions, particularly as this is likely to change through the various phases of development.

- The proposed geographical extension of Controlled Parking Zones and the expansion of their hours of operation are both welcomed.
- On OKR10 site allocation TFL suggest three additional bullet points under 'Redevelopment must:' should read: 'provide a suitable building set-back on Old Kent Road frontage to facilitate the Healthy Streets scheme, if required', 'facilitate bus service improvements' and 'facilitate the Rotherhithe to Peckham strategic cycle route'.
- It is considered that due to their size, OKR10, OKR13 and OKR16 may be suitable for bus standing and/or bus stops to support bus service improvements
- OKR10 could also potentially play an important role in delivering improvements to the recently announced Rotherhithe-Peckham strategic cycle route, for example by allowing a substantially car-free cycle link between Rotherhithe New Road/OKR junction and Frensham Street/Latona Road.
- On site allocations OKR11, OKR13, OKR14, OKR15, OKR16, OKR17 and OKR18, TFL suggest additional policy wording under 'Redevelopment must' to include reference to building set back to facilitate the Healthy Streets scheme
- The proposal for a triangular public open space on OKR north of the Olmar Street junction on the current McDonald's site is supported as it creates an appropriate break in the building line and facilitates green links. It is suggested that the significance of the space is outlined in the text
- It is suggested that the enhanced crossings shown in Figure 11 be included on the servicing and network plans for each relevant sub area
- As OKR17 is planned to be a location for a BLE station, and this site and the SG Smith land are required as a work site, it is recommended that future safeguarding requirements should be given more prominence now that these have been confirmed.
- Regarding the Servicing and road network for sub area 4, it is considered that there may need to be more flexibility in relation to the proposed realigned Asylum Road, two-way working on Devonshire Grove and stopping-up of Devon Street.
- TFL note that there is an error on the overground station key to the map as it should refer to a London Overground station called Surrey Canal on Surrey Canal Road rather than BLE station.
- On the Park and Recreation section for sub area 4, TFL note that the Old Kent Road station is shown in a different location here compared to elsewhere
- TFL suggest that given that various options for the form and location of station public realm will be considered, this document might more usefully refer to high quality public space around the new station, supporting accessible, comfortable interchange without specifying a particular form and location of this space at this stage.
- Improvement to servicing and plans to minimise the impact of queuing vehicles are welcomed
- Maximising the use of cargo cycles and consolidation of loads to reduce vehicle traffic is also supported

**Mayor of London**

Written rep received previously	2018
<ul style="list-style-type: none"> <li>• The Mayor strongly supports the high-level ambitions set out in the draft Plan's vision, namely, to build 20,000 new homes, to support and grow the area's economy by taking advantage of its proximity to and links with central London, to address inequality and to deliver the new social infrastructure the area's new and existing communities will require.</li> <li>• The Mayor also acknowledges the strong support and vision articulated in the AAP in support of the Bakerloo Line Extension. However, given the position on funding for the BLE more work will need to be done to support other transport improvements until the Bakerloo Line arrives.</li> <li>• The Mayor is keen to accelerate ambitions of the Healthy Streets project and improved bus services to provide improvements to the Old Kent Road in the short-medium term ahead of the BLE arrival and enable delivery of homes not dependent upon the capacity and access provided by the BLE.</li> <li>• It is noted that the plan states that BLE will be operational by 2031, which is no longer likely given funding constraints.</li> <li>• The Mayor suggests that the plan should place greater emphasis on the short-term upgrades that can be made, both to improve the environment and to stress the importance of these options as a means of serving the pre-BLE build out in the area.</li> <li>• It is also requested that a review of dates and milestones in the AAP around the delivery and operation of the BLE is undertaken with TFL.</li> <li>• The ambition of the plan to deliver the quantum of growth set out (20,000 homes and 10,000 jobs) is supported and should be supported by a strategy and evidence that is realistic and achievable.</li> <li>• The overarching ambitions and vision set out are strongly supported</li> <li>• The high street focus is clear and re-enforced in the sub area plans making a comprehensive and compelling case to see a reinvigorated high street along the length of the Old Kent Road but it is suggested that further reference be added to the potential restructuring of the high street as a result of factors such as online retail - more effort may need to be made to ensure the high street remains an important place not only for commerce, but also for community and cultural uses.</li> <li>• The GLA are keen to support the Council on the successful allocation of the Future High Street Fund for the Old Kent Road, welcoming further discussion and collaboration as the project develops.</li> <li>• The London Plan 2021 makes it clear that the AAP should focus on how industrial land can be intensified and provide space for businesses that need to relocate from any Strategic Industrial Land (SIL) and from any identified for release.</li> <li>• Existing workspaces for creative industries should be protected and supported and the proposed town centres should be designated close to the potential new tube stations.</li> <li>• To be consistent with the London Plan 2021 the plan should recognise the need to provide essential services to the Central Activities Zone (CAZ) and sustainable 'last mile' distribution/logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions.</li> <li>• The ambition of the AAP for the area to be net zero-carbon is welcome and the Mayor recognises the positive contribution this approach will make in achieving his</li> </ul>	

priority that London becomes a zero-carbon city

- The Mayor welcomes the reflections on the impact of COVID-19 on communities in the Old Kent Road Area and acknowledges how the AAP identifies how this impact has disproportionately impacted Black, Asian and Minority Ethnic groups.
- It is acknowledged and strongly supported that the Council has taken account of the learning from COVID-19 and will look at ways to maximise pedestrian space and support measures to make it easier to walk, cycle and use public space whilst removing traffic.
- It is suggested that the AAP could make a stronger link to the importance of access to outdoor public space as highlighted during the pandemic and look to ways to maximise use and activity as lockdown is eased.
- The Mayor welcomes the intention of the draft AAP to support the delivery of much needed genuinely and high-quality affordable housing over the course of its life.
- It is suggested that policy AAP 4 could reflect the Mayor's strategic target that 50% of all new housing should be affordable as set out in Policy H4 of the London Plan 2021.
- The Mayor notes that the AAP intends to rely on the NSP policy for affordable housing which requires a 40% threshold for developers to follow the Fast Track Route and that the AAP does not refer to the 50% threshold level of 50% on publicly owned land and on industrial land where there would be a net loss of industrial capacity.
- It is recommended that Southwark should only consider threshold levels that differ from those set out in the London Plan 2021 where they are supported by local and up-to-date evidence.
- It is recognised that the NSP is undergoing examination and the affordable housing thresholds have been subject to discussion so the Mayor will review his position on this matter when the OKR APP is formally submitted in the light of the Inspector's report on the NSP and any proposed modifications put forward by Southwark.
- The ambition to achieve no net loss of industrial and related floorspace capacity in AAP5 is supported by the Mayor and the proposed approach is consistent with the Mayor's Good Growth objective GG2 Making the best use of land which is welcomed.
- The reconfiguration of designated industrial land within the OKR area appears to be consistent with the agreement made between the Deputy Mayor and the Leader of Southwark Council in September 2018 and this is noted and supported.
- The draft Plan clearly sets out industrial development typologies and suitable locations. The great level of detail regarding proposed built forms and many other aspects of the plan are noted and welcome.
- As currently drafted the Plan does not establish that it can support the quantum of industrial development - 70,000sqm - within the South Bermondsey area and nor is there published evidence which provides a realistic indication about how much industrial space could be provided through intensification.
- The Mayor considers that although AAP5 generally supports and promotes industrial intensification, and 28ha of SPIL is identified in the sub areas and site allocations, the policy does not set out how much industrial capacity could be delivered over the Plan period.
- It is recommended that the AAP should explore in more detail, with a view to providing sufficient confidence about delivery, what types of capacity could be provided in different sites, taking into account plot sizes, yard and servicing space

and access.

- In order to fully comply with the London Plan 2021 the borough should provide additional evidence to demonstrate that the intensification envisaged is deliverable over the life of the plan and answer a set of questions relating to viability, market demand, existing planning applications and infrastructure improvements.
- It is recommended that a monitoring framework is set up to ensure that where industrial capacity is released for other uses, its replacement is carefully accounted for and monitored.
- The Plan should endeavour to develop increased industrial capacity through intensification first, prior to the release of industrial capacity from other parts of the Plan area.
- The proposals in AAP5 for 10% of workspace to be affordable is welcomed by the Mayor, however, it is suggested that the Plan should follow the approach set out in Policy E3 of the London Plan 2021 which clearly sets out that planning obligations may be used to secure affordable workspace for a specific social, cultural, or economic development purpose.
- The Mayor considers that part 7 of policy AAP5 is more closely aligned with Policy E2 of the London Plan and suggests that AAP5 be amended accordingly so that it takes both Policies E2 and E3 into account.
- In the Town Centres section, the Mayor suggests that Old Kent Road/East Street and Old Kent Road/Peckham Park Road are referenced in the Plan as having the capacity, demand and viability to accommodate new office development, generally as part of mixed-use developments including residential use as both areas have been identified as future potential District town centres.
- The strategy to create two new District town centres is strongly supported, as well as the the delivery of new uses in leisure, entertainment, recreation and play for local people of all ages to get out and have fun in the day and night-time which chimes with the 24-hour city vision set out by the Mayor.
- The town centre boundaries are welcomed by the Mayor.
- The intention for new office development to be focused in town centres as set out in AAP5 is welcomed as it follows the approach set out in Policy E1 of the London Plan 2021.
- The Mayor suggests that the supporting text should set out how much office development is projected within the area over the course of the Plan period, and this should be supported by evidence.
- The Mayor is pleased to see the AAP has adopted the approach advocated in his High Streets for All report which uses Old Kent Road as a case study and explores the uses of ground floor strategies and encourages Southwark to continue to engage with the GLA on the High Streets for All report and more recently the High Streets mission work.
- It is acknowledged that a great deal of high street interventions are already underway or delivered and these should be cited in the AAP.
- The potential for new conservation areas to be designated in key parts of the high street is also welcomed to help preserve historic high street and buildings of interest.
- The Mayor supports the council's ambition to transform the Old Kent Road into an exemplary Healthy Street by 2036 and should consider further discussion with the GLA/TFL on how the delivery of the scheme can be accelerated
- The GLA and TFL advise that the proposal to have segregated bus and cycle lane along the entire length of Old Kent Road as set out in AAP7 will not be possible

especially at the northern section of the Old Kent Road where existing high street buildings constrain achieving the 24m wide section required.

- The Mayor supports the ambition to maintain 50% less traffic than before lockdown.
- The Mayor suggests referencing the work the borough is undertaking as part of Southwark Stands Together to help promote local character and diversity in the public realm.
- It should also be recognised that the Old Kent Road will continue to fulfil a crucial function for London as a freight corridor.
- The Mayor suggests that although Figure 12 illustrates the protected views, that these be illustrated much more clearly so that the precise limit of each can be determined.
- The mapping and locations for Tier 1-3 buildings is welcomed but it is considered that these could be displayed more clearly.
- To be consistent with Policy D9 Part B2 and paragraph 3.9.2 of the London Plan 2021 for Tier One tall buildings, maximum heights should be set out clearly for specific locations and these too should be indicated clearly on maps.
- The added focus on supporting communities through the 'connected communities' section of the AAP is welcomed and it is considered that specific reference to BAME communities as being integral part of the local area should be made
- The Mayor commends the efforts being made to support virtual and permanent youth facilities in the plan and reference to providing inclusive access to social and physical infrastructure is also supported.
- The Mayor is pleased to see progress being made on an open space strategy for the area.
- The ambitions stated under AAP11 to: Increase the amount of public open space from 15 hectares to at least 25 hectares, rising to 30 hectares by 2045 is supported.
- The borough is encouraged to produce a robust, overarching open space strategy carried out in line with London Plan policy 7.18 and policy G4.
- The Mayor is pleased with the progress the Growth Partnership has made in setting up the design review workshops across Old Kent Road, New Cross and Lewisham.
- The overarching ambitions stated within AAP 9: Heritage and Character are supported, and specific references made to conserving key area of historic high street through new conservation status is particularly welcomed.
- It is suggested that the Heritage and character section may benefit from referencing the work the borough is undertaking as part of Southwark Stands Together to help promote local character and diversity in the public realm
- The Mayor provides more detailed comments relating to specific excerpts of text as an Annex

### London Gypsies and Travellers

Written rep received previously | -

- There is great concern over the Old Kent Road Area Action Plan proposals related to the Bakerloo Line extension and the site allocations in the vicinity of Ilderton Road, Burnhill Close and Brideale Close, the three local authority run Gypsy and

<p>Traveller sites in the area.</p> <ul style="list-style-type: none"> <li>• There are concerns over how the Plan does not make any attempt to identify possible locations for new culturally suitable accommodation for Gypsies and Travellers (as identified in the council's Gypsy and Traveller Accommodation Needs Assessment 2020).</li> <li>• In previous consultations, it has been suggested that OKR 16 and OKR17 could provide a mix of residential use and a small number of family pitches.</li> <li>• It is also suggested that the sites should be considered for meeting any current and future accommodation needs in the form of additional pitch provision.</li> <li>• They request a detailed appraisal of site allocations in the AAP assessed against the potential to deliver Gypsy and Traveller accommodation alongside other uses.</li> <li>• A detailed impact assessment that focuses on the sites adjacent to Ilderton Road, Burnhill Close, Brideale Close and Bakerloo Line Extension is also requested.</li> </ul>
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<b>National Grid (Avison Young)</b>	
Written rep received previously	-
<ul style="list-style-type: none"> <li>• No specific comments but states OK10, OK13 and OK16 are near electrical assets.</li> <li>• National Grid is happy to provide advice and guidance to the Council concerning their networks.</li> </ul>	

## 2) DEVELOPERS/ LAND OWNERS

<b>Safestore</b>	
Represented by	Savills
Interest	Leaseholder of Safestore, 737 Old Kent Road – OKR18
Written rep received previously	2016 and 2018
<ul style="list-style-type: none"> <li>• Supportive of exploring redevelopment opportunities provided Safestore can retain or re-provide its operation within redevelopment</li> <li>• AAP1 The masterplan is overly prescriptive and not flexible enough to respond to changes in market conditions (suggest word change)</li> <li>• Supports annual review of BLE Phasing and do not wish to be prejudiced in the chronological ordering of applications coming forward</li> <li>• AAP3: Climate Emergency is overly prescriptive and has the potential to impact upon the viability and subsequent deliverability of planning applications within the OKR</li> <li>• Savills and Safestore are supportive of the target set within AAP4: Quality Affordable Homes of achieving 20,000 new homes but opposed to the requirement for 35% to be affordable due to viability</li> <li>• The intention of the co-location approach in AAP5 are supported but Safestore object to the requirement to retain or increase the amount of employment floorspace and the requirement for 10% affordable workspace as they believe it is impractical when considered in relation to Use Class B8 storage and distribution operations.</li> </ul>	

- Savills and Safestore support the clarity that designations for areas appropriate for tall building development bring but consider that as currently drafted, AAP 8 is unduly prescriptive and will form a barrier to the optimisation of some sites.
- The designation of the Safestore site as Tier 3 (up to 15 storeys) is questioned when in previous versions it was placed at 25 storeys and the sites abutting Safestore are designated as Tier 1.
- It is stated that when read in conjunction with the Site Allocation OKR18 it appears to contradict Figure 12 - the third bullet point outlines that tier one and two buildings could in fact be considered acceptable within OKR18.
- Safestore invite LB Southwark to continue engagement with the landowner to discuss what quantum of development is achievable on the site.
- Savills are pleased to see the recognition LB Southwark has to the potential development opportunities of the wider area and consider that the potential of OKR18 to deliver this significant contribution should not be curtailed by any restrictive policy on heights on site
- Safestore express concern over the extension of Caroline Gardens Conservation Area into OKR18 shown in Figure S.A 4.1 as they claim that there was no consultation regarding a proposed amendment to the conservation area boundary.
- Concern is also expressed on Figure S.A 4.3 which designates the land uses on site as being 'small industrial' as it is fundamental that any proposed development would include B8 Storage and Distribution land use so that Safestore can seek to retain their presence on Old Kent Road.
- It is suggested that the AAP be revised to indicate that 'medium-large storage and distribution' is appropriate on OKR18.
- Safestore suggest that a variety of uses in addition to those currently listed on page 182 should be encouraged to create an active frontage on OKR, as Safestore relies on visible entrances on Old Kent Road for their business strategy.

### Apex Capital Partners

Represented by	WSP
Interest	Owner of 310-330 St James's Road – OKR11
Written rep received previously	-

- Supportive of inclusion of their site within the draft site allocation OKR11 for the delivery of 1,200 new homes
- Supportive of the masterplan but consider that it must be recognised that individual sites will be coming forward for development as part of a phased approach to the delivery of the masterplan, and as such, the delivery of new homes and employment uses on sites which are deliverable now, should be supported
- Subject to viability, Apex Capital Partners are supportive of the target to provide a minimum of 35% affordable homes on new sites in the Old Kent Road area
- Opposes the 60% of homes to provide 2 or more bedrooms and a minimum of 20% family homes with 3 or more bedrooms in the Action Area Core
- AAP5: The provision of affordable workspace is supported but Apex Capital would like less prescriptive policy and the provision to be more demand driven and believe there should be no restrictions on the types of businesses who can occupy space, provided they are uses falling within Class E.

- It is considered that the requirement to provide affordable workspace at discount market rent for at least 30 years is overly onerous and requires flexibility due to the changing nature of the market.
- It is suggested that the draft policy requirement to retain or increase the amount of employment floorspace (GIA) on site (Use Class E (g)) or sui generis employment generating uses) should also be made more flexible to allow for alternative types of employment uses within the different sub-areas in response to market demand.
- AAP7: the delivery of car-free development in the Old Kent Road OA is supported, with the exception of disabled parking and essential parking and deliveries for businesses to operate
- AAP8: Tall buildings should be a guide but not overly prescriptive and would like Figure 12 updated with proposed massing for 310-330 St James's Road
- Apex Capital consider that an evidence base is required to assess location where tall buildings would be acceptable but do not consider the Tall Buildings Background Paper (June 2020) to provide that evidence base. It sets out the Council's current thinking on their tall buildings Stations and Crossings Strategy, but it itself not an evidence base for the strategy which is referred to in the draft policy.
- It is suggested that criteria 1 of AAP9 should be clarified that when it states that development must "protect and improve the Old Kent Road's historic fabric by requiring the retention and reuse of buildings and features that add character to Old Kent Road" that this only refers to buildings which can be said to have genuine local heritage value in accordance with the definition set out in national policy.
- Although Apex Capital agree with the policy aim of AAP10, they consider that the policy approach should be in accordance with the guidance on heritage asset set out in the NPPF and reference to buildings of townscape merit should be removed as this is not in accordance with national policy.
- Apex Capital consider that it is important to ensure the provision of fewer high quality play spaces which allows residents of all ages to mix, to avoid the creation of under-used amenity spaces on sites in higher density urban area.
- The designation of the buildings at 328 and 330 St James's Road being listed as buildings and features of townscape merit is not supported as there has been no heritage assessment.
- Apex Capital agree with the proposed phasing for the former Lobo factory site on St James's Road which it says is expected to come forward for development in the mid-2020s (BLE Phase 1), however, it is suggested that this be updated to refer to the buildings at 310-330 St James's Road, which is the assembled site coming forward for development following the submission of a planning application in spring 2021.
- Figure SA2.3 should be updated to reflect proposal coming forward for 310-330 St James's Road as the arrangement as it is currently shown is not accurate and could not feasibly be built.
- Apex Capital claim that no VU.CITY modelling has been included to illustrate planning applications height, massing and impact on townscape.
- It is considered that there is clear potential for a tall building of over 30 metres at the rear of the site at 310-330 St James's Road, based on existing and emerging context of the site allocation.
- It is suggested that the proposals for 310-330 St James's Road be included within the submission version of the OKR AAP.
- Apex Capital would like 310-330 St James's Road included as a standalone site



with a capacity of 200 homes.
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<b>Tribe Student Housing</b>	
Represented by	HGH Consulting
Interest	Own the freehold of KFC, 671,679 Old Kent Road – OKR13
Written rep received previously	-
<ul style="list-style-type: none"> <li>• Tribe supports the Council's proposed approach in principle but wishes to emphasise that OKR13 covers a large and diverse area and therefore the site requirements need to be applied flexibly to reflect different circumstances</li> <li>• It is considered that although it is appropriate for a range of land uses to be sought for redevelopment proposals across OKR13, the Typologies Plan is overly prescriptive</li> <li>• There is a need for flexibility and other appropriate town centre uses, for example student accommodation, should be able to come forward especially since the Council has recently resolved to grant planning permission for a student-led redevelopment of the site.</li> <li>• It is considered that unless requirement for site allocations are made more flexible, there is a risk of inhibiting the potential for student housing schemes to come forward.</li> <li>• Tribe would like to see specific reference to 'student accommodation' made within the site allocation OKR13.</li> <li>• Tribe questions the demotion of 671-679 Old Kent Road from Tier 3 in previous versions of the AAP to being excluded from the Tier system completely with no justification or evidence.</li> <li>• Tribe is concerned that AAP8 stipulates such prescriptive height threshold without sufficient evidence and therefore considers the policy to be unsound as this does not comply with planning legislation that applications should be determined on a site by site basis and on their own merits.</li> <li>• It is also considered by Tribe that the policy as it is currently worded could result in unduly restraining development, contrary to the newly adopted London Plan, which says at paragraph 3.9.2 of the supporting text to Policy D9 ('Tall buildings') that boroughs should undertake a "sieving exercise" to determine and identify locations where tall buildings may be appropriate.</li> <li>• It is suggested that Policy AAP8 and the corresponding "building height guidance" relating to OKR13 (on page 168 of the AAP) should be amended to recognise instances where there may be opportunities for taller buildings which could deliver public benefits, including enhancements to townscape.</li> </ul>	

<b>Trustees of the Tate Gallery</b>	
Represented by	The Planning Lab
Interest	Owner of the Tate Stores, 7-14 Mandela Way – OKR3
Written rep received previously	2018

- Tate supports the overall direction of the OKRAAP
- Tate notes the need for the OKRAAP and any future development of the site and neighbouring sites to accommodate the existing operational logistics of the Tate Store site as an existing stakeholder including 24-hour access, transport impacts, noise, and air impacts from the use of plant for climate control and 24-hour security presences.
- Tate wishes to reiterate again that new uses, including sensitive residential uses, will need to be designed to adapt to the existing environment without putting undue pressure on current operations of existing businesses.
- Tate considers that more explicit support for the retention of existing uses and business should be made in the OKRAAP, especially for those that are specialist such as Tate.
- Protection for such users during construction activity to avoid impacts from vibration, which could be very damaging for the Stores.
- Tate raises some concern with the indicative layout of the area and the location of the Park and the transport routes which may impact its day to day operations and requests that the diagrams be labelled as 'indicative' to ensure that sufficient flexibility is promoted in the plan.
- Whilst it remains necessary to protect the site's operational functions e.g., 24 hours access, servicing and the widescale use of plant, fundamentally, Tate considers it inappropriate and unviable to designate the site for 'standalone industrial use' only, as is proposed.
- Tate request that the designation of its Stores site within OKR3 is amended to cover a flexible range of employment uses, which would be consistent with the site's existing lawful use, align with the site allocation and 'required uses' for Mandela Way as set out in the Proposed Submission Version New Southwark Plan.
- Tate remains concerned by the layout of OKR3 and its impact on the stores, in particular the location of the Mandela Way Park and the transport routes.
- Tate supports the provision of new and improved open spaces for the community and recognises the benefits it will bring to them and to visitors/employees alike, the rationale for the layout of the park and its interaction with key routes for vehicles needs to be provided.
- It is suggested that the layout should be labelled indicative so that alternative forms of development are not necessarily discouraged but further explored.
- Tate requests that the Park boundaries be reconsidered with suitable commercial land given over to such uses, secured via appropriate s106 agreements.
- Further, no justification has been provided in townscape terms for the resultant layout and the placement of the park feels not only arbitrary but detrimental to the operations of the surrounding buildings.

<b>City of London Corporation</b>	
Represented by	Stantec
Interest	Owner of the Avondale Square Estate
Written rep received previously	-
<ul style="list-style-type: none"> <li>• AAP1 should be amended to clarify that the masterplan approach applies to</li> </ul>	

allocated sites only or to allocated site and major non-allocated sites of 100 units or more. More clarification on the requirements for a collaborative approach including working with other developers' risks extending the programme for bringing forward smaller and more deliverable sites.

- AAP2: Supports plans for the BLE and two new stations along OKR but concerns about the number of schemes, which can be approved and started within the next 5 years to 2026 as it is a disincentive to developers if schemes cannot be delivered before this time. The AAP needs to clearly outline the proposed annual review of planning permissions and the implementation of schemes. The process and timescales for when Phase 2 schemes may be moved to the Phase 1 (2021-2026) delivery period to provide more certainty to developers and the local community.
- AAP3: further clarification needed on how existing housing estates are expected to be connected to the DHN and timescales.
- AAP8 should be amended to make clear that tall buildings on non-allocated sites may be acceptable subject to a review of site-specific constraints and surrounding context e.g. 19 storey towers at Avondale Square Estate.
- AAP11: Table 3 present a significant challenge for smaller sites or infill developments on existing estates - it should be clarified whether the Table 3 standards will be sought for allocated sites or if it will apply to all new developments in the OA. Some flexibility on these minimum requirements on a site-by-site basis should also be incorporated within the policy wording.

### Hadley Property Group

Represented by	Savills
Interest	Future developer of OKR12
Written rep received previously	-

- Overall, the preparation of an Area Action Plan by LB Southwark in seeking and guiding the regeneration of the wider Old Kent Road opportunity area is supported
- It is considered that the housing number is too low and believe the housing figures have been heavily constrained by the emphasis on retaining buildings on the site and incorporating them into the development.
- Based on capacity studies prepared with MacCreanor Lavington and the Density Matrix (no longer included in the London Plan), it is considered that the site could deliver around 161 units.
- HPG suggest that the capacity of 103 homes is removed and is replaced to read 161 homes; and this figure should be stated as an absolute minimum and no upper limit should be outlined.
- HPG supports the principle of providing employment opportunities at the site but do not support the number of jobs set out in the site allocation as they do not consider that these will be provided in the existing buildings.
- It is suggested that the job numbers be removed and replaced with employment floorspace quantum instead.
- HPG feel that the site vision for OKR12 needs to be less rigid and more high level and feel that the image included with the site allocation should be removed as it is prescriptive and could be used to 'benchmark' future design options.
- HPG agree that the site "must" provide commercial/employment floorspace and

provide public open space.

- It is strongly felt that retaining the Forge would significantly restrict the site's capability to create an uplift in new jobs and consider that there is no robust assessment in the draft AAP which sets out the significance and condition of stables, the forge, or the boundary wall, to justify the Council's safeguarding in policy.
- Site requirements are too inflexible and the reuse of the forge is too niche and unlikely to be deliverable or viable.
- It is considered that new housing is a significant public benefit and an enabling use; it should be a prerequisite for the site coming forward.
- It is proposed that the wording of the allocation is revised to set out that all or some of the buildings or wall could be retained subject to the findings of a Heritage Assessment and development viability assessment, which will be assessed during pre-application stage with officers and against the Development Plan policies.
- The allocation of the site in BLE Phase 1 is supported by HPG.
- HPG agree with the location of the taller building element and stepping down approach of the site but believe that an 11 storey building would be suitable at the site's western corner, stepping down to part 4 part 6 eastwards along Catlin Street and suggest an update the heights to reflect this.
- HPG fully supports the proposal for the open space at the centre of the site to become publicly accessible and that there is the possibility for food growing space to the rear of the stables.
- HPG support the creation of a new pedestrian and cycle link to Quietway 1 adjacent to the old railway bridge.

### Berkeley Homes

Represented by	Stantec
Interest	Developer for Malt Street Regeneration Site and Nye's Wharf – OKR10
Written rep received previously	2016, 2017 and 2018
<ul style="list-style-type: none"> <li>• Broadly supportive of the draft policies contained within the latest draft version of the OKR AAP</li> <li>• OKR AAP's images (Figure 12 – pages 62 &amp; 63, Figure 16 – pages 86 &amp; 87, Figure 17 – pages 88 &amp; 89 and 'Building Heights Guidance' accompanying image on page 142) are inconsistent with the approved plans/extant permissions for Malt Street &amp; Nye's Wharf.</li> </ul>	

### John Lyon's Charity

Represented by	Tetra Tech Planning
Interest	Landowners of the Parliamentary Press premises, Mandela Way – OKR3
Written rep received previously	2016 and 2018

- The Charity supports the Council’s strategy on collaborative working to ensure neighbouring sites work together to maximise the development potential of each site to deliver outstanding design quality, optimise density and create inclusive and successful places that are socially integrated with existing communities.
- It is considered that the use of the wording ‘development must’ in AAP1 is overly prescriptive and does not for any flexibility in design and approach and it is the suggested that the wording be changed to “The Council will expect planning applications to...”
- The Council’s response to the Climate Emergency is and its aspirations to achieve carbon neutrality by 2030 is supported.
- The Charity considers that the Council needs to reflect the position of the new London Plan (2021) and acknowledge that developments “should connect to existing heat networks wherever feasible” (London Plan 2021, Paragraph 9.3.4).
- It is noted that Figure 7 does not reflect the proposed London Heat Map as found on the GLA’s website. It is not considered appropriate that “minor development schemes” should have the same expectations as major development schemes.
- The Council’s objective of providing a range of unit sizes under AAP4 Quality Affordable Homes is supported but it is considered that flexibility will be required on a site-by-site basis.
- It is considered that AAP4 should reflect the importance of both one-and two-bedroom units in locations such as the Area Action Core.
- The Charity supports the Council’s strategy to strengthen the business community, promote an innovative mix of uses and to create mixed use and sustainable neighbourhoods where business and housing co-exist, however the policy should recognise the difficulties often associated with “industrial uses” co-existing alongside residential uses.
- The Charity questions the effectiveness of the target of “no net loss of industrial floorspace capacity across the opportunity area” as the principle was heavily criticised at the London Plan examination and it is requested that the policy is amended to reflect the London Plan 2021 in this respect.
- It is felt that the requirement for “all workspace units are equipped with mechanical and electrical fit-out, heating and cooling provision and kitchen and WC facilities” is overly prescriptive for the planning application stage and should be dealt with using planning conditions.
- The Charity feels that the requirement for AAP7 for evidence of marketing materials for the development that demonstrate it is to be promoted as car free and sustainable is overly prescriptive for the planning application stage and should be dealt with via planning condition.
- It is suggested more detail be provided for the percentage of electric charging points required and on the financial requirements required for the Delivery and Servicing Bond, the delivery of a new Cycle Hire Docking Station and bus service improvements
- The reduction in heights in each tier of the Tall buildings strategy is questioned
- It is felt that the provision of children’s play space, particularly “wet play, sand play, space to grow plants and food and sufficient seating”; and “indoor/outdoor space for older children” is overly prescriptive and will not be feasible or appropriate on every development site.
- We note the requirement of “10sqm of private amenity space for 2 or less bedrooms where possible”. This could be considered excessive on constrained sites and where public open space is also required. It is also contrary to the

London Plan requirements of 5sqm per 1 bedroom unit and 1sqm for each additional occupant. We therefore request that the London Plan (2021) requirements are applied instead.

- In relation to OKR3, the Charity recognises and respects the Council's ambitions for the area, however, there remains serious concerns in relation to the co-location of industrial and residential uses, with amenity spaces and servicing requirements competing for space within these masterplan areas.

<b>Penarth Centre</b>	
Represented by	Montagu Evans
Interest	Long leaseholder of Units 29, 30, 31 and 14/15 of the Penarth Centre, Penarth Street – OKR16
Written rep received previously	
<ul style="list-style-type: none"> <li>• Supportive of the general OKRAAP approach but has issues on policy wording</li> <li>• The Reference to arts and cultural uses within the Penarth Centre is welcomed but it is not considered that the plan adequately reflects the importance of the Penarth Centre as a cultural and creative cluster.</li> <li>• It is not considered that the site allocation properly reflects the special flexible circumstances reflected in the Emerging Policy Framework for arts and cultural uses generally.</li> <li>• It is suggested that the AAP specifically identifies arts and cultural uses as: <ul style="list-style-type: none"> <li>– Artist studios;</li> <li>– Performance space (specifically referenced and supported in previous drafts of the OKRAAP);</li> <li>– Outdoor public event space;</li> <li>– Art gallery;</li> <li>– Rehearsal and event space for hire;</li> <li>– Library space;</li> <li>– Co working space; and</li> <li>– Exhibition space</li> </ul> </li> <li>• The reference to 'sensitive' uses in OKR16 site allocation is not appropriate and should be removed as the Penarth Centre is in use class E which comprises uses that can only be carried out without detriment to residential amenity and various uses that would be permissible under Class E may be deemed sensitive.</li> <li>• It is felt that site allocation OKR 16 should specifically identify the potential for increasing / intensifying employment generating floor space within the Penarth Centre by increasing floorspace.</li> <li>• The identification of Ormside Street and Hatcham Road on the route shown in 'connecting communities' within the sub area 4 is welcomed</li> <li>• It is suggested that the Penarth Centre is highlighted on the map / image shown on page 189 and the Penarth Centre be identified as a destination for artistic and cultural uses in the 'walkthrough' on page 190.</li> <li>• The Penarth Centre welcomes that Policy AAP 5 supports 'creative makerspaces' and identifies SPIL land as a priority for such land use.</li> <li>• It is considered that AAP 5 could be better phrased to refer to arts and cultural uses in a manner that is consistent with NSP67 and OKR16 and so suggest that</li> </ul>	

the wording be amended to refer to ‘creative maker spaces and arts and cultural uses...’

- It is suggested that the objective in AAP5 which refers to increasing the number and range of jobs in the creative sector, should also make explicit reference to the arts and culture sector for consistency.
- It is noted that Paragraph 4 of page 46 refers to SPIL ‘that will be kept solely in industrial use’ which is not consistent with NSP67 and the site allocation OKR16 so should be rephrased to reflect the flexibility and approach at the Penarth Centre.
- As the Penarth Centre is not in industrial use, it is suggested that the reference to ‘industrial use’ in the supporting text on page 46 should therefore be removed, as it is not consistent with the approach set out in P28, NSP67 and OKR16.

#### **Barkwest Ltd**

Represented by	Shaw Corporation
Interest	Developer of 747-759 Old Kent Road, 765-775 Old Kent Road, and land at Devonshire Grove – OKR18
Written rep received previously	2016, 2017 and 2018

- It is suggested that the OKR18 site vision text on page 180 relating to retaining existing tree be amended to read “where possible existing trees on Old Kent Road will be retained and enhanced with additional tree planting”.
- It is suggested that the site vision on page 180 relating to new pocket parks be updated as the Devonshire Square scheme will provide a significant new public square at the end of Devon Street on Devonshire Grove, rather than a pocket park.
- In respect of Devonshire Square site requirements, Barkwest would like to clarify that the scheme will provide up to 4,480 sqm total floorspace for a range of employment, retail, leisure, and community uses, including flexible workspace and ‘maker space’ designed to accommodate light industrial uses. 1,015 sqm GEA of this will be dedicated ‘light industrial’ and a further 1,000 sqm GEA of flexible commercial floorspace will be fitted out to a light industrial specification (i.e., capable of providing but not restricted to light industrial use).
- The Sub area 4 Typologies plan is incorrect as Building A is shown as ‘small office’ when it should be a mix of residential and café/retail space. The rear of Building B and Building D is shown as small industrial when it is flexible commercial floorspace.
- It is requested that the Sub area 4 Servicing and Road Network Plan removes reference to Devonshire Grove as a “New Public Highway” as it not new but rather enhanced and consolidated.
- The ground floor axonometric plan of the High Street Strategy is misleading in respect of Devonshire Square where residential entrances should be shown on Sylvan Grove.

#### **William Say & Co Ltd and P Wilkinson Containers Ltd.**

Represented by	Daniel Watney
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Interest	Freehold owners of 20 Verney Road – OKR13
Written rep received previously	2016 and 2018
<ul style="list-style-type: none"> <li>• It is felt that there is a disconnect between the schemes consented across the area and the development envisaged and planned for within the Plan and are concerned about the piecemeal approach to development in the AAP.</li> <li>• Policy AAP1, concerning the overall masterplan for the area, is insufficiently detailed in its delivery and phasing requirements, and its treatment of the area in the meantime while development comes forward.</li> <li>• It is suggested that to protect the operation of successful existing businesses there should be a requirement at application stage to produce a delivery and phasing statement which sets out how impacts on the operation of existing businesses/sites will be mitigated until such a time as they come forward for development.</li> <li>• It is felt that the Agent of Change principle should also be specifically applied to the operational requirements of existing businesses.</li> <li>• It is suggested that more consideration be given to the impact that development will have on the area as it functions now and throughout the delivery of the masterplan and how the delay of the BLE will compound phasing issues, with new development coming long before there is the necessary infrastructure.</li> <li>• It is considered that the Plan does not provide an appropriate business relocation strategy and it is suggested that phasing and business relocation be given its own chapter in the AAP developed in consultation with existing businesses who intend to remain operational and based on a comprehensive understanding of their operational requirements including any potential to relocate. If this is not possible, the successful continuing operation of businesses must be safeguarded.</li> <li>• It is also stated that there has been a lack of engagement with local businesses and William Say &amp; Co Ltd and P Wilkinson Containers Ltd are not aware of any engagement concerning the Old Kent Road Business Network.</li> <li>• It should be recognised in the Plan that demonstrating that a proposal will not impact existing employment land is essential to ensure that the future operation of employment/industrial land in the area is preserved.</li> <li>• The proposal for a new road in sub area 3 and how impacts on existing businesses will be managed, is not explored in the Plan. The complications involved in delivering such infrastructure are multitude and include existing leasing arrangements, legal ownership issues, easements and rights of way.</li> <li>• While it has been recognised that contingency is necessary, the Plan does not follow through with further commentary regarding the phasing of the BLE itself and the impact that delay would have on the area which raises concern over the impact on the continued operation of existing businesses.</li> <li>• It is also considered that the current draft of the OKRAAP is not underpinned by viability evidence nor have the viability considerations raised in our previous representation been addressed. Although difficult to quantify, the risks identified in the preceding sections are exacerbated still further by the economic impacts caused by the COVID-19 pandemic and the ongoing uncertainty resulting from a nascent Brexit.</li> <li>• William Say &amp; Co Ltd and P Wilkinson Containers Ltd raised concerns previously over the prescriptive nature of the masterplan and its tendency to seek limits on development without sufficient justification and feel that this has not been remedied in this version of the AAP</li> </ul>	



- It is suggested that there needs to be more flexibility in terms of re-provision, relocation, scale and policy requirements; concerns over the lack of the BLE; typologies not matching existing local businesses; policy requirements of the OKRAAP is not being seen as a cost to development and there is a lack of local business network.

### Landowner of Former Southern Railway Stables

Represented by	Boyer Planning
Interest	Landowner of Former Southern Railway Stables – OKR12
Written rep received previously	2016
<ul style="list-style-type: none"> <li>• There are significant concerns about the Council's "Site Vision" for the site allocation OKR 12 and this letter provides our consultation response to the draft OKR AAP document (December 2020) concerning site allocation OKR 12.</li> <li>• It is noted that to be compliant with the requirements for new developments to provide 5sqm of public open space per dwelling, OKR12 would need to deliver 515sqm of open space which seems improbable for how the site is currently masterplanned.</li> <li>• Object to the Council's proposed plans that reduce the size and quality of open space, which conflicts with NSP P56</li> <li>• The Council is urged to ensure the existing green space in OKR12 is protected.</li> <li>• Object to original Article 4 direction on OKR12. They state that English Heritage's 2010 report recommends that the buildings are not listed due to its late date, architectural interest, alteration and context.</li> <li>• The wording in the AAP is objected to on the basis that it does not take into account the views of English Heritage.</li> </ul>	

### The Arch Company

Represented by	Turley
Interest	Landholdings with the Bermondsey Dive Under site – SA5
Written rep received previously	-
<ul style="list-style-type: none"> <li>• The Arch Company support the general principles of the AAP and the core thrust and focus to optimise and intensify employment operations within the South Bermondsey Sub-Area.</li> <li>• The main concern is Bermondsey Dive Under, within Sub Area 5 (South Bermondsey).</li> <li>• There is concern that due to the multiple land ownerships, the AAP will undermine the ability to bring forward industrial and employment uses – there is an issue on viability and servicing.</li> <li>• It is considered key that there is a positively worded policy framework in place within the AAP to allow for the future redevelopment and reoccupation of the railway arches owned by the Arch Company to come forward on standalone basis if a comprehensive redevelopment scheme is not feasible at the point of time.</li> </ul>	

- The Arch Company are fully supportive in principle of the overarching ‘Site Vision’ for the sub area and the AAP’s intention to increase industrial capacity.
- It is considered that their land holdings within Sub Area 5 can make a significant contribution to this vision through the planned future development of new commercial floorspace on land currently used for open storage.
- To provide sufficient flexibility should a comprehensive redevelopment not be achievable, particularly in the shorter term, it is commented that whilst the AAP should be aspirational in respect of the vision for a comprehensive redevelopment of this part of the SPIL and optimising industrial capacity, it should not undermine existing sub-plots coming forward in the short-medium term in a more traditional industrial typology as per the Arch Company’s current intention.
- We agree with and would emphasise the importance of the vision in respect of the railway’s arches and “bringing vacant arches into use”.
- The Arch Company is supportive of the proposed uses and would emphasise that this list should not be seen as a definitive and/or prescriptive list of occupiers to ensure that the AAP is both flexible and responsive to ever changing market conditions over the plan period.
- It is proposed that the AAP should be amended in respect of the railway arches, particularly the run of arches fronting onto both Corbett’s Lane and Silwood Street and permitted land use(s), for ‘softer’ Class E uses to be considered here.
- The Arch Company have concerns at the implications of the proposed servicing and road network as proposed within the AAP.
- Whilst Jarrow Road has two-way access rights, sufficient for access to and servicing of the arches it is viewed that the road is insufficient in width to allow for the intensification of use of this access/road to also be used as the only primary access route for HGVs for the servicing of the wider land parcels (i.e. an intensified use), whilst allowing for the planned reoccupation of the railway arches.
- It is suggested that Bolina Road must be retained as a further primary access for the land parcels in conjunction with the Jarrow Road access for the arches.
- The Arch Company request that the servicing strategy for Sites 1 and 2 for Sub Area 5 of the AAP be amended to allow for access and egress onto Bolina Road.
- Intensification of the use of Jarrow Road, to service the land parcels, is considered to be unsafe.

### Royal London

Represented by	CBRE
Interest	Six Bridges Industrial Estate and Land to the East adjoining St James’s Road – OKR11
Written rep received previously	2016 and 2018
<ul style="list-style-type: none"> <li>• AAP2: The proposed restriction of the Six Bridges site is not supported as they believe it is a missed opportunity to bring regeneration benefits due to the scale and position of the site.</li> <li>• AAP4: 40% fast track route is above the London Plans 30%. As co-location is a new concept, it comes with increased challenges flexibility is needed.</li> <li>• APP5: Flexibility needed. To remove existing businesses as business relocation are provided through landlord and tenant systems and is subject to commercial negotiation. The requirement of sprinklers to be removed as it is not always that a</li> </ul>	

tenant chooses to install this. There are also viability concerns of at least 10% affordable workspaces together with the 40% fast track affordable housing requirement and no net loss of industrial policy.

- AAP8: Justification needed of the change of the reduction of building height. In relation to the location of Tier 2 and 3 buildings, they suggest the policy worded to support their location at key open spaces and not just on Surrey Canal Park and Mandela Way Park.
- AA11: Disagree with the repurposing Marlborough Grove into a new park space as this is needed to access the existing Six Bridges Estate.
- Sub Area 2 Cantium Retail Park and Marlborough Grove: as noted above, shared space to be provided only on the northern section; flexibility of range of employment uses and building heights reconsidered.

### Tesco

Represented by	Lichfields
Interest	Occupier of Tesco Superstore, 107 Dunton Road – OKR4
Written rep received previously	2016, 2017 and 2018

- Tesco welcomes and supports the principle of the Old Kent Road Area Action Plan.
- It is suggested that the Council should consider planning for regeneration of the OKR and its planned town centres on two basis: one without the BLE at all, and the other assuming an extended delay prior to its delivery.
- Tesco supports the proposed masterplan approach but think it is inappropriate to require planning applications to be in conformity with the masterplan. For greater flexibility the wording should be changed for planning applications to demonstrate how proposals respond to the masterplan principles.
- Masterplan consideration should be given in particular for the proposed 'Town Centres' in order to guide how growth will be supported by new town centre uses, supporting facilities, and sustainable transport connections.
- Tesco appreciates the rationale for Policy AAP2 but does not accept that the proposed siting of the station is in the optimum location nor that that the tunnelling and secondary worksite proposed as part of the BLE construction requires the whole of the Tesco Property.
- Tesco considers that there are better alternatives to TfL's proposals for the outright acquisition of the Property and the loss of the trading store whilst not affecting delivery of the BLE.
- It is suggested that the AAP should revisit the Phase 2 development trigger so as to allow for more development to come forward, so land can still be optimised to its full potential, in a scenario where (at best) the BLE is further delayed (in absence of secured funding).
- Tesco objects to the aspect of the Vision for the OKR3 site which indicates that the existing FW Conway industrial site on Mandela Way could accommodate the relocation of the Tesco supermarket
- Tesco supports the OKR4 masterplan and vision which seeks to replace the existing retail floorspace at the Tesco site, including provision of a new supermarket along with the underground station entrance, such 'replacement'

being one the OKR4 site allocation requirements.

- Tesco particularly supports that the requirements for redevelopment of OKR4 recognise that the station, tunnelling and worksite requirements for a BLE underground station at OKR4 will need to be incorporated into the site design and phasing.
- Tesco is firmly of the view that a redevelopment of the Tesco store for provision of the first OKR underground station and tunnelling worksite, should only come forward if it is to be properly phased, so as to accommodate: in a first phase, Tesco's aspirations for new replacement retail and residential development and, in a second phase, the OKR1 station on land reserved within the Property for that purpose.
- Tesco object to the proposal in the final line page 102 of the AAP which suggests that to ensure continuity of trading the Tesco supermarket could be relocated to Mandela way, for the following reasons:
  - Relocation is not required given it is feasible to provide a new fully accessible BLE station at OKR4 with the existing retail store being replaced by a new one through phased re-provision on site, in a manner which would allow Tesco to continue to trade at all times, consistent with AAP5.
  - The alternative site at Mandela way, which is currently occupied by FM Conway, is not a comparable or appropriate location for the store's temporary or permanent relocation. The site does not have direct access from the OKR, nor any high street presence which is crucial to achieving required footfalls and the continued success of the store as well as the new town centre.
  - To be consistent with the ambition and successful transformation of this part of the high street into a vital and viable new OKR town centre, consistent with AAP6.
- It is requested that the last sentence on OKR4 allocation on Phasing be revised to read: "To ensure continuity of trading, the Tesco supermarket could be retained through phased temporary and then permanent re-provision on the existing Tesco site.
- Tesco supports the approach for OKR4 to be an appropriate location for taller buildings.
- Tesco supports the ambition within AAP6 to create a mixed-use high street along the OKR, which will build on the character of existing successful shops and services, including the establishment of two new major town centres, one including the Tesco Property.
- Tesco supports the reference in AAP6 (3) to the need for a "variety of shops and facilities including local independent shops meeting daily needs, as well as large stores such as supermarkets...on the high street".
- Tesco appreciates the recognition of the importance the OKR Tesco store plays in providing affordable groceries for the wider area.
- Tesco welcomes that the Council intends to work with supermarkets to ensure these will be rebuilt long the high street, alongside smaller shops and new homes.

<b>Greenspruce GP Limited</b>	
Represented by	Gerald Eve
Interest	Long Leaseholder of 107 Dunton Road – OKR4

Written rep received previously	2018
<ul style="list-style-type: none"> <li>• Greenspruce continue their support for the overall objectives of the draft OKR AAP and commitment to deliver the BLE to help create two new town centres within the Old Kent Road district which promote a sense of community and provide a variety of shops, such as large supermarkets, and the ambitions to deliver 20,000 new homes and 10,000 new jobs in the area.</li> <li>• The recognition that the Dunton Road and Southernwood Retail Park site (OKR 4) is also suitable for significantly taller buildings outside of the protected viewing corridors, reflecting its key location in the Stations and Crossings strategy is also welcomed.</li> <li>• Greenspruce continue to object to: <ul style="list-style-type: none"> <li>– the process undertaken by TfL when identifying their ‘preferred locations / favoured worksite’ for the Old Kent Road stations and BLE and the lack of consideration that has appeared to have been given to finding alternative and potentially more suitable construction sites.</li> <li>– Deficiencies in the 2017 TfL consultation process which considered two options for the Old Kent Road Station 1 from which it was not apparent that selection of the Tesco site option would lead to the closure of store, as is apparent from the consultation responses.</li> <li>– The lack of consideration that has been given to the social and economic impact that would be caused to the local community by the loss of Tesco from the Site during the construction phase of the BLE and the forced permanent closure of the store thereafter.</li> <li>– The lack of consideration that has been given to alternative means of delivering and constructing the BLE and potential for undertaking a phased approach which would allow for Tesco to be retained on Site during the construction process.</li> <li>– The suggested relocation of the Tesco store to the Mandela Way / FM Conway site (OKR 3).</li> </ul> </li> <li>• Greenspruce have concerns about the safeguarding of the Site (with directions issued by TfL on 1 March 2021) as a secondary construction worksite for the new BLE, especially considering the TFL announcement on 30 September 2020 that funding was not sought from Central Government and therefore the BLE project is being halted.</li> <li>• It is suggested that a contingency plan should be put in place to ensure that the London Borough of Southwark policy position fully supports the intensification and strategic growth of the area with or without the delivery of the BLE.</li> <li>• The emphasis on the Old Kent Road continuing to be hub for employment generation across a range of uses and target to double the number of jobs from 10,000 to 20,000 by 2036 and increase the range of jobs in the industrial, office, distribution, creative, retail, leisure, education and entertainment sectors is strongly supported.</li> <li>• The closure of the Tesco site during the construction process would have a significant impact on the local community’s choice of food sores, would result in the loss of 200 jobs and would have an impact on other local businesses for whom Tesco acts as an anchor</li> <li>• It is suggested that to ensure Tesco is not permanently lost from the site, that alternative options for constructing the BLE be considered by TfL, either by finding an alternative site for the station, using an alternative site for the secondary</li> </ul>	

worksite or by allowing a phased strategy that would see Tesco remaining on Site during construction.

#### London Square Developments Ltd

Represented by	DP9
Interest	Owner of Rich Industrial Estate
Written rep received previously	-
<ul style="list-style-type: none"> <li>• The vision for the Old Kent Road Opportunity Area is welcomed.</li> <li>• The objectives to deliver 20,000 new homes, including 7,000 affordable homes, along with the delivery of 10,000 new jobs is fully supported</li> <li>• The objectives to make Old Kent Road cleaner, greener and safer, and ensuring that all residents can access the benefits of regeneration programmes, while acknowledging the identity and heritage of Old Kent Road and its context is supported.</li> <li>• It is considered that there is no evidence for the required heights along Crimscott Street to be prescribed at eight storeys as it is considered that this would not be the best optimisation of the site, particularly in terms of the delivery of housing and therefore it is requested that the heights reconsidered.</li> </ul>	

#### Safestore

Represented by	Own response
Interest	Leaseholder of Safestore, 737 Old Kent Road – OKR18
Written rep received previously	2016, 2017 and 2018
<ul style="list-style-type: none"> <li>• It is considered that there could have been more engagement with businesses at an earlier stage and more frequently.</li> <li>• It is the view of Safestore that the level of prescription set out in AAP5 combined with the nature of the policies will serve to deter investment and re-development in the area.</li> <li>• It is considered that such stringent requirements will not provide sufficient flexibility to existing businesses seeking to redevelop or indeed investor/developers and will lead to a poorer overall mix of products for the local population.</li> <li>• Safestore questions how the Council intend to monitor the annual audit of gender pay gap and the London Living Wage neighbourhood, how much it will cost to monitor, who pays for monitoring and what authority the Council has to do so.</li> <li>• Safestore do not agree that the requirement to provide 10% of new workspace as affordable as it is not necessarily achievable for all workspace uses and would require Safestore to adapt its business model.</li> <li>• It is proposed that point 1 under 'development must' of AAP5 be deleted as it is too prescriptive and will not allow for the overall jobs target to be met.</li> <li>• Safestore question what is defined as industrial workspace as there is concern that other land uses defined in reference to the Use Classes Order will deter true industrial uses and therefore the target of no net loss of industrial floorspace.</li> </ul>	

- It is also requested that the policy wording under point 4 of AAP5 is reworded to be less prescriptive as Safestore has a tested specification for building design and by designing a building to conform with the specification as required by AAP5 point 4 it would be at odds to provide both the specification of the intended occupiers and also to provide element outside our specification such as affordable workspace.
- The requirement in AAP5 for all planning applications to ensure all workspace units are equipped with mechanical and electrical fit out, heating and cooling provision and kitchen and WC facilities is considered highly prescriptive and would result in higher occupational costs and making low cost employment space less likely to come forward.
- Safestore are of the view that the relocation requirement of AAP5 (point 6) is in direct contradiction of existing Landlord and Tenant Law and places significant burden on redevelopment plans for landowners.
- Safestore is of the view that it will not be possible to provide affordable workspace within a new self-storage facility without adversely affecting the viability of development.
- It should not be appropriate for all forms of employment development to be required to make an affordable workspace contribution, either on site or offsite.
- Safestore is concerned about the change in designation of the site from Tier 2 to Tier 3 for Tall buildings and believe it could negatively affect the development potential of Safestore's site.

#### Industrial Property Investment Fund (IPIF)

Represented by	Savills
Interest	Owners of Bermondsey Trading Estate – SA5
Written rep received previously	-

- The identification of Bermondsey Trading Estate for increased industrial capacity is strongly supported in principle, but there are concerns with the masterplan and associated detail.
- It is felt that the masterplan has the potential to prevent rather than support development and intensification and a far more flexible approach should be adopted in the next version of the OKR AAP.
- The identified quantum of additional industrial floorspace is welcomed.
- There are serious concerns over the requirement for the two sites Bermondsey Trading Estate and Bermondsey Dive Under, to be developed in conformity with the masterplan as this risks preventing development altogether as the masterplan for these sites is not realistic or feasible in many ways.
- It is suggested that the wording for requirements for planning applications be softened to be in *general* conformity with masterplan *principles*.
- It is considered that Target 4 of Policy AAP5 should be amended to 'up to 80,000sqm' to accommodate the quantum identified through the wider masterplan.
- There is concern over the identified building typologies for Bermondsey Trading Estate and Bermondsey Dive Under as it is felt that stringent application of these typologies and the associated specification as set out within the AAP risks preventing development altogether as it does not allow for alternative typologies and specifications which may be better suited to the sites and future occupiers.

- The draft OKR AAP currently fails to show how the remainder of Site 2 could be developed if Option 1 is delivered first. It is in effect missing an 'Option 1b' that would follow on from Option 1. It is recommended that the draft OKR AAP be updated to include this situation (which by its own acknowledgment is highly likely).
- The OKR AAP should therefore make it clear that the layouts are illustrative only.
- The level of detail in relation to the industrial typologies and their specific requirements in sub area 5 is considered unreasonable for such a planning policy document as it has the potential to unnecessarily restrict development and does not give enough flexibility.
- It is respectfully requested that the next draft of the AAP does not include specific typologies to a specific part of the wider site to allow for flexibility in the future.
- The AAP should also recognise there may be other typologies that are better suited to parts of the site which will still achieve industrial intensification across the wider site.
- The list of 'Suitable Uses' on page 206 is welcomed and the range of uses listed will help to futureproof both the existing Trading Estate and any future development but the list should not be applied as an all-encompassing list.
- It is welcomed that the draft OKR AAP advocates a phased approach in principle.
- There are concerns over the phasing of option 2 and it is felt that the relocation of businesses to various sites in different phases will prove problematic and disruptive for the existing businesses.
- It is considered that it should be made clear that the phasing strategy shown on page 208 is illustrative only, with a full phasing strategy to be discussed and agreed with the Council and the relevant stakeholders in the future at the appropriate time.
- It is pointed out that the axonometric for Phase 2 on page 209 does not reflect the Phase 2 phasing diagram on page 208. The building on the southern part of Site 2 is different on both.
- The approach in Option 1 to keep the access separate between the two sites is supported in principle.
- Clarification on the access for Option would be welcomed as it is unclear whether the Jarrow Road and Bolina Road accesses would also be utilised as well as the main access from Rotherhithe New Road.
- It is also considered that the draft OKR AAP should also include a plan to show the access arrangement as described for Option 1 (similar to that presented on page 211 for Option 2).

#### Proprietor of Units 28-32 Ruby Street

Represented by	NTA Planning
Interest	28-32 Ruby Street – OKR13
Written rep received previously	-
<ul style="list-style-type: none"> <li>• There is concern that the tall buildings strategy and the already approved tall buildings at Ruby Triangle development, will lead to a townscape that is disjointed to the smaller heights of the site.</li> <li>• It is considered that there is no justification for why heights have been reduced on the western edge of Ruby Street.</li> </ul>	



- It is the view of the proprietors that the sites along Ruby Street should be allocated as being suitable for Tier Three or Tier Two buildings of up to 20 storeys.

### Avanton and Scotia Gas Network (SGN)

Represented by	Quod
Interest	Gasworks – OKR13
Written rep received previously	2016, 2017 and 2018

- Avanton and SGN welcome the Council’s proposed increase in the number of homes that the OKR13 (Sandgate Street and Verney Road) allocation seeks to deliver.
- It is considered that the housing numbers in the AAP should be expressed as a minimum housing delivery figure.
- Avanton and SGN do not consider that the AAP yet recognises the extreme challenges of bringing forward a gas works site for development and specifically the cumulative constraints that will have an impact on deliverability, site capacity and viability.
- It is suggested that further consideration be given to the practical and economic implications of the proposed retention of listed gas holder no.13 within a public park.
- The current policy wording of AAP1 is absolute and fails to provide sufficient flexibility as required by national policy and offer any guidance through its supporting text of an alternative where the policy requirements cannot be achieved (for example land use or building heights).
- Following TFL’s and the Government’s revised commitment to funding the Bakerloo Line to ensure sufficient flexibility and delivery of the residual policies of the plan, we suggest that Policy AAP 2 supporting text is revised to include reference to other transport improvements.
- To ensure sufficient flexibility and delivery of the plan, we suggest that Policy AAP 2 supporting text is revised as follows “These Grampians would fall away on the signing off the construction contract for the Bakerloo Line extension, or other transport improvements ....”
- Avanton and SGN support draft Policy AAP3 and Southwark’s ambition for the Old Kent Road to be net-zero carbon by 2030 but suggest changes to include providing a future connection to the District Heat Network and any amendments to carbon offset overpayment secured through s106 is returned to the developer.
- Avanton and SGN support Policy AAP4’s ambition to maximise the number and quality of new homes to be built but believe this should represent a minimum, rather than a maximum as may currently be implied in the draft AAP.
- It is considered that the policy targets set out in AAP 4 are absolute and there is no flexibility within the wording of the policy to adapt to rapid change. This rapid change has recently been experienced globally by the COVID pandemic, and the loss in values associated with the abeyance of the Bakerloo Line extension
- The policy requirements for planning applications are absolute and fail to provide for flexibility as required by national policy and offer any guidance through supporting text of an alternative where these policy requirements cannot be achieved.

- Given the expected change in land values anticipated by the delay of the BLE, flexibility needs to be afforded to affordable housing contributions, particularly for sites which also face significant remediation and infrastructure costs, such as the gas works site. It is suggested that the wording be amended to say Development should where appropriate and viable provide a minimum of 35% of all new homes as social rented and intermediate as set out in Table 2.
- It is noted that the affordable housing requirements are more restrictive than London Plan Policy H11.
- It is suggested that the footnote under Table 2 be removed to allow for greater flexibility within the policy requirements.
- Avanton and SGN assert that the housing mix stipulated in AAP4 does not conform with the London Plan or provide the required level of flexibility.
- It is considered the delivery of 40% affordable housing for many sites across the OKR will be extremely challenging, particularly as the Bakerloo Line Extension has been put on hold and therefore achievable values will be impacted, especially sites with significant remediation costs.
- In recognition of the substantial costs of preparing surplus utilities sites for development, Footnote 59 of the London Plan (2021) endorses that gas work sites should be subject to the 35% affordable housing fast-track approach, conditioned upon evidence being provided of extraordinary costs and therefore it is suggested that a new footnote to Table 2 states: "Applicants must meet the minimum requirement unless subject to Footnote 59 of the London Plan (2021)".
- It is suggested that the targeted level at which a scheme may be progressed through the fast-track route should be reduced to 35%.
- Avanton and SGN consider that the policy requirement to deliver affordable housing or equivalent commuted sum should be removed as it is contrary to Paragraph 63 of the NPPF and will place a significant burden on small sites coming forward for development.
- It is suggested that the former gas holder no. 10 should be removed from SPIL designation as it has no industrial function and represents redundant utilities infrastructure. The site sustains no direct employment nor delivers any industrial floorspace capacity. It is also heavily contaminated.
- It is suggested that Figure 8 be updated to remove its inclusion, and this piece of land should be incorporated within allocation OKR13.
- Changes to the wording of policy AAP5 are suggested where reference is made to achieving no net loss of industrial floorspace and retaining 48ha of Strategic Protected Industrial Land so that Gasholder No 10 is excluded.
- Avanton and SGN consider that there is a conflict within the policy AAP5 as the target seeks to provide 10% of new 'workspace' as affordable but the planning applications requires developments providing over 500sqm GIA to provide at least 10% affordable workspace at discount rents secured for at least 30 years.
- In view of the introduction of Class E, Policy AAP5 should define what uses are considered as 'employment'.
- Avanton and SGN consider the requirement for planning applications to set affordable workspace rent at an appropriate level and secured for at least 30 years to be unreasonable as developers could be prejudiced through the application of this policy long term.
- It is suggested that the discount be amended to be a percentage of market rent.
- It is also suggested that flexibility to the wording be added to allow for the workspace to revert to being a market unit for an agreed period of time (i.e. 1-3

years) post-practical completion, if an occupier that meets the above requirements cannot be found during a 6-month marketing period.

- It is considered that the policy requirements are absolute and fail to provide for flexibility as required by national policy, and offer any guidance through supporting text of an alternative where these policy requirements cannot be achieved.
- Avanton and SGN support the identification of the gas works site as an appropriate location for tall buildings.
- It is asserted that the identified massing in Figure 12 for the Gasworks site is not reflective of the pre-application discussions which identified one Tier 1 building comprising two elements, both of which were above 20 storeys, as necessary to deliver the strategic planning policies of the AAP.
- The position to repurpose gasholder no 13 is supported in principle, however the viability of remediating the site, retaining the listed gas holder no 13 and delivering the new Livesey Park will be a significant constraint on the final development and must be a key factor in the future determination of any planning application for the gas works site.
- Avanton and SGN support draft Policy AAP11 and its ambition to increase the level of greener across the Old Kent Road, however some changes to ensure flexibility and clarification are suggested.
- Figure 15 appears to allocate the core of the listed no.13 gas holder structure as a potential 'Option for a Health Hub'. This is not consistent with the intention of the policy and should revert to the key colour used at Figure 10 to clearly define the proposed health hub locations.
- It is considered that the AAP site allocations should provide an element of flexibility to affordable housing provision as set out previously.
- To the site allocation OKR13, it is requested some additional wording be included under a new sub-heading 'The Gas Works to reflect the significant limitations of bringing forward the gas works site.
- Avanton oppose the typologies set out in Figure SA3.3 as the provision of industrial floorspace on a gas works site is not in conformity with the London Plan or national policy.
- It is also considered that the designation is not in conformity with Policy AAP 5 which seeks to retain or increase the amount of employment floorspace (GIA) on site or sui generis employment generating uses as the gas works site does not contain an employment or employment generating uses.
- From a practical point of view, it is also not considered the most appropriate typology for a ground floor use to a Tier 1 site (gasholder 12) fronting Livesey Park.
- It is requested that the site's primary allocation as an industrial unit is reviewed, and a mixed-use development be promoted on this site.
- Avanton support the broad ambition for gas holder no.12, albeit the delivery of this ambition will need to be considered in line with the overall viability of the policies set out in the AAP, and the need to bring the gas works forward for development at an appropriate height and density to enable the delivery of high-quality placemaking.
- Additional wording is suggested to the Connecting Communities section of OKR13 to acknowledge the significant costs associated with the delivery of the gasworks site and that this may require the flexible application of policies on Planning Obligations and the use of 'In Kind' contributions and/or ringfencing of CIL contributions for the park's delivery.

- Under Building heights guidance, Avanton support the proposed building heights to the north west of the gasholder as a 'Tier One' building but request that the adjacent building be reclassified as also forming part of the Tier One building.
- It is considered that the need for tall buildings on this site is paramount to the success of any development proposal, which will need to deliver a significant quantum of development in order to fund the substantial remediation costs, delivery of the new public park, provision of affordable housing and other planning obligations.

<b>Avanton</b>	
Represented by	Quod
Interest	Gasworks – OKR13
Written rep received previously	
<ul style="list-style-type: none"> <li>• Same representation submitted as above.</li> </ul>	

<b>SG Smith Properties on behalf of the landowners of 812 Old Kent Road</b>	
Represented by	DWD
Interest	Landowners of 812 Old Kent Road – OKR17
Written rep received previously	2018
<ul style="list-style-type: none"> <li>• The designation of the site as a worksite is objected</li> <li>• The safeguarding of the site for logistics and welfare facilities by TFL is not supported in the absence of site-specific justification</li> <li>• It is considered that consider that the site is ready for development in Phase 1 and that there is sufficient space for logistics and welfare support on the former Toys 'R' Us, which we note is now in the Council's ownership, without the need to acquire 812 Old Kent Road.</li> <li>• SG Smith Properties feel that the requirement for a Grampian condition should be applied flexibly and, on a site-by-site basis taking into account of the status and timescale of the BLE project and the policy strategy should consider the whole quantum of development in the Old Kent Road if BLE is substantially delayed or cancelled.</li> <li>• In light of the Housing Delivery Test, it is considered that additional flexibility should be included into the phasing to allow Phase 2 sites to be brought forward in Phase 1</li> <li>• It is recommended that the supporting text should be amended to include commitment to annual reporting of the delivery of homes from the Phase 1 sites and where there is evidence that the Phase 1 Sites are not delivering sufficient housing to support Southwark's requirement to meet the housing delivery test it is considered that the policy should set out clearly a mechanism for allowing Phase 2 Sites to be delivered.</li> <li>• The designation of the frontage of the 812 Old Kent Road site as proposed high street is supported.</li> </ul>	

- The masterplan and proposed uses for the site are supported.
- The designation of the 812 Old Kent Road Site for a Tier Two and Tier Three buildings is supported
- The range of uses and design requirements proposed for the OKR17 Site, which includes 812 Old Kent Road is supported.
- It is noted that the text at the bottom of page 179 appears to have been cut off so it is unclear whether further description of the proposals for OKR17 was due to be provided.

### 3) COMMUNITY GROUPS

#### Pages Conservation Residents Group

Written rep received previously	2018
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- The Pages Walk Conservation Residents Alliance are gravely concerned with how the creation of the Mandela Way Park will 'change traffic management arrangements over the next 10 to 15 years.
- There is concern over the new public highway looks as though it runs straight off Mandela Way and up Pages Walk.
- It is considered that it is totally unacceptable to be reducing and stopping traffic on existing main roads and then redirecting that traffic down a residential street which is also a Conservation Area.
- It is acknowledged that the proposed layout could be a printing mistake as assured by the Council at a consultation event.

#### Ledbury Resident Project Group

Written rep received previously	-
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- It is felt that the proposal for Livesey Park is interesting and will provide much needed new open space close to Ledbury
- It is suggested that the crossing from Ledbury to the proposed Livesey Park should be simplified and improved to improve access to the park.
- The proposal to recreate Arthur Street on p.162 is not supported as it is felt that this will have significant on what designs are possible for new homes on Ledbury and will have an effect on the security, safety and design of homes and open space when the towers are redeveloped.
- It is felt that the health services will need to be considerably increased to accommodate more people living in the area.
- There are concerns over accessing the Health Hub on Verney Road for those who less able to walk from Ledbury.
- It is felt that phasing of the improvement to the public transport and the early opening up of routes through the proposed Livesey Park will be needed for people on Ledbury to be able to access the health hub on Verney Road.
- The design to replace the Ledbury Towers, the best use of the ground floor onto the Old Kent Road will be discussed to ensure that there are not management problems and vacancies.

- It is considered that there is a need to improve existing public transport before the BLE is built.
- The Ledbury Resident Project Group welcome the Design Guide for the homes on the Old Kent Road.

### In My Community - Research Report

Written rep received previously

-

- Group focused on making a positive impact for the African Caribbean community
- Carried out citizen and stakeholder research - two workshops carried out
- Key concerns for locals include lack of employment and affordability, safety, pollution and visual neglect
- African and Caribbean community feel that they have less of an opportunity for their voices to be heard
- The A/C community feel positive about the regeneration and hope for affordable and available housing, affordable cultural activities, employment opportunities to keep them in the area, better transport links, build on smaller and industrial businesses with deep rooted histories in the OKR, and to safeguard mental health support for the youth
- Want to build the OKR's identity around the heritage and culture of the diverse mix of people who live there and want collaboration with all stakeholders (developers, council etc)

### XR Southwark Lobbying Group

Written rep received previously

-

- XR feels that AAP was not designed to address the climate emergency, and any claim to do so is both greenwashing and deeply irresponsible given the gravity of the climate crisis.
- Proposed methods of carbon capture off-setting are not referenced in Climate Change Emergency (AAP3)
- XR considers that the target to achieve a net zero carbon Area Action Plan have no evidence-based targets and no monitoring structure so are rendered completely meaningless in the face of the level of development that the AAP is proposing.
- XR note that Southwark Council do not have Climate Strategy and if one is adopted it will unlikely be binding on all council departments, particularly planning.
- It is considered that the carbon off-set fund is not an effective option to address the climate emergency
- It is suggested that the commitment to the commitment dates for the Bakerloo Line Extension (2036) to be removed.
- XR believes that energy would be best spent investing in cycling infrastructure.
- It is also suggested that a sustainable freight strategy is needed which reduces driven freight deliveries and integrates the deliveries in and around the existing and new development into the local area.
- It is considered that cargo bikes should be integral to the AAP and a key part of the traffic reduction strategy.
- XR feels that a whole corridor freight strategy is needed

- XR feel that pedestrian and public realm improvements need to be far more front loaded with local people and visitors starting to see improvements early on rather than at the end of the regeneration.
- XR suggests that traffic free strategies could be delivered early on through the roll out of Low Traffic Neighbourhoods.
- It is considered that there is no clear strategy to deliver the commitment that “Southwark aspires to maintaining 50% less driving than before lockdown” and how that relates to the OKR AAP.
- It is considered that road pricing is essential to deliver a quantum reduction in vehicle usage and this should be coupled with an area-wide programme of LTNs and increased parking charges that are emissions based.
- The Parks and Healthy Streets policy indicates a commitment which is too slow.
- XR feel that without the BLE there will be a real need for other approaches such as a rapid bus service/tram to be developed earlier in the regeneration.
- It is felt that OKR AAP completely ignores the fact that net-zero carbon emissions could not be achieved taking into account the huge carbon emissions expended in constructing developments such as those described in the OKR AAP and the planning applications which have already been approved.
- It is considered a huge omission that there is no mention of sustainable construction methods or materials given that the construction industry is responsible for approximately 40% of carbon emissions.
- XR suggests that it would be easier, more sustainable and achieve strong community support if the current buildings could be repurposed for the industrial uses they were built for, as industrial space is so desperately needed in the area.
- The District Heating Network and the SEHCLP is welcomed but it is noted that this is not enough to address the climate emergency.
- There are real concerns about the energy use in tall buildings as proposed for the Old Kent Road area action plan area.
- It is considered that the densities achieved by tall towers can be achieved with lower-rise slab or courtyard buildings. It is not always necessary to build tall to achieve high densities and energy use could, in many cases, be greatly reduced by building in different forms on fewer storeys.
- There is concern that households who require 3-4 bedrooms would not opt to live in tall buildings as it is often inappropriate for their needs.
- There is concern about the lower levels of affordable housing being achieved by taller buildings.
- XR Southwark Lobbying group think that the scale and massing of the development proposed in the OKR AAP is incompatible with Cleaner, Greener, Safer policies outlined in AAP12.
- XR do not consider the policy AAP12 effective because it makes demands that cannot realistically be met but provides no detail as to how to go about contributing to net gains in biodiversity and/or enhancing important sites and populations of protected species.
- XR Southwark also has significant concerns about this consultation process, in which there have been virtually no consultation events in order to engage residents and the period of consultation has mostly taken place in a strict third lockdown taking place during the COVID-19 pandemic.

## 4) INDIVIDUALS

**Individual**

- No specific comments on the AAP but expresses excitement about the upcoming developments in the area
- As a resident of Southwark, the respondent is keen to learn of any construction jobs available when the upcoming works commence

**Individual**

- Respondent is disappointed that the proposal to have an underground station at the Bricklayers Arms has apparently been abandoned.
- Concern is raised over the bus capacity of the area as it already stretched, and the additional housing will put further pressure on this mode of public transport.
- The respondent feels that the main problem with the latest plans is the flyover and would like to see it removed completely.
- Concern is raised over OKR1 being a “no man's land” land as it is not part of Elephant and Castle development plans, cut off from Bermondsey and not getting any benefit from the latest OKR plans.

**Individual**

- Respondent states that there is a wider recognition that there is a limit to the number of blocks needed in this covid, post covid world and questions why so many blocks are being built along Old Kent Road with more being planned.
- Respondent states that Khan says not to build if people can't afford them.
- 1 in 26 homes in Southwark is empty
- Respondent mentions that homes which remain are those well built in brick, refers to concrete towers of Ledbury labelling them “horrible” and references the “outlandish” plans for B&Q and Aldi etc.
- Respondent states that they live in one of the most polluted areas in the borough and identifies the incinerator at Veolia plant as creating sour smells
- Respondent recognises that the Old Kent Road plan has zero carbon heating systems but asserts that the Veolia plan is polluting.

**Individual**

- Respondent requests that cycling provision be improved on and near OKR as it feels very unsafe to cycle.

**Individual**



- It is considered not effective for the Council to be completing the consultation on the OKRAAP before the changes to the NSP are known, as comments may not be relevant if elements of the AAP have changed.
- Respondent feels that the AAP has not been positively prepared as the Council has not thought through how to get the best and most useful input from the local community.
- It is felt that few people have had time to consider the AAP as community members have been involved in the Examination in Public for the New Southwark Plan.
- Respondent believes that the OKR AAP is not consistent with a key strategic policy of the New Southwark Plan: Regeneration that meets the needs of all.
- It is felt that as currently drafted, the OKR AAP fails to provide fundamental resources and risks having a negative impact on the health and wellbeing of both existing and future residents and users, in light of the COVID-19 pandemic.
- Respondent does not consider the Plan Objectives to be sound because they are not justified and not effective.
- The Climate Emergency target to achieve net zero carbon Old Kent Road AAP by 2030 is considered meaningless as there is no definition of what a net zero carbon OKRAAP would look like and no targets against which the success of the plan could be measured.
- The Affordable Homes target is not considered justified as it will mean 13,000 homes will be unaffordable for the majority of Southwark residents, at a time when so many Southwark residents are in need of decent housing yet unaffordable new flats stand empty.
- The objective for 50% of new council homes to be let to local residents is considered too low a proportion when so many people are on the waiting list for council properties.
- Respondent considers the Plan has a laudable ambition to create new green space and parks but feels that the spaces proposed will be inadequate too small and are inadequate to meet the recreation and leisure needs of new residents.
- The scale of provision of green space is not justified and will be ineffective in connecting biodiversity across the borough.
- It is felt that the culture and heritage objectives are ineffective as Historic England has said that development already approved or proposed in the OKRAAP area would harm existing conservation areas, making a major visual impact on the historic rooflines of the Georgian and Victorian terraces north and south of the Old Kent Road.
- There is concern that the future residents of the OKR area will be condemned to living conditions characterised by poor air quality, limited access to green space or even quality open space and are likely to be worst affected by heat and extreme weather impacts of the climate emergency.
- In regards to AAP2, the Respondent feels that the OKR AAP is not positively prepared and not justified because it is posited on a transport project that has been indefinitely postponed and does not provide any alternative for this situation.
- Respondent considers the AAP continues the Council's flawed approach to regeneration based on demolition of existing buildings and rebuild.
- It is felt that the OKR AAP is not consistent with the London Plan which promotes the refurbishment of buildings wherever possible.
- Respondent considers that the Plan is not effective because it does not have clear and measurable targets, including baseline measurements, for addressing the

climate emergency. It is essential that the plan should define net zero targets and that these must include the full lifecycle of building.

- It is felt that the approach to rely on District Heat Networks as a means to achieving zero carbon is ineffective as current experience of DHN in Southwark is that these fail frequently, leaving residents with inadequate heating and no alternative than to use high carbon gas or electric heaters.
- Respondent feels that the proposal that 20,000 residential units can be achieved in the Old Kent Road is not compatible with meeting the needs of the industrial economy.
- The proposal to co-locate industrial with residential space is not justified by past experience or recent studies.
- It is considered that the plan is not positively prepared as in order to re-provide the amount of industrial floorspace that is being lost to residential uses, the new floorspace would have to be in basements or first floor accommodation which is unlikely to be suitable for the manufacturing activities that are losing their premises.
- Respondent considers that the Plan is not positively prepared as there is a lack of urgency and ambition for the provision of cycle routes.
- It is felt that the provision of cycle routes included in the AAP is inadequate for the existing population and totally fails to consider the huge proposed growth in population or allow for increased use of cycles for transporting goods.
- Respondent feels that the Plan is not positively prepared because it establishes no specific conditions for buildings up to this height, i.e. they could be built anywhere in the area.
- It is not considered justified to use tall buildings in a Climate Emergency as they trap heat in the city, compounding the 'urban heat island' effect and increasing heat-related health problems, especially for more vulnerable groups in the population.
- There is concern expressed over the impact of tall buildings overshadowing nearby areas and reducing the sunlight available, especially for green space and play areas.
- There is concern over the tall buildings planned for the woodland area by Burgess Park as it could impact on local wildlife and pollinators, reduction in sunlight could change the habitat.
- Respondent considers the Plan is not effective in protecting and enhancing conservation areas. Historic England has said that development already approved or proposed in the OKRAAP area would harm existing conservation areas, making a major visual impact on the historic rooflines of the Georgian and Victorian terraces north and south of the Old Kent Road.
- Respondent considers that the provision of open space as set out in Table 3 is not justified and is inadequate for healthy living.
- Respondent raises concern about the reliance on developers to provide new open space and suggests the plan state that this will be secured through legally enforceable means, and the land will be designated as open land.
- It is felt that the plan does not make sufficient provision for sports facilities.

#### **Individual**

- Respondent feels that the AAP does not plan positively for the situation on the

ground regarding the Bakerloo Line Extension and the announcement that it has been put on hold.

- Respondent notes inconsistencies in the dates presented for the delivery of the BLE: AAP7 states “we will... deliver the Bakerloo Line extension and at least two new underground stations by 2036”. On page 36 it says 2031.
- It is felt that there is no recognition in the AAP of the unprecedented financial difficulties TFL is in.
- Jargon is used on page 37 (Grampians) and it is not explained how housing can be delivered so far ahead of the BLE in an acceptable way, or how the risk of developers waiting for BLE and therefore delaying housing delivery is mitigated.
- There is concern that funding for the BLE will be raised at the detriment of residents such as through increased Council tax or higher business rates.
- Respondent feels that the AAP does not consider the main alternatives that are reasonable to consider in light of the TfL commissioner’s announcement.
- It is felt that the AAP also needs to plan for greater reliance on walking and cycling routes in the absence of major mass transit improvements and ensure that housing delivery is not accompanied by growth in private car use.
- It is felt that the AAP should plan positively for the opportunities that come from ‘waiting’ for BLE such as developing ‘meanwhile’ uses, recording and re-using more heritage, assisted moves of existing employment and community uses, bringing forward certain sites without BLE to allow environmental improvements and avoid blight, or supporting temporary creative industries (eg artists’ studios) or limited temporary development.
- It is felt that the failure to consider reasonable alternatives to BLE is not sound.
- Respondent encloses a photograph of litter which has accumulated on the Tesco boundary and suggests that the AAP sets clear guidance for developers and landowners to maintain and incrementally improve safeguarded sites during the 10–15-year interim period before BLE.
- Respondent objects to the misapplication of the ‘fifteen-minute city’ concept referenced in page 36: the published concept is not about using mass transit to travel to “central and west London in less than 15 minutes” - it is about a neighbourhood with all daily needs met within 15 minutes’ walk or cycle.
- Respondent also criticises the level of community facility provision and the new centres and questions where the swimming pools, and town squares are.
- Respondent feels that the OKR is a series of locations like E&C in terms of its scale and complexity, so it cannot be left to the hope of BLE and a well-intended but flawed AAP to deliver the housing required by the London Plan *and* the economic and environmental improvements.

### Individual

Responding to the written questionnaire:

- Respondent does not agree that the AAP will address the climate emergency
  - Feels that the council is determined to pursue large scale developments which do not use the existing built resources in the Borough.
  - It is considered that the focus is on traffic reduction which although welcomed ignores all other factors of climate change, particularly emissions from whole scale construction activity

- It is considered that gas and electric consumption from high-rise buildings are twice as high as in can be achieved with lower-rise slab or courtyard buildings.
- Respondent feels that Construction has been overlooked in the Climate Emergency Strategy even though it is 2nd only to transport in terms of carbon emissions.
- Respondent feels that the commitment to the climate emergency has been poorly thought out and appears to be nothing more than a tick box exercise.
- Bakerloo Line Extension
  - Respondent feels that the Bakerloo Line Extension at present is wishful thinking and feels that the reliance on what is clearly not happening for at least 20-30 years, if at all, suggests an inflexibility and lack of innovativeness on the part of the Council.
  - There is concern that the infrastructure will not sustain the increase in population.
- Youth
  - Respondent feels that providing for the young is essential but what is proposed only replaces the many libraries and town halls, schools and hostels that the Council has sold off in the last many years.
- Housing
  - Respondent considers that 13,000 homes will be unaffordable to Southwark and London residents and feels that the building strategy is worsening the housing crisis.
  - Respondent feels that regeneration causes property developers to actively drive up housing costs through direct marketing to overseas investors
  - 1 in 24 homes lie empty in Southwark
  - Respondent feels that the AAP fails to mention the social housing which is being lost in the face of redevelopment.
  - It is considered that the number of homes should not be raised from 14,500 to 34,500 without the BLE.
  - Respondent considers retrofitting existing social housing as the most cost effective and least damaging to both the environment and social cohesion.
- Respondent does not agree with the new tall buildings plan and does not like the emphasis of tall buildings in the plan.
  - Respondent feels they are being planned indiscriminately.
  - It is considered that tall buildings are out of scale and context with existing streets and buildings and will not integrate with the buildings around.
  - The increases in height set a precedent so within a couple of years that local areas character is completely lost and overshadowed by ugly new developments.
  - It is felt that they overshadow and vandalise heritage assets and Conservation Areas which need to be preserved and settings conserved and enhanced.
  - There is concern over the notoriously high wind speeds particularly at their base which subsequently suffer from a volatile microclimate.
  - Groups of towers cast shadow and create dark alleyways where concentrations of stagnant air and pollution can be found.
  - They shut out the sky and the light and darken the existing homes and area at

large.

- Lack of outside space and being able to relate to the scale of the people in the street lead to feelings of separation, isolation, and depression.
- Tall buildings already completed across Southwark are ugly, homogenous, and completely indistinctive.
- The higher you go, the more inefficient the building becomes in terms of the net area measured against carbon emissions from operation, construction, and maintenance.
- Movement
  - Respondent feels that the policy to divert all vehicles on to side roads has just served to displace traffic rather than reduce it creating more traffic on main roads adding to pollution.
  - Respondent feels that the focus on being car free will negatively affect many local people especially the working-class community as well as the less able bodied and elderly.
  - Respondent considers that with such an intensified plan for populating the area one may have to assume that even actually reducing the amount of traffic will finally result in traffic maintaining current levels as the population grows, because of the reliance on deliveries and servicing.
  - Respondent feels that there is a total failure on behalf of the council to understand the nature of traffic and essential journeys in the area purely because of wanting to achieve targets.
  - Businesses suffer when easy access is not permitted to their establishments by car.
- Economy and Town Centres
  - Respondent does not agree with the policy.
  - Respondent feels that the Council is underplaying the tension between industrial uses and residential capacity and it is not workable.
  - It is considered that by allocating B use to the site allocations that the traditional industrial uses will be lost.
  - It is felt that there is a focus on offices rather than protecting existing industries which will lead to the loss of OKR's unique industrial heritage.
  - It is felt that residential and employment uses should be kept separate as no one will want to live on top or next to an industrial unit with the noise, traffic and pollution at all times of day.
  - Respondent feels that there will be a loss of affordable workspace as currently it is all affordable and the requirement for redevelopment is to provide only 10% affordable.
  - Respondent feels that the quiet residential streets and areas will see the introduction of shops, cafes, drinking establishments which cause public nuisance and harm to the wellbeing of the residents.
- High Streets
  - Respondent feels that mixed messages are being given in the plan as almost all site allocations have a provision for retail uses, meaning that high street activity will be dispersed within the large developments of the plan.
- Design and Heritage

- Respondent feels that the OKR and the site allocations pay lip service to protection of high-quality design and preservation of heritage but lists several examples of heritage assets which have been destroyed.
- Parks and Open Spaces
  - Respondent feels that there is no accounting for mature trees which are being felled.
  - It is considered that the provision of green space would have to be more than doubled for Southwark to remain the 5<sup>th</sup> worst borough for access to open space.
  - Concern over the infill of green space and play areas on council estates
  - There is concern over the impact of Mandela Way Park on the existing road layout and accessibility.
  - It is felt that Tier 1 building at the edges of Mandela Way Park are not appropriate.
- Consented Development
  - Respondent feels that the ongoing and completed developments demonstrate quite clearly that the present planning system and Rules and the indeed the Council have failed the present residents.
- Any other comments
  - Respondent does not understand why OKR2 and OKR3 have been designated as town centre and Opportunity area
  - Respondent feels that the plans for development is not how the community want to live and see the area developed
  - Respondent considers that planning applications in the pipeline should be assessed in the context of the emerging AAP and not on the basis of what has already been granted permission on Crimscott Street and Willow Walk.
  - Respondent considers the height plans for Crimscott Street/ Pages Walk / Mandela Way out of scale with the existing streets and buildings, and asserts that development bears no relation to the existing character of Pages Walk and Willow Walk: openness, low rise, historic urban form, interesting townscape, quality of neighbourhood.
  - It is considered that 6 storeys is too tall for a little street and the maximum height allowed on Pages Walk should be 3 storeys.
  - Respondent feels that the guidance on conservation areas must be more strictly observed.
  - Respondent considers the buildings fronting onto Crimscott Street should be no more than 3 storeys and the 6-8 storeys set out in the plan is inappropriate.
  - Respondent feels that there should be a height restriction on the entire site allocation OKR2 of 3 storeys, rising to 4 storeys.
  - Respondent considers a patchy approach and heights have been set on the basis of the site and the very maximum possible rather than what is suitable and sympathetic to the area and- a uniform approach to planning.
  - Respondent feels that the site allocation and the plans for Mandela Way are unrealistic and unachievable because they are not supported by a deliverable infrastructure plan due to the delay in the BLE delivery.
  - Respondent does not consider that OKR3 can deliver 1955-2200 and that

these are not needed for Southwark Council to meet its housing targets as set out in the March 2021 Southwark Housing Land Supply Report.

- Respondent suggests that OKR3 be retained as Locally Significant Local Land with use class B8 for storage and distribution rather than more general use B class.
- Respondent feels that office space is not needed and there is a need for usable class B8 industrial space.
- There is concern that the Mandela Way site boundary will have a large impact on Pages Walk and the threat to the conservation areas is immediate.
- Respondent considers that a height restriction should be place on OKR3, restricted to 2 storeys behind the Conservation area rising to 3 moving further east.
- There is concern that the Conservation would be engulfed and the views into and out of the area are maintained nor enhanced by the buildings.
- It is considered that the green space on OKR3 should be open and not bult up around to be truly accessible to all.
- It is considered that Mandela Way Park is inadequate provision of green space for the number of homes and additionally businesses that are planned on these two sites.
- Respondent is supportive of Mandela Way Park but would like to see the layout from the 2017 AAP used as it showed the park without cutting Mandela Way short.
- Respondent feels that the site allocation for homes must be reduced to viable levels which would accommodate lower building heights and still meet housing targets.
- Respondent feels that the houses directly behind Pages Walk Conservation Area terraced houses should be 2 stories mirroring the Pages Walk Houses.
- It is felt that having tall buildings dodging the various view trajectories (site lies within the Background Assessment View of London View Management Framework and the Borough Views) cannot be a basis for well planned development and cannot be deemed sound in reference to the NPPF particularly part 12 on achieving well-designed places.
- Respondent requests assurances that existing trees along Mandela Way and the 30 year oaks behind the Pages Walk terraced houses will be preserved as the trees reduce carbon emissions and support a range of biodiversity.



## **Appendix D:**

Summary of key issues raised in consultation responses to the survey questions from community groups

Old Kent Road Area Action Plan: Consultation Report

October 2024



<b>Friends of Galleywall Nature Reserve</b>	
Written rep received	-
<ul style="list-style-type: none"> <li>• Supportive of redevelopment</li> <li>• Wants to see more links between small open spaces and pocket parks</li> <li>• Would like to see mention of Galleywall Nature Reserve</li> </ul>	

<b>Theatres Trust</b>	
Written rep received	2018
<ul style="list-style-type: none"> <li>• Supportive of the approach to district town centres and the borough's support for cultural and leisure activities</li> <li>• Suggest that part 4 of AAP6 might also reference performance space in addition to cinema or museum</li> </ul>	

<b>Southwark Travellers' Action Group (STAG)</b>	
Written rep received	2018
<ul style="list-style-type: none"> <li>• Do not support the Bakerloo Line Extension</li> <li>• Want to see Gypsy and Traveller sites included in the housing provision and for the plan to recognise the specific needs of G&amp;T accommodation</li> <li>• Support the commitment for the established high street to remain</li> <li>• Object to the tall buildings strategy as there is concern about tall buildings overlooking sites</li> <li>• G&amp;T do not feel they have been consulted or engaged properly about redevelopment</li> </ul>	

<b>Founder: Pages Walk Conservation Residents Alliance. Founder: Save Southwark</b>	
Written rep received	2018
<ul style="list-style-type: none"> <li>• Opposed to new schools, the hotel and the removal/repurposing of the flyover</li> <li>• Would like to see a Lido in Livesey Park</li> <li>• Does not believe the BLE will happen for 20-30 years and the existing public transport infrastructure cannot support the huge increase in pop'n</li> <li>• Object to the AAP3: Climate Emergency as demolition and construction generate a massive amount of carbon and tall buildings produce way more emissions than low-rise</li> <li>• Support the retrofitting of heritage assets</li> <li>• Object to the provision of affordable housing as it should be more and actually affordable</li> <li>• Object to co-location and the requirement for only 10% affordable workspace</li> <li>• Wants more mention of pubs and the existing diversity in terms of cafes and restaurants to remain</li> <li>• Oppose the movement strategy and the tall building strategy</li> <li>• Road layout and accessibility concerns on the proposed location of Mandela Way</li> </ul>	

Park
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<b>Old Kent Road Community Campaign /Save Southwark</b>
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Written rep received	-
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- 13,000/20,000 homes unaffordable – only 8% of the existing Southwark residents can afford this and 1 in 24 homes already lie empty
- AAP fails to note the number of social homes lost
- Housing - 80% of inflated price is unaffordable to 92% of Southwark's populations – should be capped at London Living Rent.
- Questions on the suitability of co-location
- More detail on pubs
- Disagrees with tall buildings – create unsuitable microclimates, are homogenous and carbon heavy during the construction phase
- Does not like the demolition-led development – should be retrofitting and retaining
- Replacement of what has been lost should be provided. Ball courts are targeted therefore in need of protection.
- The rest is the same as "Founder: Pages Walk Conservation Residents Alliance. Founder: Save Southwark" (above)

<b>Southwark Unified Network Black Ethnic Minority</b>
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Written rep received	-
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- Living wage should be included in reaching the affordable housing figure.
- Agree with AAP 6 but concerns in the increase of business rates and rents.
- AAP 14 – intergenerational provisions needed.

<b>Action Vision Zero</b>
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Written rep received	-
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- Strongly support the removal of the Dunton Road Gyratory
- Want to see more done for traffic reduction and segregation of cycle lanes and pedestrians
- Want to see a more developed freight strategy

<b>London Living Streets</b>
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Written rep received	-
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- Strongly support creating a high street in Sub Area 3
- Want more LTNs
- Want faster progress on the OKR to become a Healthy Street
- Would like to see an alternative to the BLE in the form of a rapid bus service or tram which can be delivered by the mid-2020s
- Wants to see a sustainable freight strategy

- The Climate Change Strategy is inadequate

### **Save Southwark, Pembroke House, St Christopher's Church Walworth**

Written rep received

-

- Failure to understand the socio-economic factors of lower income areas – small independent existing shops rented by diverse communities of ethnic minorities rely on the low rental premiums
- OKK 6 (Lidl store) -- questions why Tescos have been given site allocation but Lidl has not.
- Questions plans for new hospitals, police stations and fire stations
- Lack of transport infrastructure to support the development, given the BLE is at risk.
- Not helping the climate emergency - Carbon emissions from construction industry, the building materials used, high-rises, based on demolition rather than retrofitting existing buildings and encroachment of buildings onto green spaces such as Burgess Park.
- 13,000/20,000 homes unaffordable – 80% of market rate is not affordable and should be through the Community Land Trust so one generation does not benefit all
- Affordable rent should be capped at London Living Rent
- Careful planning needed for co-location to ensure people can live healthy and without significant noise.
- 10% affordable is not enough – many current jobs will be lost especially representing UK Minority Ethnic communities.
- Highlights diversity in faith, ethnic groups must not be lost.
- Car-free is good but there is still a needed for trades and service vehicles
- Disagrees with tall buildings – pollution collects, overshadow greenspaces and negative impact on the environment
- More retrofitting and retaining heritage needed
- Proposed Mandela Way Park exact location is a concern as the existing layout and accessibility may be affected.
- Closure of schools has huge effect on locality
- Ball courts and greenspaces used by young people are targeted.

### **Northfield House Tenants and Resident's Association**

Written rep received

2018

- Same as Pages Walk Conservation Residents Alliance PW representation

### **Friends of Burgess Park**

Written rep received

2016 and 2018

- Alternatives to the BLE as it will not be delivered until into the 2030s
- Policy isn't doing enough on Climate change

- Do not support the 20,00 homes – more needs to be done to deliver social housing and needs a big increase in transport and associated social infrastructure
- Would like to see a Burgess Park orbital route along Albany Road and St George's Way

<b>Southwark Law Centre</b>	
Written rep received	2018
<ul style="list-style-type: none"> <li>• AAP3 and AAP8 – no mention of sustainable construction methods or materials and concerns on the energy use of tall buildings.</li> <li>• More effort needed for the provision of social housing</li> <li>• Support VitalOKR</li> <li>• AAP14 – would be useful to create a map of current and proposed youth provision</li> </ul>	



Reoccurring themes: lack of affordable housing, greenspaces, lower building height, loss of socio-economic and ethnic diversity, transport issues.



## **Appendix E:** Consultation Event Summary

Old Kent Road Area Action Plan: Consultation Report

October 2024

Dates	Event
11 March 2021	OKR Business Roundtable meeting (Summary below)
18 March 2021	OKR Residents/Communities Roundtable (Summary below)
	Walworth Society Meeting (Summary below)
23 March 2021	OKR Developers and Landowners Roundtable meeting
13 April 2021	OKR Youth Roundtable meeting (Summary below)
22 April 2021	Retail Roundtable
27 April 2021	Tenants Resident Association Roundtable
	Ledbury Resident Project Group (RPG)

<b>OKR Business Roundtable meeting</b>			
Date	11 March 2021		
Location	Zoom	Number of attendees	18
<ul style="list-style-type: none"> <li>• It was raised that there is not enough engagement with businesses</li> <li>• Questions about what has happened to the OKR Business Network</li> <li>• Queries on how no net loss of industrial could be achieved</li> <li>• There is concern that the design of light industrial is more about ticking boxes than good design</li> <li>• It was felt that no net loss is not achievable with the types of small spaces that have been proposed in mixed use, servicing ramps, big service lifts etc. the type isn't the same</li> <li>• Concerns over the credibility of the industrial land uses</li> <li>• Concerns over bed and shed concept</li> <li>• The plan looks like 100% site coverage so there is no servicing or yard space</li> <li>• Concerns raised about living above dirty industrial uses e.g. metal working wouldn't work with residential uses</li> <li>• There is a need to think about operational servicing hour</li> <li>• Respondent suggested using specialist architects with experience on sheds and beds working in a positive and true concept of genuine industrial uses and no amenity issues with residents above</li> <li>• Another respondent suggested finding examples that already work and use as a precedent</li> <li>• Concerns over business relocation and that uses in the plan do not accommodate warehousing businesses like Safestore</li> <li>• Questions raised about affordable workspace and how this works for light industrial</li> <li>• Questions over whether any work has been done to look at number of jobs in business space – not short term employment – when businesses get bigger they move to Kent, Essex, Dartford</li> <li>• James Glancy runs affordable workspace at discount market rents</li> <li>• Space Studios is affordable by nature – it is not subsidized</li> <li>• There should be accreditations and jobs for young people</li> </ul>			

- Only 19% of young people with autism are employed full time – they are able and this figure should be higher and there should be opportunities for training and access to employment

### OKR Residents/Communities Roundtable

Date	18 March 2021
------	---------------

Location	Zoom	Number of attendees	8
----------	------	---------------------	---

- Questions over why the number of homes in the London Plan (12,000) was increased (given constraints of sites that would not be deliverable).
- Whilst changes have been made to the part about exceptional design and part of the skyline, new tiers irrelevant.
- Bakerloo Line Extension was raised
- Concerns over the child play space being on podiums
- It was felt that consultation was a waste of time
- Issues were raised specific to the Southernwood Retail Park planning application
- It was felt that there is no point amending the tall buildings policies when towers of over 48 storeys have already been approved
- Opaque screen being imposed because of how close development are, frosted because of proximity - not good floor lighting and mental health.
- Issues were raised about the Elephant
- It was felt that the Council is demolishing more council homes
- Question over whether there is more specific criteria which needs to be met for exceptional design
- Concerns raised over mental health of residents, particularly families
- Questions over what affordable housing is and how much it costs
- Request for an understandable note on affordable housing produced in coordination with residents so that it is clear
- Where are the 348 affordable units under construction and how does that respond to the need?
- Issues raised over the affordability for families – they cannot afford to buy
- 3 beds and 3 bath homes are for young professionals not families
- Concerns over the marketing documents going up as no one is moving in and residents do not want it.
- Concern over social rented homes being delivered in phase 2 of developments (specific reference to Southernwood) – concern over the involvement of DRP when they don't live in the borough.
- Concern over the youth and the possibility that they will not be able to stay in the area.
- Concern over the developers for Ruby Triangle acquiring planning permission on one of the largest sites but they don't have any background/credibility.
- It was noted that public engagement was better through these discussions.
- Concerns over the fact that the AAP is not adopted policy but a large amount of applications are being approved with big question marks.
- It is suggested that the BLE situation and post-covid that the Council put a temporary prohibition on planning applications coming forward.
- It is felt that the Opportunity Area policy promoted by the GLA is not good.

- Issues raised about the infrastructure to support all of the development
- Thoughts around the social value of the development
- Questions around where the s106 money is being spent
- Question about what is happening with Council owned land – it is felt that council homes should be built on Council land.
- Concerns over the amenity disappearing
- The use of language used is raised which makes things harder to understand and is not so transparent.
- There is concern over communities not being able to stay in the area (particularly BAME)
- Question raised over how the plan was prepared without a strategic needs assessment and how it was addressed without those specific needs
- It is felt that due diligence in regards to agents and developers must be done – it is felt they do not have the credentials.
- There is questions raised over the use of high rise buildings, why and how they are needed and how they can be family friendly.
- It is felt that high rise are expensive and more discussion needs to be had about their necessity.
- There is a suggestion that people be notified about the AAP though their council tax as everyone has to pay a council tax bill – missed opportunity to publicise the consultation.
- It was felt that the timing of the meeting was not right as it is during working hours.
- It was felt that the consultation process leaves out residents.
- Suggestion to advertise and publicise consultation events through the Tustin TRA and Ledbury newsletter.
- The GLA report on tall buildings was raised.
- There is concern that many residents don't know about the consultation and that the Council is not pro-actively engaging with new members.

### Walworth Society Meeting

Date	18 March 2021		
Location	Zoom	Number of attendees	Unknown
<ul style="list-style-type: none"> <li>• Issues raised over the Bricklayer's Arms Flyover - severance of the road, traffic too high, goes from two lanes to 7/8 lanes.</li> <li>• Questions over when local people will start to get the benefits from TFL investment on the OKR.</li> <li>• Northern town centre – would like to see the Walworth Road section up to East Street have more of a high street feel.</li> <li>• Fantastic to hear about the plans works in 3rd sector building in Walworth.</li> <li>• Concern over how Low Traffic Neighbourhoods impact on businesses as it is difficult to access premises and there needs to be services for disabled people and essential services need to be supported.</li> <li>• Concerns raised over where the lorries and coaches go from Dover when development happens – will they go to Camberwell Green?</li> <li>• Suggestion to have the pub signs from the Kentish Drivers reinstated along the length of OKR as navigational aids and to help with historic identity.</li> </ul>			



- Concern over the Climate Emergency policy – reuse of existing buildings.
- Positive reactions to funds for restoring valuing elements and giving sense of pride to small scale shops.
- Questions raised over how the new high street will be delivered when it is such a change from the large retail sheds of the 1990s and very car focused.
- Would like to see heritage put into something physical.

### OKR Youth Roundtable meeting

Date	13 April 2021		
Location	Zoom	Number of attendees	Unknown

- Participants raised the concern that OKR231 will not solve all issues that young people are facing at this moment in time.
- Issue raised about how to avoid gentrification with the new regeneration.
- Issue raised about avoiding increases to the cost of housing.
- Peckham regeneration raised
- There needs to be affordable spaces for young people
- Better transport links (while lowering pollution) – increase in bikes
- Architect proposals should be from young people's views, points and opinions
- Not many young people talk to the Council.
- More resources should be given out for the youth to get involved.
- Some things need to be kept for the people to still recognise the area (be able to reminisce)/ somewhere that is familiar to home.
- Allow for somewhere so that once students finish schools they can get jobs or work experience somewhere (internships).
- There needs to be a space that brings youths together allowing them to have more resources (social infrastructure)
- There needs to be somewhere to distress (because of housing, schools, lifestyle)
- It is important to use young people's opinions and make them more aware
- Sports can make benefits and skills that can be transferred into real life
- 73% cut in youth services means a lack of opportunities.
- How to draw in/interact with young people?
  - Go to where the young crowd and entice them through bright and educated conversations.
  - Council can link in with young organisations to communicate ideas.
  - Council needs to approach young people - easing the pressure between their relationships (can't expect young people to talk council).
  - Establish the next step in order to communicate efficiently with young people.
  - Pay young people to consult and get involved (Increased incentives).
- Waiting list of housing for young people
  - Council is committed to build more council homes along OKR - aims to reduce the cost of social housing so it's more affordable for young people to maintain.
  - The Current Draft Housing Allocation Scheme for consultation has failed in its equalities assessments impact especially those young people on the council waiting list (adult comment)

- Consider Mental Health of young people in council housing - due to bad conditions (Organisation comment)
- Question about race in call - majority attendees were people of colour, is it because white people are in a safer position with council? (adult comment)
- Young White people are not included in statistics + Housing should be  $\frac{3}{4}$  bedrooms not  $\frac{2}{3}$  bedrooms (Organisation comment).



## **Appendix F:** Roundtable Meeting Agendas

Old Kent Road Area Action Plan: Consultation Report

October 2024

<b>Old Kent Road Business Roundtable meeting 11.3.21</b>
--

**Location: Zoom**

**Date: 11<sup>th</sup> March 2021**

**Time: 11:00 – 12:30**

<b>Attendees</b>
------------------

**Representative / organisation:**

- DPD
- P Wilkinson Containers
- Tetrattech
- Event Concept
- FE Burman
- James Glancy Design
- Leathams
- Southwark Studios
- Space Studios
- Safestore
- Veolia
- Gadmon Industries
- Kaymet
- Martin Tiffin
- Capital Industrial
  
- Cllr Johnson Situ - LBS
- Colin Wilson – LBS
- Liz Awoyemi – LBS
- Alicia Chaumard – LBS

Item	Agenda
1	Introduction to revised December 2020 AAP - Cllr Situ
2.	Suggested topics for discussion. <ul style="list-style-type: none"> <li>• The overall approach of the plan, mixed residential and industrial/commercial. Stacked industrial/distribution.</li> <li>• Phasing and disruption during development. Business relocation strategies.</li> <li>• Practical issues, Servicing and car parking for staff and customers.</li> <li>• Fit with residential use, impact on residents/impact on business uses.</li> <li>• Design of work space and fitness for purpose.</li> </ul>

	<ul style="list-style-type: none"><li>• Affordable workspace. Securing its delivery.</li><li>• Training and apprenticeships. Relationships to schools, FE Colleges, universities.</li></ul>
--	---

<b>Old Kent Road Developers Roundtable meeting</b>
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**Date: Tuesday 23<sup>rd</sup> March 2021**

**Time: 11:00 – 12:30 (1hr 30mins)**

**Location: Zoom**

**Topic: OKR Developers/Landowners Roundtable**

**Time: Mar 23, 2021 11:00 AM Universal Time UTC**

**Join Zoom Meeting**

<https://us02web.zoom.us/j/88939091658?pwd=VUtyaXdZc0Q0T1JNaDFwT3k2SG9Odz09>

**Meeting ID: 889 3909 1658**

**Passcode: 231878**

Attendees
-----------

**Representative / organisation:**

- Aviva Galliard
- PPR Estates
- 2020 Capital
- The Vesta Group
- Tribe Student Housing
- Berkeley homes
- CHA limited – Civic & Livesey
- Avanton – Ruby Triangle.
- London Square
- HollyBrook
- MaccreanorLavington
- Chris Horn Associates
- DPD
  
- Cllr Johnson Situ - LBS
- Tim Cutts– LBS
- Liz Awoyemi – LBS
- Alicia Chaumard – LBS

Item	Agenda
1	Introduction to revised December 2020 AAP - Cllr Situ
2.	Presentation on OKR update – Where are we?
3.	Suggested topics for discussion:

	<ul style="list-style-type: none"><li>• Housing delivery</li><li>• Phasing and Bakerloo Line extension update</li><li>• Climate change and associated issues, embodied energy as well as operational</li><li>• SELCHLP and Carbon Offset Charges</li><li>• Changes to the NSP Policy</li><li>• Training and apprenticeships</li><li>• Community involvement/ consultation</li></ul>
--	---



## **Appendix G:**

Publication for start of consultation on the Council website

Old Kent Road Area Action Plan: Consultation Report

October 2024




[Accessibility](#)
[My account](#)
[Services](#)
[Search](#)

[Home](#) > [Planning and building control](#) > [Planning policy and guidance](#) > [Development guidance](#) > [Area action plans](#) > [Draft Old Kent Road AAP](#)

## Planning

Use our easy tool to [find out if you need planning permission](#) and our [fast track application service](#) to get a quick decision on your householder application.

## Current and previous versions of OKR AAP

This section gives an account of the policies in Old Kent Road AAP evolving through extensive public consultations and engagement, starting from Preferred Option Old Kent Road AAP in June 2016 to the latest December 2020 consultation draft of the Area Action Plan.

[Find further details on how we've consulted for the AAP since 2015.](#)

[Visit the Old Kent Road dedicated website](#)

### Important

#### Old Kent Road Area Action Plan: December 2020 draft

[Old Kent Road Area Action Plan: December 2020 draft](#) (PDF, 62.5mb)

Consultation on the December 2020 draft of the Old Kent Road Area Action Plan has now closed. The consultation commenced on 11 January 2021 and closed on 10 May 2021.

We also consulted on five new conservation areas in the Old Kent Road Opportunity Area, which closed on 10 May 2021. For more information and to comment on the proposals, visit the pages below:

1. Kentish Drovers and Bird in Bush Conservation Area
2. Mission Conservation Area
3. Thomas A'Becket and High Street Conservation Area
4. Livesey Conservation Area
5. Yates Estate and Victory Conservation Area

#### Next Steps

We will now carefully consider and analyse all the feedback received. Once we have reviewed all representations, these will be made publically available with our responses.

We will then begin to make any required amendments to the plan. We will wait for the final report from the Inspector's on the New Southwark Plan and make any changes to the AAP which may be necessary to bring it in conformity with the NSP. This is likely to be in November 2021. The APP will then be published and consulted on as the proposed submission version. Following the proposed submission version consultation, we'll submit the plan to the Secretary of State for public examination.

Find information on the [Old Kent Road Forums](#).

Help bring the Bakerloo line to south east London. [Sign up to show your support](#) and make it happen!

**Part 2**  
[Old Kent Road Area Action Plan: December 2020 draft](#)

Page last updated: 05 April 2023

## In this article

**Part 1**  
[Current and previous versions of OKR AAP](#)

**Part 2**  
[Old Kent Road Area Action Plan: December 2020 draft](#)

**Part 3**  
[Old Kent Road Planning and Regeneration update \(2019\)](#)

**Part 4**  
[Agreement with the GLA on the Phased Release of Strategic Industrial Land \(2018\)](#)

**Part 5**  
[Old Kent Road AAP/OAPF \(Further preferred option version 2017\)](#)

**Part 6**  
[Old Kent Road AAP: New and amended policies preferred option \(June 2017\)](#)

**Part 7**  
[Draft Old Kent Road AAP \(June 2016 preferred option\)](#)

## Contact us

### Planning policy

Contact Planning policy

**Address**  
5th Floor Hub 2  
Southwark Council  
PO Box 64529  
London  
SE1P 5LX

**Email**  
[planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk)

**Telephone**  
[020 7525 5471](tel:02075255471)

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## **Appendix H:**

Notification emails for start and extension of consultation

Old Kent Road Area Action Plan: Consultation Report

October 2024

From:Southwark Council <Southwark-Council@public.govdelivery.com>Subject:Consultations Open - Old Kent Road, Conservation Areas and Heritage

**Southwark Council is currently consulting on the following planning and heritage documents for your information and comment:**

1. **Old Kent Road Area Action Plan: December 2020 draft**
2. **Old Kent Road 5x new Conservation Areas**
3. **Heritage SPD**

### **Old Kent Road Area Action Plan**

Download the plan [here](#).

Have your say by submitting comments on the [Consultation Hub](#) or emailing [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk) by 5 April 2021.

We are arranging a series of virtual round table consultation events about the plan. If you would like to attend a session, please email [OldKentRoad@southwark.gov.uk](mailto:OldKentRoad@southwark.gov.uk) to register your interest. If you are a member of a residents, business or interest group and would like us to attend your meeting to discuss the AAP please also email us to arrange this.

3 March (Youth event for ages 13-25) 5pm-7pm

11 March (Businesses) 11.30am-12.30pm

18 March (Faith groups) time tbc

18 March (Residents groups) 3pm-4.30pm

Other sessions to be confirmed, please email to register your interest.

### **Old Kent Road Conservation Areas**

We are also consulting on five new conservation areas in the Old Kent Road Opportunity Area. For more information and to comment on the proposals by **30 April 2021**, please visit the pages below:

1. [Kentish Drovers and Bird in Bush Conservation Area](#)
2. [Mission Conservation Area](#)
3. [Thomas A'Becket and High Street Conservation Area](#)
4. [Livesey Conservation Area](#)
5. [Yates Estate and Victory Conservation Area](#)

If you are part of a local group and would like to discuss the proposals for new conservation areas, a virtual meeting can be arranged by appointment by emailing: [designconservation@southwark.gov.uk](mailto:designconservation@southwark.gov.uk)

### Heritage Supplementary Planning Document

The plan can be viewed [here](#).

Have your say by submitting comments on the [Consultation Hub](#) or emailing [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk) by **5 April 2021**.

Southwark Council

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[Unsubscribe](#) from any further emails from Southwark Council.  
You may also choose to [modify your subscriber preferences](#).

[www.southwark.gov.uk](http://www.southwark.gov.uk)

From: Southwark Council <Southwark-Council@public.govdelivery.com>  
Subject: Extension of Consultation on Old Kent Road Area Action Plan, Heritage SPD and Old Kent Road Conservation Areas

**Southwark Council is currently consulting on the following planning and heritage documents:**

- 1. Old Kent Road Area Action Plan: December 2020 draft**
- 2. Old Kent Road 5x new Conservation Area**
- 3. Heritage SPD**

This deadline for comments for these consultations has now been extended to 10<sup>th</sup> May 2021.

**Old Kent Road Area Action Plan**

Download the plan [here](#).

Have your say by submitting comments on the [Consultation Hub](#) or emailing [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk)

**Old Kent Road Conservation Areas**

We are also consulting on five new conservation areas in the Old Kent Road Opportunity Area. For more information and to comment on the proposals, please visit the pages below:

- [1. Kentish Drovers and Bird in Bush Conservation Area](#)
- [2. Mission Conservation Area](#)
- [3. Thomas A'Becket and High Street Conservation Area](#)
- [4. Livesey Conservation Area](#)
- [5. Yates Estate and Victory Conservation Area](#)

**Heritage Supplementary Planning Document**

The plan can be viewed [here](#).

Have your say by submitting comments on the [Consultation Hub](#) or emailing [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk).

Southwark Council

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You may also choose to [modify your subscriber preferences](#).

[www.southwark.gov.uk](http://www.southwark.gov.uk)



## **Appendix I:**

Press notice

Old Kent Road Area Action Plan: Consultation Report

October 2024

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)  
THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

**NOTICE OF CONSULTATION FOR:**

**OLD KENT ROAD AREA ACTION PLAN  
AND  
HERITAGE SUPPLEMENTARY PLANNING DOCUMENT**

Southwark Council is consulting on the draft Old Kent Road Area Action Plan December 2020 and Heritage Supplementary Planning Document from 11th January 2021 to 5th April 2021.

**OLD KENT ROAD AREA ACTION PLAN**

The Old Kent Road AAP will guide and manage new development and growth in the area over the next 20 years. The plan aims to create a new high street environment for the Old Kent Road, with significant public transport improvements supported by mixed use development behind the road. This will incorporate around 20,000 new homes, including affordable homes, new jobs, community facilities and green spaces. The plan includes the potential for extending the Bakerloo Line from Elephant and Castle towards Lewisham with two new stations along the Old Kent Road. The plan will be used to make planning decisions in the area and to co-ordinate the deliver the regeneration strategy.

**HERITAGE SUPPLEMENTARY PLANNING DOCUMENT**

The Heritage SPD provided detailed guidance on how to apply the relevant policies of the Southwark Plan and the emerging New Southwark Plan concerning our historic environment.

The Heritage SPD also sets out further advice on how we expect development to be consistent with wider national and local legislation and policy, within which the council must operate.

It has been written to provide better understanding of heritage matters and provides clear advice on the conservation, preservation and enhancement of our historic environment. It is designed for a wide readership, including applicants, building owners, residents, planners, community groups and developers.

**How to view documents and comment:**

**Old Kent Road Area Action Plan**

- The Old Kent Road Area Action Plan and supporting documents are available on our website for review: [www.oldkentroad.org.uk/documents](http://www.oldkentroad.org.uk/documents)
- [www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/area-action-plans-section/old-kent-road-aap](http://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/area-action-plans-section/old-kent-road-aap)

**Heritage SPD**

- The Heritage SPD along with associated supporting documents are available on our website for review: <https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/supplementary-planning-documents-spd/spd-by-planning-topic>

**How to comment**

Visiting our consultation hub:  
[consultations.southwark.gov.uk](http://consultations.southwark.gov.uk)

Sending an email to:  
[planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk)

Alternatively you can post your response to:  
Planning Policy  
Southwark Council  
FREEPOST SE1919/14  
London SE1P 5LX

All comments must be received by 23:59 on Monday 5th April 2021.

**QUERIES**

For any queries or assistance, please contact:  
[planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk)  
Tel: 0207 525 54929 or 07731 325511

Register for a My Southwark account and opt-in to our planning policy email updates on your profile at <https://www.southwark.gov.uk/mvsouthwark>



Old Kent Road Area Action Plan  
Proposed Submission Version  
October 2024

**Integrated Impact Assessment**

Old Kent Road Area Action Plan 2024 appendices: Document Locator	
No.	Title
Appendix A	Old Kent Road AAP December Version 2020
Appendix B	Consultation Plan
Appendix C	Consultation Report
Appendix D	Integrated Impact Assessment
Appendix E	Habitat Regulations Assessment
Appendix F	Equalities Impact Assessment, comprising:
	- EQIA Document 01: Executive Summary
	- EQIA Document 02: Summary of the EQIA
	- EQIA Document 03: Equalities Impact Assessment
	- EQIA Document 04: Supporting Datasets
Appendix G	Health Impact Assessment



<b>CONSULTATION</b>	<b>TIMETABLE</b>
Evidence gathering and refinement of the baseline information, plans , programmes and strategies, key issues, objectives and IIA framework	<b>2015-Spring 2016</b>
Developing and refining options and assessing effects and preparing the Integrated Impact Assessment Report	<b>Spring 2016</b>
Consultation on Integrated Impact Assessment Scoping Report	<b>12 February 2016 - 18 March 2016</b>
Consultation on the draft Old Kent Road Area Action Plan Preferred Option draft AAP policies and Integrated Impact Assessment	<b>June 2016 – November 2016</b>
Consideration of responses and developing the draft Old Kent Road Area Action Plan and Integrated Impact Assessment Report	<b>Autumn 2016</b>
Consultation on the draft Old Kent Road Area Action Plan proposed new and amended AAP policies and Integrated Impact Assessment (this document)	<b>June 2017 – September 2017</b>
Consultation on AAP: Further Preferred Option	<b>December 2017 - March 2018</b>
Consultation on AAP: December 2020 Version	<b>January 2020 – April 2021</b>
Consultation on the submission version Old Kent Road Area Action Plan and Integrated Impact Assessment Report	<b>2024</b>
Submission of the draft Old Kent Road Area Action Plan Integrated Impact Assessment Report to the Planning Inspectorate	<b>2025</b>
Examination in Public	<b>2026</b>
Adoption of the Old Kent Road Area Action Plan	<b>2026</b>

### **HOW TO COMMENT ON THIS REPORT**

If you have any queries regarding this document please contact Southwark Council's planning policy team. Comments can be returned by post or email to:

Old Kent Road Planning and Sustainable Growth Team  
 Finance, Southwark Council  
 FREEPOST SE1919/14  
 London, SE1P 5LX

Tel: 020 7525 5471  
 Email: oldkentroad@southwark.gov.uk

## Contents

Section 1	Non-technical summary	Non-technical summary of the OKR AAP	Page No.
Section 2	Introduction	The introduction sets how the approach to the IIA appraisal, what the national, regional and local policies are informing the appraisal and how it will assess the sustainability impacts of the policies and masterplan proposed by the OKR AAP Masterplan.	6
Section 3	Regulatory requirements for the IIA	Explains how the Integrated Impact Assessment completes a sustainability appraisal and the appraisals of equalities impact, health, and impacts on habitat.	11
Section 4	Background	Explains why an IIA has been prepared and provides an overview of the area action plan and preparation process.	15
Section 5	Baseline Data: Summary of findings	Section 5 sets out a high-level summary of the findings from the baseline data and how this has informed the indicators for the IIA appraisal. It identifies the sustainability issues in the Old Kent Road Opportunity Area.	19
Section 6	Options-testing for: Policy evolution the plan options	Section 6 sets out the options for policies and for sub areas and site allocations and provides justification for why each of these was chosen.	37
Section 7	IIA Appraisal Methodology	Sets out the methodology used to undertake the IIA including the consultation that has been carried out.	64

Section 8	Appraisal Summary for the Strategy	The effects of the plan policies are described, including any significant positive or negative effects, cumulative impacts, proposed mitigation, uncertainties and risks for the strategy.	70
Section 9	Appraisal Summary for the Development Management Policies	The effects of the plan policies are described, including any significant positive or negative effects, cumulative impacts, proposed mitigation, uncertainties and risks for the Development Management policies.	72
Section 10	Appraisal Summary for the Sub Areas and Site Allocations	The effects of the plan policies are described, including any significant positive or negative effects, cumulative impacts, proposed mitigation, uncertainties and risks for the sub areas and site allocations.	77
Section 11	Monitoring and Implementation	The next stages in the plan preparation, implementation and future monitoring, and the links to other plans and projects are explained.	91

## Appendices

<a href="#">Appendices relevant to the background</a>	
Appendix 1	Strategic Directive Requirement
Appendix 2	Relevant Plans, Programmes and Strategies
Appendix 3	Baseline data – Facts and Figures
Appendix 4	Sustainability Appraisal Framework
<a href="#">Appendices with detailed appraisals</a>	
Appendix 5	Assessment of the Strategy and Vision
Appendix 6	Assessment of the Development Management Policies
Appendix 7	Assessment of the Sub Areas and Site Allocations
<a href="#">Appendices of indicators, monitoring and option testing</a>	
Appendix 8	Monitoring indicators against sustainability objectives
Appendix 9	Baseline Indicators Table
Appendix 10	Options Testing
Appendix 11	Scoping Report Consultation Summary and link to OKR AAP Scoping Report
Appendix 12	Reasonable alternatives considered
Appendix 13	Mental Well-being Impact Assessment Screening
Appendix 14	OKR AAP References

## **Glossary**

IIA: Integrated Impact Assessment  
AAP: Area Action Plan  
OAPF: Opportunity Area Planning Framework  
SEA: Strategic Environmental Assessment  
SA: Sustainability Appraisal  
MWIA: Mental Well-being Impact Assessment  
EqIA: Equalities Impact Assessment  
HIA: Health Impact Assessment  
HRA: Habitats Regulations Assessment  
GLA: Greater London Authority  
TFL: Transport for London  
BLE: Bakerloo Line Extension  
SCI: Statement of Community Involvement  
OA: Opportunity Area  
AMR: Annual Monitoring Report  
SUDS: Sustainable Urban Drainage Systems  
CAZ: Central Activities Zone  
NPPF: National Planning Policy Framework  
NPPG: National Planning Policy Guidance  
SPD: Supplementary Planning Document  
BLE: Bakerloo Line Extension

## Section 1. Non technical summary

### Purpose of the Area Action Plan

- 1.1 The purpose of the Old Kent Road Area Action Plan (AAP) is to set out how the best of the Old Kent Road, including its thriving businesses and arts and cultural communities, can be nurtured and developed over the next 20 years (the ‘plan period’). It is an innovative plan, with policies that will guide new development to provide urgently needed housing and jobs, while providing new opportunities and improving the lives of people who live and work there now. To achieve this, the plan proposes mixing residential and commercial uses, so that new and existing businesses like warehouses, shops, creative workspaces and offices are designed to co-exist with new homes.
- 1.2 This innovative approach is proposed because the unique conditions and character of the Old Kent Road provide an important opportunity to address the challenges faced across London when it comes to accommodating growth in homes, jobs and social infrastructure. These challenges are particularly pressing in Central London, where competition between land uses is at its most intense. By virtue of its location, connections, existing uses, evolving character and development potential, the Old Kent Road is one of the few places in central London that really can deliver innovative solutions to these challenges.
- 1.3 This has been recognised by the London Plan 2021, which identifies the Old Kent Road in two major growth areas; Central London and the Bakerloo Line Extension Growth Corridor (Figure 1). The Bakerloo Line Extension (BLE) will be a game changer for the area. It will enable substantial growth, with the number of homes rising from 14,500 to 34,500 and the number of jobs rising from 10,000 to 20,000. This will, of course, have important positive impacts London’s economy, but it will also benefit new and existing Old Kent Road businesses.

### Vision

#### The Old Kent Road Communities, The Best of Central London

**Our vision is for a family friendly Old Kent Road that retains and grows the rich diversity of its residential, business and faith communities.**

- 1.4 “This is Old Kent Road not any old road”, was a response from a local resident in a community forum that reflects the pride in its history and a strong sense of belonging. Old Kent Road will be a place where communities and families can grow and flourish. It will continue its historic role as a vital artery connecting the commerce and culture of one of the world’s great cities to Europe but in a much changed form that allows it to be the centre of the community.

- 1.5 Old Kent Road's strength as a place to live, work and do business is its inner London character and Central London location. The Bakerloo Line will drive the growth southwards providing better connections to the wider London economy and between existing communities. This will provide tangible, direct benefits to the people of Walworth, Bermondsey and Peckham including a new and improved family friendly environment with housing, youth facilities, schools, park spaces, leisure and health centres and the creation of a wide range of jobs. These physical changes will enable the communities to realise their potential. There should be no poverty of ambition or opportunity in Old Kent Road for any age group.
- 1.6 The importance of local town centres as an essential centre of activity for local communities providing services and opportunities for social interaction has been brought home by the recent Covid crisis. Our plan is to promote Old Kent Road in which shops, jobs, schools and parks are all within a short (15 minute) walk of people's homes. We will revitalise the Old Kent Road as a high street, retaining its diversity and re-providing the range of shops and leisure uses, including the food shopping and the larger stores which are currently very well used. Segregated cycle lanes, additional trees, wider footways and better crossings will change the character of the Old Kent Road itself and make it feel much safer and more attractive for people cycling and walking. Behind the high street we want to develop significant local economy, not just by accommodating a narrow professional office sector, but by supporting and encouraging a wide range of skills and job types including the wide variety of businesses that serve the local area as well as central London. To achieve this, our plan promotes the innovative mixing of residential and industrious uses in a way that has not been seen before in London. Done with care, we believe that this can deliver a special place that is desirable to live and work and ensures business continuity.
- 1.7 Old Kent Road has the highest proportion of children and young people in the borough and is likely to experience the largest increase to 2036. We have been talking to and working with young people to provide new youth facilities at 231 Old Kent Road which are funded by developer contributions. We are looking to expand and develop that offer to meet the growing need.
- 1.8 We want to build new homes, a minimum of 35% of which will be affordable with 25% being at council rents. And while they should come in a range of types, from terraced houses to apartment buildings, they should all be designed to a high standard. The provision of larger family sized flats, generous room sizes, high ceilings and large windows will make sure that people have enough "head room" and space to think and to rest.
- 1.9 Our plan proposes to link together the area's existing open spaces, including Burgess Park to Canada Water, with new park spaces to provide a green route (Figure 3 of the OKR AAP) which will accommodate nature and biodiversity, while providing

opportunities for play, sport, food growing, and simply sitting down to take a break. We want to create an environment that delights all the senses.

- 1.10 The OKR AAP will contribute towards addressing the climate emergency and achieving the council's goal of net zero carbon. Development in the area will be car free and the promotion of walking and cycling as well as electric buses, taxis and commercial vehicles will help to tackle air and noise pollution. We are developing a District Heat Network linking new developments to the South East London Combined Heat and Power plant, which will deliver both significant savings in CO2 emissions and cheaper energy costs for residents. This is vital not only for health but for our collective long term futures. This is currently under construction.
- 1.11 Living at the centre of one of the world's great cities, with its enviable economic and cultural capital should be an opportunity for all and not just a privileged few. We have a responsibility working with the residents and businesses of Old Kent Road to make the most of that opportunity.

### **What is this document?**

- 1.12 This document reports on the Integrated Impact Assessment (IIA) of the Old Kent Road Area Action Plan (OKR AAP). The IIA fulfils the requirement for a Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Analysis (EQIA) and Health Impact Assessment (HIA). This integrated approach avoids the need to undertake and report on separate assessments, seeks to reduce any duplication of assessment work and benefits from a shared understanding of the policies. The EQIA, HIA and HRA have been completed in a separate document to appraise the specific issues on equalities, habitat and health. It also illustrates the council's approach to promoting sustainable growth in the borough with equality, diversity and the health of residents at the heart of everything we do.
- 1.13 The council is promoting sustainable growth in the borough with equality, diversity and the health of residents at the heart of everything we do. Integrated impact assessment helps us to achieve these aims as well as meeting legal requirements to undertake a sustainability Appraisal when preparing new plans. A Strategic Environmental Assessment (SEA) is required to meet European Legislation. The council is also required to consider the impact of new plans on equalities and health of residents in the borough which involves considering groups with protected characteristic as defined by the Equalities Act. This document incorporates the sustainability appraisal, SEA and equalities and health impacts in one document called the Integrated Impact Assessment. The IIA is an ongoing process and will be reviewed and monitored as the AAP progresses.

### **Why is this document required?**

- 1.14 During the preparation of local plans, the council is required by UK law to assess the sustainability impacts of its planning policies through a sustainability appraisal (SA). By testing each plan policy against sustainability objectives, the SA process assesses and reports the likely significant effects on the plan policies and the opportunities for improving social, environmental and economic conditions by implementing the plan.
- 1.15 The council is also required by UK Law to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics, as set out in the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act 2010). The council carries out Equalities Analysis (EqIA) of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals in the Equality Act 2010 and on Human Rights that replaces all previous equality legislation into one overarching act.
- 1.16 Health Impact Assessment (HIA) is a combination of procedures, methods and tools by which a policy, program or project may be judged as to its potential effects on the health of a population, and the distribution of these effects within the population. In this context health can be defined as both physical and mental health and well-being. HIA also considers the potential effects on the determinants of health such as life circumstances and lifestyles. HIA is still a relatively new concept and as yet there is no one standard method for conducting HIAs.
- 1.17 The IIA will consider if there are any unintended consequences for people within the equalities and health groups and if the policies will be fully effective for all target groups and will - will enable a considered and holistic approach to assessing the proposed policies in the AAP/OAPF in an integrated way.
- 1.18 Crucially, assessing policies from these different perspectives - that is 1) a sustainability perspective (including environmental, social and economic sustainability), 2) an equalities perspective and 3) a health perspective - will enable a considered and holistic approach to assessing the proposed policies in the AAP/OAPF in an integrated way.

### **Why do we need an AAP for OKR?**

- 1.19 The purpose of the Old Kent Road Area Action Plan (AAP) is to set out how the best of the Old Kent Road, including its thriving businesses and arts and cultural communities, can be nurtured and developed over the next 20 years (the 'plan period'). It is an innovative plan, with policies that will guide new development to provide urgently needed housing and jobs, whilst providing new opportunities and improving the lives of people who live and work there now. To achieve this, the plan proposes mixing residential and commercial uses, so that new and existing



businesses like warehouses, shops, creative workspaces and offices are designed to co-exist with new homes.

- 1.20 This innovative approach is proposed because the unique conditions and character of the Old Kent Road provide an important opportunity to address the challenges faced across London when it comes to accommodating growth in homes, jobs and social infrastructure. These challenges are particularly pressing in Central London, where competition between land uses is at its most intense. By virtue of its location, connections, existing uses, evolving character and development potential, the Old Kent Road is one of the few places in central London that really can deliver innovative solutions to these challenges.

## Section 2. Introduction

### What does this document do?

- 2.0 The IIA identifies the impacts of the AAP policies on sustainability objectives, health of the population and equality groups. The process has consisted of a collection of baseline information on the environmental, social and economic characteristics of the Old Kent Road (scoping). This has been used to identify sustainability issues, objectives and indicators used to assess the likely impacts of the policies of the AAP and to enable monitoring of the process in the future. The IIA considers the likely impact of two different options for growth in the area, low, medium and high growth based on the evolution of evidence base documents and discussions with the local community. The IIA considers the likely impact of three different options for growth and considers Option B- high growth to be the most appropriate option. The IIA then assesses the policies for development and the character areas containing site allocations in the AAP against the sustainability objectives and identifies any areas which would need to be mitigated or monitored in the plan process.
- 2.1 This further preferred option has been prepared in response to the previous consultations. This consultation is to ensure that all residents and visitors have an opportunity to comment on all policies before the formal 'proposed submission' stage.
- 2.2 The methodology for selecting these IIA Objectives, appraising Proposed changes to the Old Kent Road Area Action Plan policies, sub areas and site allocations and future monitoring of the OKR AAP are established in the subsequent section of the report. Each of the IIA Objectives is monitored by a number of Baseline Indicators, which are established in **Appendix 3: Baseline data – Facts and Figures**. This uses existing data monitored by the council, to regularly indicate sustainability outcomes from the implementation of the OKR AAP. The Baseline Indicators to continuously monitor the adoption of the OKR AAP are presented in table format in Appendix 9: Baseline Indicators Table.
- 2.3 The role of this document is to explain the process that the council has undertaken to establish these IIA Objectives, which are legally compliant with European, national and regional legislation. Secondly, to appraise the OKR AAP policies, sub areas and site allocations using these IIA Objectives and Baseline Indicators, which can be found in **Appendix 5: Assessment of the Strategy, Vision and Plan Objectives, Appendix 6: Assessment of the Strategic and Development Management Policies** and **Appendix 7: Assessment of the Sub Areas and Site Allocation Policies**. Thirdly, this document indicates how the council proposes to continue to monitor the consequences of implementing the draft Old Kent Road Area Action Plan (Option B: High growth scenario with two stations under BLE over Option A: Business-as-usual without the BLE) in Appendix 9: Baseline Indicators Table. As such, it presents a case that the draft OKR AAP is legally compliant with all relevant legislation, plans and programmes, as established in **Appendix 2: Relevant Plans, Programmes and Strategies**.
- 2.4 The Council has previously completed a thorough IIA for the OKR AAP in 2017 and 2020. This IIA has been further updated to reflect the changes in the OKR AAP arising from consultation comments, Council Objectives, Local Need and iterations in the Old Kent Road Masterplan.

- 2.5 The established appraisal framework for undertaking the IIA sets out sustainability, health and equality objectives, referred to as IIA Objectives (IIAO), with associated supporting indicators, known as Baseline Indicators, which are used to measure the impacts of the emerging OKR AAP. These objectives inform the criteria for assessment of policies, sub areas and site allocations (appraised in **Appendix 5, 6 and 7**) with relevant questions that identify any risks or negative consequences of implementing a policy/area vision or site allocation (questions and targets using baseline indicators can be found in **Appendix 4: Sustainability Appraisal Framework**). The sustainability appraisal of the OKR AAP, provides the opportunity for the Council to respond to any potential negative impact of a policy by amending or mitigating through future monitoring of the plan.
- 2.6 The conclusions reached in undertaking the IIA are a result of both quantitative and qualitative (i.e. subjective and based on professional opinion) judgements made by predicting the outcome of a potentially complex mix of social, economic and environmental factors. It is important to recognise where baseline indicators and IIAO's overlap to inform any outcome in the final appraisal. The overlap of IIAO and Baseline Indicators are visually represented in a matrix in Appendix 8, which help to inform the appraisals (**Appendix 5, 6 and 7**).
- 2.7 As part of the IIA, the final submission policies, site allocations and sub areas are assessed against seventeen sustainability, health and equalities objectives initially set out by the Southwark Plan 2022. The seventeen objectives are subsequently referred to in this report as IIA Objectives, numbered from one to seventeen, and answer the combined sustainability, health and equalities questions set out in **Appendix 4: Sustainability Appraisal Framework**.

### **What has been taken from the previous IIA?**

- 2.8 Having undertaken a detailed IIA through previous draft Local Plan consultations, it is considered that the six strategic policies (or topic areas) were positively represented through the seventeen IIAOs, and will continue to reflect this in the future monitoring of Baseline Indicators (**Appendix 4**). It is considered that these are applicable to the Old Kent Road Area Action Plan and have been used in this IIA appraisal. Additional Baseline Indicators have been added that reflect the local need, character and demographic of the Old Kent Road.
- 2.9 Through further iterations of policy through further rounds of consultation, this approach will be reviewed and the IIA updated.
- 2.10 Key positive impacts are identified in terms of social, economic and environmental sustainability in the summary of appraisals provided in this report. Some risks have been identified but these are generally mitigated by other policies in the plan.

### **Structure of this Document**

- 2.11 This document will firstly outline the policy requirements for the IIA in the following chapter, with more detailed information provided in **Appendix 1 and Appendix 2**. Secondly, it will provide a background into the IIA and the OKRAAP, summarizing how the IIA developed through earlier consultations and how these have informed the iterations to the OKR AAP. Thirdly, it will provide a brief overview to the approach taken

to collecting baseline data and subsequently forming baseline indicators that will be used to monitor the future impacts of adopting the OKR AAP. The entirety of baseline data, including baseline indicators and contextual characteristics are included in **Appendix 3**.

- 2.12 Section four provides detailed overview into the IIA appraisal methodology, describing the conjunction of baseline indicators and IIAOs, used to appraise the OKR AAP policies, area visions and site allocations. The formation of the IIAOs, to inform sustainability, health and equalities targets are provided in **Appendix 4**. This appendix describes how the IIAOs were selected based on the requirements of regulation described in **Chapter 2**, to justify legal compliance of the proposed Local Plan to meeting sustainability, health and equality targets. It also indicates the targets of the Council's baseline indicators which are continuously being monitored across different teams at the Council, and how these baseline indicators align with the objectives, to support the negative and/or positive impacts of future adoption of the draft Local Plan.
- 2.13 Section five identifies the process of identifying options within **Appendix 10**, for the OKR AAP, summarizing the OKR AAP Scoping Report that was submitted and consulted upon in 2015.
- 2.14 This is included in full in **Appendix 11** and justifies why the selection of Option C: High growth is identified as more supportive to the health, sustainability and equality objectives than Option A: Business-as-usual or by selecting Option B: Medium growth. Further information on the Council's considerations of reasonable alternatives for planning for growth and the site allocation capacities which informed the final indicative site capacity assumptions are set out within **Appendix 12**.
- 2.15 Section six sets out how the seventeen objectives were developed that formed the basis of the IIA appraisal methodology and assessment; and further details on how the IIA appraisal was carried out. This sets out the policy options and policy evolution of the OKRAAP.
- 2.16 Section seven sets out what the IIA framework is and how it is compiled.
- 2.17 Section eight summarizes the full Sustainability Appraisal of the OKRAAP policies, found in detail in **Appendix 5, 6 and 7**, and identifies any mitigation or negative impacts that could arise based on the objectives as a result of adopting policies from the draft Area Action Plan. This chapter is a summary and overview as to whether the policies are positively prepared to support the sustainability, health and equality objectives of the regulatory bodies in adopting the draft Area Action Plan. Section eight also summarizes the appraisals from **Appendix 5** of the sustainability of the Strategy, Vision and Plan Objectives.
- 2.18 Section nine summarizes the appraisals from **Appendix 6** of the sustainability of the policies of the OKRAAP.
- 2.19 Section ten summarizes the appraisals from **Appendix 7** of the sustainability of the Sub Area and Sites. Section eight further summarizes the approach to the sequential test (and exception test if required).
- 2.20 Finally, the section 11 chapter sets out how the impacts of the OKR AAP on sustainability, health and equality will be monitored based on continued feedback from

the Baseline Indicators. This is included in further detail in **Appendix 8** and **Appendix 9**.

### **Section 3. Regulatory requirements for the IIA**

### **Why is this document required?**

3.1 Under the Planning and Compulsory Purchase Act 2004 regulations, a Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA), prepared in accordance with the Strategic Environmental Assessment Directive EC/2001/42 is required for all Development Plan Documents.

3.2 Paragraph 32 of the NPPF (2023) states:

3.3 “Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)”.

3.4 Southwark Council has a statutory duty to consider the equality impacts of its decisions. The public sector Equalities Duty (section 149 of the Equality Act 2010) came into force on the 5<sup>th</sup> April 2011 which extended the previous duties to cover the following protected characteristics:

3.5 “Age, disability, gender reassignment, pregnancy and maternity, race – including ethnic or national origins, colour or nationality, religion or belief – including lack of belief, sex and sexual orientation”.

3.6 While there is no statutory requirement to undertake a Health Impact Assessment (HIA), the government has clearly expressed a commitment to promoting HIA’s at a policy level in a variety of policy documents and they are increasingly being seen as best practice.

### **The move towards Integrated Impact Assessment**

3.7 The council is also required by UK law to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics, as set out in the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act 2010). The council carries out Equalities Analysis (EqIA) of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals on the key ‘protected characteristics’ in the Equality Act 2010 and on Human Rights.

3.8 The Equality Act was introduced in October 2010. It replaces and extends all previous equality legislation into one overarching act. The Equality Act 2010 outlines a number of ‘protected characteristics’, which are the groups of people or communities where the government feels that discrimination or unfair treatment could arise.

3.9 An Equalities Impact Assessment (EQIA) has been conducted in addition to the equalities considerations made in the Integrated Impact Assessment (IIA) to form the equality analysis.

- 3.10 The equalities impact of the OKR AAP has and will continue to be assessed at every stage of the plan. The document assesses the Plan against the protected characteristics highlighting where there is a positive impact, negative impact or neutral impact. Each strategic policy, development management policy, implementation policy and area vision has been assessed for its equalities impact. A summary is also provided of the key equalities issues and positive and negative impacts of the Strategic and Implementation Policies. It also sets out the mitigation where appropriate.
- 3.11 The IIA sets out the baseline data and indicators that have informed the assessment of the equalities impacts of the policies in the OKR AAP. The EQIA pulls out further data more specifically related to the protected characteristics and socio-economic disadvantage. Appendix 1 - Supporting Datasets of the EQIA has also highlighted where the data is unavailable for more specific datasets.
- 3.12 The outcome of this assessment of equalities sits alongside the HRA, HIA, and SA to create a comprehensive sustainability assessment.
- 3.13 The IIA considers if there are any unintended consequences for people within the equalities and health groups and if the policies will be fully effective for all target groups. Crucially, assessing policies from these different perspectives - that is 1) a sustainability perspective (including environmental, social and economic sustainability), 2) an equalities perspective and 3) a health perspective - enables a considered and holistic approach to assessing the policies in the OKR AAP in an integrated way.
- 3.14 There are overlaps in the methods and outputs of the above documents and therefore an approach which fuses the statutory requirements of the SA, SEA, EqIA and HIA into a single integrated impact assessment is used to assess the impact of the draft OKR AAP in an integrated way.

### **Strategic Environmental Assessment Directive**

- 3.15 SAs are also required to satisfy the European Directive 2001/42/EC. The Directive requires a formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. SEA is transposed into UK legislation through the Environment Assessment of Plans and Programmes Regulations 2004. SEA is focused primarily on environmental effects, whereas SA goes further by examining all the sustainability related effects of plans, whether they are social, environmental or economic. The process for undertaking SA is conducted in accordance with the requirements of the SEA Directive. Appendix 1 explains what the SEA directive is and signposts where the relevant information can be found within the document.

### **Habitats Regulations Assessment**

- 3.16 The Conservation of Habitats and Species Regulations (as amended) (2010) [the Habitats Regulations] require that Habitats Regulation Assessment (HRA) is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance.

- 3.17 The objective of the HRA screening process is to determine whether likely significant effects on designated Natura 2000 sites, either alone or in combination may result from the implementation of the OKR AAP. 'Likely significant effect' in this context is any effect that may reasonably be predicted as a consequence of the plans that may affect the conservation objectives of the features for which a site was designated.
- 3.18 The HRA of the AAP/OAPF will be undertaken alongside the IIA with the findings of the HRA informing the IIA. The methods and findings of the HRA process will be reported separately from the IIA and will be sent to the statutory consultee (Natural England) and placed for consultation for the wider public.
- 3.19 The information collated in the baseline information and from consultation on the scoping report has been mapped, reviewed and assessed against the draft policies and strategies of the draft OKR AAP to determine whether there is potential for the integrity of these sites to be affected. Site integrity is defined as:
- 3.20 *“the coherence of its structure and function across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified”*
- 3.21 The HRA of the draft OKR AAP has been undertaken alongside the IIA, with the findings of the HRA informing the IIA. The methods and findings of the HRA process are reported separately from the IIA and the report has been approved by the statutory consultee (Natural England) and placed online to be accessed by the wider public.
- 3.22 The HRA screening process has found that the policies and site allocations to be adopted under the draft OKR AAP will have no negative impact on the four European Sites that are located within a 10km boundary of Southwark, either alone or when considered in combination with other existing plans and projects. In light of this finding, it is not required to carry out any further HRA analysis.

## Health Impact Assessment

- 3.23 Health Impact Assessment (HIA) is a combination of procedures, methods and tools by which a policy, program or project may be judged as to its potential effects on the health of a population, and the distribution of these effects within the population. In this context health can be defined as both physical and mental health and well-being. HIA also considers the potential effects on the determinants of health such as life circumstances and lifestyles. HIA is still a relatively new concept and as yet, there is no one standard method for conducting HIAs. However it should involve all relevant stakeholders and use a range of methods to gather data as evidence. While HIA is not required by law it is considered good practice, particularly since responsibility in managing the health of populations was transferred from national government to local authorities following the Health and Social Care Act 2012.
- 3.24 A Health and Wellbeing Impact Assessment (HIA) has been collated to identify the impacts of planning issues on health in the borough. This is centred round the assessment of the plan using four key themes:
- Housing design and affordability;
  - Accessibility and active travel;



- Healthy environment; and
- Vibrant neighbourhoods.

- 3.25 These findings are reflected in a separate report (Appendix G of the OKR AAP) and used to inform the IIA. This report is a desktop based assessment of the health impacts of the draft OKR AAP. The HIA uses the HUDU Model to identify health impacts of the policies in the draft OKR AAP. The HUDU Planning Contributions Model is a comprehensive tool to assess the health service requirements and cost impacts of new residential developments. The public health team at Southwark was also given the opportunity to comment and give guidance.
- 3.26 The key identified health impacts on the proposed submission version OKR AAP are surrounding mental health and wellbeing in regards to creating a strong sense of place, and easily navigable and legible pedestrian routes and public realm. This is especially important for the elderly, and for those with neurological conditions or disabilities as it allows for independent living and improves safety and security for all. There are also issues surrounding the prevalence of hot food takeaways and obesity, which the OKR AAP and public health initiative School Superzones aims to address.
- 3.27 The transport policies ensure greater safety and accessibility to active travel and improve the pedestrian experience to encourage more active lifestyles for all. In terms of air quality and pollution, there are also issues around the impact of poor air quality on life expectancy, health and quality of life. These are all issues the OKR AAP aims to mitigate.
- 3.28 The findings of the Health and Well-being Impact Assessment have underpinned and directly informed the production of the IIA. . The IIA in its assessment of the policies and their impact has taken into consideration the potential health impacts of the plan. The sustainability objectives also make due regard to the potential health impacts arising from the implementation of policies in the draft OKR AAP. The baseline data and indicators in the IIA provide a context for need in the borough and have informed the assessment of policies in the HIA.
- 3.29 The EQIA has also assessed the health impacts of the policies of the proposed submission version OKR AAP against the protected characteristics and socio-economic disadvantage. It has indicated what the potential positive, negative or neutral impacts will be on health, and provided a mitigation method where there is a negative impact.

## Section 4. Background

### Purpose of the Integrated Impact Assessment

- 4.1 This IIA will follow the same methodology as the IIA carried out for the first preferred option. The purpose of Sustainability Appraisal (SA) is to ensure that sustainable development has been integrated in the formulation of development plans and to verify that due consideration has been given to social, economic and environmental factors. The SA must also show how the requirements of the Strategic Environmental Assessment (SEA) Directive have been met. The National Planning Practice Guidance (NPPG) states that SEA can be undertaken as an integral part of the SA. The Integrated Impact Assessment (IIA) considers the sustainability impacts of the plan in addition to impacts on health and equalities

## Planning and Sustainable Development

- 4.2 The National Planning Policy Framework (NPPF) (2023) provides the over-arching national policy to deliver sustainable development through the planning process. There are three dimensions to sustainable development: economic, social and environmental, giving rise to the need for the planning system to perform a number of roles:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- An environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

- 4.3 The National Planning Policy Framework states that:

*“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains).” - **NPPF, para 32***

- 4.4 The NPPG sets out the key stages and tasks for the SA process and their relationship with the Local Plan process, which are illustrated in Figure 2.1. It is important to note that IIA is an iterative and on-going process. Stages and tasks in the IIA process may be

revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.

- 4.5 Following this process, this document sets out the context, other policies, plans and programmes and a summary of the baseline information from the scoping stage in Section 5. This information was used to set out the issues in Section 4. These issues form the basis for the IIA Framework in Section 7. That framework is used to assess the plan options and alternatives in Section 6 and to assess the policies in Section 8, 9 and 10. Section 11 explains the next stages in the plan preparation, implementation and future monitoring.

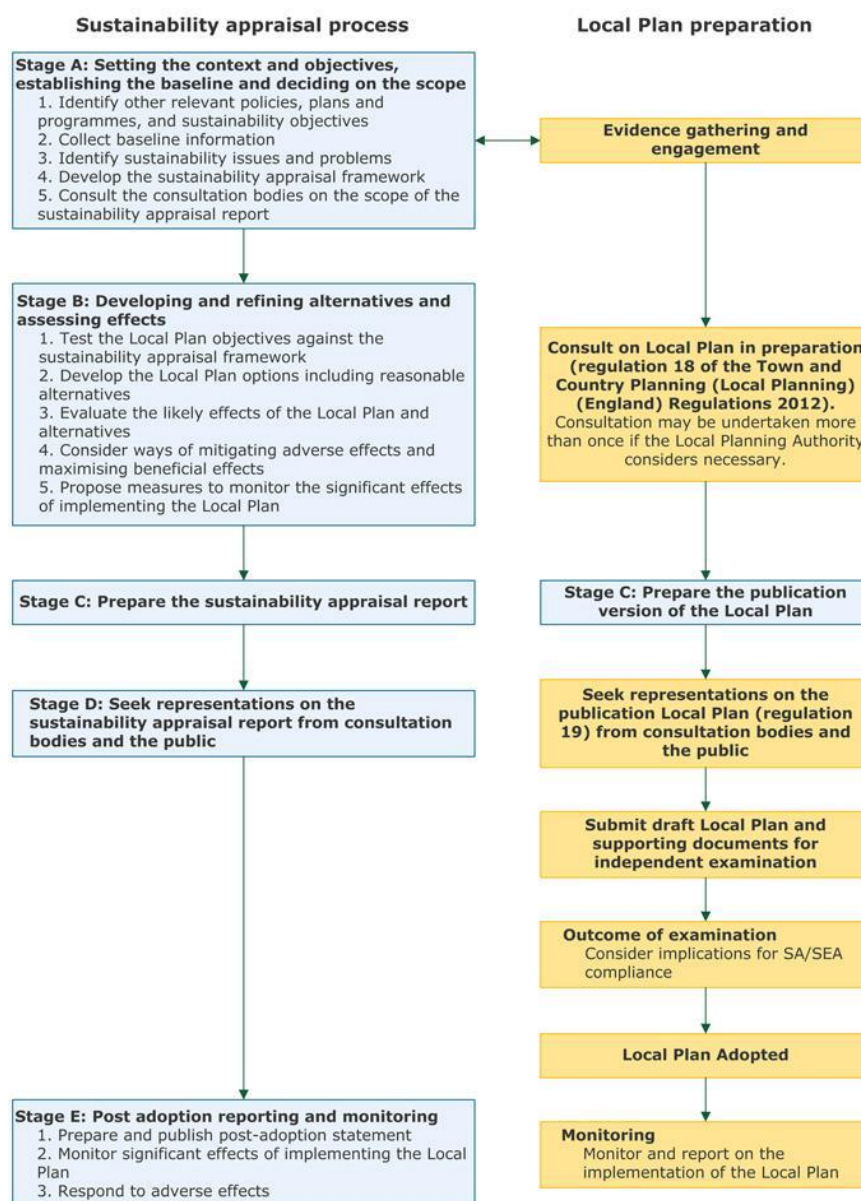


Figure 4.1 from Local plan-making, National Planning Practice Guidance 2014



## Process

<p><b>Stage A – Scoping</b></p>	<p>Setting the context and objectives, establishing the baseline and deciding on the scope.</p> <p>Consultation on the scoping report took place from 12 February 2016 - 18 March 2016</p>
<p><b>Stage B – Testing alternatives</b></p>	<p>Developing and refining options and assessing effects against the IIA framework.</p> <p>Options were considered in community forum events throughout 2015-2016.</p>
<p><b>Stage C – Prepare the Integrated Impact Assessment Report</b></p>	<p>This stage involves testing in detail the impacts of the preferred options. The IIA report is prepared for consultation with the public along with the consultation on the Draft AAP.</p>
<p><b>Stage D – Seek representations from consultation bodies and the public</b></p>	<p>Consultation on the draft AAP and IIA report has taken place in five phases over the past 9 years. The next stage of consultation for the proposed submission version OKR AAP 2024 will take place from October 2024 to early 2025.</p>
<p><b>Stage E – Post adoption reporting and monitoring</b></p>	<p>Following public examination by the Planning Inspectorate, the OKR AAP is adopted and monitoring reports are prepared to measure the implementation of the plan.</p>

## Stages of the preparation on the draft OKR AAP

- 4.6 Community consultation has been carried out as an ongoing process to make sure that local residents, businesses and stakeholders are informed of the changes within the area. Our SCI sets out how individuals, community groups, developers and anyone else who may have an interest in local plans should be consulted on planning documents.
- 4.7 The first stage of formal consultation for this IIA involved the IIA Scoping Report, referenced in Appendix 11. SEA regulations require that the contents of the scoping report must be consulted on with the following ‘authorities with environmental responsibility’: Natural England, Environment Agency and Historic England.

- 4.8 We initially assessed and consulted on three options for the plan. In the latest version of the AAP we have refined these options to reflect the two scenarios that would likely be delivered in reality, with or without extension of the Bakerloo Line.
- 4.9 Following consultation on the December 2020 draft OKR AAP , this current version is the proposed submission version of the OKR AAP.
- 4.10 As we move forward to develop the submission version AAP we will continue to assess the sustainability implications across the area. We will also consult the same groups and organisations on the sustainability report at the next stage. An extensive list of local consultees on our planning policy database were consulted.

### **The Old Kent Road Area Action Plan, Integrated Impact Assessment: Scoping Report**

- 4.11 The Old Kent Road Area Action Plan, Integrated Impact Assessment: Scoping Report (OKR AAP IIASR) was consulted on during the period between **12 February 2016** and **18 March 2016**. The OKRAAP IIASR (**Appendix 11**) considered relevant baseline information (**Appendix 3**) regarding key environmental, social and economic matters within the borough which are likely to be impacted by OKR AAP policies. The OKR AAP IIASR also established the framework for undertaking the IIA by setting out sustainability, health and equalities objectives, decision making criteria and indicators used to measure the impacts of the emerging policies. These were updated as part of consultation responses, where the finalised seventeen IIA Objectives can be found in **Appendix 8**. The way which these objectives will be monitored on an ongoing basis is identified in **Appendix 9** through selected baseline indicators.

### **Consultation Responses on the IIA**

- 4.12 The first stage of formal consultation for the OKR AAP IIA involved the IIA Scoping Report, which was published for consultation in February and March 2016. SEA regulations require that the contents of the scoping report must be consulted on with the following ‘authorities with environmental responsibility’:
- Natural England
  - Environment Agency
  - Historic England
  - Sport England
- 4.13 The law requires the statutory organisations be provided with five weeks in which to respond to the Scoping Report. Consultation responses from all respondents to the consultation have been used to update the relevant elements of this IIA report and to inform the preparation of the draft OKR AAP.
- 4.14 Consultation responses on the Scoping Report set out in Appendix 11 included suggestions for some minor amendments to be incorporated and also suggestions were put forward for: additional baseline information to be included in the appendices; recommendations for amending some of the objectives; recommendations for new sustainability questions and suggestions for amending and creating new indicators.

- 4.15 As we move forward, we will continue to assess the sustainability implications across the wider area. We will also consult the same groups and organisations on the sustainability report at this stage.
- 4.16 Government guidance also recommends that additional bodies can be consulted in order to represent the social and economic aspects of sustainability. An extensive list of local consultees on our planning policy consultation database was consulted.

### **Social Regeneration Indicators (Fairer Future Promises)**

- 4.17 Southwark Council has prepared a set of social regeneration indicators which will monitor social regeneration impacts in the borough. The social regeneration indicators will sit alongside the Council Plan to monitor the high-level impact that our actions are having across the borough and the progress we are making in achieving our regeneration for all ambitions.
- 4.18 The council adopted an initial Southwark Regeneration Framework in September 2017. A revised Regeneration that Works for All Framework was adopted in January 2019. The Framework identifies 10 Social Regeneration Charter Areas in the borough. A Social Regeneration Charter must be prepared for each area which will set out the vision, the specific opportunities, challenges and our priorities for the area, using the Social Regeneration Indicators as a means of monitoring. The Charters will also inform the local Community Infrastructure Levy priorities for the area.
- 4.19 Social Regeneration Charters have been adopted for Canada Water (December 2018), St Thomas Street (December 2019), and the Old Kent Road (January 2020). A draft Charter for Borough & Bankside is awaiting adoption at the time of writing. Charters are currently being prepared for Bermondsey & The Blue, Camberwell, Peckham and Nunhead, and Walworth subject to public consultation.
- 4.20** Details of the Old Kent Road Social Regeneration Charter are set in **Appendix 2 Relevant Plans and Strategies**. This document was drawn up in consultation with the local community and sets out social regeneration objectives that have informed the vision, strategy and objectives for the OKRAAP.
- 4.21 The outcomes measured through the Social Regeneration Indicators inform the IIAOs and Baseline Indicators described in **Appendix 4** and **Appendix 8**. They will be used across the council and by partners to inform council activities, plan strategically for the future and influence others.

### **Identifying Other Relevant Plans, Strategies and Programmes**

- 4.22 To establish a clear and concise scope for the IIA it is necessary to identify and review the relevant policies, plans and programmes that may influence the content of the draft

OKR AAP. The process of an IIA appraisal enables potential relationships to be identified that will allow any synergies to be exploited and any inconsistencies and/or constraints to be addressed. Additional objectives and indicators which would assist in analysing and comparing economic, environmental and social impacts are also identified.

- 4.23 The policy framework is constantly evolving: at a national level, the NPPF and NPPG are now in place; at a regional level, the London Plan 2021 and associated SPG's are subject to on-going review.
- 4.24 At a local level, planning decisions in Southwark are influenced by a number of statutory plan-making authorities and policy is developed with regard to corporate Council-wide strategies. In addition the evidence base draws on the Southwark Plan and associated framework documents which were adopted in February 2022.
- 4.25 **Appendix 2** provides an overview of the key international, national, regional and local policies, plans and programmes that inform the OKR AAP and the accompanying IIA.

### **Southwark's Local Plan**

- 4.26 The "Local Plan" refers to all relevant documents that are prepared by a local planning authority in planning for the future and in assessing and making decisions on planning applications. There are several layers and sub-sets to a Local Plan. The following documents together, make up Southwark's current Local Plan:
- 4.27 The National Planning Policy Framework (NPPF) was updated in 2023. To aid understanding and interpretation of the NPPF, the government also produced topic-based National Planning Practice Guidance (NPPG). However, the guidance does not constitute formal policy and so does not hold significant weight in the determination of planning applications. The NPPF seeks to establish planning policies applicable to the UK as a whole. Unless otherwise justifiable, all regional and local planning policy must be in general conformity with the NPPF.
- 4.28 The London Plan 2021 contains the regional planning policy for Greater London as a whole. The London Plan considers long-term, large scale, strategic issues as well as more detailed policy suited specifically to London, for example prescribing acceptable levels of density in a London context. The Mayor of London also produces more detailed Supplementary Planning Guidance (SPG) to aid understanding and interpretation of the planning policies in the London Plan. Unless otherwise justifiable, all London borough local planning policy must be in general conformity with the London Plan.
- 4.29 The Southwark Plan was adopted in February 2022. It contains the overarching spatial plan and vision for the borough; detailed development management policies used to assess planning applications; and incorporates area specific policies. It is noted throughout this IIA that some of the policies in the proposed submission version OKR AAP have been diluted since the 2020 draft version to reflect the adoption of the Southwark Plan.



- 4.30 Other area and topic based Supplementary Planning Documents (SPD's) - These do not constitute planning policy and their purpose is to aid understanding and provide a more detailed interpretation of and guidance to local Southwark planning policies.
- 4.31 Neighbourhood Plans – Southwark has several Neighbourhood Forums either established or currently in the process of being established with the objective of designating a Neighbourhood Area. Designated Neighbourhood Forums are able to prepare a Neighbourhood Plan which must be in general conformity with the local, regional and national planning policy. There are currently no Neighbourhood Plans which impact the Old Kent Road area.
- 4.32 The Local Development Scheme (LDS) sets out the timetable for the preparation and adoption of Southwark's various planning policy documents (such as those listed above). This schedule takes into account the different stages of plan preparation including evidence base preparation, background studies, and various consultation phases and where relevant any public hearings that the Council will need to satisfy before adopting policies. This is updated annually.

### **Old Kent Road's Area Action Plan**

- 4.33 Once adopted the Old Kent Road Area Action Plan (OKR AAP) will become area-specific planning policy for the Old Kent Road Opportunity Area. New development in the Old Kent Road will need to be in compliance with the OKR AAP and the Southwark Plan.
- 4.34 The OKR AAP explains the council's strategy and vision for regeneration of the Old Kent Road **from 2019 to 2036**. The OKR AAP:
- Sets out an indicative masterplan and policies to support:
  - The delivery of:
    - 20,000 new homes of which 7,000 will be affordable
    - 2 new tube stations on the Bakerloo Line Extension
    - 10,000 new jobs
    - New health centre
    - Two new district town centres and a revitalised high street
  - The protection of local businesses and attracts more businesses into Old Kent Road to increase job opportunities
  - The enhancement of local distinctiveness and protecting our heritage assets
  - The delivery of new open spaces, green infrastructure and to promote opportunities for healthy activities

- 4.35 The OKR AAP also explains how development will be delivered and may inform future decisions about investment in infrastructure to provide a Fairer Future for all residents, as identified in the council's **Fairer Future Promises<sup>2</sup>**.

### **What are the Sub Areas and Site Allocations?**

- 4.36 Sub Areas:** The Old Kent Road's neighbourhoods each have a rich, varied and unique character. The OKR AAP contains a vision and masterplan for each area setting out what the neighbourhood will be like in the future, and how new development will help achieve this. The sub areas set out the existing individual character of the Old Kent Road's neighbourhoods and how the OKR AAP will help to build on this character as sites come forward for development. They will set out how development will seek to protect, enhance and incorporate heritage assets in new development and will identify key opportunities for new development including improvements in public realm, walking and cycling routes, health and education facilities and green links.
- 4.37 Site allocations:** Site allocations comprise a detailed list of potential development sites that the council has identified for future development. Councils are required to identify and allocate development sites in their local plans to help ensure strategic needs for housing, employment, schools and health facilities and more can be met. To ensure this, the council has the opportunity to set out key land use and other requirements for each site, including indicative densities, routes through sites and any other requirements the council deem necessary. Each site also has an illustrative masterplan to indicate how the development will configure together to deliver housing, employment, community facilities, schools and open space. The Old Kent Road site allocations are also proposed in the New Southwark Plan which has been submitted for Examination.

### **Appraisal of the Sub Areas and Site Allocations**

- 4.38** Sub areas provide the strategic vision for the future of each neighbourhood's illustrative masterplan. They set out key infrastructure enhancements, opportunities for public realm and transport improvements and growth opportunities for new homes and jobs. Sub areas also identify the prevailing character of different places to be renewed, retained or enhanced. Development proposals should be formulated in the context of the relevant sub area and should demonstrate how they contribute towards realising the sub area for that area.
- 4.39** Site Allocations are planning policies which apply to key potential development sites of strategic importance. Site allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs and infrastructure. Site allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. For example, site allocations may specify that development must provide new public open space, new public access routes, and new health or education facilities.

4.40 The full appraisal of the sub areas and site allocations is provided within **Appendix 7**.

**How has sustainability, health and equalities been considered in the development of the Proposed changes to the draft OKR AAP?**

4.41 For the HIA element of the IIA the impacts on the population groups listed in Table 4.3 will be considered:

Children 0-16	Unemployed
Young Adults 16-25	Low Income
Adults 25-65	Homeless/Street Community
Older Adults 65+	Refugees and asylum seekers
People with alcohol and drug problems	Ethnic groups
People with long term illness	Learning difficulties
People with mental health problems	Physical disabilities
Residents	Carers
Visitors	People who experience domestic violence

Table 4.3 Population groups considered in the HIA.

4.43 The IIAO indicators give due regard to the population groups in Table 4.3. The HIA assesses the health impacts of the policies on the above population groups in more detail in a separate document. The HIA was completed as a separate appraisal (**Appendix G** of the OKR AAP) using the HUD Urban Planning Checklist assessing the health impacts of the policies cumulatively of the OKR AAP.

- 4.44 For the EqIA element of the IIA the impacts on the protected characteristics listed below in Table 4.4 will be considered.
- 4.45 The Equality Act was introduced in October 2010. It replaces and extends all previous equality legislation into one overarching act. The Equality Act 2010 outlines a number of “protected characteristics”, which are the groups of people or communities where the government feels that discrimination or unfair treatment could arise. The IIA will consider if there are any unintended consequences for some groups and if the policies will be fully effective for all target groups.

<b>Age</b>	A person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18-30 year olds).
<b>Disability</b>	A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
<b>Gender reassignment</b>	The process of transitioning from one gender to another.
<b>Marriage and civil partnership</b>	In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).
<b>Pregnancy and maternity</b>	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

<b>Race</b>	A group of people defined by their race, colour and nationality (including citizenship) ethnic or national origins.
<b>Religion and belief</b>	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.
<b>Sex</b>	A man or a woman.
<b>Sexual orientation</b>	Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Table 4.4 Protected Characteristics included in the Equalities Act 2010 and their definitions as set by the Equalities and Human Rights Commission<sup>3</sup>

- 4.46 The EQIA also assesses the impact of the policies in the draft OKR AAP on those with socio-economic disadvantage. This is aligned with Southwark Council's objectives to deliver a fairer future for all.
- 4.47 The EQIA was completed in a separate document (**Appendix F of the OKR AAP**) and assessed the impacts of each the strategy, vision, policies, sub areas and site allocations on each of the above protected characteristics and of socio-economic background. Where these impacts were negative mitigation was provided and details of the monitoring laid out to continuously ensure that as the plan progresses the impacts of the policies are positive.
- 4.48 A Mental Health and Wellbeing Screening report has also been prepared to support the IIA appraisal, the results of this are set out in Appendix 13.

### **Southwark Council's approach to equality: Southwark Council Equality Framework 2021**

- 4.43 This report sets out the overarching equality objectives which are linked to the strategic priorities of the council. The objectives below will also be considered in the IIA and are set out below:
- Stand together against all forms of racism and discrimination
  - Tackle health inequalities so everyone can live a healthy life
  - Reduce the number of vulnerable people in our borough, including by providing
  - targeted engagement and support to groups most affected by COVID-19
  - Provide decent homes for all

- Give young people in our borough the best opportunities in life
- Put communities at the heart of everything we do from services to decision-making,
- ensuring everyone is heard especially marginalised communities
- Deliver a fair and green economic recovery where no-one is left behind
- Tackle abuse, harassment, exploitation and violence

## **Section 5. Baseline Data: Summary of findings**

### **Links to other policies, plans and programs**

- 5.1 It is important to identify this policy framework at an early stage as a wide range of guidance and initiatives influence the United Kingdom's planning system and the development of planning policy in Southwark. A considerable number of relevant documents were identified at the international, national, regional and local levels as part of the Scoping Report. Since the consultation on the Scoping Report, additional or more recent documents of relevance have been identified and these have been included in the table set out at Appendix 2. This provides an overview of the key international, national, regional and local policies, plans and programmes that informs the AAP/OAPF and accompanying IIA.

- 5.2 In order to establish a clear and concise scope for the IIA it is necessary to identify and review the relevant policies, plans and programmes that may influence the content of the OKR AAP. This process enables potential relationships to be identified that will allow synergies to be exploited and any inconsistencies and constraints to be addressed. It will also identify additional objectives and indicators, which will assist in analysing and comparing economic, environmental and social impacts throughout the IIA and help in identifying key sustainability issues.
- 5.3 The policy framework is constantly evolving: at a national level, the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) are now in place, at a regional level; the London Plan was adopted in 2021 and associated Supplementary Planning Guidance (SPG) are subject to on-going review.
- 5.4 At a local level, planning decisions in Southwark are influenced by a number of statutory plan-making authorities and policy is developed with regard to corporate Council-wide strategies. In addition the evidence base continues to evolve as the Southwark Plan undergoes an early review.
- 5.5 It is important to identify this policy framework at an early stage as a wide range of guidance and initiatives influence the United Kingdom's planning system and the development of planning policy in Southwark. A considerable number of relevant documents were identified at the international, national, regional and local levels as part of the Scoping Report (**Appendix 11**). Since the consultation on the Scoping Report, additional or more recent documents of relevance have been identified and these have been included in the table set out in **Appendix 2**. This provides an overview of the key international, national, regional and local policies, plans and programmes that informs the OKR AAP and accompanying IIA.

### Summary of baseline information

- 5.6 The aim of collecting baseline information is to assemble data on the current state of the area and the likely future state. The information then provides the basis for predicting and monitoring effects. Collecting baseline information is also a way of identifying sustainability problems and alternative ways of dealing with them.
- 5.7 Both qualitative and quantitative data has been used to inform the baseline analysis. Quantitative data has been taken from monitoring and research activities currently being carried out by a variety of organisations. Qualitative information is more often based on judgement and is particularly useful for objectives that relate to the character and quality of the built environment.
- 5.8 A summary of the baseline information is provided in **Appendix 3**.

### Problems in collecting baseline data

- 5.9 Problems arose because in some instances where data did exist it was often either at the wrong geographical scale e.g. borough/regional/national or held over insufficient time to show a trend. There was also a case where some baseline data was no longer being collected. Where qualitative data has been used, it has not always been possible to provide an analysis of trends.
- 5.10 Monitoring is carried out more frequently for some indicators than others. In addition, some of the gaps in data still remain. In the future, if data is still not available for some indicators it may be more appropriate to select alternative indicators. However, in some cases where there are no suitable indicators relating to an objective, the objective itself may need to be revised or deleted. The baseline data has been used to describe the current social, economic and environmental characteristics. Where possible, data specific to the borough has been used.

### Key environmental, health and equality issues

- 5.11 Table 5.1 identifies key sustainability issues that have been identified for the Old Kent Road AAP which the IIA will address. These have been abstracted from the findings of **Appendix 3** which divide contextual characteristics and baseline indicators into economic, social and environmental conditions.
- 5.12 These have also been identified through monitoring, engagement with stakeholders, a review of relevant policies, strategies and programmes and existing council evidence base documents, and a survey of baseline data and information about the borough.
- 5.13 The sustainability issues are set out in the context of a number of themes, in recognition of the over-arching status and the format of the draft OKR AAP.

Table 5.1 identifies sustainability issues that have been identified for the Old Kent Road opportunity area which the IIA will address.

<b>Table 5.1 : Key environmental, health and equality issues</b>
<b>Theme 1: Climate Emergency</b>
<b>Mitigating against and adapting to the Climate Emergency</b>
<ul style="list-style-type: none"> <li>• Address the Climate Emergency by achieving carbon neutrality in the Old Kent Road</li> <li>• Create low carbon jobs and businesses</li> <li>• Reduce carbon emissions from transport of people and goods, and construction</li> <li>• Provision of public transport</li> <li>• Reduction in waste and more efficient use of resources</li> </ul>
<b>Theme 2: Quality Affordable Housing</b>
<b>Homes</b>



- Providing everyone with a decent and affordable home to live in to meet housing needs of present and future generations
- Providing and maintaining suitable accommodation for those with specialist need, vulnerable individuals and families.
- Improving existing housing stock and delivering new council housing
- Providing the right mix and balance of housing types, sizes and tenures in areas of the borough
- Optimising the efficient use of land to create mixed use neighbourhoods
- Contributing to delivery of the London Plan housing target by maximising the number of homes which can be provided in the opportunity area
- Delivering quality housing to help reduce health inequalities and improving health
- Ensuring the demand for specialist accommodation, such as student housing, is met and successfully integrated to create mixed and inclusive neighbourhoods

### **Theme 3: Revitalised Neighbourhoods**

#### **Revitalised Neighbourhoods**

- Addressing relatively high levels of deprivation and low incomes among the existing population of the opportunity area
- Improving access to services to help reduce health inequalities
- Improving the health of the population in the opportunity area by improving lifestyle (such as unhealthy diet) and mitigate the influence of external factors such as noise and air pollution affecting mental and physical illness associated with unemployment and poverty
- Reducing the high levels of crime and fear of crime
- Accommodating a growing population
- Addressing poor parts of the local environment that lead to physical inactivity
- Maintaining local distinctiveness and protecting and enhancing place-making assets
- Improving safety and facilities for young people including play space and sports facilities
- 

#### **Design, Heritage and Environment**

- Ensuring a high quality of design in new developments to ensure accessibility, inclusivity and interaction
- Protecting and enhancing biodiversity and access to the natural environment
- Mental health benefits from access to nature, biodiversity, green space and water
- Addressing existing open space deficiencies and poor access to private open space; improving the use of open spaces for sport, leisure and environmental purposes
- Increasing green links, for sustainable transport across the area and access to open spaces, improving the public realm and overcoming the severance barrier of the Old Kent Road
- Need to preserve and enhance the historic environment and built heritage including the conservation areas within and around the opportunity area
- Securing a positive and viable future for heritage assets at risk
- Protection of landscape features and designated sites
- Sensitivities around very tall buildings

### **Theme 4: Strong local economy**

#### **Business, Employment and Enterprise**

<ul style="list-style-type: none"> <li>• Addressing employment inequalities and reducing the barriers to employment</li> <li>• Increasing employment opportunities through training to increase skills</li> <li>• Accommodating changing demands as a result of changing trends in industrial activity and the modernisation of businesses</li> <li>• Providing new jobs in the opportunity area as part of mixed use development opportunities</li> <li>• Providing space for businesses of all sizes to establish and grow</li> <li>• Considering impacts of regeneration on existing businesses and a need for relocation strategies where appropriate</li> <li>• Providing the incorporation of space for small and medium sized enterprises and encouraging managed and affordable workspace by specialist providers</li> <li>• Maintaining progress in educational attainment, skills and aspirations of residents</li> <li>• Facilitating the growth of an emerging life sciences cluster for South East London</li> </ul>
<b>Town Centres</b>
<ul style="list-style-type: none"> <li>• Ensuring provision of sufficient shopping space to meet needs and seeking to cluster this within existing or new town centres</li> <li>• Supporting a transition from out-of-town style development based around retail parks to town centre and mixed use development</li> <li>• Improving retail choice and the balance of retail and other town centre uses</li> <li>• Supporting local people to make healthier choices</li> <li>• Creating attractive and safe pedestrian shopping environments and encouraging sustainable forms of transport to town centres</li> <li>• Attracting and facilitating town centre investment</li> <li>• Protecting essential shopping services for local communities</li> </ul>
<b>Theme 5: Well-being: The best start in life, child and youth provision and Healthy streets</b>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• The creation of healthy, cohesive, inclusive and safe environments</li> <li>• Providing adequate community facilities and infrastructure to meet the needs of a growing population and facilitate social interaction</li> <li>• Addressing the needs of faith groups and continuing to provide for multiple places of worship in the opportunity area</li> <li>• Identifying appropriate locations for community facilities</li> <li>• Provision of training, education, recreation and sports for children and youth</li> </ul>
<b>Theme 56: Movement and Transport</b>
<b>Travel</b>
<ul style="list-style-type: none"> <li>• Improving the transport network and infrastructure on Old Kent Road</li> <li>• Improving the legibility and safety of the Old Kent Road including crossing points for pedestrians</li> <li>• Improving the health of the population by promoting healthy lifestyles including active forms of travel such as walking and cycling</li> <li>• Reducing congestion and pollution and managing traffic flows on the Old Kent Road</li> <li>• Reducing car parking</li> <li>• Managing delivery and servicing activities for mixed use development</li> <li>• Improving accessibility by public transport</li> <li>• Supporting provision of the Bakerloo Line extension with two new stations on Old Kent Road</li> </ul>

## Theme 7: Cleaner, greener, safer

### Sustainability

- Mitigating and adapting to climate change
- Minimising flood risk and improving resilience to flood risk
- Maintaining improvement in recycling and the management of waste
- Improving energy efficiency and use of renewables
- Providing opportunities for heat and power networks.
- Addressing poor air quality around the Old Kent Road and decreasing level of emissions from industry, construction and traffic
- Ensuring sustainable use of water resources
- Ensuring that there is social, physical and green infrastructure capacity for existing and future needs
- Reducing the impact of noise, in particular traffic noise associated with the Old Kent Road
- Ensuring high standards of sustainable design are achieved in the built environment
- Reducing health risks from toxicity of contaminated land due to past industrial land uses
- Meeting the high demand for food growing as an opportunity for active lifestyles, healthy diet and tackling food poverty
- Improving water quality, sustainable drainage and the enhancement of green infrastructure to manage flood risk and improve biodiversity

## Section 6. Options-testing for the AAP

### The Assessment of Options

- 6.1 This section outlines and provides a summary on the options that have been considered for the Old Kent Road AAP.
- 6.2 In addition to the options presented below, the development of the policies within the Old Kent Road AAP and the justification for their evolution is set out below.

### Policy evolution

- 6.3 In response to external and internal consultation the OKR AAP policies have been iterated to reflect changes in design, land use, approach, priority and updated evidence bases and regional and national Planning policy and guidance.
- 6.4 We published the engagement summary ‘You Said/We Did’ document in 2019 detailing feedback from over 35 consultation events and over 1,000 comments made on the AAP. We also published the Old Kent Road Social Regeneration Charter which contained 10 promises. The revised AAP delivers on these promises.
- 6.5 For clarity, each of the development policies have been structured to set out a strategy, targets, expectations for planning applications and reasons for each policy theme.
- 6.6 The following table shows the proposed policies from each iteration of the plan through 2017, 2020 and 2024:

	<b>2017</b>	<b>2020</b>	<b>2024</b>
	Vision	Vision	Vision
	Strategy	Strategy	
	Delivery	Delivery	Delivery
	Funding	Funding	Funding
	Plan Objectives	Plan Objectives	Plan Objectives
AAP1	The Masterplan	Delivery of the Masterplan	The Masterplan
AAP2	Site Allocations	Bakerloo Line Extension and Infrastructure	Bakerloo Line Upgrade and Extension
AAP3	Infrastructure and Delivery	Climate Emergency (new policy)	Homes for All
AAP4	Social Regeneration to Revitalise Neighbourhoods	Quality Affordable Homes	Student Homes (new policy)
AAP5	Quality affordable homes	Businesses and workspace – The Bow Tie	Businesses and workspace – The Bow Tie
AAP6	Businesses and workspace – The Bow Tie	Town centre, leisure and entertainment	Life Sciences (new policy)
AAP7	Town centre, leisure and entertainment	Movement – People, Place and Experience (Public and Surface Transport) (new policy)	Town Centres, Leisure and Entertainment
AAP8	Tall Buildings Strategy – The Stations and Crossings	Tall Buildings Strategy – The Stations and Crossings	Movement
AAP9	Character and Heritage	Character and Heritage	The Grenner Belt Strategy – Parks and Healthy Streets
AAP10	Parks, streets and open spaces – The Greener Belt	Design (new policy)	Tall Buildings Strategy – The Stations and Crossings

AAP11	Cleaner, greener, safer	Parks and Healthy Streets – The Greener Belt	Character and Heritage
AAP12	Healthy, active lives	Cleaner, Greener, Safer	Design
AAP13	Best Start in Life	Best Start in Life	Climate Emergency
AAP14		Child and Youth Provision	Water Management, Air, and Noise Quality
AAP15		Sub Areas and Site Allocations	Great Start in Life
AAP16			Child and Youth Provision

## Strategy and Vision

6.7 The vision remains focused on re-establishing the Old Kent Road as one of London’s most important arteries, connecting the city to the rest of Europe. There are three prongs to the vision: the ‘Greener Belt’; ‘Connecting Communities’; and the South Central Cluster’. The funding section has been updated to reflect changes in funding streams and bids.

6.8 The ‘Central London Smiley’ images used in the previous version of the AAP have been retained but reformatted to better to convey the Vision.

6.9

6.10 The plan objectives have been reviewed and minor amendments made to reflect updates to policies and additional objectives since 2020.

## Delivery

1. The text content of AAP1 The Masterplan remains largely similar to policy in the draft OKR AAP 2020, but has been updated to ensure conformity with the Southwark Plan 2022 and the AAP masterplan and design codes. It also shows how the site allocations, including estimated numbers of homes and jobs which are identified in the Southwark Plan 2022 can be delivered.

6.11

2. AAP2 Bakerloo Line Upgrade and Extension now includes definitions to explain the acronyms BLE (Bakerloo Line Extension) and BLU (Bakerloo Line Upgrade). The timelines for the delivery of the BLE have been updated and the timescales of the the two-phase Housing Delivery Plan up to date, setting out that the 9,500 homes within Phase 1 are expected to be constructed by 2032, with the 10,500 in Phase 2 to be complete by 2042. References to investment in schools, health and leisure facilities have been removed from the policy and placed in AAP13 ‘Great Start in Life’. With regard to monitoring, the policy upholds the commitment in the 2020 OKR AAP to undertake annual reviews of both the grant of planning permissions and the implementation of schemes.

## Homes for All

- 6.1 AAP3 Homes for All has been retitled to align with the Southwark Plan 2022 and has been moved forward in the plan. The policy content has been updated to reflect the adopted Southwark Plan 2022.
- 6.2 The commitment remains for at least 35% of new homes to be affordable (7,000 out of 20,000 new homes). However, as these requirements have been adopted in the Southwark Plan 2022, this has been moved from the main body of the policy to the 'Commitments' box to avoid repetition but ensure readers remain aware of the policy requirement.
- 6.3 The policy now makes express reference to providing new council housing including for the over-55s, and reinforces the local need for larger family homes. It also explicitly links housing density to the capacities the BLE can support, and strengthens the co-location ambition.
- 6.4 The Old Kent Road opportunity area overall is achieving the highest average % delivery in London at 51% affordable homes with approvals to date. This is included in the 'Reasons' section of the policy in order to demonstrate delivery.
- 6.5
- 6.6
- 6.7 A new policy AAP4 Student Homes has been introduced to the draft OKR AAP 2024 which addresses student housing. The objective of this new policy is to ensure that the provision of student housing integrates successfully with the Old Kent Road's existing and future neighbourhoods. The policy requires that proposed student housing developments demonstrate how they will contribute to the creation of mixed and inclusive communities.
- 6.8 The policy includes requirements for student housing proposals to make a contribution towards public open space or a payment-in-lieu where the required amount of open space cannot be delivered. This is as per the approach in the London Plan and is also reflected in Southwark's draft s106 and CIL SPD 2024.
- The affordable housing and wheelchair requirements in Southwark Plan 2022 Policy P5 for student housing proposals have not been included in the draft OKR AAP policy AAP5 to avoid duplication of existing policy.

## Strong Local Economy

- 6.9 AAP5: Businesses and workspace – The Bow Tie has been updated to remove the requirements for affordable workspace and relocation options for displaced business as these are policy requirements in the Southwark Plan 2022. These have been moved to the 'Commitments' section so that readers are aware of the requirements but policy is not duplicated. The requirement for sprinkler tanks has been clarified so that it refers to all types of employment floorspace. The figure of 10,000 new jobs is underpinned by up-to-date projections for different kinds of employment space (office, studios, light industrial and logistics/distribution etc.) and the estimated job

numbers arising from this.

- 6.10 AAP6: Life Sciences is another new policy to be included in the draft OKR AAP 2024. It has been placed after AAP6 because of the common theme of seeking to diversify and strengthen the Opportunity Area's economy. The Old Kent Road area holds potential to provide wet labs and other facilities associated with medical and life science sectors. The policy is borne out of the Life Sciences Strategy produced and promoted by SC1 London, which aims to make south central London a world-recognised district for life sciences.

AAP7: Town centres, leisure and entertainment has been updated to make it clear that are two District Town Centre in the Old Kent Road Area. The 'Strategy' section has also been updated to reflect changes to the NHS strategy for the borough by referring to the Old Kent Road health hub and including a map identifying sites where the health hub could be located. The 'Reasons' section of the policy has been updated to include details of redevelopments currently under construction, as well local investment projects underway, including those that have received Future High Streets granting funding.

## **Movement**

- 6.11 AAP 8: Movement has been updated to include the ambitions to make the Old Kent Road High Street an exemplary Healthy Street; design commercial servicing intelligently to ensure the mixed use agenda is successfully delivered; and deliver leisure links to improve the walking and cycling experience across the Opportunity Area.
- 6.12 The 'Development Must' section of this policy has been updated to require consideration of cargo bikes and the payment of a financial contribution towards the TfL-led Bus Service Improvements programme.
- 6.13 AAP9: The Greener Belt Strategy – Parks and Healthy Streets, the name of which differs slightly to that used in the draft OKR AAP 2020, now has a more detailed 'Strategy' section explaining the rationale behind the Greener Belt.
- 6.14 The updated policy includes further explanation about how the public open space "equalisation" mechanism works. It also includes two guides, one named 'Principles of Public Open Space Delivery' and the other 'Principles of Playspace Delivery', to help developers prepare their planning application proposals.
- 6.15 The locations and sizes of parks proposed in the draft OKR AAP 2020 remain largely unchanged in the 2024 draft, with the exception of an increase in size of the Livesey or Gas Works Park.
- 6.16 There has been some rationalisation and elaboration of the 'Reasons' section of the policy.
- 6.17
- 6.18 AAP10: Tall Buildings - The Stations and the Crossings is similar but additions have been to the design requirements of tall buildings, including consideration of

townscape, relationship to heritage assets, and managing changes in urban scale and form. More detail has also been provided about the role that Tier One, Two and Three tall buildings will play in the townscape. There have also been some deletions where the wording reflected the Southwark Plan 2007 tall building policy, as this has now been rescinded since the adoption of the Southwark Plan 2022.

## Design and Conservation

- 6.19 AAP 11: Character and Heritage still reflects a strong desire to conserve and enhance the local character of the Old Kent Road, especially the industrial character. Following the adoption by the council in December 2023 of 'locally listed buildings', this policy has been updated where appropriate to refer to this designation. The policy continues to identify a small number of buildings in the Opportunity Area that are not locally listed but nevertheless warrant a degree of protection because of their townscape, architectural, cultural and/or heritage merit. These are reflected on the accompanying map.
- 6.20 The proposed 5 new conservation areas have now been adopted. A new section entitled 'We Have' has been added to the policy to reflect this. The 'We Have' section also mentions the successful conservation of the historic industrial chimney at Glengall Road as part of redevelopment proposal.
- 6.21 The policy gives stronger emphasis to the archaeological heritage of the Opportunity Area, requiring developments to conserve sites of interest including and, where appropriate, make the results of archaeological work publicly accessible
- 6.22 AAP12: Design has been updated to make an express requirement for new development to be well designed and constructed in high quality durable materials. A targets section has been added to match the format of the other policies sub divided into 'We Will' and 'We Have' sections. Some of the topic based design guidance has been retained and made more detailed where it applies masterplan wide, with the area-based detailed design guidance now included in the sub-areas. Some sections of the guidance have been removed to avoid repetition with the Southwark Plan 2022 design policies. The locations and sizes of parks proposed in the draft OKR AAP 2020 remain unchanged in the 2024 draft.

6.23

## Environment

- 6.1** AAP13: Climate Emergency (previously AAP3) has been moved to sit alongside the other environment policies. It still sets out the priority for new development to connect to the District Heat Network and to reduce carbon emissions and to make use of waste heat from SELCHP. A map of the proposed District Heat Network which is currently under construction has been added with additional information about how that will be delivered based on the business case and feasibility study worked up over the last two years.
- 6.2 AAP13 also gives focus to reducing emissions generated by transport, through delivering car free development and facilitating new industrial typologies that encourage electrification and cargo bikes/quadracycles. The stacked logistics hub at



Mandela Way, granted consent in 2023, is an example of a typology that responds to the Last Mile Logistics challenge.

3. AAP14: Water Management, Air and Noise Quality was previously called 'Cleaner, Green, Safer', but has been renamed to better reflect the thrust of the policy.
4. The policy has been rationalised and reordered to make it more focused, but the substantive content has largely been retained, the exceptions being the drainage hierarchy and grey water references. These have been removed because these are now captured in the Southwark Plan 2022.

6.3

## Young people

5. AAP15: A Great Start in Life has been re-named since the publication of the draft OKR AAP 2020 (at which time it was called 'Best Start in Life') to align with the Great Start in Life policy of the Southwark Plan 2022, SP3.
6. The current situation with school under-subscriptions in the Old Kent Road area is such that the wording of AAP13 now refers to the "potential" for additional pupil places and new schools to be delivered, depending on demand. This is different to the wording of the policy in the draft OKR AAP 2020, which commits to delivering two new primary schools and a new secondary school. We continue to own the land on which the secondary school would be located so it remains an option should delivery be required in the future.

7.

6.4

8. AAP16: Youth, Education and Healthcare has remain mostly unchanged except for a new commitment to develop a youth facility and space for local residents and community organisations at Leyton Square. The 'Reasons' section of the policy explains that this would be funded through CIL contributions.

6.5

### Deleted Policy: Sub-area and Site Allocations

- 6.6 The policy, which was AAP15 within the draft OKR AAP 2020, is no longer required. This is because the site allocations have been adopted in the Southwark Plan and Policy AAP1 states that proposals must comply with the guidance contained in the sub area sections.

## Sub Areas

The Masterplan has been updated based on planning applications that have come forward, funding changes, , , commissioned design codes, previously approved outline schemes and wider council priority progressions and regeneration.

6.7 The core format of each sub area has remained the same coming from looking at OKR in the past, the area today and then the proposed plan and strategy for each sub area and site allocation to deliver housing, employment, green space and community facilities for local people, in an appropriate scale design and character to each section of the sub area.

6.8 Sub areas 1-4 have the following structure: :

- History
- The Area Today
- Sites and Masterplans
- Sites
- Building Typologies and Land Uses
- Servicing and Road Network
- Parks and Recreation
- Connecting Communities
- Building Heights Guidance

6.9 Sub area 5 has the following structure:

- History
- The Area Today
- Masterplan – Industrial Intensification
- Sites – Sub Area 5
- Building, Typologies and Land Uses
- Phasing
- Servicing and Road Network
- Parks and Communities

## **Sub Area 1**

6.10

6.11 The masterplan in Sub Area 1 remains largely similar for most site allocations except for OKR 3 Mandela Way and OKR4 Dunton Road (Tesco Store) and Southernwood Retail Park where further design work has been undertaken to hone the masterplan and produce a design code to guide development. The main changes include the inclusion of the multi-storey industrial storage and distribution development on Mandela Way and the reconfiguration of the park to facilitate the retention of Mandela Way through the park.

## **Sub Area 2**

- 6.12 The masterplan in Sub Area 2 has remained unchanged for OKR10 and OKR11 except for where there have been updates to applications or new applications received.
- 6.13 OKR10 and OKR11 have remained the same in footprint. Some of the densities and typologies have changed to reflect more recent planning applications.
- 6.14 The masterplan for OKR12 has evolved as it is now considered that a reduced capacity of 40 units across the site is more realistic in order to retain the heritage assets and ensure delivery of affordable housing.

### **Sub Area 3**

- 6.15 The masterplan for Sub Area 3 has seen several updates following extensive work to create a design code OKR13 and to reflect updates to planning applications.
- 6.16 The proposed primary school has been removed from the site to reflect changes in pupil projections. However, the masterplan is still flexible enough to re-provide this if future demand deems it necessary. A logistics centre has been introduced on Verney Road following a planning application, which has meant some of the capacity of the site has had to be redistributed amongst other plots. The linear park has also been relocated to allow for more realistic access and servicing.

### **Sub Area 4**

- 6.17 The masterplan in Sub Area 4 contains the second proposed tube station as part of the Bakerloo Line Extension. Sub Area 4 remains largely unchanged except for updates to planning applications. A detailed design code has been completed for the Sub Area.

### **Sub Area 5**

- 6.18 Sub Area 5 remains designated as SPIL and the sites section sets out a phased strategy for industrial intensification. Proposed road networks and servicing have also been included to detail how the area might operate as an industrial area.

## **Options Testing**

### **Summary**

- 6.19 Throughout the preparation of the Old Kent Road Area Action Plan, a number of options for development have been assessed. The Old Kent Road Place Making Study 2016 (Allies and Morrison) considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option (20,000 homes), a Bakerloo Line (1 or 2 stations, medium scenario) (13,658 homes) and a no Bakerloo Line extension option (low scenario) (8,468 homes). This was based on indicative massing. The options were presented at Old Kent Road

Community Forums in 2016 to begin the process of master planning and community engagement.

- 6.20 The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. Throughout the 2017 and 2020 drafts of the AAP, a detailed masterplan has been prepared informed by multiple local development studies and urban design studies which are available as evidence base. The masterplan has evolved through a series of iterations, testing and feedback from consultation.
- 6.21 As a result of testing a detailed masterplan and preparation of the AAP, the masterplan demonstrates we can achieve a high growth option of 20,000 homes and 10,000 additional jobs over 20 years. This high option would exceed the target set out by the regional plan and provide a healthy buffer to deliver our 5 and 15 year land supply.
- 6.22 Prior to the confirmation of the Bakerloo Line extension the Council has agreed with the Mayor around 9,500 homes could come forward (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). Planning applications will still be permitted for Phase 2, but there is a Grampian condition restricting this development until after agreement by the GLA and TfL, and sign off by LB Southwark to ensure sufficient transport infrastructure is in place to support the delivery of 10,500 homes.
- 6.23 The options for each site demonstrate the options for capacity in the 2016, 2017 and 2020 versions of the AAP. Since the AAP was published, numerous planning applications have been submitted and approved which reflect the potential capacity consistent with the high option scenario.
- 6.24 Continuous master planning work, which takes into account planning applications and various constraints, has been undertaken for site specific allocations to come to the capacity as various iterations of the AAP have been published. This is informed partly by detailed design of some planning applications received which indicate capacity of some sites in more detail and partly through architectural studies undertaken to inform design codes for specific sub-areas. The Southwark Plan site allocations have been consulted on and were adopted in February 2022. The proposed Old Kent Road site allocations align with these, as set out in the Southwark Plan 2022..
- 6.25 The site allocations within the Old Kent Road will be intensified for mixed use development and industrial co-location. Development will include an innovative new approach to create new town centres which include community facilities, retail, office, education and health uses. Industrial development will be included alongside or underneath new homes with specific design criteria to ensure businesses can operate successfully without harming residential amenity.
- 6.26 In this appraisal, two options have been assessed:
- Option A: 9,500 homes without the BLE (Reasonable alternative)
  - Option B: 20,000 homes with two stations with the BLE (Plan option)

### **What options have been considered and why?**

- 6.27 The Old Kent Road has been a designated “action area” since the Southwark Plan was adopted in 2007, and our Core Strategy (2011) set out a vision for how we would produce an area action plan to help guide and manage the evolution of the area to reach its potential. In January 2014 the GLA identified the Old Kent Road as a potential opportunity area in the draft Further Alterations to the London Plan and this designation was confirmed in March 2015.
- 6.28 Alongside the GLA, TfL and other partners we have worked together to build a strong evidence base which has helped to inform the options explored in the preparation of the AAP. The options were also explored with the Old Kent Road community forum, of which eleven workshops were held.
- 6.29 One of the key drivers for change in the Old Kent Road area is the delivery of the Bakerloo Line Extension and improvements to surface transport on the Old Kent Road itself. Throughout the plan preparation, TfL consulted on two potential routes for a Bakerloo Line tube extension from Elephant and Castle to Lewisham, either via Camberwell or via the Old Kent Road. TfL then confirmed the preferred route was via the Old Kent Road following consultation in 2015.
- 6.30 TfL consulted on BLE station and shaft locations from Elephant and Castle to Lewisham with 4 options for stations along the Old Kent Road in 2017. The Council responded in support of the scheme and have been actively campaigning along with Lewisham Council to Back the Bakerloo. The Council requested three stations along the Old Kent Road, including one at Bricklayers Arms. In 2020, TfL launched another consultation which included the TfL preferred option location of two stations on Old Kent Road (at the Tesco and former Toyrus sites). The consultation included the following proposals:
- A new integrated station entrance at Elephant & Castle
  - The route of the proposed tunnels from Lambeth North to Elephant & Castle
  - The route of the proposed tunnels from Elephant & Castle to Lewisham
  - The location of the primary and secondary tunneling worksites for the scheme
  - The naming of the two proposed stations on Old Kent Road
  - A possible further extension of the route from Lewisham to Hayes and Beckenham Junction, involving a conversion of the National Rail line
- 6.31 89% of respondents to the consultation made positive or supportive comments about the BLE proposals. Work is ongoing by TfL, the GLA and the boroughs to update the business case for the BLE and complete the feasibility design, including packages of work looking at station design and funding options.
- 6.32 The Secretary of State for Transport has issued directions to safeguard land needed to deliver the BLE. The directions preserve parcels of land for future

infrastructure, either temporarily during construction or permanently, to ensure the extension can be delivered as soon as possible. Safeguarding also covers land which, if developed, could otherwise impact on the ability to construct or operate the railway, for example due to foundation design.

- 6.33 The estimated cost of the BLE is £8 billion, and delivery of this major piece of new transport infrastructure remains dependent on a viable funding package being put together. TfL and the Mayor of London remain committed to delivering the BLE as set out in the adopted London Plan 2021.
- 6.34 Since the previous draft and following extensive consultation, **nearly 9,499 homes**, including shared living and student housing, have been granted on site allocations in the plan, in accordance with the draft masterplan. The masterplan has been updated in the 2024 version of the plan to take into account changes as a result of consultation with the local community. The options below reflect the growth options for the opportunity area without a tube line and with a Bakerloo Line extension. Option B assumes the provision of two new tube stations to serve the area which is reflective of the latest position on the BLE.
- 6.35 The assessment compares the sustainability implications between adopting each alternative of the OKR AAP, or two reasonable alternatives depending on the delivery of the BLE.
- 6.36 The full Option-testing sustainability appraisal is included in **Appendix 10**, this provides the justification on why the decision to develop and adopt a new Area Action Plan through the selection of Option B: High growth scenario (20,000 homes) with two BLE stations was deemed preferable to achieve increased sustainability, health and equality objectives in the borough compared to the reasonable alternative.
- 6.37 The reasonable alternatives considered are set out within **Appendix 12**. This demonstrates how the indicative capacities have changed throughout different iterations of the OKR AAP.
- 6.38 Within this context, potential OKRAAP sub areas and sites options were assessed for their 'reasonableness' prior to being taken forward for appraisal. This involved considering a series of questions:
- Will implementation of the option assist in fulfilling the objectives of the OKRAAP?
  - is it a genuine option?
  - Will the necessary resources be available to deliver the OKRAAP?
  - Will there be sufficient time within the plan period to implement the option?
  - Is there an unacceptable risk that the option will not be fully implemented for one reason or another?
  - Is the option sufficiently flexible to accommodate changing circumstances?
  - Does the option generally conform with the London Plan and NSP?
- 6.39 All options were assessed against the IIA framework set out in **Appendix 10**.

### **Option A: Business as usual without BLE extension**

- 6.40 This option would be delivered without the extension of the Bakerloo Line. The option would deliver approximately 8,000-9,500 new homes by 2037. There would be limited

opportunities to grow the business, arts and cultural communities in the area or to deliver the other benefits to residents unlocked by the Bakerloo Line.

### *Summary of Option A*

- 6.41 This option considers how the area is expected to evolve without any significant intervention. The AAP therefore would need to evolve policies to fit the aspiration as an opportunity area but without any significant changes to existing policy designations and infrastructure. In this scenario the plan would come forward to deliver around 8,000 – 9,500 new homes and the Bakerloo line extension would not be brought forward. The ability for the area to deliver additional jobs in this scenario may require incentive for change within the PIL's which may be difficult due to well established uses and land values unlikely to change significantly over the plan period. Existing uses in storage, distribution and warehousing sectors typically have a low floorspace to jobs ratio. Industrial sites are more likely to remain in industrial use in this scenario.
- 6.42 In this scenario the provision of schools and health facilities and children's play space may be limited to improvements to existing facilities as a result of CIL collected from new development. Significant transport interventions such as the BLE would also have limited opportunity within this scenario and bus priority would be needed to support new development. The creation of new routes to support cycling and walking would also be limited as there would be less change to the structure of the street pattern through redevelopment and it is likely that private car will remain the dominant transport mode. Therefore, in this scenario, it will be more difficult to deliver better areas and improve public realm. There will also be less capacity to accommodate larger site allocations. For the same reasons, there would not be the opportunity to coordinate for larger areas Sustainable Urban Drainage Systems to help alleviate risks of flood.

### **Option B - High Growth scenario with two stations under BLE**

- 6.43 The key driving factor for growth in this option would be significant improvements to public transport through the delivery of the Bakerloo Line extension and two new underground stations. With this option, development would benefit residents by delivering the following outcomes that would not be achieved under option A:
- 20,000 new homes, with the 8,000 – 9,500 homes expected under Option A delivered 10 years sooner
  - 7,000 affordable homes
  - 1 further education college and the opportunity for a university
  - 2 new tube stations on the Bakerloo Line Extension
  - 1 new community health hub
  - 10,000 new jobs
  - The opportunity for a new new primary school if required
  - primary school expansions
  - 7 new parks and other public spaces

### *Summary of High Growth scenario with two stations under BLE*

- 6.44 In this option, the Old Kent Road Opportunity Area would involve significant new homes, jobs, community, health and leisure facilities which will accompany the addition of two new underground stations as part of an extension to the Bakerloo Line. Key industrial areas will be retained and intensified while some industrial units and large retail warehouses would transition to mixed use neighbourhoods and a revitalised high street providing a high density scenario of around 20,000 new homes and 10,000 new jobs.
- 6.45 The addition of 20,000 new homes would contribute significantly to the council's housing target and respond to housing needs for all housing types and tenures. Each development scheme would be expected to deliver at least 35% affordable homes.
- 6.46 Near to the tube stations and along the Old Kent Road, high density new employment space would be delivered such as offices and co-working space for small businesses. There would also be opportunities for small manufacturing, artists' studios and creative enterprises. Further away from the Old Kent Road, new employment space would be lower density and accommodate depots, distribution sheds and industrious workspace that requires better access for HGVs, vans and lorries. Workspaces would remain flexible so they can adapt to changing business needs over time and suit a variety of uses. Developments would be carefully designed to ensure businesses can function effectively and residents can live peacefully. Masterplans would ensure businesses can be clustered to strengthen commercial identity and foster a vibrant business community.
- 6.47 This option would also retain 26 hectares of land kept in industrial use and support these uses to be intensified to make more effective use of space. This would help increase the number of jobs in industrial use, make use of railway arches and continue to provide essential infrastructure such as waste facilities and electricity sub stations.
- 6.48 In a high growth scenario, it is anticipated that there will be considerable demands on the provision of new schools and health facilities. The AAP would encourage a coordinated approach to deliver these facilities in line with phased development. There are considerable opportunities in this scenario to attract new cultural and leisure facilities which would enhance the vitality and perception of the area as a cultural destination. In a high growth scenario, there would also be the possibility of encouraging a major educational institutional such as a University which would further provide more employment opportunities and create a thriving new community.
- 6.49 The Bakerloo Line extension and two new stations along Old Kent Road would significantly improve the accessibility of the area and provide rapid connection to the city and would support the delivery of the scale of development envisaged. There would be considerable improvements to the Old Kent Road highway, improving facilities for buses, pedestrians and cycle links, helping reduce the segregation of areas on either side of the road. Transport improvements would be integrated with public realm improvements to promote better linkages across the road and better facilities for same and convenient routes for pedestrians and cyclists. In a mixed use development, servicing for new employment uses will be an important component of the scheme design and reduce the impact of servicing and heavier traffic on adjoining residential development.



- 6.50 Through larger site allocations, meaningful new areas of public open space or green links could be delivered. Larger areas of sustainable Urban Drainage Systems (SUDS) would be coordinated in to help alleviate flood risks and provide amenity and biodiversity benefits. There would also be opportunity to support the development of a decentralised energy network to achieve a low carbon energy supply to the population.
- 6.51 Within option B there is the opportunity to develop a standard size building with all 18 sites being 15 stories as perimeter blocks with a monolithic development providing the 20,000 new homes but losing the opportunity to retain and provide new business space and 10,000 new jobs. There would also be daylight and sunlight issues and it would lack the opportunity to create new open spaces and provide new routes. Or there is the opportunity to develop a Stations and Crossings approach with a variety in landscape and land use with the strategy to locate tall buildings to provide wayfinders and development space for residential homes above retail and a variety of types of businesses that will enable 20,000 new homes and 10,000 new jobs to be built. This type of development with clear guidelines would retain the traditional business space alongside opportunities for new business space, offices and homes to be developed whilst leaving the space for open spaces, public realm and other infrastructure.
- 6.52 To test Option B of the OKR AAP, iterations of the Masterplan were tested to set out how high growth could be achieved in a sustainable way, and so that other uses such as education, community facilities and open space could also be delivered. The masterplan testing has been done by urban design work, capacity modelling and detailed masterplanning options to inform the current version of the plan.

### **What have the options identified?**

- 6.53 Each option is considered against the 17 identified IIA objectives incorporating SEA objectives, sustainability, health and equality. The full appraisal can be found in **Appendix 10**. The assessment summarises the impacts and gives an overall score based on the opportunities the Plan could offer in each scenario. The following summary explains the results and gives a qualitative analysis of the complexities and challenges of the two alternative approaches.

### **What option was chosen for the Old Kent Road AAP and why?**

- 6.54 The AAP has been prepared according to the principles outlined in Option B. There are considered to be more social, economic and environmental benefits in this scenario which will improve the health and wellbeing of communities. Whilst the scenario itself presents a number of challenges, the council considers the AAP can help guide and deliver redevelopment successfully.

- 6.55 The AAP would give confidence to the ability of the Old Kent Road to undergo a transformation that creates a new identity and position in central London. The provision of 20,000 new homes would significantly contribute to needs of a growing and diverse population, particularly the provision of affordable homes. The AAP would provide robust policies, and detailed guidance to coordinate development to achieve the best possible outcome for the benefit of local people. The AAP would address the challenges identified through new policies that would be less affected by uncertainty and potentially incompatible objectives. In this scenario it is anticipated that benefits will be seen in relation to levels of crime and deprivation, improved health of the population through better physical activity and better modes of transport, and less exposure to harmful pollutants and poor air quality. These benefits, along with improving social cohesion would positively impact on a wide range of equality groups. However to accommodate this level of development there are likely to be significant pressures on infrastructure and environmental considerations such as water consumption and waste management. Increased construction activity in the short to medium term could bring adverse environmental impacts affecting residential amenity and climate change.
- 6.56 Option B would ensure mixed use development can accommodate a range of new employment sectors and opportunities to the area, whilst ensuring existing businesses have the opportunity to be accommodated in redevelopment or relocated within the OA. The retention of industry in the area would be maximised by protecting and intensifying industrial land. The delivery of the high growth option would also need to include high density development including tall buildings, and the AAP needs to ensure the strategy for place-making, urban design and a high quality public realm supported by new green spaces and connections is strongly maintained.
- 6.57 We have also assembled an extensive evidence base which confirms both the need and opportunity for large scale redevelopment of land in Southwark as well as the need for planning policy to guide development to ensure that it is sustainable, equitable and supports health and wellbeing.
- 6.58 Option B provides in excess of our housing targets for housing without compromising other strategic aims of the borough, including good design principles, heritage, provision of non-residential uses including industrial co-location and open spaces. Option B also provides a healthy buffer of housing, over our London Plan housing target which is identified in the 5 and 15 Year Housing Land Supply Report.
- 6.59 **Appendix 10 (Table 1)** sets out the averaged scoring for the three options against the 17 sustainability objectives, encompassing economic, social and environmental aspects. The options appraisal found that Option B: High Growth would have an overall score of 79% against the sustainability objectives and this option would result in positive impacts overall. 17 of 17 objectives received a positive scoring in achieving the sustainability objectives.
- 6.60 This option will provide more positive social, economic and environmental benefits than Option A, which will improve the health and wellbeing of Old Kent Road's communities.

- 6.61 The benefits anticipated through this preferred approach will be achieved through securing growth in housing, employment, town centre amenities, primary health and care facilities, school places, higher education and public open spaces. They will also be served by enhancing and expanding physical networks of sustainable transport and habitats for wildlife, social interaction and economic interaction within local business clusters.
- 6.62 The options appraisal considers Option A to have an overall neutral score of 25%, and this option would have overall neutral social, economic and environmental impacts. The majority of the objectives in this option have scored uncertain (11 out of 17) and positive (3 out of 17). The sustainability appraisal found that without the identification of land to provide infrastructure, including new education, health facilities and open space and without the identification of area-wide improvements the delivery of infrastructure would be uncertain and less coordinated. Furthermore, without guidance on sites and areas, opportunities to improve places for community cohesion and support for a diversity of lifestyles could be missed. Without guidance the full consideration of heritage assets and opportunities for heritage-led regeneration might not be incorporated into development proposals; and without the identification of opportunities for new open space and green links sufficient space might not be provided to serve the needs of a growing population or habitats provided and connected for wildlife.
- 6.63 Option A has not been taken forward as the preferred option. Whilst it would be a reasonable alternative to identify opportunity sites for development and rely on other local plan policies to shape growth, the social, economic and environmental effects would be deeply uncertain. The lack of improved transport infrastructure from the Bakerloo Line extension would be a significant disbenefit for local residents and to generate growth. It would create uncertain impacts for growth, would not deliver as much housing to help achieve our short and long term housing supply and would not achieve strategic ambitions such as providing park spaces across multiple sites (e.g. linear park).

### **What are the significant positive effects?**

- 6.64 The policies in the AAP/OAPF seek to guide future development and set out the clear aspirations for the OA over the next 20 years. Detailed policies guide the strategy for homes, jobs, shopping, leisure, arts, culture, education, health, public realm, heritage, transport, sustainability and high quality design of buildings. The plan also describes how the objectives of revitalised neighbourhoods can be achieved in five sub areas across the OA. Site allocations are also considered within the sub areas, setting out the expected uses, design, supporting infrastructure, capacity and phasing. The full appraisal of the policy themes and sub areas are provided as **Appendix 5**.
- 6.65 The AAP/OAPF preparation has also been subject to a Mental Well-being Impact Assessment (MWIA) screening tool which has been designed to help people who are

planning or providing policies, services, programmes or projects to begin to find out how they might make a difference to mental well-being. A wide range of potential long term and short-term impacts on the determinants of mental well-being have been identified by the screening and a range of equalities groups are considered. The screening report is provided as **Appendix 13**.

- 6.66 The plan generates major positive impacts relating to tackling poverty and encouraging wealth creation due to the large increase in the number and diversity of jobs in the area. These benefits will be seen in the short to medium term, with the long-term effects anticipated to bring stronger benefits as the OA becomes increasingly incorporated into central London functions and increases opportunities to diversify the economy and increase the number of jobs available. This will improve opportunities for young people, unemployed people and low-income groups through new apprenticeships and learning new skills, contributing to improving levels of deprivation in the area.
- 6.67 The provision of new homes will significantly improve supply and help to meet local needs across all tenures including private rented, homes for sale and affordable homes. The plan would also bring significant improvements to the quality of the townscape, particularly with the creation of a revitalised high street environment for the Old Kent Road, improved public realm, new connections for walking and cycling, high quality design of new buildings and new parks and green infrastructure. This would create a better-quality environment in which people can live, work and visit and may particularly benefit accessibility for those with mobility problems, such as disabled or elderly people. It would also generate positive impacts in relation to reducing crime and the fear of crime, as new routes in mixed use neighbourhoods would increase footfall and security. This would benefit a number of groups particularly those who would be more vulnerable to crime and low-income groups.
- 6.68 The plan also generates positive impacts for sustainable transport and major infrastructure improvements. There are strong links between improvements to sustainable transport modes and improving health. The BLE will have a major impact on public transport accessibility in the area in the long term, and improvements to surface transport including junctions will have positive effects for sustainable transport modes in the short to medium term. The creation of better crossing points on the Old Kent Road and pedestrian environment would help to reduce road traffic accidents and providing accessibility to essential services. Improvements to cycling and walking routes will encourage sustainable modes of transport, in turn improving air quality by reducing the need to travel by car. New attractive cycling and walking routes would have positive effects for health, promoting physically active lifestyles.
- 6.69 The opportunities for new and improved areas of open space will also bring positive effects in terms of improving public realm and air quality, which will have a beneficial health impact. Improvements to infrastructure such as education, health, cultural and community facilities will enhance accessibility to health and social facilities benefiting a wide range of groups. The integrated of sustainable urban drainage systems in new development would also help to reduce flooding in the long term, and improve opportunities for biodiversity and an attractive urban environment.
- 6.70 Accelerating the delivery of housing development will provide major contribution towards providing everyone with the opportunity to live in a decent home. By creating

certainty around the requirements for other land uses and infrastructure on site allocation this will also support affordable housing delivery by allowing the more accurate understanding of development costs in the valuation of land.

- 6.71 Option B helps meet our London Plan housing target as detailed in the 5 and 15 Year Housing Land Supply without compromising our other strategic aims of the borough including good design principles, heritage, provision of non-residential uses and open spaces.
- 6.72 The plan generates major positive effects to tackle poverty and encourage wealth creation. The acceleration of development in most areas will create jobs in construction. Where a significant uplift in commercial floor space is planned for there will be further increases in employment opportunities. The opportunity for the occupation of affordable workspace to provide support for start ups, small or independent businesses is vital to secure Southwark's thriving economy. This will include job opportunities secured for local people as well as procurement opportunities for other local businesses. Support for the most promising economic clusters within the borough will generate higher wages and economic resilience.
- 6.73 The policies seek to retain some of the previously removed Strategic Protected Industrial Land and to allocate three sites as Locally Significant Industrial Sites (LSIS); this will ensure the retention of the businesses and employment on these sites.
- 6.74 The health of the population will be improved by encouraging active lifestyles and wellbeing through a network of green links, cycle routes and open spaces across the borough and maintained by additional health and care facilities. These will provide the opportunity to deliver integrated health services to improve the quality of their operation. Public spaces, public realm, cultural facilities and a flexible range of new town centre amenities will have major long term positive effects to promote social inclusion, equality, diversity and community cohesion by creating spaces for interaction as well as a diversity of different lifestyles.
- 6.75 In parts of the borough redevelopment will deliver area-wide improvements in the architectural quality of buildings and the public realm alongside new or enhanced open space and urban greening. These will deliver major positive effects and enhance the quality of landscape and townscape.

### **What are the significant negative effects?**

- 6.76 There will be some negative environmental impacts in the short term as a result of higher levels of construction. Increased construction traffic, methods of construction and embodied carbon emissions in demolition and construction could adversely contribute to climate change. Similarly construction traffic and methods could also adversely affect air quality in the short term, and improvements in public transport may not occur immediately. This could also affect the health of the population in the

short term by the increase of noise, dust and disruption to active travel routes. The proposals for significant new development and population increase in the area will place additional pressure on waste facilities, including safe disposal, recycling and management of waste. There will also be increased demand for water and foul sewage disposal which could put increased pressure on the water and sewer network and water resources.

- 6.77 The plan does not generate major negative effects in the appraisal although there are residual areas of uncertainty, discussed further below, which could result in negative effects; particularly where they are cumulative in nature.
- 6.78 The sub areas and site allocations and area visions seek to steer development opportunities that already exist towards delivering a sustainable regeneration strategy. Furthermore they are supported by the strategy and vision and development management policies to further mitigate negative effects.
- 6.79 The appraisal does indicate minor negative effects in the short term in some areas towards social inclusion, equality, diversity and community cohesion. This is related to the loss of some community assets in the short term, which may impact particular groups, and the potential disruption of social interaction through the impacts of construction. This would be in locations where the acceleration of development brings forward a number of sites concurrently within a small area as development management policies will seek general mitigation of the impacts of construction. The appraisals indicate that this disruption will occur in areas that will likely accrue more significant benefits in the long run towards this sustainability objective. Nevertheless, opportunities for further mitigation in the short term could be explored through targeted community infrastructure development and the coordination of quick wins from regeneration and meanwhile uses.

### **Uncertain impacts**

- 6.80 The plan provides a positive strategy for growth however there are some impacts that may be uncertain at this stage. The plan encourages mixed use development and this will intensify land across the OA to provide high density development where a range of uses will be expected to be provided, along with key infrastructure improvements and open space. The plan encourages the retention of existing businesses and provides design guidance for the effective mixing of uses. This presents a challenge for new development, particularly if industrial uses are sited in close proximity to residential development. The servicing arrangements, public realm and practical functions for workspace will need to be carefully balanced in mixed use development. The provision of tall buildings will also need to be carefully designed and located to positively contribute to improvements to the public realm. Similarly new high density development will need to ensure heritage assets are appropriately conserved and enhanced in the public realm strategy.
- 6.81 The OA also has a number of existing community networks, including many religious groups and churches, and a diverse population. There may be a risk that community networks could be affected by redevelopment in the area if meeting places or cultural facilities are displaced by development.

- 6.82 Exploring the issues and options through community engagement, evidence base studies and the findings of the Scoping Report and subsequent consultation helped to guide the sustainability of the draft AAP policy options. Areas of concern identified at the scoping stages have led to development of the policies, objectives and indicators to address areas that had not been covered in sufficient detail.
- 6.83 The conclusions that were reached in undertaking the IIA of this version of the OKR AAP are a result of both quantitative and qualitative (i.e. subjective) judgement by planning professionals within the council. In addition, predicting the outcome of a potentially complex mix of social, economic and environmental factors is an inherently difficult task to undertake, and can only be undertaken on the basis of the background data that is available.
- 6.84 Consequently, the sub areas and site allocations were ranked against particular sustainability objectives may be subjective. However, whilst some rankings are assessment individually, it is the overall performance of policy against the IIA Framework (**Appendix 4**) taken as a whole, which is the most important element to consider.
- 6.85 The plan provides a positive strategy for growth however there are some impacts that may be uncertain at this stage.
- 6.86 The key uncertainty is the phasing strategy for housing delivery as it is dependent on the construction of the Bakerloo Line Extension. Contracts for the project have not yet been signed and funding is yet to be agreed which means there remains a lack of certainty over the deliverability of the extension. The 9,500 homes to be delivered in Phase 1 can rely on existing public transport upgrades, as agreed with TfL and the GLA. However, the remaining 10,500 homes planned for Phase 2 would require a larger transport intervention to support and therefore does depend on the delivery of the Bakerloo Line Extension.
- 6.87 Option B enables us to meet our 5 and 15 Year Housing Land Supply based on the adopted London Plan 2021 target. Within the 6-15 year supply the evidence base for the Southwark Plan identified a buffer of 9860 homes which allows for the flexibility that in the event that the BLE is delayed further or cancelled, there is still capacity within other sites in Southwark to meet our housing target up until 2036.
- 6.88 The uncertainty surrounding the BLE also creates uncertainty around the delivery of other land uses proposed in the masterplan. If the Phase 2 sites are not able to come forward for housing, then the commercial uses proposed for co-location may not come forward either. Some of the infrastructure which would provide public benefit on the phase 2 sites, such as new open spaces may also be at risk.

The initial date for the delivery of Phase 2 was for completion in 2036 but delays to the start of the project means completion is more likely to be 2042. The Transport Works Act order is expected to be made in 2028, with the letting of the construction contract anticipated for 2030. The 10,500 homes will be delivered between 2030 and 2042.

- 6.89 Southwark Council together with Lewisham have been actively campaigning and promoting the BLE given its importance for the delivery of homes in the boroughs. This infrastructure is essential to meet our future housing need up to 2036, given the planned delivery of new homes in the Old Kent Road Opportunity Area in Southwark and New Cross and Catford Opportunity Areas in Lewisham. Both parties are also working with the Greater London Authority and Transport for London to develop these proposals for the BLE and to make the case to government to ensure the project is delivered. We have agreed a phasing plan for the delivery of these new homes with the GLA and TfL.
- ~~6.90 However, should the BLE not be delivered or delivery be delayed, this could significantly impact upon our housing land supply for years 6-15 and beyond should some pipeline permissions, site allocations or windfall sites not come forward.~~
- 6.91 While on the whole the allocation of flexible employment space will have major positive effects for the local economy and employment, redevelopment of sites will in several instances result in the loss of existing businesses. For lower value storage or industrial space or where businesses are less compatible with existing land uses similar operations may be challenging to re-incorporate. In order to maintain and enhance economic diversity there may be further opportunities for mitigation from regeneration and engaging stakeholders to curate the offer of commercial space within vision areas.
- 6.92 Sustainable transport improvements and greening will help to mitigate the causes of climate change. However, traffic congestion impacts of construction could add to emissions in some locations. There may be further opportunities to reduce emissions overall all in the medium to long term through decentralised energy. A district heating network is currently under construction in the Old Kent Road area which will contribute to the reduction of emissions from domestic gas boilers. Congestion could similarly affect air quality and there may be as yet unidentified opportunities for area-wide responses.
- 6.93 Within critical drainage areas policy will seek flood risk assessments and sustainable drainage measures. Where redevelopment is particularly concentrated there may be a greater risk of cumulative impacts. Opportunities for strategic solutions to manage any risk could be further investigated.

## Cumulative impacts



- 6.94 The SEA Directive requires an assessment of secondary, cumulative, and synergistic effects, which should be incorporated in the SA. Collectively these effects are called cumulative impacts. Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects (e.g. noise, dust and visual) have a combined effect.
- 6.95 Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.
- 6.96 The cumulative impact of policies with a minor negative or uncertain impact could result in a major negative impact overall. It is difficult to assess the extent of such impacts at this stage in the process, however by grouping sites within character areas informed by masterplanning studies cumulative effects are reflected in the assessment. Providing that suitable mitigation measures are applied to individual proposals it is considered that the potential negative impacts will remain minor and, with the development of new technologies and regulations, could even be reduced further over time. Cumulative impacts may also be positive – for example several minor positive impacts on open space and biodiversity could lead to a major positive impact for the area as a whole.
- 6.97 The cumulative impacts of the policies will need to be kept under review through the monitoring process and assessment of planning applications to measure the success of implementing the policies and inform any amendments that may be needed to policies and guidance.
- 6.98 The SEA Directive requires an assessment of secondary, cumulative, and synergistic effects, which should be incorporated in the SA. Collectively these effects are called cumulative impacts. Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects (e.g. noise, dust and visual) have a combined effect.
- 6.99 Synergistic effects interact to produce a total effect greater than the sum of the individual effects. The potential of these are outlined in **Appendix 10**. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.
- 6.100 There could be cumulative impacts with development occurring in Southwark and the surrounding boroughs. Engagement is continuous with these boroughs to ensure the cumulative impact of development can be realised and mitigated where required. In particular, Lewisham also has significant growth planned within the Opportunity Areas, there is continuous communication with Lewisham to ensure there is the

required infrastructure for the planned development. This includes working positively and in cooperation with Greater London Authority and Transport for London to support the business case for, and secure delivery of, the Bakerloo Line Extension which will run through Old Kent Road, Lewisham and beyond to Hayes.

- 6.101 The cumulative impact of policies with a minor negative or uncertain impact could result in a major negative impact overall. It is difficult to assess the extent of such impacts at this stage in the process with the lack of detailed information on the design of proposals for individual sites. Providing that suitable mitigation measures are applied to individual proposals it is considered that the potential negative impacts will remain minor and, with the development of new technologies and regulations, could even be reduced further over time. Cumulative impacts may also be positive – for example several minor positive impacts on open space and biodiversity could lead to a major positive impact for an area as a whole.
- 6.102 The cumulative impacts of the policies will need to be kept under review through the monitoring process and assessment of planning applications to measure the success of implementing the policies and inform any amendments that may be needed to policies and guidance.

### **Proposed mitigation**

- 6.103 Where the SA identified potential shortcomings of particular policies, mitigation measures are proposed to help off-set the negative impacts. Many of these mitigation measures are policy requirements in either the emerging Southwark Plan where some of the negative impacts will be mitigated.
- 6.104 Whilst there may be short term negative environmental effects relating to construction in the OA, the longer-term effects could have more positive impacts. For example, redevelopment of existing industrial and retail land would present the opportunity to employ more sustainable building techniques and enable long term carbon savings. There would also be opportunities to include renewable energy in new developments, good insulation in homes and harvest rainwater. This could help create more positive impacts for climate change in the future. In relation to the demand for water, efficiency of water resources would be encouraged in new schemes. We have published an Integrated Water Management Strategy prepared with Thames Water and the GLA for the opportunity area to manage future demand.
- 6.105 It is anticipated that additional jobs will be provided within the OA. The AAP retains some strategic industrial land to ensure industrial functions are maintained and additional space in railway arches can be utilised. Retaining the quantum of employment space on allocation sites with premises configured to different sectors will also help to maintain business networks and provide purpose-built new industrial space.
- 6.106 In relation to community space, the AAP provides many opportunities to replace, enhance and expand community and cultural functions, which will be an integral part of the place-making strategy. The implementation of the AAP will ensure high quality

development is delivered across the OA, encouraging sites to consider wider considerations to achieve the aspirations of the plan, including new green spaces, connecting routes and high-quality new buildings. Disruption to communities will also be mitigated by a social regeneration approach to ensure existing residents can access the opportunities created by regeneration and supporting full engagement in the planning process.

6.107 Where the SA identified potential shortcomings, mitigation measures are proposed to help off-set the negative impacts. To a large extent mitigation measures are provided in this iteration of the OKR AAP.

6.108 The following measures warrant further investigation following potential negative consequences of selecting Option B: High growth:

- short-term offsets to benefit communities disrupted by concentrated largescale construction;
- curation of business space;
- de-centralised energy networks;
- air quality improvement;
- strategic sustainable drainage systems and flood risk.

6.109 These will be cross-examined in further detail in the IIA appraisal summary included in the following chapters, to identify whether the benefit of policies outweigh risks.

## Section 7. IIA Appraisal Methodology

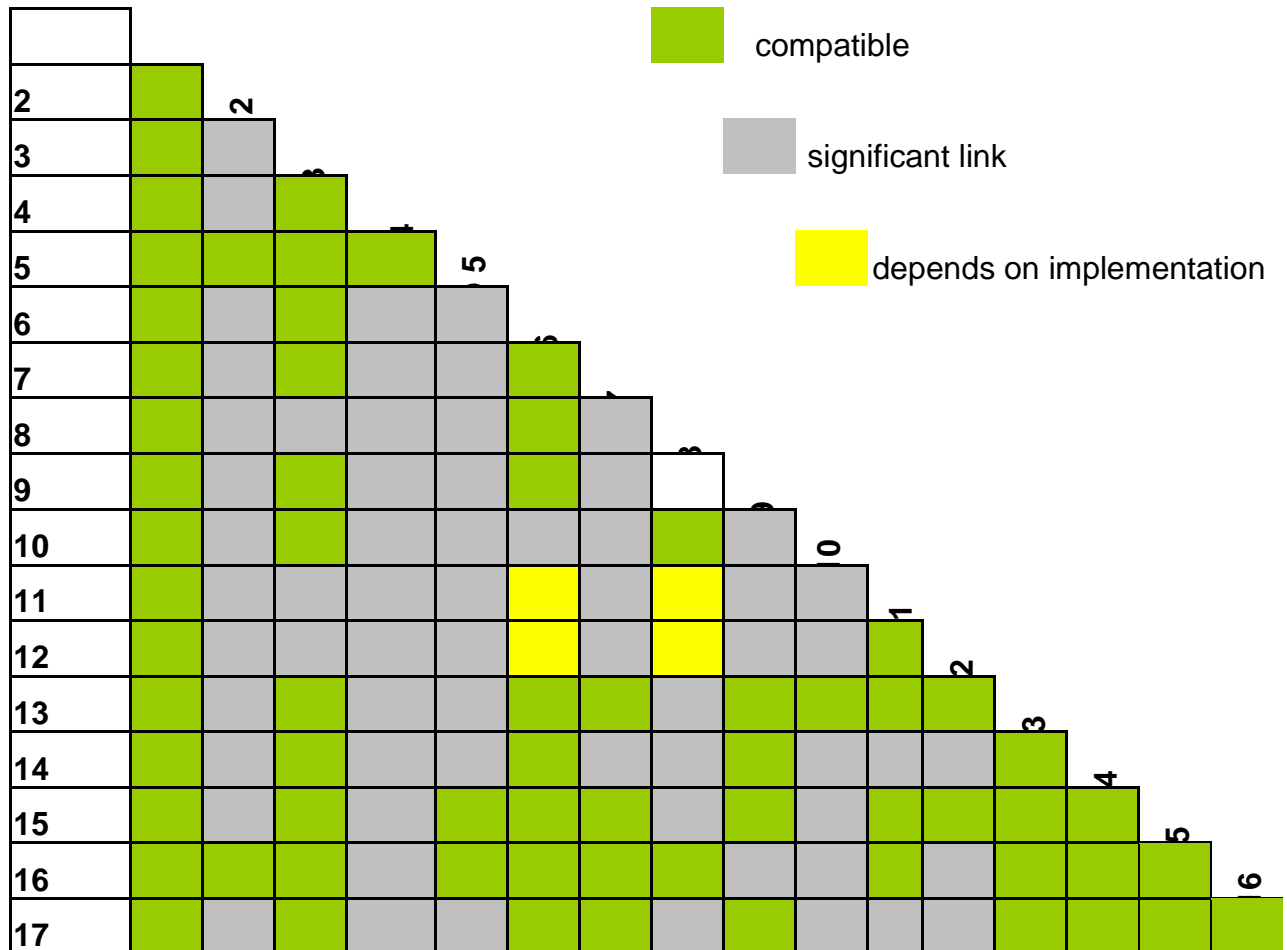
- 7.1 The establishment of appropriate objectives and indicators is central to the assessment process and provides a way in which the performance of the polices can be assessed. By researching specific issues affecting Southwark through a detailed desktop analysis and internal discussions, seventeen objectives (**Appendix 4**) were developed that formed the basis of the IIA appraisal methodology and assessment. The associated baseline indicators table, for which the IIAOs are to be continuously monitored, has been included in **Appendix 9**.
- 7.2 Upon developing an appraisal, each of the development management policies are grouped into six strategic policy areas identified in the Southwark Plan IIA. These are the strategic policies for the borough and there is some overlap with the vision and strategy for the Old Kent Road Opportunity Area, so these indicators have also been selected for the OKR AAP IIA appraisal. More specific monitoring indicators have been introduced where this is relevant.

### What is the IIA framework?

- 7.3 The likely impacts of the AAP/OAPF will be assessed using a set of objectives, which relate to the existing and emerging strategic vision for the opportunity area reflecting the current social, economic and environmental issues set out in section 4.
- 7.4 The 17 objectives set out below are based off of the policies in the plan, vision for the OKR AAP and sustainability issues identified. These indicators are monitored against by baseline indicators and data as set out in **Appendix 8 and Appendix 9**.

### Comparison of the IIA objectives

7.5 As part of the IIA a comparison of the objectives was undertaken to check if the objectives are compatible with one another.



### Method of Assessment

7.6 This section explains the approach and methods for the draft IIA of the AAP/OAPFF. The IIA Framework presented in Appendix 4 form the basis for assessing the OKR AAP policies (strategic, implementation and development management), site allocations and area visions. That includes the indicators that will be used to continuously monitor each of the IIA objectives (IIAOs). **Appendix 4** also sets out the IIA objectives and associated questions that have been asked when undertaking the appraisal methodology, to ensure that the IIA objectives are consistently appraised across all of the strategic, development management policies, implementation policies, area visions and site allocations.

7.7 The IIA is structured under the objectives in the IIA Framework **Appendix 4**, which incorporate topics in the SEA Directive (**Appendix 1**). This provides a framework and structure to evaluate the likely significant effects of the policies

within the proposed submission version of the OKR AAP 2024 against these key sustainability appraisal topics determined above, which include health and equality. The appraisal takes short, medium and long term effects into consideration, but does not explicitly determine on each of these basis separately.

- 7.8 The appraisal is undertaken using professional judgment, supported by the baseline information and wider evidence base.
- 7.9 A summary appraisal commentary alongside the system of symbols is provided in **Appendix 5, 6 & 7** of this IIA report to set out any significant effects identified for the proposed submission version of the OKR AAP 2024, masterplan, sub areas, site allocations and implementation policies, along with suggestions for mitigation or enhancement to be made where relevant. The nature of the likely effects (including positive/negative, duration, permanent/ temporary, secondary, cumulative and synergistic) are described, along with any assumptions or uncertainties noted. Where necessary, the appraisal commentary also identifies any potential cumulative effects for that option.
- 7.10 Table 7.1 demonstrates the system of symbols which will be used to represent the findings of the IIA for different elements of the emerging AAP.

Symbol and colour	Scoring Value (%)	Score	Description
üü	100	Major or direct positive	The proposed option/policy contributes significantly to the achievement of the objective.
ü	50	Minor or indirect positive	The proposed option/policy contributes to the achievement of the objective but not significantly or indirectly.
-	0	Neutral	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the

			relationship is negligible.
x	-50	Minor or indirect negative	The proposed option/policy detracts from the achievement of the objective but not significantly.
xx	-100	Major or direct negative	The proposed option/policy detracts significantly from the achievement of the objective.
?	N/A	Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.

Table 7.2 (below) Individual scoring metric against each objective included in sustainability appraisals of Appendix 5, 6 and 7

Negative	Neutral	Positive
%	10 - 49%	50 - 100%

7.11 The IIA is structured under the objectives in the IIA Framework, which incorporate topics in the SEA Directive. This provides a framework and structure to evaluate the likely significant effects of the AAP/OAPF policies against key topics. The appraisal also considers short, medium and long term effects Table 7.3 outlines the grouping structure for the assessment.

Table 7.3 (below) sets out the policies and their key themes for assessment

<b>Policy themes</b>	<b>Draft AAP Policies</b>
Vision	Area Today Connected Communities: The Best of London The Central London 'Smiley'
Delivery	Delivery Funding Plan Objectives  AAP1: The Masterplan AAP2: Bakerloo Line Upgrade and Extension
Quality affordable homes	AAP3: Homes for All AAP4: Student Homes
Strong local economy	AAP5: Businesses and workspace – The Bow Tie AAP6: Life Sciences AAP7: Town centre, leisure and entertainment
Movement	AAP8: Movement
Parks and Open Space	AAP9: The Greener Belt Strategy – Parks and Healthy Streets
Design	AAP10: Tall buildings strategy: The Stations and the Crossings AAP11: Character and heritage AAP12: Design
Environment	AAP13: Climate Emergency AAP14: Water Management, Air and Noise Quality
Best start in life	AAP15: Great Start in Life AAP16: Child and Youth Provision
<b>Sub Areas</b>	<b>Draft AAP Sub Areas</b>
1 Mandela Way, Crimscott Street and Old Kent Road (North)	OKR1: Bricklayers Arms roundabout OKR2: Crimscott Street and Pages Walk OKR3: Mandela Way OKR4: Dunton Road (Tesco store and car park) and Southernwood Retail Park OKR5: Salisbury Estate Garages OKR6: 96-120 Old Kent Road (Lidl Store) OKR7: Former petrol filling station, 233-247 Old Kent Road OKR8: Kinglake Street Garages OKR9: 4/12 Albany Road
2 Cantium Retail Park and Marlborough Grove	OKR10: Land bounded by Glengall Road, Latona Road and Old Kent Road OKR11: Marlborough Grove and St James's Road OKR12: Former Southern Railway Stables



3 Sandgate Street, Verney Road and Old Kent Road	OKR13: Sandgate Street and Verney Road OKR14: 634-636 Old Kent Road OKR15: 684-698 Old Kent Road (Kwik Fit Garage)
4 Hatcham, Ilderton and Old Kent Road (South)	OKR16: Hatcham Road and Ilderton Road OKR17: South of Old Kent Road (760,812 and 840 Old Kent Road, Toysrus and Aldi stores) OKR18: Devon Street and Sylvan Grove
5 South Bermondsey	Phased Industrial Intensification

7.12 A summary appraisal commentary is provided in Section 7 to set out any significant effects identified along with suggestions for mitigation or enhancement to be made where relevant.

7.13 IIA is an assessment tool that helps to inform decision-making, it is not the sole basis for a decision. The Council will consider the findings of the IIA alongside the wider evidence base to inform the development of policy as well as help to determine which of the reasonable options should be progressed through the AAP/OAPF. This report clearly set out the reasons for the selection or rejection of options in plan-making in Section 6.

## Section 8. Appraisal Summary for the Strategy and Vision

### Appraisal of the draft OKR AAP

- 8.1 The AAP/OAPF has strong objectives for improving the quality of the environment in Old Kent Road including fostering community cohesion, improving health and equal opportunities for all. The plan has been carefully prepared mindful of the potential impacts considered at options stages as outlined in the previous chapter. The Old Kent Road OA experiences relatively high levels of deprivation with poor health and crime as contributing factors. The OA is on the fringes of the CAZ and the functions of central London and extending these beneficial functions to the Old Kent Road will help to improve opportunities for new jobs, homes and infrastructure. Innovative mixed use development incorporating different business sectors will help to focus and reinforce networks of creative workspaces which contribute to the central London economy. The scope of the AAP/OAPF also brings the opportunity for increased funding from new development through changes to CIL charges. The BLE will play a major role in improving transport infrastructure in the area, and the vision for creating a revitalised high street, improving the street network and connections for walking and cycling will bring significant benefits to the OA. Improving access to green space, encouraging physical activity, less exposure to harmful pollutants and improved health and shopping facilities will help to improve deprivation, crime and poor health.

### Appraisal Summary for the Development Management Policies

- 8.2 The sub areas and site allocations are assessed with explicit reference to the short-, medium- and long-term impacts of the designations. These are assessed against the 17 IIA objectives. This is considered appropriate due to acknowledging that the temporal impacts, including those from the implementation of the strategy and vision.
- 8.3 The IIA appraisal tables in Appendix 5 set out the details of the impacts of the vision, strategy and plan objectives in terms of the 17 objectives in the IIA framework.

### Vision

#### Overall Summary: **Positive**

- 8.4 The vision is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors. This includes the delivery of the Bakerloo Line Extension which will unlock further capacity for housing and employment in the local area and increase accessibility to public transport and other areas which will ensure that residents have improved opportunities to access services, employment and recreation in a sustainable way and that reduces the need for private vehicles.

### Strategy

**Overall Summary: Positive**

- 8.5 The strategy is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 8.6 The strategy sets out a number of key deliverables which will help to implement the vision. The strategy sets out the delivery of homes, including affordable homes to ensure all residents have a decent home, employment generating uses and jobs to support a strong local economy, schools to readdress the issue of child and youth provision, community and health facilities to improve access to support for local residents and promote community cohesion, and green space to ensure that walking and cycling and active recreation are accessible to all to reduce childhood obesity, improve life expectancy and generally promote better physical and mental health and wellbeing for local residents.
- 8.7 Due to the phased nature of the masterplan, it is anticipated these positive impacts will vary across the short, medium and long term, and it will take time for some of these impacts to register on the indicators due to this time lag in implementation and improvement.

**Plan Objectives****Overall Summary: Positive**

- 8.8 The plan objectives are anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 8.9 The plan objectives set out how each of the key policy themes will be achieved. These target key issues in the Old Kent Road including housing, employment, child and youth provision, schools and community cohesion, mitigating against the climate emergency, provision of open and green space, character and heritage, vibrant town centres, environmental sustainability and transport and movement. These broadly align with the 17 indicators and are anticipated to have positive impacts on these 17 key areas.

**Section 9. Appraisal Summary for the Development Management Policies**

- 9.1 The IIA appraisal tables in Appendix 6 set out the details of the impacts of the vision, strategy and plan objectives in terms of the 17 objectives in the IIA framework.

### **AAP1: The Masterplan**

#### **Overall Summary: Positive**

- 9.2 AAP1 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 9.3 AAP1 is anticipated to have positive impacts for all because it aims to ensure that all development within the masterplan complies with the policies set out to deliver housing, employment, community facilities, child and youth provision and transport. Which cumulatively have positive impacts for all in terms of community cohesion, access and security.

### **AAP2: Bakerloo Line Upgrade and Extension**

#### **Overall Summary: Positive**

- 9.4 AAP2 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 9.5 AAP2 is anticipated to have a wide range of positive benefits. Firstly, by increasing the capacity of public transport it unlocks further capacity for homes and jobs in the Old Kent Road to meet local need and growth the local economy. Secondly it provides a more sustainable mode of transport which reduces the need for private vehicles and reduces carbon emissions which contribute to climate change, and therefore mitigates against the Climate Emergency. Thirdly, it improves accessibility for residents to employment, services and recreation which encourages greater opportunities for all and community cohesion.

### **AAP3: Homes for All**

- 9.1 AAP3 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors. It should be noted that the scope of the policy has been reduced due to the adoption of the Southwark Plan.
- 9.2
- 9.3 Notwithstanding this reduction in scope AAP3 is anticipated to have positive impacts for all because it ensures the delivery of range of size, type and tenure of homes that meet the local need. This will provide greater security for residents and impact positively on their mental wellbeing and sense of place.

**AAP4: Student Homes**

AAP4 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.

AAP4 is anticipated to have positive impacts because it will ensure the successful integration of student housing without jeopardising the delivery of the other plan's priorities such as affordable housing, commercial business space and, public open space. This will contribute to the creation of mixed and inclusive neighbourhoods within the Old Kent Road and residents will benefit from increases in the student population.

**Overall Summary:** Positive

**AAP5: Businesses and Workspace – The Bow Tie**

**Overall Summary:** Positive

- 9.4 AAP5 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors. It should be noted that the scope of the policy has been reduced due to the adoption of the Southwark Plan.
- 9.5 Notwithstanding this reduction in scope, AAP5 is anticipated to have positive impacts for all because it will deliver employment generating uses to support local people in finding work. It will also deliver affordable workspace to ensure that all businesses have the space to develop and grow.
- 9.6 AAP5 also requires mixed use development including intensification of industrial uses. This uses the 15-minute city theory to ensure that employment, housing and amenities are in walking or cycling distance of each other to reduce the need for private vehicles and to promote a healthier and more active lifestyle for residents.

**AAP6: Life Sciences**

**Overall Summary:** Positive

AAP6 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.

AAP6 is anticipated to have positive impacts by creating educational, training and employment opportunities for local residents. Through the delivery of life sciences as meanwhile uses, this will bring otherwise inactive sites into use creating safer neighbourhoods and a better public realm experience.

**AAP7: Town centres, leisure and entertainment**

**Overall Summary: Positive**

- 9.7 AAP7 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 9.8 AAP7 is anticipated to have positive impacts by creating more vibrant and attractive town centres. This will promote walking and cycling to improve health and wellbeing but also attract people back to the high street to create more passive observation to improve the perception of safety and security.
- 9.9 AAP7 will also create more employment generating uses in town centres and provide opportunities for training and education by extension for local people. This will support a strong local economy.

**AAP8: Movement****Overall Summary: Positive**

- 9.10 AAP8 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 9.11 AAP8 is anticipated to have positive impacts because it is ensuring that walking, cycling and scooting are the first choice of transport as opposed to the car. This has positive impacts for sustainability as it reduces carbon emissions, and for population health as air pollution is improved and opportunities for safer exercise and recreation are more accessible to all.

**AAP9: The Greener Belt Strategy - Parks and Healthy Streets****Overall Summary: Positive**

- 9.1 AAP9 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 9.2 AAP9 is anticipated to have positive impacts because it will deliver healthier streets. This includes the greening of streets, and delivery of quieter and green cycling and walking routes to incentivise more active travel modes, this has benefits for reducing carbon emissions and creating opportunities for exercise and more active recreation.

**AAP10: Tall Buildings Strategy: The Stations and Crossings****Overall Summary: Positive**

- 9.3 AAP10 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 9.4 AAP10 is anticipated to have a positive impact because it sets out a strategy for tall buildings to ensure that the character, heritage and townscape of the existing town centres and Old Kent Road Opportunity areas are conserved. This strategy uses tall buildings as a landmark to demonstrate where there are crossings and stations, this improves legibility for local residents and minimises the impact of tall buildings as it fits within the tall buildings hierarchy as set out in the masterplan.

### **AAP11: Character and Heritage**

#### **Overall Summary: Positive**

- 9.5 AAP11 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 9.6 AAP11 has positive impacts on community cohesion and sense of place because it aims to preserve and enhance the industrial character of the Old Kent Road. It sets out how heritage assets, listed and non-listed will be protected and sympathetic materials used where possible to maintain this rich urban fabric.

### **AAP12: Design**

#### **Overall Summary: Positive**

- 9.7 AAP12 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 9.8 AAP12 is anticipated to have positive impacts because it will ensure that design is of a high standard and meets regulation to deliver decent homes and other non-domestic uses. The design will adapt to the climate emergency and reduce carbon emissions onsite, reuse materials and promote retrofitting. The design policy also sets out how inclusive and accessible design can be achieved to ensure that all can benefit from the new residential and non-residential uses. The design must also respond to the existing character to protect and enhance the quality of the landscape and townscape.

### **AAP13: Climate Emergency**

**Overall Summary: Positive**

- 9.1 AAP3 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 9.2 AAP3 has positive impacts for all because it sets out how the climate emergency should be mitigated against in development to ensure that new development is as close to net carbon zero as possible. It sets out how design, heat sources and use of materials can reduce carbon emissions and be used more efficiently. This has wider benefits for improving housing and non-domestic building stock as these will be made more efficient.

**AAP14: Water Management, Air and Noise Quality****Overall Summary: Positive**

- 9.9 AAP14 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 9.10 AAP14 is anticipated to have positive impacts because it addresses how development can adapt to climate change and how it can manage its environment to benefit local people. It aims to improve biodiversity and green infrastructure for sustainability and carbon reduction but also because of the positive impacts on mental health and wellbeing of having access to green and open space.

**AAP15: Great start in life****Overall Summary: Positive**

- 9.11 AAP15 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 9.12 AAP15 aims to improve the quality of education providing buildings to make sure these are well designed and adapted to climate change too. This is crucial to ensure that all local children can access education which is close to where they live to reduce the need to go by car and enable children to be more active.

**AAP16: Child and Youth provision****Overall Summary: Positive**



- 9.13 AAP15 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 9.14 AAP15 is anticipated to have positive impacts because it addresses the issue of an underproviding of facilities for children and youth. This policy aims to deliver facilities with the capacity for mentoring, opportunities to improve skills and sports, as well as delivering safer open spaces and parks for a range of ages. These will be inclusive and accessible for all to promote greater community cohesion and equality.

## **Section 10. Appraisal Summary for the Sub Areas and Site Allocations**

- 10.1 The sub areas and site allocations are assessed with explicit reference to the short, medium and long term impacts of the designations. These are assessed against the 17 IIA objectives. This is considered appropriate due to acknowledging that the temporal impacts, including those from the implementation of policies alongside the area visions and site allocations, will be experienced to varying degrees in each area, i.e. Spatially.
- 10.2 The IIA appraisal tables in Appendix 7 set out the details of the impacts of the vision, strategy and plan objectives in terms of the 17 objectives in the IIA framework. A summary of the sustainability appraisal for sub areas is set out further below.

### **Sub Area 1**

**Overall Summary: Positive**

- 10.3 Sub Area 1 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 10.4 Sub area 1 proposes a new tube station, mixed-use development incorporating warehouse and distribution industrial space, employment generating and town centre uses, new green spaces in the sites OKR3 and OKR4. This will benefit new and existing communities by ensuring all local residents have access to good quality green space, this benefit both their mental and physical wellbeing.

**Sub Area 2****Overall Summary: Positive**

- 10.5 Sub Area 2 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 10.6 Sub Area 2 proposes 5 new parks including the Linear Park which improves the pedestrian experience in the Old Kent Road and incentivises more active travel modes. The provision of parks also addresses the issues of a lack of open space provision and biodiversity.
- 10.7 Sub Area 2 proposes a new crossing for Old Kent Road to improve safety for pedestrians to ensure greater mobility and accessibility. This also ensures a shift away from the private vehicle being the first mode of transit which reduces combustion and carbon dioxide and nitrogen dioxide levels. This in turn reduces contributions to climate change and adapts to the climate emergency, this has secondary benefits for improving air quality in the Old Kent Road.

**Sub Area 3****Overall Summary: Positive**

- 10.8 Sub Area 3 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 10.9 Sub Area 3 proposes sports facilities which will address the lack of child and youth provision in the local area. This will provide increased opportunities for education, training and mentoring to give local young people the best start in life. The sports facilities and school also bring wider opportunities to local people by reinforcing a sense of place and greater community cohesion as well as delivering facilities that the wider community can use to encourage healthier, active lives.

10.10 The Linear Park is a key green space link throughout the OKR Opportunity Area and provides safer spaces for walking and cycling. This is anticipated to have a positive impact on local residents because it will address issues of childhood obesity and promote positive behavioural changes to walk and cycle more

#### **Sub Area 4**

##### **Overall Summary: Positive**

10.11 Sub Area 4 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.

10.12 Sub Area 4 proposes one of the two tube stations connect to the Bakerloo Line Extension. This will increase mobility for local residents and improve accessibility to employment, services and recreation and reduce the need to travel by car. The proposed tube line as unlocks greater potential for housing and employment which enables the OKR AAP to improve the quality and sustainability of housing and employment space, as well as creating new jobs in the area to support a strong local economy.

10.13 In the emerging masterplan, mixed use development has been proposed with a number of green spaces to address the deficiency of open space in the opportunity area. This encourages residents to walk and cycle more and lead more healthy active lifestyles. This includes Pat Hickson park, which is newly designated.

#### **Sub Area 5**

##### **Overall Summary: Positive**

10.14 Sub Area 5 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.

10.15 Sub Area 5 proposes a phased approach to industrial intensification. This phased approach creates an opportunity for new industrial space. There is no net loss of industrial space and there are increased opportunities for employment generating uses and the provision of affordable workspace, as well as the protection and enhancement of the existing rich industrial character. This is achieved through the design requirements in sub area 5 which sets out the heritage assets that must be protected and acceptable indicative building heights. This sub area also sets out policy to utilise the existing railway arches for a range of business types to preserve the heritage in the area.


#### **Flood Risk of Site Allocations**

- 10.16 The borough is at risk of flooding from a number of sources including from the River Thames as well as from ground and surface water flooding. Within the sustainability appraisals set out in Appendix 5, Objective 14 details how the sequential test (and exception test if required) has been applied with further analysis for each site allocation.
- 10.17 The next section within this chapter sets out the NPPF approach to flood risk management in the preparation of a local plan; and further information on the sequential and exceptions tests. This section further elaborates on the Council's approach to flooding and an appraisal summary for site allocations sequential and exception tests.

#### NPPF approach to flood risk management in the preparation of a local plan

- 10.18 The National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance emphasise the responsibility of Local Planning Authorities to ensure that flood risk is understood and managed effectively and sustainably throughout all stages of the planning process.
- 10.19 The greatest risk to property and life from flooding within the Old Kent Road is as a result of tidal activity within the River Thames. However, the Borough is currently protected from combined tidal and fluvial flooding by the River Thames Tidal Defences, up to the 1 in 1000 year event. The risk is therefore of a residual nature, associated with overtopping or breaching of defences. Excepting the River Thames, there are no other watercourses within Southwark known to present a risk of fluvial flooding. A potential risk of flooding from other (non-river related) sources exists throughout the Borough, including sewer surcharge and surface water flooding as a result of heavy rainfall and/or blocked drainage systems.
- 10.20 Southwark plays a key role in managing this risk as a Lead Local Flood Authority, under the Flood and Water Management Act (2010) and the Flood Risk Regulations (2009). Areas of the Borough are also thought to be susceptible to elevated groundwater levels, which may additionally interact with and exacerbate these other sources of flood risk. It is expected that changing climate patterns will have a substantial impact on the level of flood risk from all sources within Southwark.
- 10.21 The NPPF approach aims to ensure that flood risk is considered at all stages of the planning process and to avoid inappropriate development in areas of greatest flood risk; steering development towards areas of lower risk. Development is only permissible in areas at risk of flooding in exceptional circumstances where it can be demonstrated that there are no reasonably available sites in areas of lower risk, the sustainability benefits of that development outweigh the risks from flooding and, the development will be safe for its lifetime without increasing flood risk elsewhere.
- 10.22 Such development is required to include mitigation/management measures to minimise risk to life and property should flooding occur. Building on these principles, the NPPF and Technical Guidance have established a process for

the assessment of flood risk, with each stage building upon the previous assessment with a refinement of the evidence base. Utilising a Source – Pathway – Receptor approach, the source of flooding, the spatial distribution of flood risk and the vulnerability of development types are assessed to inform decision making through each of the key stages of the Flood Risk Management Hierarchy, as outlined in the NPPG and shown in the table below.



Stage	Approach
Level 1 SFRA	Assessment (broad scale and comprehensive)
Sequential Test Across Planning Area	Avoidance
Level 2 SFRA (if required)	Detailed Assessment (Growth Area or Site Specific)
Sequential Approach at Site	Avoidance
Control and Improvement	Through Design (e.g. SuDS)
Mitigate Remaining Risks	Flood Resilient Design and Construction

### Applying the sequential test

10.23 The sequential test for allocated sites has been undertaken through the Southwark Plan. The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. (paragraph 168 of the NPPF). As such, development should not be permitted in areas of flood risk, where there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

10.24 Planning Practice Guidance requires inappropriate development in areas at risk of flooding (i.e. in flood zones 2 and 3 or land within flood zone 1 which has critical drainage problems) to be avoided by directing development away from areas at highest risk. Where development is necessary, it is required that it is made safe without increasing the risk of flooding elsewhere. The NPPF sets out a sequential approach in order to achieve this. This requires that development can be located in flood zone 2 and then flood zone 3 only if there are no reasonably available sites in flood zone 1. The Sequential Test should be carried out on all development sites and can be applied at all levels and scales of the planning process, both between and within Flood Zones.

10.25 The approach seeks to prevent the allocation of sites that are inappropriate on flood risk grounds by considering the vulnerability of the type of development proposed and how compatible the intended use is with the level of flood risk at the site. The NPPF Technical Guidance Note classifies the flood risk vulnerability of land uses into five categories, as follows:

### **Flood risk vulnerability of land uses**

#### **i. Essential infrastructure**

Includes:

- Essential transport infrastructure;
- Essential utility infrastructure including electricity generating power stations, water treatment works;
- Wind turbines.

## ii. **Highly vulnerable**

Includes:

- Police stations, fire stations and ambulance stations;
- Emergency dispersal points;
- Basement dwellings;
- Caravans, mobile homes and park homes intended for permanent residential use;
- Installations requiring hazardous substances consent.

## iii. **More vulnerable**

Includes:

- Hospitals;
- Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels;
- Buildings used for dwelling houses, student halls of residence, drinking establishment, nightclubs and hotels;
- Non-residential uses for health services, nurseries and educational establishments;
- Landfill and sites used for waste management facilities for hazardous waste;
- Sites used for holiday or short-let caravans and camping.

## iv. **Less vulnerable**

Includes:

- Police, ambulance and fire stations which are not required to be operational during flooding;
- Buildings used for shops; financial, professional and other services; restaurants and cafes; hot food takeaways; offices; general industry; storage and distribution; non-residential institutions not included in 'more vulnerable', and assembly and leisure;
- Land and buildings used for agriculture and forestry;
- Waste treatment;
- Minerals working and processing;
- Water treatment works;
- Sewage treatment works.

## v. **Water-compatible development**

Includes:

- Flood control infrastructure;
- Water transmission infrastructure and pumping stations;
- Sewage transmission infrastructure and pumping stations;
- Sand and gravel workings;
- Docks, marinas and wharves;
- Navigation facilities;

- MOD defence installations;
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location;
- Water-based recreation (excluding sleeping accommodation);
- Lifeguard and coastguard stations;
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation; and
- Essential facilities such as changing rooms; essential ancillary sleeping or residential accommodation for staff required by uses in this category.

10.26 The below table sets out the types of development that are considered as suitable within areas of varying perceived flood risk.

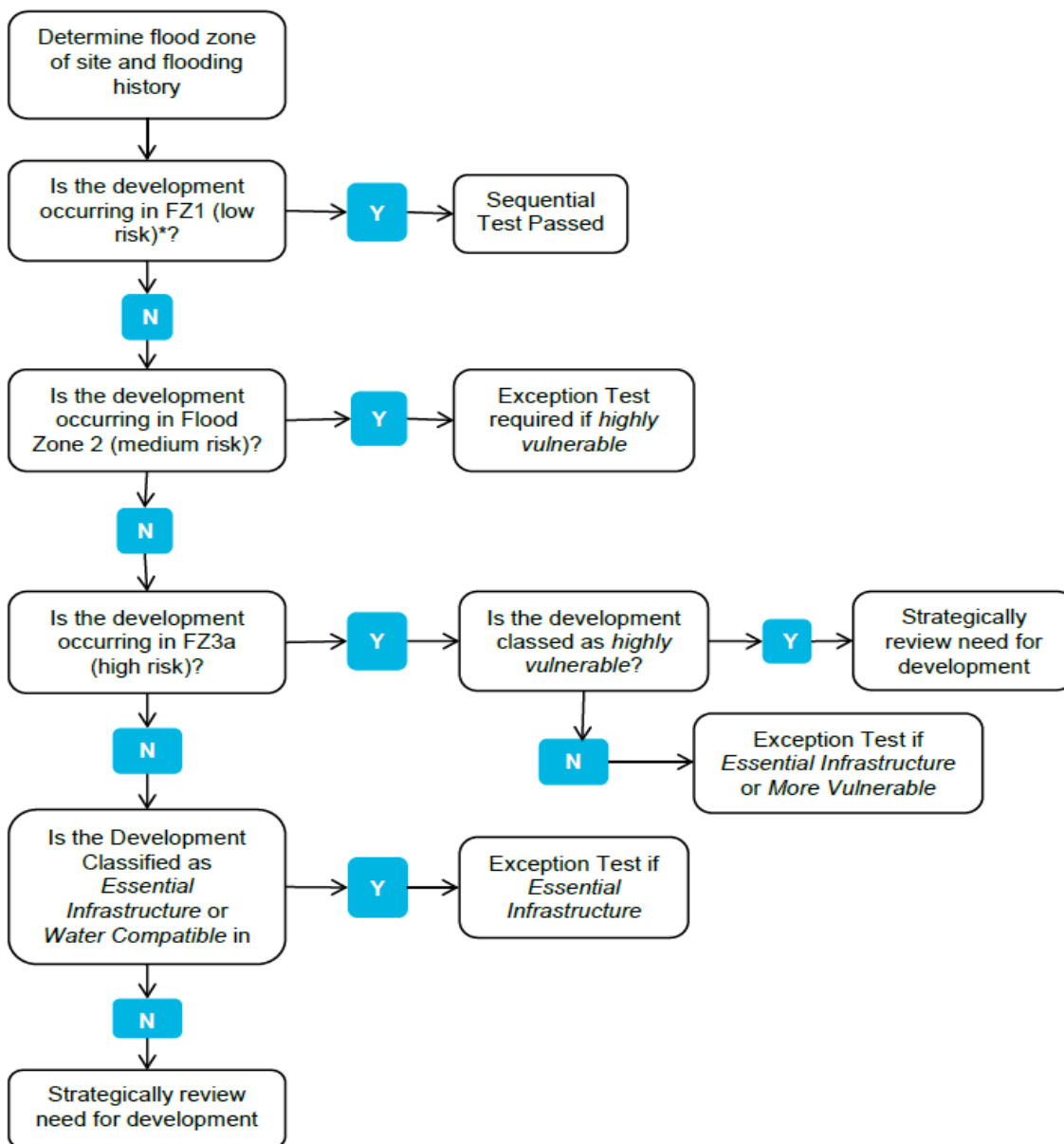
### 1) Flood zones and development compatibility

Flood Zone	Description	Annual probability of river or sea flooding	Appropriate uses
Zone 1	Low Probability	1 in 1,000 (<0.1%)	<ul style="list-style-type: none"> <li>• All uses</li> </ul>
Zone 2	Medium Probability	1 in 100 – 1 in 1,000 (river) (1-0.1%) 1 in 200 – 1 in 1,000 (sea) (0.5-0.1%)	<ul style="list-style-type: none"> <li>• Water Compatible</li> <li>• Less Vulnerable</li> <li>• More Vulnerable</li> <li>• Essential Infrastructure</li> <li>• Highly Vulnerable*</li> </ul>
Zone 3a	High Probability	1 in 100 or greater (river) (>1%) 1 in 200 or greater (sea) (>0.5%)	<ul style="list-style-type: none"> <li>• Water Compatible</li> <li>• Less Vulnerable</li> <li>• More Vulnerable*</li> <li>• Essential Infrastructure*</li> </ul>
Zone 3b	The Functional Floodplain	1 in 20 or greater (5%) or land which is designed to flood in an extreme (0.1%) flood.	<ul style="list-style-type: none"> <li>• Water Compatible</li> <li>• Essential Infrastructure*</li> </ul>

Notes: \*only if Exception Test passed

## The Sequential Test

10.27 There is significant development and regeneration proposed in the Old Kent Road in the future, with a large number of site allocations located in medium-to-high risk flood zones 2 or 3. As such it is crucial that the allocation of development considers flood risk early in the planning process. It is therefore necessary for Southwark to consider whether potential development sites in flood zones need to and can pass the sequential and exception test. Within the *Strategic Flood Risk Assessment (SFRA) Level 1 (2017)* it is set out how the Sequential Test has been undertaken and how the below flow diagram has been applied to identify the suitability of a site for allocation, in relation to the flood risk classification.



\* Other sources of flooding also need to be considered



- 10.28 The Old Kent Road is in the north of the borough. The majority of the Opportunity Area land is located in flood zone 2 and 3. Therefore locating all required development away from these areas is unlikely to be achievable. In order to effectively manage flood risk, a sequential test has been applied for each site allocation in the *Strategic Flood Risk Assessment (SFRA) Level II: Sequential test of site allocations* according to the NPPF risk-based approach. The test confirms if the proposed land use is acceptable and compatible with the flood risk zone or requires an additional exception test to allow the development to occur for wider sustainability reasons (paragraph 169 of the NPPF).
- 10.29 The greatest risk to property and life from flooding within the Old Kent Road (LBS) is as a result of tidal activity within the River Thames. However, the Borough is currently protected from combined tidal and fluvial flooding by the River Thames Tidal Defences (TTD) up to the 1 in 1000 year event. The risk is therefore of a residual nature, associated with overtopping or breaching of defences. Excepting the River Thames, there are no other watercourses within Southwark known to present a risk of fluvial flooding.
- 10.30 A potential risk of flooding from other (non-river related) sources exists throughout the Borough, including sewer surcharge and surface water flooding as a result of heavy rainfall and/or blocked drainage systems. Southwark plays a key role in managing this risk as a Lead Local Flood Authority, under the Flood and Water Management Act (2010) and the Flood Risk Regulations (2009).
- 10.31 Areas of the Borough are also thought to be susceptible to elevated groundwater levels, which may additionally interact with and exacerbate these sources of flood risk. It is expected that changing climate patterns will have a substantial impact on the level of flood risk from all sources within Southwark.
- 10.32 The SFRA identifies the tidal floodplains associated with the River Thames and presents Flood Zone Maps that delineate the flood zones outlined in the NPPF. Breach modelling has additionally been undertaken to enable a greater understanding of the residual risk associated with this source. The resulting hazard, depth and velocity mapping contained within the SFRA provide further definition of the spatial variations of flood risk within Flood Zone 3.
- 10.33 The majority of the northern half of the Borough is located within Flood Zone 3a and therefore classed as at high risk of flooding. The floodplain areas within Southwark associated with the River Thames do not have a Flood Zone 3b or functional floodplain associated with them, as they are classed as defended and would not flood during a 1 in 20 year event. Therefore, the functional floodplain has been defined as the area situated on the river side of the raised defence line.
- 10.34 OKR site allocations are required to deliver the quantum of housing necessary to meet the borough needs, as well as the development of employment and retail floorspace, particularly in the Central Activities Zone (north of the borough). Additional social infrastructure and new parks will also be delivered

as part of the regeneration objectives of these areas. The development of these areas, in conformity with the London Plan objectives for growth and housing targets, is considered to bring significant sustainability benefits to the local communities.

10.35 The development envisaged for these areas to meet the requirements of meeting the boroughs targets for growth, the duty to cooperate with neighbouring boroughs (for example to secure significant infrastructure improvements such as the Bakerloo Line extension) and the Opportunity Area designations for growth in the London Plan. The scale of development envisaged for these areas is unlikely to be achievable in other parts of the borough and would not meet other sustainability objectives of the IIA. Whilst many of the sites are located in Flood Zone 3, these benefit from the Thames Tideway defences, and many safety measures are incorporated into Southwark Plan Policy P67 to ensure the developments are safe. The sequential test for the site allocations is therefore considered to be passed.

### The Exception Test

10.36 A local planning authority should demonstrate through evidence that it has considered a range of options in the site allocation process, using the Strategic Flood Risk Assessment to apply the Sequential Test and the Exception Test where necessary. This can be undertaken directly or, ideally, as part of the sustainability appraisal. Where other sustainability criteria outweigh flood risk issues, the decision making process should be transparent with reasoned justifications for any decision to allocate land in areas at high flood risk in the sustainability appraisal report.

10.37 **Appendix 5** contains a detailed sustainability appraisal, where every area vision and site allocation was assessed against the Council's objectives. For every site allocation under objective 14 (To reduce vulnerability to flooding) it is set out whether it has satisfied the sequential test, or an exception test was required. As set out in SFRA Level II, if the sequential test is passed, the development is permitted as it proposes 'less vulnerable' land uses which are acceptable within the respective Flood Zone. If the sequential test confirms that the site will have 'more vulnerable' land uses, an exception test has been carried out to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. Within the exception test two criterion need to be satisfied, as per paragraph 170 of the NPPF as follows:

**10.38 Demonstrate wider sustainability benefits to the community that outweigh flood risk**

*Evidence of wider sustainability benefits to the community should be provided, for instance, through the sustainability appraisal. If a potential site allocation fails*

*to score positively against the aims and objectives of the sustainability appraisal, or is not otherwise capable of demonstrating sustainability benefits, the local planning authority should consider whether the use of planning conditions and/or planning obligations could make it do so. Where this is not possible the Exception Test has not been satisfied and the allocation should not be made.*

**10.39 Demonstrate that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall**

10.40 *Wider safety issues need to be considered as part of the plan preparation. If infrastructure fails then people may not be able to stay in their homes. Flood warnings and evacuation issues therefore need to be considered in design and layout of planned developments. In considering an allocation in a Local Plan a level 2 Strategic Flood Risk Assessment should inform consideration of the second part of the Exception Test.*

10.41 Where an exception test was required, to satisfy the sequential test criterion, under objective 14 we have set out the wider sustainability benefits for each site allocation in Appendix 5 such as social, economic and environmental benefits that would be brought to the community that outweigh flood risk.

10.42 Many site allocations are located in the four opportunity areas designated for significant growth in the London Plan (Canada Water, Borough, Bankside and London Bridge, Elephant and Castle and Old Kent Road). Many of the sites in the north of the borough are required to deliver the quantum of housing necessary to meet the borough needs, as well as the development of employment and retail floorspace, particularly in the Central Activities Zone (north of the borough). Additional social infrastructure and new parks will also be delivered as part of the regeneration objectives of these areas. The development of these areas, in conformity with the London Plan objectives for growth and housing targets, is considered to bring significant sustainability benefits to the local communities. The following regeneration benefits are relevant:

- Making use of brownfield sites;
- New homes to meet and exceed our housing targets including affordable housing to meet the borough needs of social rented and intermediate housing
- An increase in high-quality office accommodation to support the growth of the local economy and bring increased job opportunities and prosperity to the borough including the provision of affordable workspace;
- A variety of town centre uses and retail at ground floor level to provide active frontages and create a vibrant urban area;

- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development;
- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant;
- Delivery of the Low Line walking route creating improved accessibility and the quality of experience for walking. Improved walking networks encourage active travel and exercise, which is beneficial for health, as well as activating railway arches for a variety of commercial uses;
- Bringing more destinations closer to residents through strategic walking routes and improved accessibility, with improved pavements, crossings and public spaces encourage people to walk more. Measures to encourage walking can also help tackle social isolation and routes should accommodate parents and older or disabled people;
- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
- New homes will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health;
- Some sites are required to deliver new open space in areas of deficiency. New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialisation, nature conservation, food growing and cultural events. This will maintain and improve open spaces to ensure health and wellbeing benefits associated with these activities are accrued;
- The provision of open space is valuable in supporting active travel and walking which has the potential to encourage a reduction in climate change. By reducing the intensity of carbon emissions released in a certain area contributes to better air quality;
- The increased provision of open space will help absorb negative CO<sub>2</sub> emissions and this will contribute to better air quality;
- The requirement to improve pedestrian movement and permeability through site developments will enhance connectivity across the area, promoting healthy lifestyles and improving access to services.
- Redevelopment opportunities will also enable social infrastructure such as schools and health facilities to be provided.

10.43 These sites are therefore considered to pass part 1 of the Exceptions Test.

10.44 Furthermore, to meet the second requirement that the development is safe for its lifetime, and that flood risk to people and property will be managed satisfactorily, recommendations set out in the SFRA Level II report including

site specific emergency evacuation procedures, flood resilient construction techniques and SuDS have been incorporated under objective 14 in Appendix 5 for each site. The site allocations in Flood Zone 3 are in the 'defended' zone, meaning they benefit from protection from combined tidal and fluvial flooding by the River Thames Tidal Defences (TTD) up to the 1 in 1000 year event. The risk is therefore of a residual nature, associated with overtopping or breaching of defences.

10.45 Ongoing maintenance of these defences is critical, and the SFRA recommends priority should be given to safeguarding the Standard of Protection (SoP) provided by defences over the lifetime of any development. Additionally, the SFRA recommends consideration should be given to the specific recommendations of the Environment Agency's Thames Estuary 2100 (TE2100) plan in requiring reduction of current and future flood risk through raising, maintaining and enhancing flood defences.

10.46 Policy AAP12 Cleaner, greener, safer requires a number of measures to mitigate against issues of water and sewage capacity in the OKR Opportunity Area to ensure flood protection by setting out a target greenfield run off rate onsite, utilising Sustainable Urban Drainage and limit water discharge to greenfield run off rates.

10.47 Flood protection and mitigation policy set out in the Southwark Plan also applies to the OKR AAP. Policy P68 in the Southwark Plan requires a number of measures in developments to promote safety measures:

- Finished floor levels set no lower than 300mm above the predicted maximum water level
- Reducing surface water run-off to greenfield run-off rates including the use of SUDS to the drainage hierarchy and water sensitive urban design
- Permeable paving and gardens
- A set back of 10 metres for development on sites located adjacent to the River Thames defence wall

10.48 A Flood Risk Assessment (FRA) would also be required for any development proposals in flood risk zones 2 and 3. The FRA must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, include site specific measures to, reduce flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas, as recommended in the Level 1 SFRA.

10.49 Where an approved application is relevant to a site allocation, further information has been provided under objective 14 to set out the flood risk considerations that were taken into account during the decision making process, and what recommendations have been made to reduce flood risk and

making the development safe for its lifetime. The SFRA also recommended using Integrated Water Management Strategies (IWMS) for areas which would receive a significant amount of development to manage surface water run-off on a strategic scale. An IWMS has been prepared for the Old Kent Road AAP incorporating these principles. Overall, the site allocations requiring the exceptions test are considered to be able to demonstrate the development will be safe, protecting the vulnerability of its users, and without increasing flood risk elsewhere by using the principles of Policy P67 of the Southwark Plan, Integrated Water Management Strategies and individual Flood Risk Assessments, in accordance with Part 2 of the Exceptions Test.

- 10.50 The sustainability appraisal of objective 14 (in Appendix 5) was undertaken using professional judgment, supported by the baseline information and wider evidence base. Out of 82 sites, all sites have passed the sequential test. A number of sites also required additional exception tests. All sites required for the exception test have satisfied the two criteria of the exception test. None of the site allocations represented inappropriate development which is incompatible with the flood risk level as defined in the NPPF.
- 10.51 As such, overall the sustainability appraisal of each site demonstrates a positive appraisal. No risks have been identified as part of the site appraisals and if any arose at a later time, they are generally mitigated by other policies in the Southwark Plan.

## Section 11. Monitoring and Implementation

### Proposals for monitoring

- 11.1 The identification of suitable sustainability indicators within the IIA Framework to ensure issues can be effectively measured and monitored has been an iterative process and taken into consideration comments made in the consultation process. We have borne in mind that the indicators need to satisfy the following characteristics since only these are suitable for monitoring purposes: Importance, supported by readily available information, capabilities of showing trends over time, easy to understand and communicate.
- 11.2 At the options identification stage we dealt with general concepts and directions for regeneration and growth in the Old Kent Road opportunity area. This has meant that this initial appraisal has been high level, identifying potential social, environmental and economic impacts.
- 11.3 It is important that the plan is monitored to keep track of whether it is working in the way it should. The most appropriate way to monitor the area action plan is through the Local Development Framework Authority's Monitoring Report (AMR). The AMR monitors the type of development that is occurring as a result of all of the council's planning policies and guidance and what effects this development is having in terms of sustainability. Where new indicators have been identified, through the IIA process, these will be added to the AMR. The AAP sets out a monitoring framework to ensure new development meets the objectives of the plan. These indicators will be added to our AMR once the AAP is adopted.
- 11.4 The council has also been carrying out a project on enhancing the impact of planning policy on health outcomes. This has developed an enhanced evidence base to inform and monitor the Old Kent Road policies. The approach to the project has been informed by the Mental Well-being Impact Assessment screening.
- 11.5 This plan will be monitored through Baseline Indicators found in **Appendix 9** which refer to findings of **Appendix 3: Baseline Data**. Each of the baseline indicators are attributed to specific IIAOs which have been used during the appraisals of the OKR AAP (**Appendix 5, 6 and 7**).
- 11.6 The most appropriate way to monitor the plan is through the Local Development Framework Authority's Monitoring Report (AMR). The AMR monitors the type of development that is occurring as a result of all of the council's planning policies and guidance and what effects this development is having in terms of sustainability.
- 11.7 The sources of monitoring for all indicators can be found in **Appendix 9**.

### **How will the plan be implemented?**

- 11.1 We will ensure the AAP is implemented by working with local communities, businesses developers, Lewisham council, GLA, TFL and other partners but also explore joint governance arrangements with our partners to reflect the commitment to supporting growth.
- 11.2 Implementation of the AAP policies will be achieved through our development management function when we make decisions on planning applications. We will work with landowners and developers to ensure schemes make effective use of land across the OA and consider the wider context. We will use the council's delivery programmes to help deliver new council homes and using our compulsory purchase powers where necessary to ensure that land is made available for development where it is needed to deliver the AAP vision and policies.
- 11.3 Development should not be permitted unless essential infrastructure (social infrastructure such as schools, health and other community facilities; physical infrastructure such as transport and utilities; green infrastructure such as parks and open spaces) can be completed prior to occupation of the new development.
- 11.4 We will ensure the OKR AAP is implemented by working with the local community and businesses, developers, neighbouring borough councils, GLA, TFL and other partners to deliver the plan.
- 11.5 The OKR AAP will be implemented in the context of the Southwark Plan. This plan will shape development in Southwark from 2019 to 2036 through the application of area vision guidance and strategic, development management and site allocation policies to planning proposals. As a spatial planning document, the Southwark Plan will also influence the investment decisions of the council and its development and infrastructure partners.
- 11.6 Southwark Council together with Lewisham will continue to actively campaign and promote the BLE given its importance for the delivery of homes in the boroughs. This infrastructure is essential to meet our housing target, given the planned delivery of new homes in the Old Kent Road Opportunity Area in Southwark and New Cross and Catford Opportunity Areas in Lewisham. Both parties will continue working with the Greater London Authority and Transport for London to develop these proposals for the BLE and to make the case to government to ensure the project is delivered.
- 11.7 Implementation of the OKR AAP policies will be achieved through our development management function when we make decisions on planning



applications. We will work with landowners and developers to ensure schemes make effective use of land across the borough and consider the wider context. We will use the council's delivery programmes to help deliver new council homes and using our compulsory purchase powers where necessary to ensure that land is made available for development where it is needed to deliver the OKR AAP vision and strategy.

- 11.8 Our Statement of Community Involvement (SCI) sets out how and when the community will be involved in preparing planning policy documents and in making decisions on planning applications. The SCI was developed by working with many local people, businesses, voluntary and community organisations, councillors and statutory organisations. The SCI includes: information on different consultation methods; how to overcome barriers to involve different groups and; the consultation process for both planning policy documents and planning applications. Involving the community at the earliest stage possible in the planning process helps to implement development that is wanted and needed by the community.
- 11.9 New development also needs to be supported by adequate social, physical and green infrastructure. This includes: social infrastructure such as schools, health and other community facilities; physical infrastructure such as transport and utilities; green infrastructure such as parks and open spaces. Where infrastructure is needed to support development, it should be provided alongside it. Development should not be permitted unless essential infrastructure can be completed prior to occupation of the new development.
- 11.10 We will continue to work in partnership with infrastructure providers, including both internal council departments and external agencies, throughout the development of the OKR AAP to identify infrastructure required to facilitate the development set out in the plan.
- 11.11 We will use S106 planning obligations/CIL to overcome negative impacts of development and to make sure that infrastructure needed to support development is provided. We will use planning obligations in accordance with government guidance, set out in the CIL Regulations. We have an approved Planning Obligations/CIL SPD which explains our policies in more detail and sets out a series of standard charges to be applied to development. Through implementing this SPD and collecting CIL we will secure financial contributions to mitigate the impacts of development.

### **Links to other tiers of plans, programmes and other guidance**

- 11.1 The OKR AAP will be continuously influenced by other tiers of planning at national, regional, borough and local levels. Any changes to other spheres of

planning legislation will require the IIA and OKR AAP to be updated accordingly to align with these new targets set.

11.2 The NPPF updates the approach to plan making by simplifying the process and returning to a system of Local Plans. The Southwark Plan has been adopted as of February 2022. The Local Development Scheme (available on our website) sets out the programme for the production of documents.

11.3 It should be noted that local planning policy is produced within a framework set by national and regional government planning guidance such as the NPPF and the London Plan. This guidance indicates the broad principles that local policy should adopt. For example, the London Plan identifies opportunity areas which are expected to deliver new homes, jobs and infrastructure to be determined in more detail in a local level plan.

11.4 Figure 8.1 demonstrates the various tiers of planning at national, regional, borough and local levels. The National Planning Policy Framework updates the approach to plan making by simplifying the process and returning to a system of Local Plans.

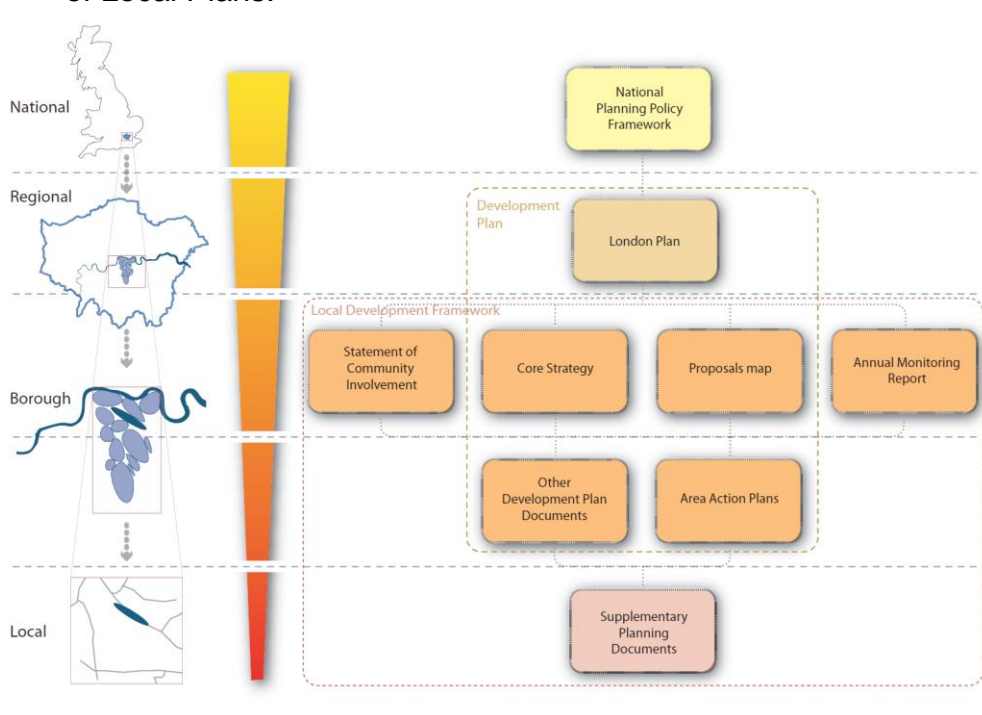


Figure 11.1

11.1 The references to support the IIA appraisal are set out in Appendix 14.



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**Appendix 1: SEA Directive Requirement**

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<b>No.</b>	<b>Title</b>
Appendix 1	SEA Directive Requirement
Appendix 2	Relevant Plans, Programmes and Strategies
Appendix 3	Baseline Data – Facts and Figures
Appendix 4	Sustainability Appraisal Framework
Appendix 5	Assessment of the Strategy and Vision
Appendix 6	Assessment of the Strategic and Development Management Policies
Appendix 7	Assessment of the Sub Areas and Site Allocations
Appendix 8	Monitoring Indicators against Sustainability Objectives
Appendix 9	Baseline Indicators Table
Appendix 10	Options Testing
Appendix 11	Scoping Report Consultation Summary and link to OKR AAP Scoping Report
Appendix 12	Reasonable Alternatives Considered
Appendix 13	Mental Well-being Impact Assessment Screening
Appendix 14	OKR AAP References

## Appendix 1

### The Strategic Environmental Assessment Regulations 2004 requirements checklist

Strategic Environmental Assessment Regulations requirements checklist	Plan-making stage
<p>Preparation of environmental report (regulation 12)</p> <p>Preparation of an environmental report that identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)).</p> <p>The report shall include such of the information referred to in Schedule 2 as may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3)). Information may be provided by reference to relevant information obtained at other levels of decision-making or through other EU legislation (regulation 12 (4)).</p> <p>When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted.</p>	<p>Stages A-C as described in Table 2.1 of the IIA.</p>
<p>The information referred to in Schedule 2 is:</p> <p>a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.</p>	<p>Stage A as described in Table 2.1 of the IIA – Scoping stage.</p>
<p>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>	<p>Stage A as described in Table 2.1 of the IIA - Scoping stage.</p>
<p>c) The environment characteristics of areas likely to be significantly affected.</p>	<p>Stage A as described in Table 2.1 of the IIA - Scoping stage.</p>
<p>d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives <a href="#">2009/147/EC (Conservation of Wild Birds)</a> and <a href="#">92/43/EEC (Habitats Directive)</a>.</p>	<p>Stage A as described in Table 2.1 of the IIA - Scoping stage.</p>

e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Stages A-B as described in Table 2.1 of the IIA.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Stage B as described in Table 2.1 of the IIA. (Section 6 of the IIA).
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Stages B-C as described in Table 2.1 of the IIA. (Sections 6 and 7 of the IIA).
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Stages A-C as described in Table 2.1 of the IIA. (Scoping and Sections 6 and 7 of the IIA).
i) A description of measures envisaged concerning monitoring in accordance with regulation 17.	Stages A-C as described in Table 2.1 of the IIA. (Scoping and Section 8 of the IIA).
j) A non-technical summary of the information provided under the above headings.	Stage C as described in Table 2.1 of the IIA. (Non-technical summary of the IIA).
<p>Consultation procedures (regulation 13)</p> <p>As soon as reasonably practicable after their preparation, the draft plan or programme and environmental report shall be sent to the consultation bodies and brought to the attention of the public, who should be invited to express their opinion. The period within which opinions must be sent must be of such length as will ensure an effective opportunity to express their opinion.</p>	Stages A-D as described in Table 2.1 of the IIA.
<p>Information as to adoption of plan or programme (regulation 16)</p> <p>As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State (who will inform any other EU</p>	Stage E as described in Table 2.1 of the IIA (to follow).

<p>Member States consulted) shall be informed and the following made available:</p> <ul style="list-style-type: none"> <li>• the plan or programme adopted</li> <li>• the environmental report</li> <li>• a statement summarising:       <ol style="list-style-type: none"> <li>(a) how environmental considerations have been integrated into the plan or programme;</li> <li>(b) how the environmental report has been taken into account;</li> <li>(c) how opinions expressed in response to:           <ol style="list-style-type: none"> <li>(i) the invitation referred to in regulation 13(2)(d);</li> <li>(ii) action taken by the responsible authority in accordance with regulation 13(4),</li> </ol>           have been taken into account;</li> <li>(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;</li> <li>(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. (regulation 16)</li> </ol> </li> </ul>	
<p>Monitoring of implementation of plans or programmes (regulation 17)</p> <p>Monitoring of significant environmental effects of the plan's or programme's implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (regulation 17 (1)).</p> <p>Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).</p>	<p>Stage E as described in Table 2.1 of the IIA (to follow).</p>



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**Appendix 2: Relevant Plans, Programmes and Strategies**

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<b>No.</b>	<b>Title</b>
Appendix 1	SEA Directive Requirement
<b>Appendix 2</b>	<b>Relevant Plans, Programmes and Strategies</b>
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## APPENDIX 2

### RELEVANT PLANS, STRATEGIES AND PROGRAMMES

#### Global

Plan, Strategy or Programme	Summary of objectives and targets
WHO Age-friendly Cities Guide (2007)	The WHO Age-friendly Cities Guide highlights eight domains that cities and communities can address to better adapt their structures and services to the needs of older people: the built environment, transport, housing, social participation, respect and social inclusion, civic participation and employment, communication, and community support and health services.

#### European

Plan, Strategy or Programme	Summary of objectives and targets
EU Biodiversity Strategy to 2020 (2012)	<p>The European Commission adopted an ambitious new strategy to halt the loss of biodiversity and ecosystem services in the EU by 2020. There are six main targets, and 20 actions to help Europe reach its goal. Biodiversity loss is an enormous challenge in the EU, with around one in four species currently threatened with extinction and 88% of fish stocks over-exploited or significantly depleted. The six targets cover:</p> <ul style="list-style-type: none"> <li>• Full implementation of EU nature legislation to protect biodiversity</li> <li>• Better protection for ecosystems, and more use of green infrastructure</li> <li>• More sustainable agriculture and forestry</li> <li>• Better management of fish stocks</li> <li>• Tighter controls on invasive alien species</li> <li>• A bigger EU contribution to averting global biodiversity loss</li> </ul> <p>The new Biodiversity Strategy follows on from the 2006 Biodiversity Action Plan.</p>
EU Biodiversity Action Plan (2006) and 2010 Assessment	The EU Biodiversity Action Plan addresses the challenge of integrating biodiversity concerns into other policy sectors in a unified way. It specifies a comprehensive plan of priority actions and outlines the responsibility of community institutions and Member States in relation to each. It also contains indicators to monitor progress and a timetable for evaluations. The European Commission has undertaken to provide annual reporting on progress in delivery of the Biodiversity Action Plan. A baseline report was prepared in 2010 to take stock of the 2006 Biodiversity Action Plan and assess the impact it has had on Europe's biodiversity. The report produced by the European Environment Agency, provides the latest facts and figures on the state and trends of different biodiversity and ecosystems components in the EU.
European Landscape Convention (ratified by the UK Government in 2006)	<p>The European Landscape Convention (ELC) is the first international convention to focus specifically on landscape, and is dedicated exclusively to the protection, management and planning of all landscapes in Europe. The ELC was signed by the UK government on 24 February 2006, ratified on the 21 November 2006, and became binding on 1 March 2007.</p> <p>The convention highlights the need to recognise landscape in law, to develop landscape policies dedicated to the protection, management and creation of landscapes, and to establish procedures for the participation of the general public and other stakeholders in the creation and implementation of landscape policies. It also encourages the integration of landscape into all relevant areas of policy, including cultural, economic and social policies</p>



Plan, Strategy or Programme	Summary of objectives and targets
EU Sustainable Development Strategy 2002 (revised 2006) (reviewed 2009)	The overall aim of the EU Sustainable Development Strategy is to identify and develop action to enable the EU to achieve a continuous long-term improvement of quality of life through the creation of sustainable communities able to manage and use resources efficiently, able to tap the ecological and social innovation potential of the economy and in the end able to ensure prosperity, environmental protection and social cohesion
<b>EU Directives</b>	
Air Quality Directive 2008/50/EC	<p>This Directive is on ambient air quality and cleaner air for Europe and includes the following key elements:</p> <ul style="list-style-type: none"> <li>• The merging of most of existing legislation into a single directive (except for the fourth daughter directive) with no change to existing air quality objectives*</li> <li>• New air quality objectives for PM2.5 (fine particles) including the limit value and exposure related objectives – exposure concentration obligation and exposure reduction target</li> <li>• The possibility to discount natural sources of pollution when assessing compliance against limit values</li> <li>• The possibility for time extensions of three years (PM10) or up to five years (NO2, benzene) for complying with limit values, based on conditions and the assessment by the European Commission.</li> </ul> <p>* <i>Framework Directive 96/62/EC, 1-3 daughter Directives 1999/30/EC, 2000/69/EC, 2002/3/EC, and Decision on Exchange of Information 97/101/EC.</i></p>
Assessment and Management of Environmental Noise (END Directive 2002/49/EC)	<p>The Environmental Noise Directive or END concerns noise from road, rail and air traffic and from industry. It focuses on the impact of such noise on individuals, complementing existing EU legislation which sets standards for noise emissions from specific sources. The Directive requires:</p> <ul style="list-style-type: none"> <li>• the determination of exposure to environmental noise, through noise mapping</li> <li>• provision of information on environmental noise and its effects on the public</li> <li>• adoption of action plans, based upon noise mapping results, which should be designed to manage noise issues and effects, including noise reduction if necessary</li> <li>• preservation by the member states of environmental noise quality where it is good.</li> </ul> <p>The Directive requires mapping and action planning in relation to noise from major roads, major railways, major airports and in agglomerations (large urban areas).</p>
Conservation on Natural Habitats and of Wild Fauna and Flora (Directive 92/43/EEC)	The main aim of this Directive is to promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements. While the Directive makes a contribution to the general objective of sustainable development; it ensures the conservation of a wide range of rare, threatened or endemic species, including around 450 animals and 500 plants. Some 200 rare and characteristic habitat types are also targeted for conservation in their own right
Conservation of Wild Birds Directive 2009/147/EC	This Directive ensures far-reaching protection for all of Europe's wild birds, identifying 194 species and sub-species among them as particularly threatened and in need of special conservation measures.
Energy Performance of Buildings (EU Directive 2002/91/EC)	<p>The objective of this Directive is to promote the improvement of the energy performance of buildings within the Community, taking into account outdoor climatic and local conditions, as well as indoor climate requirements and cost effectiveness considering;</p> <p>This Directive lays down requirements as regards :</p> <ol style="list-style-type: none"> <li>(a) the general framework for the energy performance of buildings;</li> <li>(b) the application of minimum requirements on the energy performance of new buildings;</li> <li>(c) the application of minimum requirements on the energy performance of large existing buildings that are subject to major renovation;</li> <li>(d) energy certification of buildings; and</li> <li>(e) regular inspection of boilers and of air-conditioning systems in buildings and in addition an assessment of the heating installations in which boilers are more than 15 years old.</li> </ol>
Environmental Impact Assessment (EIA)	The newly amended Environmental Impact Assessment (EIA) Directive (2014/52/EU) entered into force on 15 May 2014 to simplify the

Plan, Strategy or Programme	Summary of objectives and targets
Directive (2014/52/EU)	<p>rules for assessing the potential effects of projects on the environment. It is in line with the drive for smarter regulation, so it reduces the administrative burden. It also improves the level of environmental protection, with a view to making business decisions on public and private investments more sound, more predictable and sustainable in the longer term.</p> <p>It applies to a wide range of defined public and private projects, which are defined in Annexes I and II. All projects listed in Annex I are considered as having significant effects on the environment and require an EIA. For projects listed in Annex II, the national authorities have to decide whether an EIA is needed. This is done by the "screening procedure", which determines the effects of projects on the basis of thresholds/criteria or a case by case examination.</p>
Floods Directive (EU Directive 2007/60/EC)	<p>This Directive requires Member States to assess if all water course and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this flood risk. This Directive also reinforces the rights of the public to access this information and to have a say in the planning process.</p>
Groundwater Directive (EU Directive 2006/118/EC)	<p>This Directive establishes specific measures as provided for in Article 17(1) and (2) of Directive 2000/60/EC in order to prevent and control groundwater pollution. These measures include in particular:</p> <ul style="list-style-type: none"> <li>(a) criteria for the assessment of good groundwater chemical status; and</li> <li>(b) criteria for the identification and reversal of significant and sustained upward trends and for the definition of starting points for trend reversals.</li> </ul> <p>This Directive also complements the provisions preventing or limiting inputs of pollutants into groundwater already contained in Directive 2000/60/EC, and aims to prevent the deterioration of the status of all bodies of groundwater.</p>
Landfill Directive 1999/31/EC	<p>The objective of the Directive is to prevent or reduce as far as possible negative effects on the environment from the landfilling of waste, by introducing stringent technical requirements for waste and landfills.</p> <p>The Directive is intended to prevent or reduce the adverse effects of the landfill of waste on the environment, in particular on surface water, groundwater, soil, air and human health.</p>
Promotion of the use of Biofuels or other Renewable Fuels for Transport (EU Directive 2003/30/EC)	<p>Objective to promote the use of bio-fuels or other renewable fuels to replace diesel or petrol for transport purposes in each Member State, with a view to contributing to objectives such as meeting climate change commitments, environmentally friendly security of supply and promoting renewable energy sources</p>
Renewable Energy (EU Directive 2009/28/EC)	<p>The Directive on renewable energy sets ambitious targets for all Member States, such that the EU will reach a 20% share of energy from renewable sources by 2020 and a 10% share of energy specifically in the transport sector. It also improves the legal framework for promoting renewable electricity, requires national action plans that establish pathways for the development of renewable energy sources including bio-energy, creates cooperation mechanisms to help achieve the targets cost effectively and establishes the sustainability criteria for bio-fuels.</p>
Strategic Environmental Assessment (SEA Directive 2001/42/EC)	<p>Requires the formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. An SEA is mandatory for plans/programmes which are:</p> <ul style="list-style-type: none"> <li>• are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste/ water management, telecommunications, tourism, town &amp; country planning or land use <u>and</u> which set the framework for future development consent of projects listed in the EIA Directive, or</li> <li>• have been determined to require an assessment under the Habitats Directive.</li> </ul>
Urban Waste Water Directive (91/271/EEC)	<p>The Council Directive 91/271/EEC concerning urban waste-water treatment was adopted on 21 May 1991. Its objective is to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors (see Annex III of the Directive) and concerns the collection, treatment and discharge of Domestic waste water, Mixture of waste water and Waste water from certain industrial sectors (see Annex III of the Directive)</p>
Waste Framework Directive (2008/98/EC)	<p>To set up a system for the co-ordinated management of waste within the European Community in order to limit waste production. Member states must promote the prevention, recycling and conversion of wastes with a view to their reuse.</p>

Plan, Strategy or Programme	Summary of objectives and targets
Water Framework Directive (EU Directive 2000/60/EC)	The purpose of this Directive is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater. All inland and coastal waters to reach good ecological status by 2015. Indicates the importance of applying and developing SUDS policy.
Industrial Emissions Directive (Directive 2010/75/EU)	This directive commits European Union member states to control and reduce the impact of industrial emissions on the environment.

## National

Plan, Strategy or Programme	Summary of objectives and targets
<b>Legislation</b>	
Air Quality Standards Regulations (2010)	These regulations transpose into English law the requirements of Directives 2008/50/EC and 2004/107/EC on ambient air quality
Building Regulations: England and Wales (Part L1A – Conservation of Fuel and Power, 2010 and 2013) and (Part G Sanitation, hot water safety and water efficiency, 2015) and Part H Drainage and waste disposal, 2015)	<p>Part L – Conservation of fuel and power The legal framework and Approved Documents for Part L (Conservation of fuel and power) were last revised by amendments that came into effect in 2013 and 2014. DCLG has published: The 2013 edition of Approved Document L1A, Conservation of fuel and power in new dwellings, is the current edition for use in England. It came into effect on 6 April 2014 and replaces the 2010 edition (incorporating further 2010 amendments).</p> <p>Part G (Sanitation, hot water safety and water efficiency)The 2015 edition contains changes to the water efficiency requirements. In particular, it introduces an optional requirement of 110 litres/person/day where required by planning permission, and an alternative fittings-based approach to demonstrating compliance. It also includes the water-efficiency calculation methodology for new dwellings, approved by the Secretary of State. This edition incorporates previous amendments. It replaces the 2010 edition of Approved Document G, as amended. The changes reflect amendments to regulations 36 and 37 of the Building Regulations 2010 and regulation 20 of the Building (Approved Inspectors) Regulations 2010. There has been no amendment to the requirements in Part G of Schedule 1 to the Building Regulations 2010.</p> <p>Part H ( Drainage and waste disposal) The 2015 edition of Approved Document H (Drainage and Waste Disposal) contains changes to guidance on waste disposal. It also incorporates previous amendments. The 2015 edition takes effect on 1 October 2015 for use in England*. The 2002 edition, as amended, will continue to apply to work started before 1 October 2015 or work subject to a building notice, full plans application or initial notice submitted before that date.</p>
Climate Change Act (2008)	<p>The Climate Change Act creates a new approach to managing and responding to climate change in the UK, by:</p> <ul style="list-style-type: none"> <li>• setting ambitious, legally binding targets</li> <li>• raking powers to help meet those targets</li> <li>• strengthening the institutional framework</li> <li>• enhancing the UK’s ability to adapt to the impact of climate change</li> <li>• establishing clear and regular accountability to the UK Parliament and to the devolved legislatures</li> </ul>
Community Infrastructure Levy Regulations (2010) (as amended)	The Community Infrastructure Levy (the levy) came into force in April 2010. It allows local authorities in England and Wales to raise funds from developers undertaking new building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development. This includes new or safer road schemes, flood defences, schools, hospitals and other health and social care facilities, park improvements, green spaces and leisure centres.
Civil Contingencies Act 2004 (CCA)	Legislation that aims to provide a single framework for civil protection. The Act and accompanying non-legislative measures, delivers a single framework for civil protection in the country. The National Flood and Coast Erosion Management Strategy (July 2011) require communities to prepare flood action plans and link with the Cabinet Office’s initiative to develop wider community resilience to threats and hazards. Part 1 of the Act and supporting Regulations and statutory guidance establish a clear set of roles and responsibilities for

Plan, Strategy or Programme	Summary of objectives and targets
	<p>those involved in emergency preparation and response at the local level. They are required to:</p> <ul style="list-style-type: none"> <li>• assess the risk of emergencies occurring and use this to inform contingency planning; put in place emergency plans;</li> <li>• put in place Business Continuity Management arrangements;</li> </ul>
The CROW Act 2000	An Act to make new provision for public access to the countryside; to amend the law relating to public rights of way; to enable traffic regulation orders to be made for the purpose of conserving an area's natural beauty; to make provision with respect to the driving of mechanically propelled vehicles elsewhere than on roads; to amend the law relating to nature conservation and the protection of wildlife; to make further provision with respect to areas of outstanding natural beauty; and for connected purposes.
Energy Act 2011	<p>The Energy Act provides for some of the key elements of the Coalition's Programme for Government and its first Annual Energy Statement. It is a first step in our legislative programme, and further legislation has been sought to implement, for example, the findings of the Electricity Market Reform Programme.</p> <p>The Act provides for a step change in the provision of energy efficiency measures to homes and businesses, and makes improvements to our framework to enable and secure low-carbon energy supplies and fair competition in the energy markets.</p>
Environmental Assessment of Plans and Programmes regulations 2004	Provides the regulations for the implementation of the Strategic Environmental Assessment Directive (EU/2001/42/EC) for certain plans and programmes that are likely to have significant environmental impacts
Environmental Noise (England) Regulations 2006 (as amended)	The regulations transpose the EU Directive 2002/49/EC that relates to the assessment and management of environmental noise.
Growth and Infrastructure Act 2013	An Act to make provision in connection with facilitating or controlling the following, namely, the provision or use of infrastructure, the carrying-out of development, and the compulsory acquisition of land; to make provision about when rating lists are to be compiled; to make provision about the rights of employees of companies who agree to be employee shareholders; and for connected purposes
Human Rights Act 1998	An Act to give further effect to rights and freedoms guaranteed under the European Convention on Human Rights
Local Democracy, Economic Development and Construction Act 2009	The Act seeks to create greater opportunities for community and individual involvement in local decision-making. It also provides for greater involvement of local authorities in local and regional economic development
Local Government Act 2000	<p>This act received Royal Assent in July 2000 and is made up of three parts:</p> <ul style="list-style-type: none"> <li>• Part I introduces a new power for local authorities to promote the economic, social or environmental wellbeing of an area.</li> <li>• Part II requires that all local authorities move away from the traditional committee style of decision making in which all members had a formal decision-making role, to one of four executive models. These are; leader or cabinet, mayor or cabinet, mayor or council manager, or alternative arrangements.</li> <li>• Part III introduces a new ethical framework for councils, including a requirement to adopt a code of conduct for members and implement a standards committee. The general functions of the standards committee are to promote and maintain high standards of conduct within the local authority, and to assist members of the authority to observe the code of conduct.</li> </ul>
Localism Act (2011)	An Act to make provision about the functions and procedures of local and certain other authorities; to make provision about the functions of the Commission for Local Administration in England; to enable the recovery of financial sanctions imposed by the Court of Justice of the European Union on the United Kingdom from local and public authorities; to make provision about local government finance; to make provision about town and country planning, the Community Infrastructure Levy and the authorisation of nationally significant infrastructure projects; to make provision about social and other housing; to make provision about regeneration in London; and for connected purposes.

Plan, Strategy or Programme	Summary of objectives and targets
Equality Act (2010)	<p>This act replaced previous anti-discrimination laws with a single act to make the law simpler and to remove inconsistencies. This makes the law easier for people to understand and comply with. The act also strengthened protection in some situations. The act covers nine protected characteristics, which cannot be used as a reason to treat people unfairly. Every person has one or more of the protected characteristics, so the act protects everyone against unfair treatment. The protected characteristics are:</p> <ul style="list-style-type: none"> <li>• Age</li> <li>• Disability</li> <li>• gender reassignment</li> <li>• marriage and civil partnership</li> <li>• pregnancy and maternity</li> <li>• race</li> <li>• religion or belief</li> <li>• sex</li> <li>• sexual orientation</li> </ul>
Flood and Water Management Act (2010)	<p>This Act provides a more comprehensive management of flood risk for people, homes and businesses, protects water supplies to the consumer and helps safeguard community groups from unaffordable rises in surface water drainage charges. The Act introduces into law the concept of flood risk management rather than 'flood defence' and provides the framework for delivery of flood and coastal erosion risk management through national and local risk strategies. The Act establishes a SuDS approving body (SAB). The SAB will have responsibility for the approval of proposed drainage systems in new developments and redevelopments (in accordance with National Standards for Sustainable Drainage). The Act requires Lead Local Flood Authorities (LLFA's) to maintain a register and record important flood risk management strategies and to investigate flooding to determine which authority has responsibility.</p>
London Squares Preservation Act, 1931	<p>This act identifies a London Squares which are to be provided protection from development.</p>
Natural Environment White Paper (2011)	<p>The Natural Environment White Paper recognises that a healthy natural environment is the foundation of sustained economic growth, prospering communities and personal wellbeing. It sets out how the value of nature can be mainstreamed across our society by facilitating local action; strengthening the connections between people and nature; creating a green economy and showing leadership in the EU and internationally. It set out 92 specific commitments for action.</p>
Natural Environment and Rural Communities Act (2006)	<p>The Natural Environment and Rural Communities Act is designed to help achieve a rich and diverse natural environment and thriving rural communities through modernised and simplified arrangements for delivering Government policy. The Act was published by Parliament and is accompanied by a set of explanatory notes, a Regulatory Impact Assessment and a policy statement.</p>
The Neighbourhood Planning (General) Regulations (2012)	<p>The Regulations set out the procedure for the designation of neighbourhood areas and neighbourhood forums and for the preparation of neighbourhood development plans and neighbourhood development orders (including community right to build orders). A separate instrument will be brought forward in relation to neighbourhood planning referendums.</p>
The Neighbourhood Planning (General) (Amendment) Regulations 2015	<p>These Regulations amend the Neighbourhood Planning (General) Regulations 2012 which made provision for neighbourhood planning as provided in the Localism Act 2011</p>
Planning Act (2008)	<p>The Planning Act 2008 was granted Royal Assent on 26 November 2008. The Act introduced a new stream-lined system for decisions on applications to build nationally significant infrastructure projects (NSIPs) in England and Wales, alongside further reforms to the</p>

Plan, Strategy or Programme	Summary of objectives and targets
Planning and Compulsory Purchase Act (2004)	town and country planning system and the introduction of a Community Infrastructure Levy (CIL). The Act received Royal Assent on 13 May 2004 and the provisions of the Act were introduced through a series of Commencement Orders and Regulations. The Act strengthened the focus on sustainability, transparency, flexibility and speed. The aim of the Act is to give effect to the Government's policy on the reform of the planning system, the principal features of which are set out in the policy statement Sustainable communities: Delivering through planning which was published on 23 July 2002.
Planning and Energy Act (2008)	This Act allows local councils to set targets in their areas for on-site renewable energy, on-site low carbon electricity and energy efficiency standards in addition to national requirements. It requires developers to source at least 10% of any new building's energy from renewable sources.
Planning (Listed Buildings and Conservation Areas) Act (1990)	This Act consolidates certain enactments relating to special controls in respect of buildings and areas of special architectural or historic interest.
Pollution Prevention and Control Act 1999	This Act gives the Secretary of State the power to make regulations providing for a new pollution control system to meet the requirements of European Council Directives on Integrated Pollution Prevention and Control and for other measures to prevent and control pollution.
Sustainable Communities Act (2007) (Amendment) Act 2010	The Sustainable Communities Act 2007 provides local authorities and local communities with the opportunity to ask central government to devolve more power to them in order to improve the sustainability of their local area. The amendment improves the process to allow communities a greater say in how their proposed changes can happen
Town and Country Planning Act (1990)	The Town and Country Planning Act 1990 is an act of the British Parliament regulating the development of land in England and Wales
The Town and Country Planning (Environmental Impact Assessment) Regulations (2011)	These regulations are used to determine whether a planning application will require an Environmental Impact Assessment (EIA). These Regulations replace the Town and Country Planning (Environmental Impact assessment (England and Wales) Regulations 1999 (SI No. 293) ("the 1999 regulations") and subsequent amending instruments. The Town and Country Planning (Environmental impact Assessment) (Mineral Permissions and Amendment) (England) Regulations 2008 remain in force. These Regulations, except for the provisions relating to projects serving national defence purposes, extend to England only. The 1999 Regulations remain in force for Wales.
The Town and Country Planning (Environmental Assessment and Permitted Development) Regulations 1995	These Regulations are concerned with the further implementation in England and Wales of Council Directive 85/337/EEC.
The Town and Country Planning (General Permitted Development) (England) Order 2015	The main purpose of this Order is to grant planning permission for certain classes of development without any requirement for an application to be made under Part III of the Town and Country Planning Act 1990.
The Town and Country Planning (Compensation) (England) Regulations (2012)	The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2012 amends the Town and Country Planning (General Permitted Development) Order 1995 ("GPDO")
The Town and Country Planning (Compensation) (England) (Amendment)	The Town and Country Planning (Compensation) (England) Amendment) Regulations 2014 ("the Compensation Regulations") amend the Town and Country Planning (Compensation) (England) Regulations 2013 to limit the circumstances in which compensation is



Plan, Strategy or Programme	Summary of objectives and targets
Regulations (2014)	payable in the event that the new permitted development rights are withdrawn.
The Town and Country Planning (Local Planning) (England) Regulations 2012	These regulations amend the Town and Country Planning (Local Development) (England) Regulations 2009, in response to the enactment of the Localism Act 2011
The Town and Country Planning (Major Infrastructure Project Inquiries Procedure) (England) Rules 2005	These rules outline the procedures to be followed for local inquiries into 1) applications for planning permission or 2) the approval of local planning authorities for major developments deemed to have national or regional importance.
The Town and Country Planning (Modification and Discharge of Planning Obligations) Regulations 1992	This Regulation gives further detail to the procedure for appeals against enforced planning obligations.
The Town and Country Planning (Tree Preservation) (England) Regulations 2012	Local planning authorities protect trees in the interests of amenity by making Tree Preservation Orders (TPOs). Provisions are spread across primary and various secondary legislation and different rules apply depending on when the TPO is made.
The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010	This amendment introduces a definition of houses in multiple occupation into the Use Classes Order.
The Town and Country Planning (Use Classes) Order 1987	This Order revokes and replaces the Town and Country Planning Order 1972 as amended by the Town and Country Planning Order 1983.
Levelling Up and Regeneration Act 2023	The Bill provides for the reform of the planning system in England, to reflect the Government's priorities for levelling up and regeneration. The process for plan making is amended.
Environment Act 2021	Introduces requirement for Biodiversity net gain.
The Wildlife and Countryside act 1981, as amended	Consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the conservation of wild birds (Birds Directive) in Great Britain (NB Council Directive 79/409/EEC has now been replaced by Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (codified version)).
<b>Planning Framework</b>	
National Planning Policy Framework (NPPF) (2023)	The Government has produced a simple national planning policy framework setting out their priorities for the planning system in England in a single, concise document covering all major forms of development proposals handled by local authorities. All the national planning policies set out in PPSs, MPSs, PPGs and MPGs, have been superseded by the NPPF. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
National Planning Practice Guidance (NPPG)	On 6 March 2014 the Department for Communities and Local Government (DCLG) launched this planning practice guidance web-based resource. This was accompanied by a Written Ministerial Statement which includes a list of the previous planning practice guidance documents cancelled when this site was launched. For the first time, planning practice guidance is now available entirely online in a usable and accessible way
<b>Government Strategies</b>	



Plan, Strategy or Programme	Summary of objectives and targets
Air Quality Strategy (2007)	The Strategy: sets out a way forward for work and planning on air quality issues; sets out the air quality standards and objectives to be achieved; introduces a new policy framework for tackling fine particles; identifies potential new national policy measures which modeling indicates could give further health benefits and move closer towards meeting the Strategy's objectives.
Biodiversity – The UK Action Plan (1994)	The Action Plan is the UK Government's response to the Convention on Biological Diversity (CBD) signed in 1992. It describes the UK's biological resources and commits a detailed plan for the protection of these resources. The first lists of Priority Species and Habitats were published by Government in 1995 as part of the UK Biodiversity Action Plan (UK BAP). They included over 300 species of which 11 were butterflies and 53 were moths.
Biodiversity and Geological Conservation: Statutory obligations and their impact within the planning system.- Government circular 06/05	This circular provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England. It complements the national planning policy in the National Planning Policy Framework and the Planning Practice Guidance.
Conserving Biodiversity – the UK approach (DEFRA 2007)	This statement has been prepared by the UK Biodiversity Standing Committee <sup>1</sup> on behalf of the UK Biodiversity Partnership. Its purpose is to set out the vision and approach to conserving biodiversity within the UK's devolved framework for anyone with a policy interest in biodiversity conservation. It sets out an approach to biodiversity conservation that is designed not only to meet the commitment to halt the loss of biodiversity by 2010, but to guide action well into the second decade of the 21st century at a time when the challenges faced by the natural environment are great.
Department of Health Public Health Strategy – healthy lives, healthy people (July 2011)	<p>This policy statement sets out the progress the government has made in developing the new public health system. In doing so the paper sets out how the government expect the reformed public health system to work including:</p> <ul style="list-style-type: none"> <li>• clarifying the role of local authorities and the Director of Public Health in health improvement, health protection and population healthcare;</li> <li>• proposals for who is responsible for commissioning the different public health services;</li> <li>• the mandatory services local authorities will be required to provide;</li> <li>• the grant conditions we expect to place on the local authority public health grant;</li> <li>• establishing Public Health England as an Executive Agency to provide greater operational independence within a structure that is clearly accountable to the Secretary of State for Health;</li> <li>• clear principles for emergency preparedness, resilience and response.</li> </ul>
The Sustainable Development Strategy for the NHS, Public Health and Social Care System	This strategy outlines a vision and three goals based on the challenges outlined above to aim for by 2020. It describes the opportunities to reduce our environmental impacts, improve our natural environment, increase readiness for changing times and climates and strengthen social cohesion. It also explores how this can be taken forward as a system and outlines specific areas of focus that can be used to guide action.
Departments of Health and Transport- Active Travel Strategy 2010	The Department of Health and Department for Transport jointly published a new Active Travel Strategy. The strategy highlights plans to put walking and cycling at the heart of local transport and public health strategies over the next decade. The guiding principles for the strategy are that walking and cycling should be everyday ways of getting around – not just for their own sake but also because of what they can do to improve public health, tackle congestion, reduce carbon emissions and improve the local environment
Healthy Weight Healthy Lives: A Cross	This cross-government strategy is the first step in a sustained programme to support people to maintain a healthy weight. It will be

Plan, Strategy or Programme	Summary of objectives and targets
Government Strategy for England (2008)	followed by a public annual report that assesses progress, looks at the latest evidence and trends, and makes recommendations for further action.
Biodiversity 2020: A strategy for England's wildlife and ecosystem services and its outcomes and actions	This new, ambitious biodiversity strategy for England builds on the Natural Environment White Paper and provides a comprehensive picture of how we are implementing our international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea
Noise Policy Statement for England (DEFRA 2010)	This statement sets out the long term vision of Government noise policy, which is to promote good health and a good quality of life through the management of noise within the context of Government policy on sustainable development. The policy seeks to make explicit the implicit underlying principles and aims regarding noise management and control that are to be found in existing policy documents, legislation and guidance.
Plan for Growth – (March 2011)	<p>The Government's economic policy objective is to achieve strong, sustainable and balanced growth that is more evenly shared across the country and between industries. The Plan for Growth contains four overarching ambitions that will ensure the progress is made towards achieving this economic objective. The ambitions are:</p> <ol style="list-style-type: none"> <li>1. to create the most competitive tax system in the G20;</li> <li>2. to make the UK one of the best places in Europe to start, finance and grow a business;</li> <li>3. to encourage investment and exports as a route to a more balanced economy; and</li> <li>4. to create a more educated workforce that is the most flexible in Europe.</li> </ol>
Mainstreaming sustainable development (2011)	This document sets out the Coalition Government's vision for sustainable development and a package of measures to deliver it through the Green Economy, action to tackle climate change, protecting and enhancing the natural environment, and fairness and improving wellbeing, and building a Big Society
Strategic Review of Health Inequalities in England Post 2010 (The Marmot Review)	<p>In November 2008, Professor Sir Michael Marmot was asked by the Secretary of State for Health to chair an independent review to propose the most effective evidence-based strategies for reducing health inequalities in England from 2010. The strategy will include policies and interventions that address the social determinants of health inequalities.</p> <p>The Review had four tasks</p> <ol style="list-style-type: none"> <li>1 Identify, for the health inequalities challenge facing England, the evidence most relevant to underpinning future policy and action</li> <li>2 Show how this evidence could be translated into practice</li> <li>3 Advise on possible objectives and measures, building on the experience of the current PSA target on infant mortality and life expectancy</li> <li>4 Publish a report of the Review's work that will contribute to the development of a post- 2010 health inequalities strategy</li> </ol>
Construction 2025 (2013)	<p>This Strategy is aimed at providing clarity around the existing policy framework and signalling the future direction of Government policy. It aims to realise the shared vision of sustainable construction by:</p> <ul style="list-style-type: none"> <li>• Providing clarity to business on the Government's position by bringing together diverse regulations and initiatives relating to sustainability;</li> <li>• Setting and committing to higher standards to help achieve sustainability in specific areas;</li> <li>• Making specific commitments by industry and Government to take the sustainable construction agenda forward</li> </ul>
Adapting to climate change: national adaptation programme (2013)	The National Adaptation Programme sets out what government, businesses and society are doing to become more climate ready. It contains a register of actions which includes all the actions agreed in the programme so far. It also aligns risks identified in the Climate Change Risk Assessment to actions being undertaken or to be undertaken and the timescales according to each theme.
The Carbon Plan: Delivering our low carbon	This plan sets out how the UK will achieve decarbonisation within the framework of our energy policy: to make the transition to a low carbon economy while maintaining energy security, and minimising costs to consumers, particularly those in poorer households.

Plan, Strategy or Programme	Summary of objectives and targets
future (2011)	
UK Renewable Energy Strategy (2009)	<p>The Renewable Energy Strategy sets a path towards increasing UK generation of renewable projects. It sets out the actions the Government are taking to ensure the targets of producing 15% of UK energy needs from renewable energy sources by 2020 are met. To achieve this the strategy calls for;</p> <ul style="list-style-type: none"> <li>• 30% of electricity supply to come from renewable sources, including 2% from micro-generation</li> <li>• 12% of heat supply to come from renewable sources</li> <li>• 10% of transport supply from renewable sources</li> </ul>
UK Sustainable Procurement Action Plan (2007)	<p>The Government launched a package of actions to deliver the step change needed to ensure that supply chains and public services will be increasingly low carbon, low waste and water efficient, respect biodiversity and deliver wider sustainable development goals. The Action Plan puts in place clear lines of accountabilities and reporting, and develops plans to raise the standards and status of procurement practice in Government which will strengthen delivery of these targets.</p>
Future Water: The Government's Water Strategy for England (2011)	<p>This includes: sustainable delivery of secure water supplies, an improved and protected water environment, fair, affordable and cost-reflective water charges, reduced water sector greenhouse gas emissions and more sustainable and effective management of surface water.</p>
Waste Management Plan for England (2013)	<p>The waste management plan for England (WMPE) provides an analysis of the current waste management situation in England and fulfils the mandatory requirements of article 28 of the revised Waste Framework Directive (rWFD). The plan does not introduce new policies or change the landscape of how waste is managed in England. Its core aim is to bring current waste management policies under the umbrella of one national plan.</p>
National Flood and Coast Erosion Management Strategy (July 2011)	<p>Objectives are to:</p> <ul style="list-style-type: none"> <li>• ensure a clear understanding of the risks of flooding and coastal erosion</li> <li>• set out clear and consistent plans for risk management</li> <li>• manage flood and coastal erosion risks in an appropriate way</li> <li>• ensure that emergency plans and responses to flood incidents are effective</li> <li>• help communities to recover more quickly and effectively after incidents.</li> </ul>
National Flood Emergency Framework	<p>In planning and preparing for a flooding emergency, the Government's strategic objectives are to:</p> <ul style="list-style-type: none"> <li>• protect human life and alleviate suffering; and, as far as possible, property and the environment;</li> <li>• support the continuity of everyday activity and the restoration of disrupted services at the earliest opportunity; and</li> <li>• uphold the rule of law and the democratic process.</li> </ul>
Prevention is better than cure: the role of waste prevention in moving to a more resource efficient economy. (2013)	<p>This document sets out the Waste Prevention Programme for England. It articulates the actions for government and others which together will move us towards reducing waste. The aim of the Programme is to improve the environment and protect human health by supporting a resource efficient economy, reducing the quantity and impact of waste produced whilst promoting sustainable economic growth.</p>
NHS Five Year Forward View (2014)	<p>The NHS Five Year Forward View was published on 23 October 2014 and sets out a vision for the future of the NHS. It has been developed by the partner organisations that deliver and oversee health and care services including NHS England, Public Health England, Monitor, Health Education England, the Care Quality Commission and the NHS Trust Development Authority. Patient groups, clinicians and independent experts have also provided their advice to create a collective view of how the health service needs to</p>

Plan, Strategy or Programme	Summary of objectives and targets
	change over the next five years if it is to close the widening gaps in the health of the population, quality of care and the funding of services.
<b>Guidance and Other Reference Documents</b>	
A Practical Guide to the Strategic Environmental Assessment Directive (2005)	Practical guidance, published in September 2005, on applying European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”.
BREEAM (Building Research Establishment Environmental Assessment Method) (2008)	BREEAM addresses wide-ranging environmental and sustainability issues and enables developers and designers to prove the environmental credentials of their buildings. It uses a straightforward scoring system that is transparent, easy to understand and supported by evidence-based research; has a positive influence on the design, construction and management of buildings and sets and maintains a robust technical standard with rigorous quality assurance and certification
Environment Agency - Creating a better place. Our corporate strategy (2010-2015)	This strategy sets out the Environment Agency's aims for the period to 2015 and describes the role they will play in being part of the solution to the environmental challenges society faces. It sets out how the EA will continue to review their priorities and ways of working to ensure value for money whilst creating a better place for people and the environment..
Environment Agency – Climate Change, adapting for tomorrow (2009)	This report shows how the Environment Agency are working, often in partnership with others, to help communities and businesses adapt, while still protecting the natural environment.
Environment Agency - Flood risk assessments: climate change allowances (2016)	Guidance on how climate change could affect flood risk to new development.
Environment Agency – Building a better environment. A guide for developers (2006)	This guide provides advice on making sure development contributes to the long-term environmental quality of our country. The guide gives practical advice on each of the environmental issues that may affect a site. This ranges from how you can reduce flood risk through to creating quality green space in your development. It gives pointers for building sustainable, cost-effective homes, helping create an environment in which people will really want to live. It also provides examples of sites where this good practice has already been applied.
Environment Agency State of Environment Report for Southwark (2010)	This report provides a snapshot of the environment in the London Borough of Southwark. It outlines trends and changes in the environment, and highlights some of the work being carried out in the local areas to improve the environment, and people's experience of it. The report has been compiled as an extension of the London State of the Environment report to provide a local focus on the boroughs and the health of their environment.
Environment Agency: guidance for developments requiring planning permission and environmental permits 2012	This guidance sets out how the Environment Agency will respond to planning consultations that require an environmental permit under the Environmental Permitting (England and Wales) Regulations 2010 (EPR).
Environment Agency Policy paper: Preliminary flood risk assessments and flood risk areas (2011) and Map of Flood Risk areas in England	The Environment Agency (EA) is responsible for managing flood risk from main rivers, the sea and reservoirs. Lead local flood authorities, unitary authorities or county councils, are responsible for local sources of flood risk, in particular surface water, groundwater and ordinary watercourses. To manage flood risk both EA and lead local flood authorities must follow a 6 year cycle of planning. The current planning cycle runs from 2010 to 2015.
Environment Agency Greenroof Toolkit	Environment Agency on-line toolkit which sets out guidance for site specific opportunities, green roof design and technical assessment

Plan, Strategy or Programme	Summary of objectives and targets
	<p>The vision is that developers will promote the use of green roofs to:</p> <ul style="list-style-type: none"> <li>• create a better and more sustainable London</li> <li>• deliver better quality places to live and work</li> <li>• create a low-carbon city</li> <li>• adapt to and mitigate the effects of climate change</li> </ul>
Environment Agency: Groundwater Protection: Principles and Practice (GP3)	The GP3 document is a key Environment Agency reference for LPAs, developers and land owners. It sets out our approach to groundwater protection and management and what we want others to do. It covers our high-level approach, the technical background to our work and an introduction to the tools we use. It also describes the legal framework the EA works within and the approaches and positions it takes to regulate and influence certain activities and issues.
Environment Agency: Guiding Principles for Land Contamination (2010)	The GPLC documents were developed initially for landowners, developers, advisors and practitioners involved in redevelopment and evaluation of land contamination. These documents refer to relevant UK guidance and highlight specific steps and considerations involved in evaluating risks associated with land and water contamination.
Water for Life (2011) Government White paper	The Water White Paper focuses on the challenges facing the water sector, including maintaining water supplies, keeping bills affordable and reducing regulation. It recognises the need to protect rivers, streams and lakes from pollution and unsustainable abstraction, and acknowledges the critical importance of water supply and sewerage infrastructure.
Forestry Commission – The case for trees (2010)	This document aims to inspire people involved in planning policy and practice to become champions and advocates for trees.
Neighbourhood Planning (2013)	Information on what neighbourhood planning is, why it matters, how it works, and sources of advice and support available for communities.
English Indices of Deprivation 2010	The Index of Multiple Deprivation 2010 combines a number of indicators, chosen to cover a range of economic, social and housing issues, into a single deprivation score for each small area in England. This allows each area to be ranked relative to one another according to their level of deprivation.
Living Streets – UK Charity for everyday walking. Making the Case for Investment in the Walking Environment A review of the evidence (2011)	This document provides an extensive report detailing the key investments in the walking environment, in addition to outlining the benefits of walking friendly places and the identified cost of effectiveness.
How to get more children walking to school A best practice guide by Living Streets	This document comprises of the recommendations of the physical and financial benefits of walking for everyone, captured from a 'Walk to School outreach project carried out with various boroughs across England and Wales.
Model Procedures for the Management of Contaminated Land- Environment Agency.	The Model Procedures for the Management of Land Contamination, CLR 11, have been developed to provide the technical framework for applying a risk management process when dealing with land affected by contamination.

Plan, Strategy or Programme	Summary of objectives and targets
	The process involves identifying, making decisions on, and taking appropriate action to deal with land contamination in a way that is consistent with government policies and legislation within the UK.
Natural England: A Natural Development (2009)	<p>The Natural Development Project launched on 3 November 2009 to demonstrate how both large and small scale development can incorporate green infrastructure in practice. Natural England and key players in the development sector formed a partnership to understand how to value, design and create quality green infrastructure. The partnership aims to demonstrate how – at different scales and locations – the contribution of the natural environment in regeneration can move from that of traditional landscaping to one of providing vital spaces for people, wildlife, health, wellbeing, and climate change adaptation. The Natural Development project will provide a focus for our engagement with real sites and enable us to practically demonstrate positive planning with developers. It will work to highlight opportunities and overcome barriers to success and enable sharing of best practice to support the mainstreaming of green infrastructure in development and regeneration.</p> <p>Over the coming months and years the project will collect and share:</p> <ul style="list-style-type: none"> <li>Case Studies, focusing on a range of sites – initially in the Thames Gateway, and widening out as the project progresses.</li> <li>Commentary on problems, opportunities, and issues for large and small scale developments.</li> <li>Technical information relating to our work with developers across the country.</li> </ul>
Biodiversity Planning Toolkit (2011)	The Toolkit provides information on the issues to be considered at the forward planning stage, including gathering a sufficient evidence base, biodiversity opportunity mapping, green infrastructure provision, setting spatial biodiversity objectives and targets and identifying potential for biodiversity enhancements.
English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)	This document contains policies and guidance for the sustainable management of the historic environment.
English Heritage, Guidance on Environmental Assessment, Sustainability Appraisal and the Historic Environment (2010)	This guidance focuses on SEA/SA for development plans, building on existing Government advice, it is equally applicable to the preparation of SEAs for other types of documents, such as Local Transport Plans and Water Resource Management Plans.
Conservation Bulletin 47: Characterisation, English Heritage (2005)	A bulletin that explores the subject of characterisation and sets out some examples of studies of local character.
Understanding Place: Historic Area Assessments in a Planning and Development Context, English Heritage (2010)	Sets out guidance for undertaking Historic Area Assessments to inform plan making and development management.
Understanding Place Historic Area Assessments: Principles and Practice, English Heritage (2010)	Sets out guidance for how to undertake assessments for historic areas in order to produce a Historic Area Assessment.

Plan, Strategy or Programme	Summary of objectives and targets
Valuing Places: Good Practice in Conservation Areas, English Heritage (2011)	Sets out a series of exemplary case studies for managing change in the historic environment.
Seeing The History In The View: A Method For Assessing Heritage Significance Within Views, English Heritage (2011)	Sets out a method for understanding and assessing heritage significance of views.
Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment (2013)	This SEA/SA provides guidance that focuses on key principles required when analysing the historic environment that must be measured for the development of certain Plans and Programmes on the Environment that is also applicable to neighbourhood plans and other documents such as the Local Transport Plans and Water Resource Management Plans.
The Historic Environment in Local Plans Historic Environment Good Practice Advice in Planning: 1 (2015)	This Historic England Good Practice Advice note provides comprehensive steps required for the development of local plans through ascertaining not only the setting of the site, but the 'value to society', to coincide with a strong evidence base that must incorporate the use of local lists, heritage assets, with further consideration of the conservation areas within and outside the site area. The conservation and enjoyment of the historic environment must make a positive contribution, by enhancing the local character and distinctiveness of the area, paying special attention in implementing historic environment legislation the National Planning Policy Framework (NPPF), and the related guidance given in the Planning Practice Guidance (PPG).
Managing Significance in Decision-Taking in the Historic Environment Historic Environment Good Practice Advice in Planning: 2 (2015)	This Historic England Good Practice Advice note provides the key principles required for Managing Significance in Decision-Taking in the Historic Environment, inline with implementing historic environment legislation, the National Planning Policy Framework (NPPF), and the related guidance given in the Planning Practice Guidance (PPG).
The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning: 3 (2015)	The GPA outlines good vital information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance in the National Planning Practice Guide (PPG).
Tall Buildings Historic England Advice Note 4 (2015)	This Historic England Good Practice Advice note provides guided support to all those dealing with proposals for tall buildings in implementing historic environment legislation, the National Planning Policy Framework (NPPF), and the related guidance given in the Planning Practice Guidance (PPG).
Understanding Place: Character and context in local planning, English Heritage (2011)	Sets out case studies for how historic characterisation can be used to inform plan making and development management decisions.



Plan, Strategy or Programme	Summary of objectives and targets
Understanding Place: Conservation Area Designation, Appraisal and Management, English Heritage (2011)	Sets out guidance for managing change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management.
Good Practice for Local Listing Consultation Draft, English Heritage (2011)	Sets out best practice guidance for identifying buildings and structures suitable for local listing and for managing the list.
Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS (2010)	Sets out guidance for producing Heritage Impact Assessments for World Heritage Sites in order to evaluate the impact of potential development on the Outstanding Universal Value. This may also provide a guide for assessing general impact of development on heritage assets and their settings.
National Institute for Health and Clinical Excellence (NICE):Alcohol-use disorders: preventing harmful drinking	The guidance identifies how government policies on alcohol pricing, its availability and how it is marketed could be used to combat such harm. Changes in policy in these areas are likely to be more effective in reducing alcohol-related harm among the population as a whole than actions undertaken by local health professionals.
National Institute for Health and Clinical Excellence (NICE): Prevention of Cardiovascular disease at the population level	<p>The guidance is for government, the NHS, local authorities, industry and all those whose actions influence the population's cardiovascular health (that is, can help keep people's hearts healthy and prevent strokes). The guidance comprises two sets of recommendations aimed at national policy makers and local practitioners respectively. Recommendations 1 to 12 outline a national framework for action. They break new ground for NICE by focusing on legislative, regulatory and voluntary changes – including further development of existing policies. Topics covered include:</p> <ul style="list-style-type: none"> <li>• How to reduce the nation's consumption of salt, saturated fats and trans fats</li> <li>• How to ensure food marketing and promotions aimed at children and young people do not encourage them to consume high levels of salt, saturated fats and trans fats</li> <li>• Commercial interests</li> <li>• Food product labelling</li> <li>• The European Union's common agricultural policy</li> <li>• Public sector catering guidelines</li> <li>• Advice on take-aways and other food outlets.</li> </ul>
National Institute for Health and Clinical Excellence (NICE): Preventing unintentional injuries among children and young people aged under 15: road design and modification	<p>This is one of three pieces of NICE guidance published in November 2010 on how to prevent unintentional injuries among under-15s. A second publication covers unintentional injuries in the home and a third covers strategies, regulation, enforcement, surveillance and workforce development. The guidance covers 20 mph limits, 20mph zones and engineering measures to reduce speed or make routes safer. The recommendations include advice on:</p> <ul style="list-style-type: none"> <li>• How health professionals and local highways authorities can coordinate work to make the road environment safer.</li> <li>• Introducing engineering measures to reduce vehicle speeds, in line with Department for Transport guidance.</li> <li>• Making routes commonly used by children and young people safer. This includes routes to schools and parks.</li> </ul>
National Institute for Health and Clinical Excellence (NICE): Promoting physical activity: active play and sport for pre-school and school-age children and young people in family, pre-school, school and community settings	<p>This guidance is for all those who are involved in promoting physical activity among children and young people, including parents and carers. The NICE recommendations give advice on:</p> <ul style="list-style-type: none"> <li>• how to promote the benefits of physical activity and encourage participation</li> <li>• high level strategic planning</li> <li>• the importance of consultation with children and young people and how to set about it</li> <li>• planning and providing spaces, facilities and opportunities</li> </ul>



Plan, Strategy or Programme	Summary of objectives and targets
	<ul style="list-style-type: none"> <li>• training people to run programmes and activities</li> <li>• how to promote physically active travel such as cycling and walking.</li> </ul>
National Institute for Health and Clinical Excellence (NICE): Promotion and creation of physical environments that support increased levels of physical activity	<p>This guidance offers the first evidence-based recommendations on how to improve the physical environment to encourage physical activity. It is for NHS and other professionals who have responsibility for the built or natural environment. This includes local transport authorities, transport planners, those working in local authorities and the education, community, voluntary and private sectors. The seven recommendations cover strategy, policy and plans, transport, public open spaces, buildings and schools. They include:</p> <ul style="list-style-type: none"> <li>• Ensure planning applications for new developments always prioritise the need for people (including those whose mobility is impaired) to be physically active as a routine part of their daily life.</li> <li>• Ensure pedestrians, cyclists and users of other modes of transport that involve physical activity are given the highest priority when developing or maintaining streets and roads.</li> <li>• Plan and provide a comprehensive network of routes for walking, cycling and using other modes of transport involving physical activity.</li> </ul>
Planning sustainable cities for community food growing (2014)	This guide brings together in one place examples of planning policies around the UK that support community food growing. It is aimed primarily at planning authorities to help them to use food growing as a way of creating healthy communities.
No health without mental health: implementation framework (2012)	The Framework sets out what a range of local organisations can do to implement No Health Without Mental Health, and improve mental health outcomes in their area. It also outlines what work is underway nationally to support this, and how progress will be measured.
Local action on health inequalities: evidence papers (2014)	This research shows the evidence supporting action to reduce health inequalities.
Obesity: working with local communities; NICE guidelines [PH42] (2012)	This guidance aims to support effective, sustainable and community-wide action to prevent obesity. It sets out how local communities, with support from local organisations and networks, can achieve this.
Physical activity: walking and cycling NICE guidelines [PH41] (2012)	This guideline sets out how people can be encouraged to increase the amount they walk or cycle for travel or recreation purposes. This will help meet public health and other goals (for instance, to reduce traffic congestion, air pollution and greenhouse gas emissions).

## Regional

Plan, Strategy or Programme	Summary of objectives and targets
<b>Air Quality</b>	
Air Quality Strategy (2010)	This strategy sets out a framework for delivering improvements to London's air quality and includes measures aimed at reducing emissions from transport, homes, offices and new developments, as well as raising awareness of air quality issues. Over the last few years, a number of innovative measures have been introduced to help improve air quality in London. Nevertheless, air pollution remains a problem in the capital, as is clear from the fact that European Union targets for air quality standards that were intended to be met in 2004 and 2005 have still not been achieved.
The control of dust and emissions from construction and demolition - Best Practice Guidance (2014)	The GLA and London Councils have produced 'Best Practice Guidance' to control dust and emissions from construction and demolition. The Guidance will be used to inform the planning process within London boroughs; assisting developers in understanding the methods available to them and what London boroughs might expect. The Guidance will be reviewed regularly, in order to update new best practice in dust and emissions management.
<b>Equality</b>	
Focus on London: The Hidden City (2013)	
A Digital Inclusion Strategy for London (2015)	This strategy outlines why digital exclusion is an issue for London and how the Mayor can work with partners to address the barriers people face to getting online. It provides data on the numbers and groups of people that are digitally excluded. It then explains the cost of digital exclusion to the individual, society and the economy. The Mayor is keen to use his office to work with partners to ensure as many Londoners who want to get online, have the opportunity to do so.
Equal Life Chances for All (2015)	The Equal Life Chances for All framework 2014 highlights the Mayor's commitment to tackling inequality; improving life chances, and removing barriers that prevent people from reaching their full potential. The GLA will ensure that equality is mainstreamed into everything the organisation does, including how it obtains goods and services.
Mayors Annual Equality Report 2013/2014	The Mayor's Annual Equality Report 2013/2014 highlights the progress made during the financial year April 2013 to March 2014 towards achieving the GLA's revised equality objectives. It also gives the latest figures and trends for the indicators of progress.
Equal Life Chances for All – Measures Report (2011)	The Equal Life Chances for all Measures report sets out the most recent trends on measures of the delivery of policies and programmes directly under the control of the Mayor and his partners as well as statistical measures outside the Mayor's direct influence.
Poverty in London: 2012/13	The number of Londoners living in poverty has seen little change over the last few years and remains at around 2.2 million people, or 28 per cent of all those living in the region, averaged over three years 2010/11-2012/13. Around 300,000 children in Inner London are living in poverty, with a further 400,000 in Outer London. The Inner London child poverty rate remains significantly higher than for any other region, at 45 per cent. Inner London also stands out as having exceptionally high rates of material deprivation among pensioners – more than double the rate for any other region with almost one in four unable to have or take part in the social norms for that population group for reasons of poverty, health or isolation.
A Fairer London: The 2014 Living Wage in London	This is the tenth London Living Wage report from the GLA, and calculates the wage for 2014 at £9.15 per hour (a 4.0 per cent increase on the 2013 wage). In the Mayor's '2020 Vision' for London he pledged to make the Living Wage the norm across the capital. There are now over 400 accredited London Living Wage employers plus a number who have chosen not to be accredited. Accredited Living Wage employers alone have now provided over 20,000 London workers the benefits of the Living Wage since 2011.
Accessible London: Achieving an Inclusive	This SPG provides guidance on the implementation of <b>London Plan Policy 7.2 An inclusive environment</b> and of other policies in the

Plan, Strategy or Programme	Summary of objectives and targets
Environment SPG (2014)	Plan with specific reference to inclusive design. It also provides guidance on Lifetime Neighbourhoods to support London Plan <b>Policy 7.1 Building London's neighbourhoods and communities</b> . One of the Mayor's aims for London is that everyone, whether resident, visitor or worker, is able to participate and enjoy all that the city has to offer. To help achieve this aim the London Plan 2011 includes a number of policies which promote an inclusive environment to help ensure that all of London's diverse communities can contribute to London's growing economy and enjoy a high quality of life.
Violence Against Women and Girls Strategy 2013-2017	This strategy covers the following forms of violence against women and girls: <ul style="list-style-type: none"> <li>• Domestic violence and abuse</li> <li>• Female Genital Mutilation (FGM)</li> <li>• Forced marriage</li> <li>• 'Honour'-based violence</li> <li>• Prostitution and trafficking</li> <li>• Sexual violence including rape</li> <li>• Sexual exploitation</li> <li>• Sexual harassment</li> <li>• Stalking</li> <li>• Faith-based abuse.</li> </ul> This strategy is focused on the needs of women and girls and is a deliberate response to the disproportionate impact of VAWG crimes on women and girls.
Police and Crime Plan 2013	The Police and Crime Plan 2013-2016 outlines the Mayor's mission, priorities and objectives for tackling crime and making London safer.
2013 Round Ethnic Group Population Projections	The White population of Greater London is projected to be fairly stable at about 4.9 million over the next decade and increase very slightly thereafter, reaching 5.1 million in 2041. The BAME population of Greater London is projected to increase from 3.3 million in 2011 to 5.2 million in 2041. By the Census year 2011 the Black African population (576 thousand) had surpassed the Indian population (545 thousand) to become the biggest individual BAME ethnic group in Greater London
Hate Crime Reduction Strategy (20xx)	The strategy sets out plans to boost confidence across all communities in reporting hate crime, develop ways to prevent offences and reduce repeat victimisation and outlines how agencies can work together to ensure swift and sure justice for victims. Hate crime is defined as any criminal offence which is perceived, by the victim or any other person, to be motivated by a hostility or prejudice based on a personal characteristic, specifically race, religion/ faith, sexual orientation, disability and transgender identity.
London Enriched (2009) and update (2013)	London Enriched is the Mayors refugee integration strategy, setting out a vision for refugee integration in the capital, focusing on the right of refugees to live in dignity and security, sharing with other Londoners the same life chances and opportunities to contribute.
An evidence base on migration and integration in London (2010)	The report begins with a literature and demographic review presenting a picture of migration in London and the key issues around migrant integration. This draws together the state of the academic and policy literature with as recent as possible primary data provided by the GLA and UK Border Agency and original data analysis conducted by COMPAS. The work was conducted over two months in Spring 2010. The report presents the broad contours of the contemporary migration landscape in London, before looking at each of the Mayor's integration strategy core themes in terms of barriers and factors to successful integration and policy implications arising. It concludes with a framework of interventions, noting the policy priorities arising from the evidence for each of the themes.
Planning for Equality and Diversity in London SPG (2007)	This SPG: <ul style="list-style-type: none"> <li>• provides guidance to boroughs, partners and developers on the implementation of policies in the London Plan which relate to equalities issues and addressing the needs of London's diverse communities;</li> <li>• sets out some of the tools for promoting equality and diversity in planning processes;</li> <li>• highlights the spatial impacts of wider socio-economic issues such as poverty and discrimination in the planning context;</li> <li>• sets out overarching principles and the key spatial issues for planning for equality; and examines in greater detail the spatial needs of London's diverse communities and identifies how spatial planning can be used to try and address these</li> </ul>

Plan, Strategy or Programme	Summary of objectives and targets
Responding to the needs of faith communities: Report and evidence (2008)	CAG Consultants with Diverse Ethics and Land Use Consultants were commissioned by the GLA in late 2007 to explore the needs of faith communities in relation to places of worship in London. This document reports on our findings and conclusions from the research and engagement process with faith communities and planning authorities in relation to places of worship in London.
<b>Culture</b>	
Cultural Metropolis 2014 - The Mayor's culture strategy for London	The Mayor's Cultural Strategy sets out the vision, priorities and recommendations for how to strengthen the cultural life of Londoners across the capital. It recognises the significance of the cultural and creative sectors in making London a successful world city, and puts forward a case for its continued support and investment. It includes an update on the policy achievements and next steps in: Maintaining London's position as a world city of culture, Widening the reach, Education and skills, Infrastructure, environment and the public realm. It provides a recap of the cultural triumphs and cultural legacy from the Games.
Culture on the high street guide 2013	The <i>Culture on the High Street</i> guide will help local authorities, town centre managers and business improvement districts to improve the quality and ambition of culture on our high street.
Working Paper 48: Culture and regeneration - What evidence is there of a link and how could it be measured? (2011)	Despite much research, there have been few comprehensive evaluations of culture-led regeneration schemes and so a good evidence base does not exist. A review of the limited evidence shows mixed results and much uncertainty of the impact of culture-led regeneration. Current evaluation measures are not appropriate for understanding the long-term and dynamic changes that regeneration schemes may cause and instead these schemes should be monitored, focussing on both people and places.
<b>Design and place shaping</b>	
Shaping Neighbourhoods: Character and Context SPG (2014)	This guidance sets out an approach and process to help understand the character and context of a place so that its results can inform the planning and design process, and guide change in way which is responsive to individual places and locations. A separate non-technical summary sets out the main messages of the SPG. A supporting list of data and research resources is provided as a living document that will be updated as appropriate.
Streetscape Guidance: A guide to better London Streets (2009)	The Streetscape Guidance provides advice on improving and managing the Transport for London Road Network (TLRN) and promotes consistency of approach and excellence in design and workmanship. The document highlights relevant policies and guidance, sets out specific design principles and guidelines including a palette of materials and products, and acts as a best practice resource for London boroughs and other partners.
London View Management Framework Supplementary Planning Guidance, Mayor of London (2012)	The London View Management Framework is a key component of the Mayor's strategy to preserve London's character and built heritage. It outlines the policy framework for managing the impact of development on key panoramas, river prospects and townscape views.
<b>Economy</b>	
London's Economy Today 2015	Regular update on the state of London's economy.
London's Digital Economy (2012)	This report draws together a variety of data sources to highlight London's position in the digital arena. The report looks at uptake and use of digital technologies by businesses and households.
Retail in London: Looking forward (2015)	<p>Through reading the main report you will:</p> <ul style="list-style-type: none"> <li>• Find out how developments such as changing consumer behaviour and technological advances have altered the playing field for London's retailers</li> <li>• See how retailers have adapted by implementing measures such as 'Click-and-Collect' or 'Dark Stores'</li> <li>• Gain an understanding of what these adaptations may mean for the role retail plays in London, ranging from the employment it provides to the land it uses</li> </ul>

Plan, Strategy or Programme	Summary of objectives and targets
Jobs and Growth Plan (London Enterprise Panel) 2014	<p>It will help to deliver jobs and growth for London through:</p> <ul style="list-style-type: none"> <li>• Skills and employment: to ensure Londoners have the skills to compete for and sustain London's jobs;</li> <li>• Micro, small and medium sized enterprises: to support and grow London's businesses;</li> <li>• Digital creative, science and technology: for the capital to be recognised globally as world leading hub; for science, technology and innovation - creating new jobs and growth; and</li> <li>• Infrastructure: to keep London moving and functioning.</li> </ul>
London Labour Market Projections (2013)	<p>This report outlines GLA Economics' latest employment projections and shows that jobs in London are projected to grow by more than 850,000 by 2036. The report also provides future projections for both the occupations and qualifications of those employed in London. The report looks at the level of turnover in the labour market with the analysis suggesting that just over half a million people left their occupation in London in 2012. The report also considers the projected increase in London's population and considers the extent to which the demand for, and supply of, labour is likely to be in balance in the longer term.</p>
Alcohol Consumption in the nighttime economy (2012)	<p>The night-time economy (NTE) is activity which occurs between the hours of 6pm to 6am and involves the sale of alcohol for consumption on-trade (e.g. bars, pubs and restaurants). This work looks at the most effective ways to mitigate the costs associated with alcohol in the NTE. It is combined with a tool which estimates (currently measurable) pros and cons for each London Local Authority. The policy options assessed cover pricing, licensing, premise design and operations, public realm design, service interventions, and community mobilisation.</p>
London's Super Connected City Plan (2012)	<p>London's Super Connected City Plan is ambitious and innovative. It will underpin the capital's aspiration for contiguous ultrafast connectivity, provide the digital infrastructure needed for the new economy and help East London realise its full economic potential. Successful delivery of this plan will be critical to realising the Mayor of London's prime objective: economic growth for London, and job creation for Londoners.</p>
Mayor's Economic Development Strategy (2010)	<p>The Mayor's vision is for London to be the best big city in the world. The Economic Development Strategy sets out this vision with respect to the London economy, and how it can be realised. The Mayor's ambitions are for London to be the World Capital of Business, and to have the most competitive business environment in the world; to be one of the world's leading low carbon capitals, for all Londoners to share in London's economic success and for London to maximise the benefits of the 2012 Olympic and Paralympic games.</p>
Economic Evidence base (2010)	<p>This document aims to provide an economic evidence base to support the three Mayoral strategies that have recently been revised (the London Plan, the Economic Development Strategy and the Transport Strategy).</p>
GLA Employment Time Series (2010)	<p>Roger Tym and partners were commissioned by the GLA to produce historic and projected employment data by sector and borough. The objectives are:</p> <ul style="list-style-type: none"> <li>• To provide a sectoral breakdown of both historic employment data and the latest GLA Economics employment projections for London to 2031 using at least the established 'RTP definitions' of Offices, Industry and Other and;</li> <li>• To provide the sectoral breakdown above for all London Boroughs plus sub-totals showing the Central Activities Zone (CAZ), Isle of Dogs (IOD), rest of Inner London, Outer London and the sum Total for London.</li> </ul>
London Office Policy Review (2014) Update	<p>The London Office Policy Review is the most recent in a series of independent reviews of office market trends commissioned by the GLA. It includes robust Monitoring Benchmarks and associated time series data to illustrate key trends and market relationships and their bearing on policy. LOPR 12 includes:</p> <ul style="list-style-type: none"> <li>• A review of office-based employment projections and office floor space need estimates to inform future alterations to the London Plan</li> <li>• An assessment of the impact of recent economic events on different parts of the London office market, and those which might</li> </ul>

Plan, Strategy or Programme	Summary of objectives and targets
	<p>be anticipated in the future</p> <ul style="list-style-type: none"> <li>• A review of London Plan town centre office development guidelines and associated policy proposals</li> <li>• An investigation of the 'mega-schemes' identified in LOPR 2009, their implications for office development within the Central Activities Zones, on its fringes, or beyond</li> <li>• Consideration of the potential for conversion of surplus office space to other uses, especially residential, in different parts of London</li> <li>• An overview of hybrid office/industrial buildings, their locational attributes and implications for office, industrial, transport and other policies.</li> </ul>
London Business Survey (2014)	The 2014 London Business Survey is an innovative survey designed by the Office for National Statistics, on behalf of the London Enterprise Panel and the GLA. The survey covers a wide range of topics including the profile of London business, their performance and outlook, workforce, trade, and London as a place to do business.
Land for Industry and Transport SPG (2012)	This draft document sets out proposed guidance to supplement the policies in the 2011 London Plan relating to land for industrial type activities and transport. The SPG provides advice on how to implement these policies, in particular Policy 2.17 on Strategic Industrial Locations, Policy 4.4 on Managing Industrial Land and Premises; and Policy 6.2 on Providing Public Transport Capacity and Safeguarding Land for Transport. Once adopted it will replace the 2004 Industrial Capacity SPG
London Industrial Land Demand and Release Benchmarks, Roger Tym & Partners (2012)	The Industrial Land Demand and Release Benchmarks Study assesses future demand for industrial land across London and compares it with the current and planned supply. The aim of the study is to provide evidence to inform London-wide and local planning policy in order to ensure that London has the right quantity and quality of industrial land to support its economy and its population while using the land efficiently. Where there is evidence of an over-supply, the study estimates how much land may be released to other uses and makes recommendations for the management of surplus capacity.
Understanding the demand for and supply of visitor accommodation in London to 2036	GLA Economics was asked by the Greater London Authority (GLA) London Plan team to update work surrounding the demand for serviced visitor accommodation to see whether the existing London Plan benchmark target (Policy 4.5) for serviced rooms needed revising. The work was to also include an update around the accessibility of serviced visitor accommodation. The first part of this report examines the supply side of the London market. It sets out the best estimate of the current supply of serviced (and non-serviced) visitor accommodation in London. It also looks at the potential growth in supply of visitor accommodation over time (from focusing on the supply side only). The report then moves onto the demand side, illustrating how visitor nights in London have moved over time. It sets out how GLA Economics has gone about projecting visitor nights over time and its central projection for visitor nights. The report finishes with the projection for nights converted into the likely requirement for serviced visitor accommodation over time.
Accessible Hotels in London (2012)	This report was commissioned by Design for London (DfL)/London Development Agency (LDA) and Greater London Authority (GLA) to provide evidence to inform a new London Plan policy on the percentage of accessible hotel bedrooms required to meet demand now and over the next 20 years. A room which is 'accessible' is defined as one which minimises barriers to use for as many people as possible. It is a wider definition than a room being wheelchair accessible as it allows use by people with disabilities other than mobility impairments. Policy and planning requirements have previously been based around the definition of wheelchair accessibility, but this is now considered to be too narrow a definition of disability, as well as being based on an outdated medical model of disability.
Cornered shops: London's small shops and the planning system (2010) and addendum	This report looks at how the planning system, and other initiatives, can provide support for London's small shops and neighbourhood shopping areas. It seeks to identify the benefits of small, local and independent retailers to London; the evidence there is to show that they are under threat; the policies that have been proposed to support small shops; and what progress has been made in implementing them.
London's Retail Street Markets (June 2010)	This is a research report commissioned by the LDA. It provides a spatial and economic analysis of the retail street markets in London and identifies the area based issues facing these markets. The analysis also considers the contribution street markets can and are



Plan, Strategy or Programme	Summary of objectives and targets
	making to London's economy. The study has been used to inform the LDA (and the wider GLA group) what role they could have in supporting street markets. The study includes research on all types of London retail markets (such as clothing, arts, food etc) but exclude wholesale markets.
Managing the Night Time Economy PDF(March 2007)	This is one of a series of best practice guides issued by the Mayor to demonstrate how the broad policies of the London Plan can be implemented locally. This Best Practice Guide suggests how public authorities and the private and voluntary sectors can work together to support the development of the night time economy in appropriate locations and improve the way they manage its impacts.
London Town Centre Health Check (2013)	The 2013 London Town Centre Health Check is the latest in the ongoing series of strategic London-wide health checks undertaken by the Greater London Authority with support from the London boroughs. It provides a 'snapshot' of the health of over 200 of London's town centres using a selection of strategic health check indicators and illustrates how these have changed over time.
Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (2013)	Government policy in the National Planning Policy Framework requires the GLA and boroughs to assess the overall need for additional floorspace for economic uses, including retail and leisure development. This study assesses the scale and nature of consumer expenditure in London for comparison goods retail, convenience goods retail, and other expenditure including leisure over the period from 2011 to 2036. It focuses on strategic requirements for comparison goods retail floorspace need in London, distributed to boroughs and individual town centres. The project is both current and forward-looking, factoring in major retail pipeline developments in and around the capital and contains three additional scenarios to test alternative spatial patterns of growth and quality.
Accommodating Growth in Town Centres: Achieving Successful Housing Intensification and High Street Diversification (2014)	The 'Accommodating Growth in Town Centres' report assesses the changing nature of retail and the capacity and deliverability of housing intensification in and around town centres, while encouraging a diverse range of enterprises and the spaces they need on High Streets.
Artists Workspace Study: We made that (2014)	Study to better understand the picture of affordable studio provision for artists in London. The study is the first step in creating a list of all London's Artist Studios on the Mayor's 'London.Gov' website
Supporting Places of Work: incubators, accelerators and co-working spaces (2014)	The GLA appointed URS, Ramidus, #1Seed and Gort Scott to carry out research into the supply of existing Incubators, Accelerators and Co-working (IAC) spaces in London, which was the first study into the emerging sector of this kind. The report recommends the creation of a workspace provider network, through which IACs can inform emerging workspace policies, share learnings, and engage with boroughs and developers. The report also recommends the creation of an online interactive map to make IAC spaces visible to Londoners. The report concludes that any future public sector investment should focus on IACs with clear community outreach goals (e.g. providing training for disadvantaged groups, providing subsidised workspace) as well as being combined with wider initiatives to maximise public outcome.
Cross River Partnership business plan (2014)	Cross River Partnership (CRP) is a public-private partnership that was originally formed to deliver cross-river infrastructure projects such as the Millennium Bridge. CRP has since diversified to deliver a wide range of externally-funded, multi-partner regeneration projects.
Town Centres SPG (2014)	<p>This SPG provides guidance on the implementation of London Plan Policy 2.15 Town centres and of other policies in the Plan with specific reference to town centre development and management. It also provides guidance on Policy 2.16 Strategic Outer London Development Centres and their potential to be developed as business locations with distinct strengths of greater than sub regional importance. To support the policies in the London Plan this SPG includes guidance on:</p> <ul style="list-style-type: none"> <li>• Supporting the evolution and diversification of town centres</li> <li>• Delivering mixed use housing intensification</li> <li>• Quality matters</li> <li>• Promoting Accessibility and Connectivity</li> <li>• Town centre regeneration and initiatives</li> </ul>

Plan, Strategy or Programme	Summary of objectives and targets
	<ul style="list-style-type: none"> <li>• Proactive town centre strategies</li> <li>• Strategic Outer London Development Centre implementation guidelines</li> </ul>
The Mayor's Action for High Street (2014)	It also outlines what the Mayor and his staff will do to help high streets, including how to diversify and grow and the support on offer from the Mayor's regeneration team. It makes the case for investment and how the Mayor will lobby to protect the future of London's high streets.
<b>Energy and Climate Change</b>	
Delivering London's Energy Future: the Mayor's climate change mitigation and energy strategy (2011)	Delivering London's Energy Future is the Mayor's climate change mitigation and energy strategy. It sets out his strategic approach to limiting further climate change and securing a low carbon energy supply for London. To limit further climate change the Mayor has set a target to reduce London's CO <sub>2</sub> emissions by 60 per cent of 1990 levels by 2025. Delivering London's Energy Future details the programmes and activities that are ongoing across London to achieve this.
Managing risks and increasing resilience: the Mayor's climate change adaptation strategy (2011)	Managing risks and increasing resilience is the Mayor's climate change adaptation strategy for London. It details his strategic approach to managing the climate risks we face now and in the future in order to maintain London as one of the best big cities in the world.
Climate Change Adaption Strategy for London (2010)	<p>The Mayor's Climate Change Adaptation Strategy:</p> <ul style="list-style-type: none"> <li>• identifies who and what is most at risk today</li> <li>• analyses how climate change will change the risk of flood, drought and heatwave through the century</li> <li>• describes what action is needed to manage this and who is responsible for it.</li> </ul> <p>The key actions proposed in the strategy are:</p> <ul style="list-style-type: none"> <li>• To improve our understanding and management of surface water flood risk</li> <li>• An urban greening programme to increase the quality and quantity of greenspace and vegetation in London – this will buffer us from floods and hot weather</li> <li>• To retro-fit up to 1.2m homes by 2015 to improve the water and energy efficiency of London homes</li> </ul>
Decentralised Energy Capacity Study (2011)	This publication is formed of three reports providing data on, and analysis of, the potential for renewable and low carbon energy in London. This regional assessment breaks down the types of energy that can contribute to the Mayor's target to supply 25 percent of London's energy from decentralised sources by 2025.
<b>Flood Risk</b>	
Thames Region Catchment Flood Management Plan, 2009	This plan presents what the Environment Agency considers the most sustainable direction for the management of fluvial flood risk within the region for the next 50 to 100 years. It is based on extensive research into the catchment characteristics of the region and the options available for managing the risk to people, properties and the environment. It takes into account the likely impacts of climate change and the plans for future development.
Regional Flood Risk Appraisal (2009)	In June 2007 the Mayor published the draft Regional Flood Risk Appraisal (RFRA) for the London Plan, for public consultation. The RFRA examines the nature and implication of flood risk in London and how the risk should be managed.
<b>Health and well-being</b>	
Individual well-being in London (2014)	Over the past four years, the UK Government has sought to understand the subjective well-being of individuals as an alternative measure of the relative 'health' of a country compared to traditional measures such as GDP. This analysis presents findings for London and examines variations in how individuals assess their own well-being according to a number of different personal characteristics.



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	Among those characteristics exhibiting the largest levels of variation in well-being are qualification level, health and disability status, along with some variation seen across different age and ethnic groups.
London Mental Health: The invisible costs of mental ill health (2014)	This report aims to, where possible, quantify the impact of mental ill health in London in order to highlight the scale of the problem. It does this through analysing the wider economic and social impacts of mental ill health. As such the measurement and quantification of the costs of mental ill health go beyond usual measures of economic output, or Gross Value Added (GVA) to consider, amongst other things, so-called 'non-market' impacts, for instance the impact on individuals' quality of life from mental ill health. The intention is for this to provide for a more 'all-encompassing' measure of the economic and social costs of mental ill health to London.
The London Health Inequalities Strategy (2010)	The London Health Inequalities Strategy sets out the Mayor's commitments to work with partners to: 1 Promote effective parenting, early years development, young people's emotional health and readiness for learning 2 Motivate and enable Londoners to adopt healthier behaviours and engage in lifelong learning 3 Build knowledge about health and wellbeing, tackling stigma and taboo in the process 4 Promote community development approaches to improve health, and actively support the role of the third sector 5 Build public sector capacity to engage more effectively with individuals, communities and the Voluntary and Community Sector (VCS).
The London Health Inequalities Strategy: First Steps to Delivery (2012)	This 'First Steps to Delivery' plan sets out the actions prioritised to 2012 against the thirty high-level commitments which form the bedrock of the strategy.
Takeaways Toolkit: Tools, interventions and case studies to help local authorities develop a response to the health impacts of fast food takeaways (2012)	Takeaways may be good for London's economy, but they're often bad for Londoners' health. To help London boroughs balance these conflicting priorities and understand the options available when considering the health impacts of fast food, we've created a 'takeaways toolkit'. The toolkit has three main recommendations for boroughs: <ul style="list-style-type: none"> <li>• <b>making food healthier</b> – working with takeaway businesses and the food industry to make healthier fast food.</li> <li>• <b>starting them young</b> – schools should have strategies to reduce the amount of unhealthy food children eat at lunch and on their journey to and from school.</li> <li>• <b>planning for health</b> – use regulatory and planning measures to address the proliferation of hot food takeaway outlets.</li> </ul>
Health: Children and Young People (2010)	Health: Children and Young People is the second report in the Focus on London 2010 series. This chapter, authored by the London Health Observatory, provides recent evidence on the health experience of children and young people in London. The report includes data about the Local Index of Child Wellbeing, infant mortality, breastfeeding, immunisation, injury, childhood obesity, physical activity, diet, smoking, alcohol consumption, drug use, teenage conceptions and sexual health. It reveals many areas of inequality within the city, but also highlights the ways in which London's children are doing well.
A Sporting Future for London (2009)	This plan is about increasing participation in sport and physical activity. It aims to deliver a grass-roots sporting legacy for Londoners from the 2012 Olympic and Paralympic Games by: <ul style="list-style-type: none"> <li>• securing a sustained increase in participation in sport and physical activity amongst Londoners</li> <li>• using sport to assist in tackling social problems including ill health, crime, academic underachievement and lack of community cohesion.</li> </ul>
Our Healthier South East London (2014)	Our Healthier South East London is a five year commissioning strategy which aims to improve health, reduce health inequalities and ensure all health services in south east London meet safety and quality standards consistently and are sustainable in the longer term.
NHS London: A Call to Action (2014)	This builds on NHS England's national Call to Action document published in July, which set out a case that the NHS must transform in order to continue to deliver the best care to those who need it.
Better Health for London: Next Steps (2015)	The Mayor of London, NHS England (London), Public Health England, London Councils and the 32 GP-led clinical commissioning

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	groups have come together to outline how, individually and collaboratively, they will work towards London becoming the world's healthiest major city.
<b>Heritage</b>	
English Heritage's Heritage at Risk- London (2011)	The Register identifies which heritage assets are at risk from development pressures, neglect or decay. It also monitors the changing condition of assets in order to help us prioritise where resources and expertise can best be deployed to resolve the problems. It also includes listed buildings and scheduled monuments, Conservation Areas, Registered Parks and gardens.
The National Heritage List for England	The Register identifies all registered heritage assets including listed buildings, scheduled monuments, protected wreck sites, registered parks and gardens, registered battlefields, world heritage sites, applications for certificates of immunity (COIs) and current building preservation notices (BPNs).
London World Heritage Sites - Guidance on Settings (2012)	<p>The London Plan sets out policies to conserve and enhance London's World Heritage Sites and their settings, and states that the Mayor will produce guidance on defining the settings of London's World Heritage Sites. There are four World Heritage Sites and one potential site on the Tentative List in London:</p> <ul style="list-style-type: none"> <li>• Palace of Westminster and Westminster Abbey, including St Margaret's Church</li> <li>• Tower of London</li> <li>• Maritime Greenwich</li> <li>• Royal Botanic Gardens, Kew</li> <li>• Darwin Landscape Laboratory (Tentative List)</li> </ul> <p>Each has been designated because of its outstanding universal value of international significance. The sites themselves are set in a very dynamic, complex urban environment in which pressure for development is high. However one of the things that makes London distinctive is the way it combines old and new, protecting heritage but encouraging change. The Mayor has brought forward guidance on how this dynamic relationship can be managed in ways that protect the value of the sites and whilst also allowing the city to grow and change around them</p>
<b>Housing</b>	
Housing supplementary planning guidance (2012)	The SPG provides guidance on how to implement the housing policies in the 2011 London Plan. In particular, it provides detail on how to carry forward the Mayor's view that "providing good homes for Londoners is not just about numbers. The quality and design of homes, and the facilities provided for those living in them, are vital to ensuring good liveable neighborhoods". It is informed by the Government's National Planning Policy Framework and by its Housing Strategy for England.
London Housing Strategy (2014)	The Mayor's strategy aims to put in place the resources to deliver more than 42,000 new homes a year, but achieving this ambition will require the full commitment of the London boroughs, of government, and of private and public sector developers. The Mayor believes that only by working together can we agree a long-term financial settlement with national government, free up local councils to build, promote institutional investment in new housing, bring forward surplus public land and develop Housing Zones across the capital to drive delivery. The strategy also aims to make sure that the homes we build better reward those who work hard to make this city a success – by massively increasing opportunities for home ownership, by improving the private rented sector and by ensuring working Londoners have priority for affordable homes to rent.
Housing in London (2014)	Housing in London is the evidence base for the Mayor's London Housing Strategy, summarising key patterns and trends across a wide range of topics relevant to housing in the capital.
GLA Housing Design Guide Interim edition (2010)	The new 'interim edition' of the London Housing Design Guide sets out the Mayor of London's aspirations for the design of new housing in the capital. The Mayor is committed not just to delivering more homes in London, but also to improving the quality of our homes. The

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	London Development Agency has published the new London Housing Design Guide, which sets a new benchmark for housing design in London. All housing built on London Development Agency land is expected to meet these standards. The standards will also start to be applied to housing schemes applying for funding from the London Homes and Communities Agency from April 2011.
South East London Housing Market Assessment (2014) and sub reports	Cobweb were commissioned by local authorities in South East London to undertake a Strategic Housing Market Assessment (SHMA) for the sub region. The local authorities involved in the project are Bexley, Bromley, Greenwich, Lewisham and Southwark. A SHMA is a framework that local authorities and regional bodies can follow to develop a good understanding of how housing markets operate.
The Private Rented sector in South East London and Lambeth (2014)	The aim of the research was threefold: <ul style="list-style-type: none"> <li>• To complement the South East London Strategic Housing Market Assessment (SHMA) that had been undertaken recently, by providing evidence and analysis of the PRS that would not be available or achievable through the 'desk top' SHMA.</li> <li>• To provide some of the evidence base that boroughs will need to draw on if considering introduction of licensing in the PRS.</li> <li>• To enable boroughs to better target interventions in the PRS, in terms of both enforcement and procurement (e.g. for use as temporary accommodation or for the prevention of homelessness).</li> </ul>
The role of the planning system in delivering housing choices for older Londoners (2012)	This study is a 'think piece' to look specifically at the role of the planning system in helping to ensure that older Londoners have a choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in high quality environments. A policy for older Londoners will be a key input to a wider policy development process across London. The research set out to provide estimates of the future demand for and supply of specialist housing for older Londoners and to identify the challenges and potential barriers to delivery. Methods included modelling supply and demand, analysis of borough policies and practice and an extensive review of existing research.
GLA 2013 Round Population Projections	Detailed ward level population projections to support the London Plan. Incorporating housing provision targets as outlined in the consultations draft of the revised London Plan
Barriers to Housing Delivery (Update 2014)	In 2012 The GLA asked Molior London to produce a report called 'Barriers to Housing Delivery in London'. The report's purpose, broadly, was to find out why developers in London were not building more homes for private-sale. The report's conclusion was, broadly, 'they are building more homes for private sale than you think'. Molior London was asked to update that report. This time the brief might be simplified as 'the stock of unbuilt private-sector planning permissions in London is significant –so why aren't we hitting housing delivery targets?'. This report's conclusion can be summarised as 'big schemes in London are commencing units in line with the numbers required to meet housing need'.
London Student Housing Requirements Study (2007)	BBP Regeneration, SQW Ltd., Tribal Consulting, and Opinion Research Services undertook a study in 2006 to assess the impact that growth in the Higher Education (HE) sector may have on housing requirements and housing markets in Greater London. The primary aim of this research was to inform the implementation of London Plan and borough policy. The study incorporates a policy review, an analysis of baseline data on London's student population and student accommodation, and primary research. The data has been used to help forecast future student population growth and accommodation needs and the potential impact of the HE sector on London's economy, followed by a number of recommendations.
Mayor's Academic Forum Recommendations Paper – student housing (2014)	The Mayor's Academic Forum was established through the 2011 London Plan particularly to support implementation of Policy 3.8 Bh, which recognises that specialist student provision could give rise to concerns over: <ul style="list-style-type: none"> <li>• the loss of capacity for conventional homes, especially affordable family housing;</li> <li>• the need to secure mixed and balanced communities;</li> <li>• the scope for identifying land suitable for student accommodation; and,</li> </ul>

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	<ul style="list-style-type: none"> <li>the way these issues are expressed in parts of inner London “where almost three quarters of the capacity for new student accommodation is concentrated”.</li> </ul> <p>The <i>Mayor’s Academic Forum Recommendations Paper – student housing</i> is the first report of the Mayor’s Academic forum to the Mayor, focusing on strategic planning issues for student housing. Its main recommendations have been reflected in FALP paragraphs 3.52, 3.53a and 3.53b.</p>
<b>Infrastructure</b>	
Draft London Infrastructure Plan 2050 (2014)	The document sets out what infrastructure London requires. It is the first ever strategic attempt to set out London’s infrastructure needs, how much it might cost and how we pay for our needs. The aim is to prepare for, and benefit further from, London’s growth: bringing fresh thinking into the city’s infrastructure needs now, in order to meet them more costs effectively in the long term.
MOPAC/MPS Estates Strategy 2013-16	Linked to the Police and Crime Plan is the new MOPAC/MPS Estates Strategy 2013-16, see below. Following consultation on local policing and public access in January-March 2013, further work was undertaken to finalise plans for the wider police estate and the final version of this strategy is available below.
Central London Infrastructure Study (2009)	The study aims to provide a strategic understanding of the implications of growth for the whole of Central London, with an indication of how growth, and therefore demand for infrastructure, is distributed across the study area. This analysis allows Central London Forward to build a robust case for additional infrastructure investment for Central London to achieve sustainable growth up to 2026. In particular, as well as offering local authority level information and analysis, the report provides evidence of sub-regional issues and opportunities, encouraging joint solutions wherever appropriate. This study also identifies existing gaps and shortfalls in infrastructure provision.
Community Infrastructure Charging Schedule – Mayor of London (2012)	Sets out the level of charge that will apply to certain types of new development across London in order to deliver the Crossrail programme.
Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy – SPG (2013)	This SPG sets out guidance on implementation of London Plan policies on the funding of Crossrail, planning obligations and the Community Infrastructure Levy (CIL).
Draft Social Infrastructure SPG (2014)	<p>Social infrastructure includes a wide range of services and facilities, including health, education, community, cultural, play, recreation and sports facilities, faith, emergency facilities and many other local services and facilities that contribute to quality of life.</p> <p>The draft guidance;</p> <ul style="list-style-type: none"> <li>Gives a range of information sources to evaluate need for social infrastructure at the strategic planning level, starting with the GLA’s own demographic projections and the ways in which these can be used to understand need for health, education and sports facilities.</li> <li>Emphasises the need for planning across services to ensure the efficient and timely delivery of social infrastructure in a way the meets the broader built environment aims of the London Plan.</li> <li>Describes Department of Health models for service delivery in a way that should help planners and health professionals to communicate with each other.</li> <li>Sets specific targets for the provision of burial space based upon projections of need and survey of existing capacity set out in the 2011 Audit of London Burial Provision.</li> <li>Provides a comprehensive range of resources for the assessment of social infrastructure need arising from individual applications.</li> </ul>
<b>London Plan</b>	

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London Plan (2021)	The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2036. It forms part of the development plan for Greater London. London boroughs' local plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by councils and the Mayor.
London Implementation Plan (2013)	<p>The Implementation Plan is intended to:</p> <ul style="list-style-type: none"> <li>• facilitate effective coordination and cooperation of activities to ensure the realisation of the London Plan</li> <li>• inform developers and all delivery partners who need to understand the envisaged implementation actions and strategic infrastructure provision in relation to the London Plan</li> <li>• provide communities with transparent and accessible information to enable them to get involved in the development of their area</li> <li>• help boroughs in terms of the wider context for their local implementation and infrastructure planning and the preparation for their Community Infrastructure Levy (CIL).</li> </ul> <p>The Plan will be updated regularly.</p>
	<ul style="list-style-type: none"> <li>•</li> </ul>
<b>Noise</b>	
London Agglomeration Noise Action Plan (2010)	The purpose of the Noise Action Plan is to assist in the management of environmental noise and its effects, including noise reduction if necessary, in the context of government policy on sustainable development. Noise Action Plans are based on the results of the strategic noise maps published in 2008.
Sunder City: The Mayor's Ambient Noise Strategy (2004)	<p>The aim of the Mayor's ambient noise strategy is a practical one – to minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practices and technology within a sustainable development framework.</p> <p>Three key issues are:</p> <ol style="list-style-type: none"> <li>1. Securing good noise reducing road surfaces</li> <li>2. Securing a night aircraft ban across London</li> <li>3. Reducing noise through better planning and design of new housing</li> </ol>
<b>Open Space, Biodiversity, Geodiversity</b>	
A Manifesto for Public Open Space: London's Great Outdoors (2009)	London's Great Outdoors recognises that investment in public space enhances the look and feel of the city, making it a more healthy and pleasant place for residents and visitors and an environment in which businesses can thrive. It contributes to maintaining and improving London's image as the world's most green and liveable big city and highlights London's offer as a city that can sustain economic growth.
Open Spaces Strategies: Best Practice Guidance (2008)	This document provides guidance on how to create an open space strategy. Drawing on the lessons learnt from 5 years of CABE Space strategic enabling support with local authorities across England, it updates earlier CABE Space guidance, ( <i>Green space strategies: A good practice guide</i> , 2004), and combines this with an update of the guidance for London, ( <i>Mayor's guide to preparing open space strategies; Best practice guidance of the London Plan</i> , 2004), to provide one comprehensive guide for England.
Connecting with London's Nature. The Mayor's Biodiversity Strategy (2002)	The document details the Mayor's vision for protecting and conserving London's natural open spaces. It seeks to ensure that there is no overall loss of wildlife habitats in London, and that open spaces are created and made accessible, so that all Londoners are within walking distance of a quality natural space. The strategy is an important step in establishing a London-wide framework for maintaining London's diversity of wildlife.

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Preparing Borough Tree and Woodland Strategies SPG (2013)	<p>The Preparing Borough Tree and Woodland Strategies Supplementary Planning Guidance, a joint publication with the Forestry Commission, has been published. It sets out an approach to trees and woodland that:</p> <ul style="list-style-type: none"> <li>• Covers the audit, protection and management of trees and woodland in line with Policy 7.21 of the London Plan</li> <li>• Highlights the asset value of trees and woodland, both in financial terms and the broad range of economic and environmental benefits they provide</li> <li>• Considers all the trees in a borough as a single unified resource – an ‘urban forest’</li> <li>• Extends the concept of an ‘urban forest’ across boundaries so that the cumulative benefits of trees to Londoners can be enhanced</li> <li>• Takes a step by step approach to the management of trees and woodland.</li> </ul>
All London Green Grid SPG 2012	<p>The SPG aims to promote the concept of green infrastructure, and increase its delivery by boroughs, developers, and communities, by describing and advocating an approach to the design and management of green and open spaces to deliver hitherto unrealised benefits. These benefits include sustainable travel, flood management, healthy living, and creating distinctive destinations; and the economic and social uplift these support.</p>
Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)	<p>This SPG aims to help those involved in planning local neighbourhoods to engage with young Londoners to deliver real improvements in the quality of play spaces. The Mayor wants to see a child-friendly London with inclusive, accessible, and safe play spaces that allow all young Londoners to engage in fun, positive, and healthy play and recreation in their own communities and throughout London. The 2012 SPG adds further guidance to the previous 2008 SPG, in particular expanding on the concept of lifetime neighbourhoods.</p>
London’s Foundations SPG (2012)	<p>London’s Foundations (2009) was a joint publication with Natural England setting out London’s geological heritage, explaining the process for identifying sites of national, regional and local geological importance, identifying important geological sites for protection and advising boroughs on how to promote as well as protect geodiversity. It has been updated to reflect:</p> <ul style="list-style-type: none"> <li>• The publication of the 2011 London Plan;</li> <li>• The emerging advice of the Government in its National Planning Policy Framework;</li> <li>• The ongoing work of the London Geodiversity Partnership (LGP) in updating the number of sites that should be promoted/protected by boroughs via their development plan documents;</li> <li>• The publication by the LGP of their Geodiversity Action Plan.</li> </ul>
<b>Sustainability</b>	
Sustainable Design and Construction. Mayor’s Supplementary Planning Guidance (2014)	<p>This SPG provides guidance on what measures developers can include in their building designs and operations to achieve the carbon dioxide and water consumption targets set out in the London Plan. It also provides guidance on how boroughs can take forward the new approaches set out in the London Plan, such as carbon-dioxide off-setting, retrofitting and ‘air quality neutral’.</p>
Adapting to Climate Change: A checklist for development (2005)	<p>This guidance on designing developments in a changing climate was published by the Greater London Authority. The main actions are summarised in a simple to use checklist, however, it is not intended to be a design manual, although it does contain signposts to more detailed guidance.</p>
Sustainable Development Framework for London. London Sustainable Development Commission (June 2003)	<p>This Framework has been developed by the London Sustainable Development Commission, appointed by the Mayor in May 2002 to advise on sustainability issues in the capital. It is the first Sustainable Development Framework for London. It sets out a Vision for the capital and a set of objectives to guide decision making.</p> <p>The Framework should be used to:</p> <ul style="list-style-type: none"> <li>-provide the context for policy development and decision-making;</li> </ul>



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	<ul style="list-style-type: none"> <li>-undertake sustainability appraisals of projects, plans and strategies;</li> <li>-monitor progress towards a more sustainable city</li> </ul>
Sustainable Communities Plan for London: Building for the Future (2003)	This document is part of a national programme of action setting out how the Government intends to achieve sustainable communities in London. The main challenges for London are to accommodate growth and to reduce poverty and deprivation. To do this, the main aims are for more and better-designed and affordable homes, including homes for key workers. To improve public transport and other infrastructure to support the development of new and growing communities; to raise education standards and skill levels across the capital; to tackle crime, anti-social behaviour and the fear of crime.
<b>Transport</b>	
Mayor's Transport Strategy (2010)	<p>The Mayor's Transport Strategy is a statutory document, developed alongside the London Plan and Economic Development Strategy as part of a strategic policy framework to support and shape the economic and social development of London over the next 20 years. It sets out the Mayor's transport vision and describes how Transport for London (TfL) and its partners, including the London boroughs, will deliver that vision. Six goals set out how the overarching vision should be implemented. The transport strategy should:</p> <ul style="list-style-type: none"> <li>• Support economic development and population growth</li> <li>• Enhance the quality of life for all Londoners</li> <li>• Improve the safety and security of all Londoners</li> <li>• Improve transport opportunities for all Londoners</li> <li>• Reduce transport's contribution to climate change and improve its resilience</li> <li>• Support delivery of the London 2012 Olympic and Paralympic Games and its legacy</li> </ul>
Land for Industry and Transport SPG (2012)	The SPG provides an update of previous Mayoral guidance, setting out how boroughs should make effective, efficient use of land for transport purposes.
River Action Plan (2013)	This plan outlines a number of specific measures to be taken by TfL and other stakeholders to help boost the number of river trips in line with achieving the Mayor's target of 12 million passenger journeys a year by 2020
Cycling Revolution London (2010)	The Strategy sets out the vision and policies for encouraging and enabling more cycling across London. The strategy sets out an aspiration to increase cycling by 400% by 2026 through a range of initiatives including the delivery of a series of cycle superhighways, improved cycle safety and an increase training aimed at cyclists
The Mayor's Vision for Cycling	<p>The Mayor's Vision for Cycling document sets out how this will be achieved, focusing on four key outcomes:</p> <ol style="list-style-type: none"> <li>1. <b>A Tube network for the bike.</b> London will have a network of direct, joined-up cycle tracks, with many running in parallel with key Underground, rail and bus routes.</li> <li>2. <b>Safer streets for the bike.</b> Spending on the Better Junctions programme will be significantly increased and substantial improvements to the worst junctions will be prioritised. With government help, a range of radical measures will improve the safety of cyclists around large vehicles.</li> <li>3. <b>More people travelling by bike.</b> We will 'normalise' cycling, making it something anyone feels comfortable doing.</li> <li>4. <b>Better places for everyone.</b> The new bike routes are a step towards the Mayor's vision of a 'village in the city', with more trees, more space for pedestrians and less traffic.</li> </ol>
An Electric Vehicle Delivery Plan for London	The EV Delivery Plan sets out a comprehensive strategy to stimulate the market for electric vehicles in London.
Your Accessible Transport Network (2014)	Mayor of London's commitment to make it easier for people to travel around London.
Improving the Health of Londoners:	A Health Action Plan to improve the health of the population by examining the links between health and public transport and improving people's health through transport interventions and strategies. The document is reviewed regularly and updates are provided by TfL.

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Transport Action Plan (2014)	
<b>Waste</b>	
London's Wasted Resource: The Mayor's Municipal Waste Management Strategy	London's Wasted Resource sets out the Mayor's policies and proposals for reducing the amount of municipal waste produced, increasing the amount of waste reused, recycled or composted, and generating low carbon energy from waste remaining. This strategy also sets out how the Mayor, through the London Waste and Recycling Board, will help develop more waste management infrastructure in London.
Making Business Sense of Waste: The Mayor's Business Waste Management Strategy	Making Business Sense of Waste is the first Mayoral strategy for London's business waste. It sets out initiatives to help all kinds of London's businesses, from shops, restaurants, office buildings, manufacturers to construction companies to save money and reduce harm to the environment through better waste management.
London Waste Apportionment Study (2007) – update and further sensitivity testing	Subsequent to the reiteration of the apportionment, published in December 2006, further data of relevance to criteria within the model has become available. The update includes <ul style="list-style-type: none"> <li>• correct data on safeguarded wharves,</li> <li>• revision of current licensed waste management capacity in London resulting from the decision on the development of the Belvedere facility, updated, recently verified and soon to be published data on indicative capacity of land for waste, logistics and other industrial used in London, provided by the GLA.</li> </ul>
London Waste Apportionment Study (2006)	This report describes in detail the waste apportionment methodology underlying the London Plan minor alteration on borough level waste apportionment.
London Remade Demolition Protocol Report (2005)	This describes how demolition recyclate can be recovered with maximum value and how this can be provided as a high quality recycled material in new builds.
<b>Water</b>	
Securing London's Water Future (2011)	The draft London Water Strategy is intended to complement the plans and strategies of other organisations by presenting a London-specific view of managing water resources. At a time of decreasing supply and increasing demand for water we need to use the water we have more wisely. The strategy promotes increasing water efficiency and reducing water wastage to balance supply and demand for water, safeguard the environment and help tackle water affordability problems. It also sets out how the Mayor will help communities at risk of flooding to increase their resilience to flooding
Environment Agency Thames Estuary 2100 plan	This document provides regional guidance on the predicted effects of climate change in relation to tidal flood risk
Thames River Basin Management Plan (2009)	The EU Water Framework Directive requires the Environment Agency to prepare and publish 10 River Basin Management Plans (RBMP) by 2009 to promote the concept of sustainable water management. Their aims are: <ul style="list-style-type: none"> <li>• To safeguard the sustainable use of water</li> <li>• To protect and restore the status of aquatic ecosystems</li> <li>• To improve aquatic environments by the reduction of hazardous substances</li> <li>• To reduce groundwater pollution; and</li> <li>• To help mitigate the effects of flood and droughts</li> </ul>
Taking Care of Water- Our Plan for the next 25 years (Thames Water Utilities ) 2015-	Taking care of water describes a long-term strategy to address a series of issues. It is built around the four main themes that have emerged from public consultation: delivering for customers; planning for a sustainable future; delivering efficiently; and providing



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2040	affordable services. The document set out the things that are needed to meet the challenges of the future. It also set out the costs of providing those services and the likely impact on bills.
Water Resources Management Plan (Thames Water Utilities) 2015-2040.	Sets out how demand for water is balanced against the supply over the next 25-year period.
Our Plans for Water (Thames Water Utilities) 2015-2020	A five-year Plan which sets out proposals to maintain and improve services during the period 2015 to 2020.
Drought Plan (2013) (Thames Water Utilities)	The Drought Plan sets out the actions to take in the event of a drought to maintain essential supplies of water while protecting the environment.
Draft Strategic Proposals for Sludge Management (Thames Water Utilities) 2008	Thames Water Utilities Ltd. (Thames Water) has developed high-level strategic proposals for sludge management/disposal in our region for the 25 years to 2035. The decision to carry out the strategy development was taken for the following reasons: (1) to provide a broad framework for the specific investment proposals, particularly in the period 2010-2015 for the periodic review of our charges in 2009, and (2) to review the appropriateness of the current strategy (i.e. wherever possible recycle sludge to land) going forward, given the increasing costs and regulatory/other constraints arising from this outlet.
Thames Corridor Catchment Abstraction Management Strategy (CAMS)	This guidance on designing developments in a changing climate was published by the Greater London Authority in November 2005. The main actions are summarised in a simple to use checklist, however, it is not intended to be a design manual, although it does contain signposts to more detailed guidance.
Sustainable Remediation Forum UK (SuRF-UK) (2010)	This document presents the first phase of work by the UK Sustainable Remediation Forum (SuRF-UK), which is a framework for assessing the sustainability of soil and groundwater remediation, and for incorporating sustainable development criteria in land contamination management strategies. It helps assessors to identify the optimum land and/or groundwater remediation strategy and/or technique.

## LOCAL

Policy or Plan	Summary of objectives and targets
<b>Community</b>	
The Council Plan 2020-2026	The Council Plan is the council's overarching business plan. The council plan describes how we will deliver our fairer future vision through the promises and commitments that we have made to the people of Southwark. It also makes a number of commitments to equality and fairness in line with our approach to equality.
Children and Young People's Plan 2013-2016	This strategy provides a plan for all local services affecting children and young people in Southwark. The aims in the next three years

Policy or Plan	Summary of objectives and targets
	are: improved literacy and numeracy; more things to do; less crime against children and young people; fewer teenagers getting pregnant; and a reduction in the rate of increase of children who are obese.
Southwark Primary and Community Care Strategy 2013-2018	This plan describes Southwark Clinical Commissioning Group's intentions to build strong local services to meet the challenges of improving care over the next five years. It supports a range of our other plans and priorities as well as reflecting national policies and thinking on the best way to ensure that primary and community care services are fit for the future.
Southwark Statement of Community Involvement (2022)	The Statement of Community Involvement (SCI) sets out how and when Southwark Council involve the community in the alteration and development of town planning documents and applications for planning permission. This ensures there is effective community involvement in the planning process.
Safer Southwark Partnership Action Plan (2013-2015)	The Safer Southwark Partnership (SSP) has agreed minimum standards of service for responding to antisocial behaviour and for victims and witnesses of crime. These are a commitment to residents that the SSP will continue to keep Southwark a safe place to live, work and visit.
Southwark Violent Crime Strategy 2010/2015	The Southwark violent crime strategy 2010/15 detailing how the council, police and other partners in Southwark are tackling violent crime in the borough.
Southwark Statement of Licensing Policy 2016-2020	Section 5 of the Licensing Act 2003 requires each licensing authority to prepare and publish a statement of its licensing policy every five years.
<b>Economy and Employment</b>	
Southwark Employment Land Review (2010)	The study provides an assessment of the quantity, quality and viability of employment land throughout the borough and evaluates the viability of existing (UDP) employment policies as well as informing the LDF evidence base and associated policies.
Southwark Economic Well-being Strategy 2012-2020	Our new strategy sets out what we want to achieve between now and 2020, and how we aim to work across the Council and with our partners in the private, public and voluntary sectors in order to make Southwark a place: <ul style="list-style-type: none"> <li>• Where people, especially our young people, are equipped with the skills and ambition to make the most of our central London location</li> <li>• Where businesses grow and prosper</li> <li>• Where town centres and high streets thrive</li> <li>• Where our residents are financially independent</li> </ul>
Southwark Industrial and Warehousing Land Study (2014)	Southwark Council commissioned GVA to undertake a review of industrial and warehousing land and premises in the borough. The study is an evidence base document and will inform the preparation of future planning policies, as well as a wider employment land review (a forecast of how much space will be needed to meet demand over the next 15 years or so) that will be carried out in 2014/15.
Culture Strategy 2013-2018 and action plan	We have developed a strategy to cover the period from 2013 to 2018 that uses our targeted support, partnership and leverage to enable the valuable cultural sector in Southwark to create, develop and grow. The key objectives are to generate opportunities, build local pride and deliver prosperity for the borough. The strategy is presented as a range of specific and measurable actions to be delivered over the next five years.
<b>Education</b>	

Policy or Plan	Summary of objectives and targets
Primary Investment Strategy Cabinet Report 2014	This Cabinet Report sets out a series of recommendations for addressing need for additional primary school places in the borough
School places strategy update, Cabinet Report (2014)	This report sets out the forecast demand for primary and secondary places and the associated need for additional school places. It sets out the approach for meeting primary demand.
Southwark Extended Schools Strategy	<p>The strategy sets out a set out principles as the basis for the development of extended schools in Southwark.</p> <p>The strategy anticipates that providing extended services will</p> <ul style="list-style-type: none"> <li>• support improvements in standards</li> <li>• enable children to have fun and develop new skills</li> <li>• enhance support for vulnerable children</li> <li>• encourage parental involvement in children's learning</li> <li>• make better use of facilities by opening them up to the community</li> <li>• provide better help to address children's wider needs</li> </ul>
<b>Flood Risk</b>	
Southwark Strategic Flood Risk Assessment (SFRA) ( 2008)	A Strategic Flood Risk Assessment (SFRA) has been prepared to ensure that flood risk is taken into account and minimised in all new developments. The SFRA sets out the level of flood risk in different areas of the borough. This will help plan for new developments and assist in the determination of planning applications.
Southwark Interim Preliminary Flood Risk Assessment 2011	This document forms a Preliminary Flood Risk Assessment (PFRA) report for the Southwark in accordance with the Flood Risk Regulations 2009. The PFRA provides a high level summary of significant flood risk, based on available and readily derivable information, describing both the probability and harmful consequences of past and future flooding. The scope of the PFRA is to consider flooding from the following sources; surface runoff, groundwater and ordinary watercourses and any interaction these may have with main rivers and the sea
Draft Local Flood Risk Management Strategy (2014)	Under Section 9 of the Flood and Water Management Act 2010 Act, Southwark Council is required to develop, maintain, apply and monitor a Local Flood Risk Management Strategy (LFRMS) for the borough. The LFRMS ("the Strategy") should provide strategic direction in proactively managing flood risk in Southwark and to meet the requirements of the Act. The Strategy will be developed in consultation with key internal and external stakeholders, and will be reviewed every 6 years in consonance with the periodic reviews of Southwark Council's Preliminary Flood Risk Assessment (PFRA) as required under the Regulations.
<b>Health</b>	
Better Environment, Better Health (Southwark) (2013)	The Better Environment, Better Health guide offers tailored information on seven important environmental factors that can impact on residents' health. These factors are green spaces, active travel and transport, surface water flood risk, air quality, healthy food, fuel poverty and overheating. These guides are written for borough Health and Wellbeing Boards, Directors of Public Health, elected members, Regeneration and Planning Officers, Environmental Officers, Health Watch and Clinical Commissioning Groups (CCGs). The guides aim to influence local borough decisions and how budgets are decided and allocated. The hope is to encourage more collaborative work to reinforce London's resilience to changes in climate and improve Londoners' health.
Southwark Alcohol Needs Assessment (2011)	The Alcohol Needs Assessment quantifies the prevalence of alcohol related behaviours, the impact of alcohol on health in Southwark

Policy or Plan	Summary of objectives and targets
Annual Public Health Report 2010	and assesses the services provided to reduce alcohol related harm.  Life expectancy in Southwark has never been higher, with women in Southwark living to an average of 82.9 years, which is above the national average of 82.3 and men in Southwark living to an average of 77.8 years. However, every year up to 600 people die in Southwark before the age of 75. This year's Annual Public Health Report for Southwark focuses on how GP practices can work with their patients to prevent more early deaths. Southwark's early death rates from heart attack and chronic obstructive lung disease (covering emphysema and bronchitis) was significantly higher than the national average.
Children and Young People's Health Needs Assessment (2010)	A detailed analysis of the demand and performance of Southwark's services and how this contributed to the development of the Children and Young People's Plan 2010-2013.
Southwark Children and Young Peoples Health plan (2010)	This plan sets out how we will improve the wellbeing of children and young people in regard to the five Every Child Matters outcomes: <ul style="list-style-type: none"> <li>• Be healthy</li> <li>• Stay safe</li> <li>• Enjoy and achieve</li> <li>• Make a positive contribution</li> <li>• Achieve economic wellbeing</li> </ul> This plan recognises and addresses the far-reaching implications of statutory changes to children's trusts, local safeguarding children boards, Children and Young People's Plans and the roles of lead members and directors of children's services, which came into force on 1 April 2010.
Southwark Health Profile 2013	This report contains a summary of health and wellbeing issues represented through available statistics obtained from reliable sources. This document forms a part of the suite of documents published as a part of the Joint Strategic Needs Assessment work programme. The document is intended to provide an understanding of the health and well-being of Southwark residents. The content of this report is meant to support the health and social care commissioners; along with other stakeholders in primary, secondary and community care including local voluntary sector agencies.
Pubic Health Observatories: Southwark Health Profile (2014)	This profile gives a picture of people's health in Southwark. It is designed to help local government and health services understand their community's needs, so that they can work to improve people's health and reduce health inequalities.
Public Health Outcomes Framework: Southwark (2013)	The Public Health Outcomes Framework 'Healthy lives, healthy people: Improving outcomes and supporting transparency' sets out a vision for public health, desired outcomes and the indicators that will help us understand how well public health is being improved and protected. The framework concentrates on two high-level outcomes to be achieved across the public health system, and groups further indicators into four 'domains' that cover the full spectrum of public health. The outcomes reflect a focus not only on how long people live, but on how well they live at all stages of life. This profile currently presents data for the first set of indicators at England and upper tier local authority levels, collated by Public Health England. The profile allows you to: <ul style="list-style-type: none"> <li>-Compare your local authority against other authorities in the region</li> <li>-Benchmark your local authority against the England value</li> </ul>
Child Obesity Joint Review (2012)	The child obesity joint review examines the high rate of childhood obesity in the borough and recommends a wide range of actions to counteract the increasing prevalence.
Joint Health and Wellbeing Strategy 2015-20	This strategy outlines how the council and its partners will work together to promote integration, improve outcomes and reduce health inequalities of Southwark's residents by focusing on three strategic objectives.

Policy or Plan	Summary of objectives and targets
Lambeth and Southwark: Emotional Wellbeing and Mental Health Needs Assessment 2013	This needs assessment (NA) covers Lambeth and Southwark boroughs and was overseen by a stakeholders group. It aims to inform the commissioning strategies of the two boroughs and partner agencies.
Supporting the Health of Young People in Southwark: A summary report of the Health Related Behaviour Survey 2014	These results are the compilation of data collected from a sample of primary and secondary pupils aged 8 to 15 in Southwark during the summer term 2014. This work was commissioned by the Lambeth and Southwark Public Health team on behalf of the London Borough of Southwark as a way of collecting robust information about young people's lifestyles.
Betting, borrowing and health: Health impacts of betting shops and payday loan shops in Southwark (2014)	This report summarises evidence on the health impacts associated with the clustering of betting shops and payday loan shops in the context of Article 4 Directions. The objectives of this report are to: review existing evidence around health and wellbeing impacts; identify a range of local health indicators; and examine the spatial relationship between betting shops and pay-day loan shops and health indicators.
Adult Social Care: Promoting independence, wellbeing and choice – Local Account 2012/2013	The Local Account is a new form of public performance report, setting out the progress councils have made in delivering national and local adult social care priorities and the key areas where further improvement is required.
Southwark Pharmaceutical Needs Assessment 2015	From 1 April 2013, every Health and Wellbeing Board (HWB) in England has a statutory responsibility to publish and keep up-to-date a statement of the needs for pharmaceutical services for the population in its area, referred to as a 'pharmaceutical needs assessment' (PNA). The PNA will help in the commissioning of pharmaceutical services in the context of local priorities.
<b>Heritage, Design and Archaeology</b>	
Southwark Conservation Area Appraisals	The government requires all councils to produce appraisals for the conservation areas in their borough. Conservation area appraisals are intended to: Provide an analysis and account of the area; explain why it is considered to be of special architectural or historic interest; Give a clear indication of the council's approach to its preservation and enhancement. They are also used by the council in assessing the design of development proposals.
Southwark Archaeology Priority Zones	Southwark Council has policies to protect the borough's archaeology. The policy identifies seven archaeological priority zones (APZs). When development proposals are submitted for these areas, the archaeology officer conducts initial appraisals to assess the archaeological implications and ensures that any necessary investigations take place
Core Strategy: Policy 12 Tall building background paper, Southwark Council (2009)	Sets out the background and research that has informed the suitable locations for tall buildings as established in Policy 12 and supporting text contained within our core strategy. It summarises our evidence base, describes our strategy and our reasons for selecting the approach we have taken.
Core Strategy: Borough-wide Strategic Tall Building Study, Southwark Council (2009)	Sets out an overview of the character of Southwark to inform the evidence base which informs the production of Core Strategy Policy 12, particularly the tall building height policy.
Guidance on Tall Buildings, July 2007, CABE & English Heritage	This document sets out how CABE and Historic England evaluate proposals for tall buildings. It also offers advice on good practice in relation to tall buildings in the planning process.
Heritage in local plans - how to create a sound plan under the NPPF, 2012, English Heritage	This is a guide to local authorities from Historic England on how to achieve the objectives of the NPPF for the historic environment and thereby pass the test for a sound local plan.

Policy or Plan	Summary of objectives and targets
Seeing The History In The View: A Method For Assessing Heritage Significance Within Views, June 2011, English Heritage	This document presents a method for understanding and assessing heritage significance within views.
<b>Housing – General</b>	
Southwark Affordable Housing Viability Study (2010)	This report examines in terms of financial viability, the potential for development sites in Southwark to deliver affordable housing at varying percentages and mixes, while maintaining other planning obligations at the current levels as advised.
Southwark Housing Requirements Study (and sub reports) 2010	The study was undertaken to inform local policies, in particular relating to the development plan and housing strategy surrounding affordable housing provision. The study provides a key component of the evidence base required to develop and support a robust policy framework.
Southwark Housing Strategy (2015)	<p>Southwark Council Cabinet agreed Southwark’s first long-term housing strategy in January 2015. The Southwark housing strategy to 2043 consists of four principles:</p> <ul style="list-style-type: none"> <li>• We will use every tool at our disposal to increase the supply of all kinds of homes across Southwark.</li> <li>• We will demand the highest standards of quality, making Southwark a place where you will not know whether you are visiting homes in private, housing association or council ownership.</li> <li>• We will support and encourage all residents to take pride and responsibility in their homes and local area.</li> <li>• We will help vulnerable individuals and families to meet their housing needs and live as independently as possible.</li> </ul>
Planning Committee report on Affordable Rent (2011)	This Planning Committee report clarifies the council’s affordable housing policies, including the council’s current approach in addressing the affordable rent tenure.
Affordable Rent in Southwark Study (2011)	This study looks at the affordability of affordable rent across the nine different postcode areas of Southwark. It models a range of scenarios from 40% to 80% market rents for one, two, three and four bedrooms dwellings. It shows that it will be very difficult for people in housing need to afford the affordable rent model, particularly family homes
Impact of the Affordable Rent tenure on the viability of developments in Southwark (2011)	This study looks at the viability of delivering affordable rent housing in Southwark. It considers the potential for development sites in Southwark to deliver affordable housing at varying percentages and mixes, while maintaining other planning obligations at the current levels as advised.
Southwark Commuted Sums Study 2011	This study looks at how much money could be secured as a pooled contribution in lieu of on-site affordable housing, if a scheme was 100% private housing rather than requiring affordable housing to be on site. It tests the amount of potential pooled contribution that could be viable by testing 35 sites across Southwark. It is part of the evidence base for the draft affordable housing supplementary planning document 2011.
Private Sector Housing Action Plan 2014/15	
Maximising independence through housing: The older people’s housing delivery plan: Southwark Housing Strategy 2009 to 2016 (2012)	This plan covers both the supply of housing for older people and housing support services for older people. These services cross council departments and partner agencies.
<b>Housing – Student accommodation</b>	
Research into the need for additional student	London Borough of Southwark undertook research into the need for additional student housing in Southwark in 2008. The study was initiated to inform the comprehensive review of the Southwark Housing Strategy and to inform the preparation of the core strategy. It

Policy or Plan	Summary of objectives and targets
housing in Southwark (2008)	was produced at the time when the borough was beginning to experience an increasing number of planning applications from developers wishing to build accommodation for students in Southwark. The objective of this study is to report provide consolidated information on: Existing student accommodation in the Borough; the schemes of student housing currently in the pipeline with planning consent to include those under construction and those not yet started; and the student housing schemes with current applications.
Student Implementation Study (2011)	This study looks at how strategic policy 8 of the core strategy on requiring affordable housing within student homes could be implemented. It looks at ways in which the policy can be implemented as well as testing the viability of the policy. It is part of the evidence base for the draft affordable housing supplementary planning document 2011.
<b>Neighbouring boroughs:</b>	
<p>Lewisham Council Sustainable Community Strategy (2008-2020)</p> <p>Our vision 2020: Lambeth Community Strategy (2008-2020)</p> <p>Croydon community Strategy 2010-2015</p> <p>The City Together Strategy: the Heart of a World Class City 2008-2014</p> <p>Tower Hamlets Community Plan (2011)</p> <p>Building a better Bromley 2020 (2009)</p> <p>Westminster City Plan (2006-2016)</p>	<p>Every London Borough has a Sustainable Community Strategy that is prepared by the Local Strategic Partnership. Broadly, the role of the strategy is to establish a vision for the how the borough should change over a set period for the benefit of the local community. The strategies are cross-cutting in terms of the themes covered and each is tailored to the key issues in each of the boroughs in question. Subsequent strategies, including Local Plans and other planning documents, should be linked to achieving this vision and where appropriate delivering specific objectives. The sustainable communities strategies for our neighbouring boroughs set the context for much of the partnership working that that we undertake with each other.</p>
<p>Lambeth Core Strategy (2011) and Draft Local Plan (2015)</p> <p>Lewisham Core Strategy (2011)</p> <p>Lewisham draft Local Plan Regulation 19 version 2023</p> <p>Bromley saved UDP (2006) and emerging Local Plan (2014)</p> <p>The City of London Local Plan (2015)</p> <p>Tower Hamlets Core Strategy (2010)</p> <p>Croydon Strategic Policies</p> <p>Westminster City Plan: Strategic Policies (2013) and saved UDP (2010)</p>	<p>The Core Strategies and Local Plans of each of the London Boroughs contain their vision for future development, usually over a 10 or 15 year period. They set out the spatial planning policies that establish guidance around strategic issues such as the distribution of housing, delivery of new jobs and economic growth, transport and connectivity, the environment and sustainability and the delivery of new infrastructure. Importantly, the Core Strategies of the various London Boroughs will set out planning issues that could potentially have an impact across administrative boundaries. Where a core strategy has not yet been adopted, the Unitary Development Plan forms the basis of the Local Plan for those boroughs.</p>



Policy or Plan	Summary of objectives and targets
<b>Open Spaces and Biodiversity</b>	
Southwark Open Space Strategy (2013) and evidence base (2013)	This report provides the evidence base setting out the current position with regard to the provision of open spaces in Southwark, This includes an updated audit of all the existing protected open spaces. The strategy sets out a number of recommendation on improving the quality of the existing open spaces and makes site specific recommendations for the different sub-areas of the borough.
Southwark Physical Activity and Sport Strategy 2014-2017	This study sets out what the council and PRO-ACTIVE Southwark partners will deliver to support more people becoming more active more often.
Southwark Biodiversity Action Plan (2013-2019) and evidence base	A new Biodiversity Action Plan (BAP) has been developed and is in the process of being adopted by the Council. The BAP has been developed by the Southwark Biodiversity Partnership in accordance with national, regional and local legislation and policies. The plans will run from 2012 to 2018. This plan provides information and guidance on protecting, managing and promoting key wildlife habitats and species within London.
Southwark Tree Management Strategy (2011)	A tree management strategy is a policy framework for the trees owned, managed and/or protected by an organisation. Southwark Council's tree management strategy sets out a vision for the next five years and explains how we will achieve this vision. It is a reference document for anyone with an interest in Southwark's trees.
<b>Planning</b>	
Southwark Plan (2012)	The Southwark Plan explains the strategy for the regeneration of Southwark and contains area visions setting out aspirations for places, strategic policies setting out the Council's strategy for planning and regeneration. It contains detailed development management policies.
Southwark Plan Adopted Policies Map (updated March 2022)	The adopted proposals map is part of Southwark's Local Plan and shows the proposals and policies for the borough, including Old Kent Road.
Southwark adopted Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPGs)	Supplementary planning documents (SPDs) and supplementary guidance documents (SPGs) are used to provide more information and guidance on the policies in the development plan. They can be based on certain topics such as transport or design, or they can be specific to certain places such as Dulwich. Southwark has several SPDs and SPGs which provide additional information on the saved policies in the Southwark Plan (UDP) and Core Strategy.
Southwark Annual Monitoring Reports (2004-2011)	<p>The AMR assesses if our planning policies achieve their objectives and targets by using a collection of data from local, regional and national sources and a number of indicators that measure performance.</p> <p>The AMR sets out:</p> <ul style="list-style-type: none"> <li>• progress in producing planning documents</li> <li>• whether planning policies are achieving the objectives of the plan</li> <li>• what impacts the policies are having on the local environment, communities and economy</li> <li>• details of how policies need to be changed or replaced if we are not meeting our objectives or targets</li> </ul>
<b>Pollution</b>	



Policy or Plan	Summary of objectives and targets
Air Quality Management and Improvement Plan (2012)	This document will help deliver the National Air Quality Strategy for Air Quality Management Areas (AQMA).
Southwark Contaminated Land Strategy (2001)	This document establishes a programme to identify contaminated land and water in Southwark, and to facilitate its remediation according to UK National Regulations.
<b>Town Centres</b>	
Southwark Retail Study (2015)	The study considers: <ul style="list-style-type: none"> <li>• The vitality and viability of Southwark's existing town centres</li> <li>• The extent to which Southwark centres are fulfilling their role in meeting the retailing needs of the borough</li> <li>• The need for further retail development during the local plan period, and possible scenarios for meeting any identified need for additional retail floorspace</li> </ul>
Southwark Street Trading and Markets Strategy (2010)	The street trading and markets strategy sets out how we want to work with traders to revitalise markets in the borough. The strategy aims to set out what we will do to: increase numbers of people using and trading on our markets; keep markets thriving and viable business environments; improve the management of markets and market areas.
Town Centre retail surveys (2014)	This survey explore the health of 5 town centres in the borough and in particular the impact of Betting and Payday Loan shops on the environment and offer in these town centres.
<b>Sustainability</b>	
Environment Agency summary for Southwark (2011)	This report provides a snapshot of the environment in Southwark. It outlines trends and changes in the environment, and highlights some of the work being carried out in the local areas to improve the environment, and people's experience of it. The report has been compiled as an extension of the London State of the Environment report to provide a local focus on the Boroughs and the health of their environment.
Southwark Energy and Carbon Reduction Strategy (2011)	The Energy and Carbon Reduction Strategy summarises the current situation with regard to carbon emissions in Southwark and sets out a series of recommendations as to how the council can reduce its own emissions
<b>Transport</b>	
Movement Strategy (2019)	The Movement Plan takes a people-centred approach, placing the people that live in, work in, and visit the borough at the starting point of our journey. This places fairness at the core of our work
Southwark Transport Plan (2011)	The new Transport Plan for Southwark replaces the Local Implementation Plan. The Transport Plan sets out how we will improve travel to, within and from the borough. It also sets out our long term goals and transport objectives for the borough (up to 20 years), a three year programme of investment, and the targets and outcomes we are seeking to achieve. The Southwark Transport Plan responds to the revised Mayor's Transport Strategy (MTS), the emerging Sub-Regional Transport Plans (SRTPs), Southwark's Sustainable Community Strategy and other relevant policies.
Southwark Cycling Strategy (2015)	A strategy setting out objectives to work together in partnership with our neighbouring boroughs, TFL, the police, businesses, organisations and agencies, schools and local community groups and residents to further develop the local cycling economy, invest in cycle friendly infrastructure, promote a cycling culture and ensuring new developments are future proofed for cycling.
<b>Waste</b>	
Southwark Waste Management Strategy: 2003 – 2021	This sets out Southwark council's programme for achieving the waste management targets set out in the GLA Waste Management Strategy.

Policy or Plan	Summary of objectives and targets
<b>Infrastructure and Viability</b>	
Southwark Community Infrastructure Levy 2017 (	The Community Infrastructure Levy (CIL) is a new levy that local authorities can choose to charge on new developments in their area. CIL is a mandatory charge levied on most new developments that involve an increase of 100sqm or more of net additional internal floorspace or development that involves the creation of a new residential unit or more. The money can be used to support development by funding infrastructure that the council, local community and neighbourhoods need.
Southwark Infrastructure Plan	The Infrastructure Plan identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of Southwark's Core Strategy (2011-2026). It is a "living document" which will be updated regularly as further details about infrastructure requirement to support growth become clearer.
CIL Viability Further Sensitivity Testing, BNP Paribas, November 2013	This report includes further sensitivity testing to support the proposed Community Infrastructure Levy ('CIL') Revised Draft Charging Schedule.
CIL Viability Study (2014)	This report tests the ability of a range of developments throughout the London Borough of Southwark to yield contributions to infrastructure requirements through the Community Infrastructure Levy ('CIL'). Levels of CIL have been tested in combination with the Council's other planning requirements, including the provision of affordable housing.
Cemetery Strategy (2012)	This Cemetery Strategy seeks to address the chronic shortage of burial space in the borough. The Strategy focuses on practical options for burial within the current cemetery areas within Southwark but also takes account of potential options for burial outside of those areas.
Metropolitan Police Estate – Asset Management Plan (2007)	This document sets out the strategy for improving the Metropolitan Police Estate in Southwark over the next three years. The future estate will be based around the following five operational policing themes: <ul style="list-style-type: none"> <li>• Safer Neighbourhoods bases</li> <li>• Custody Centres</li> <li>• Patrol Bases</li> <li>• Front Counters</li> <li>• Office accommodation</li> </ul>
MPA Estate Strategy 2010/14	This Estate Strategy sets out our vision for the estate in supporting the delivery of an effective policing service to London in a way that increases public confidence and safety.

## Neighbourhood

Policy or Plan	Summary of objectives and targets
University studies and reports	A number of Universities including London Metropolitan University Cass School of Architecture, University College London and London School of Economics are working on research and projects relating to the Old Kent Road. Some exhibitions of the work have taken place in Southwark. Studies can be updated here when they are ready to be published.
CASS Cities Audit Book (2015-16) and	Produced by architecture students from the Sir John Cass Faculty of Art, Architecture and Design, the document is an

Interviews	audit of the economic life of the Old Kent Road which researches and catalogues the existing environment and examined how a mixed use environment can be realised. <a href="http://www.casscities.co.uk/Cass-Cities-audit-book">http://www.casscities.co.uk/Cass-Cities-audit-book</a>
Elephant and Walworth Neighbourhood Forum research documents	The Elephant and Walworth Neighbourhood Forum in cooperation with a range of partners including Latin Elephant, the Elephant Amenity Network and UCL students have been working on a range of research studies to inform the progression of a neighbourhood plan, and there are parallels with the wider area including Old Kent Road. The workshops, reports and research are published at <a href="http://ewnf.herokuapp.com">http://ewnf.herokuapp.com</a>



Old Kent Road Area Action Plan  
Proposed Submission Version  
October 2024

Integrated Impact Assessment Appendices

**Appendix 3: Baseline Data – Facts and Figures**

Old Kent Road Area Action Plan 2024 Integrated Impact Assessment: Document Locator	
No.	Title
Appendix 1	SEA Directive Requirement
Appendix 2	Relevant Plans, Programmes and Strategies
Appendix 3	Baseline Data – Facts and Figures
Appendix 4	Sustainability Appraisal Framework
Appendix 5	Assessment of the Strategy and Vision
Appendix 6	Assessment of the Strategic and Development Management Policies
Appendix 7	Assessment of the Sub Areas and Site Allocations
Appendix 8	Monitoring Indicators against Sustainability Objectives
Appendix 9	Baseline Indicators Table
Appendix 10	Options Testing
Appendix 11	Scoping Report Consultation Summary and link to OKR AAP Scoping Report
Appendix 12	Reasonable Alternatives Considered
Appendix 13	Mental Well-being Impact Assessment Screening
Appendix 14	OKR AAP References

## Appendix 3 - Baseline Data - Facts and Figures

### Introduction

The SEA Directive requires the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the borough and providing the basis for predicting and monitoring effects of the Old Kent Road Area Action Plan (OKR AAP). To make judgements about how the emerging content of the OKR AAP will progress or hinder sustainable development, it is essential to understand the economic, environmental and social circumstances in the borough today and their likely evolution in the future. The aim is to collect only relevant and sufficient data on the present and future state of the borough to allow the potential effects of the OKR AAP to be adequately predicted.

The baseline data comprises two components across social, economic and environmental conditions of the Borough: Baseline Indicators and contextual characteristics. The Indicators are incorporated into the Sustainability Appraisal Framework to assess the sustainability effects of policies in the current stage and monitor the policy performance and implications after they are adopted and implemented. The contextual information provides a background overview of the Borough's characteristics but is not included in the Sustainability Appraisal Framework. The baseline data is also set out in the same way for data related to the Old Kent Road Opportunity Area (OKR OA) specifically.

The SA/SEA Guidance provided by Government proposes a practical approach to data collection, recognising that information may not yet be available and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the IIA process guides plan making and as new information becomes available.

A summary of the collated baseline information is provided below.

The baseline data has been set out for the Old Kent Road OA below. The data below is selected to the geographical area level which is considered appropriate to the individual indicators. The following are the common geographical areas of the data:

- Old Kent Road Ward: The OKA OA covers the whole Old Kent Road ward and part of London Bridge and West Bermondsey, Chaucer, North Walworth, South Bermondsey, Faraday, Peckham and Nunhead & Queen's Road wards.
- East Central Southwark: The East Central Southwark covers the following wards: Old Kent Road (fully within the OKA OA), Peckham and Nunhead & Queen's road (both are partly within OKA OA) and Peckham Rye and Rye Lane wards (both are not within the OKA OA).

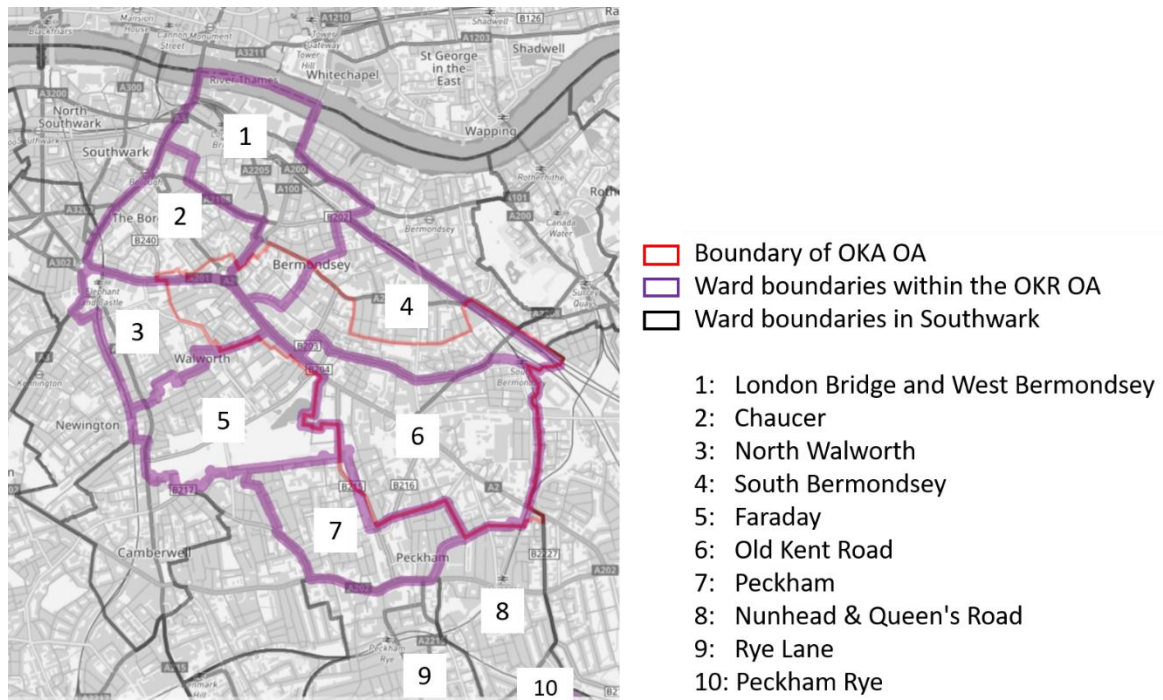


Figure 1: Map showing the ward boundaries intersecting the OKA OA

- Middle Layer Super Output Area (MSOA) : The six Middle layer Super Output Areas (MSOAs) falling within the OKR OA include the following:

MSOA Area	ONS Area Code and Name
London Bridge & Bermondsey West	E02000812 : Southwark 006
South Bermondsey Central	E02000816 : Southwark 010
Walworth North	E02000818 : Southwark 012
South Bermondsey West	E02000819 : Southwark 013
Burgess Park	E02000821 : Southwark 015
Peckham Park Road	E02000824 : Southwark 018

The baseline data for Southwark has also been set out as some data is not currently available for the geographical area level of the OKR OA.

The baseline data used is tabulated in Appendix 9.

## Old Kent Road Opportunity Area

### Population

Based on the Census 2021, there are 19,037 people in the Old Kent Road ward. 65% of the population are from black and ethnic minority communities. 22% are under 18, 7.9% are over 65.

There are more children and young people living in the Old Kent Road ward compared to the borough as a whole.

Old Kent Road ward live birth rate in 2011 was 338 and in 2021 was 173 which saw a -49% decline. Its general fertility rate in 2021 was 36.1 which is lower than that of East Central and Southwark<sup>1</sup>

Approximately 17% of people living in London have a disability, equating to 42,000 people in Southwark.<sup>2</sup> As the ward population equates to roughly 6.2%<sup>3</sup>, this may equate to around 2,604 people living in the Old Kent Road ward have a disability.

Estimates indicate that Southwark has the 4<sup>th</sup> largest gay or lesbian population in the England, 4.53% of the borough aged 16+ identify as gay or lesbian.<sup>4</sup> Given the ward population equates to roughly 2%, this may equate to approximately 1,523 people in the Old Kent Road ward.

The diversity of Old Kent road ward is substantially higher than England, London, and Southwark. Around 65% of residents in Old Kent Road ward are non-White.

Ethnic Group	East Central Southwark MWA	Old Kent Road Ward	London	England
White	43%	35%	54%	81%
Black, Black British, Caribbean or African	35%	38%	14%	4%
Asian or Asian British	8%	9%	21%	10%
Mixed or Multiple Ethnic Groups	8%	7%	6%	3%
Chinese/Other	7%	11%	6%	2%

Source: Census 2021; Southwark's Joint Strategic Needs Assessment 2023<sup>5</sup>

<sup>1</sup> End Child Poverty estimates, 2022, available at: [https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Child-Poverty-AHC-estimates-2015-2022\\_final.xlsx](https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Child-Poverty-AHC-estimates-2015-2022_final.xlsx)

<sup>2</sup> Southwark's Joint Strategic Needs Assessment - East Central Southwark", Southwark Council, 2023, available at: <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>3</sup> Based on the 2021 Census, the population of Southwark is 307,637 and the population of Old Kent Road ward is 19,037.

<sup>4</sup> Southwark's Joint Strategic Needs Assessment - East Central Southwark", Southwark Council, 2023, available at: <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>5</sup> ONS Census data 2021, available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/lifeexpectancies/bulletins/nationallifetablesunitedkingdom/2020to2022#:~:text=Life%20expectancy%20at%20birth%20in%202020%20to%202022%20was%20estimated,and%2082.8%20years%20for%20females>

"Southwark's Joint Strategic Needs Assessment", Southwark Council, 2023, available at:

<https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

[figures have been rounded to the nearest whole number to standardise across the two data sources]

## Deprivation

While 21% of residents in Southwark live in areas considered to be the most deprived nationally. The average Indices of Deprivation score across the six Middle layer Super Output Areas (MSOAs) falling within the OKR OA is 34.7<sup>6</sup>, which indicates higher levels of deprivation than Southwark as a whole. The majority of the Lower Layer Super Output Areas (LSOAs) within the OKR OA are in the top 30% most deprived in England. Within the Old Kent Road Ward, the ID score is 31.9<sup>7</sup>, which indicates higher levels of deprivation than Southwark as a whole. The majority of the LSOAs within the OKR OA are in the top 30% most deprived in England.<sup>8</sup> The areas of greatest concern are income, barriers to housing and other services, crime levels and living environment.

The average child poverty rate across the two parliamentary consistencies in which the OKR OA is located is 35.6%. This is slightly lower than Southwark as a whole, which has a child poverty rate of 36.2%.<sup>9</sup>

The average unemployment level across the six MSOAs falling within the OKR OA is 6.82%. This is higher than Southwark as a whole, which has an average unemployment level of 5.6%.<sup>10</sup>

8.6% of the working age population in the East Central Southwark MWA are claiming out of work benefit. Within the Old Kent Road Ward, the rate is 9.7%. This is higher than Southwark as a whole, which has a benefits claimants rate of 6.9%.<sup>11</sup>

## Safety

In 2022, there were 132.3 crimes per 1,000 residents in Old Kent Road ward which is slightly higher than the crime rate in Southwark at 130.8 and substantially higher than the rate in London at 95.5.<sup>12</sup>

## Childhood Health

69.9% of children in Old Kent Road ward achieved a good level of development at the end of Reception 2022/2023, which is broadly in line with levels in London (69.1%) and slightly above that of England.<sup>13</sup>

<sup>6</sup> English Indices of Deprivation 2019 maps”, My Society, 2019, available at:

[https://research.mysociety.org/sites/imd2019/media/data/imd2019\\_msoa\\_level\\_data.csv](https://research.mysociety.org/sites/imd2019/media/data/imd2019_msoa_level_data.csv)

<sup>7</sup> “Southwark’s Joint Strategic Needs Assessment - East Central Southwark”, Southwark Council, 2023, available at: <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>8</sup> Indices of Deprivation – London Datastore”, Mayor of London, 2019, available at:

[http://dclgapps.communities.gov.uk/imd/iod\\_index.html](http://dclgapps.communities.gov.uk/imd/iod_index.html)

<sup>9</sup> End Child Poverty estimates, 2022, available at: [https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Child-Poverty-AHC-estimates-2015-2022\\_final.xlsx](https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Child-Poverty-AHC-estimates-2015-2022_final.xlsx)

<sup>10</sup> Economically active and unemployed, usual residents aged 16 years and over, 2021, local authorities in England and Wales”, ONS Census data, 2021, available at:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/economicactivitystatusenglandandwales/census2021#economically-active-unemployed>

<sup>11</sup> Southwark’s Joint Strategic Needs Assessment - East Central Southwark”, Southwark Council, 2023, available at: <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>12</sup> Southwark’s Joint Strategic Needs Assessment - East Central Southwark”, Southwark Council, 2023, available at: <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>13</sup> Academic year 2022/23 - Early years foundation stage profile results - Good level of development by region and local authority”, available at: <https://explore-education-statistics.service.gov.uk/find-statistics/early-years-foundation-stage-profile-results/2022-23>



In 2019/20, there were 99 emergency hospital admissions among children aged 0 to 4 years, per 1,000 population which is higher than the rate of Southwark (93) but lower than the rate of England (140.7) <sup>14</sup>28.6% of children living in Old Ken Road ward are overweight or obese in Reception which is above Southwark (24.8%), London (21.8%) and England (22.6%). For year 6, 50% of children living in Old Kent Road ward are overweight, which is substantially above Southwark (41.2%), London (38.9%) and England (35.8%)<sup>15</sup>

## Adult health

The standardised admission ratios (SAR) for all causes emergency admissions, coronary heart emergency admission, COPD emergency admissions and alcohol-related admissions in Old Kent Road ward are 105, 79, 166 and 130 respectively which are significantly higher than the borough average <sup>16</sup>

## Housing

There are 14,500 homes in the OA. 58% of housing in the Old Kent Road ward is managed by Southwark Council or a TMO. This is higher than Southwark as whole, where the rate is 40%.<sup>17</sup>

9,494 homes in OKR OA have been approved since 1st April 2018. As set out in the Southwark Affordable Housing Delivery document, as of May 2024, 708 homes have been completed, 1,825 homes under construction and 800 homes are about to start on site in the OKR OA. In total this comprises 3,333 homes of which 1,709 or 51.2% are affordable and 30% are social rented. When measured against need on our housing waiting list, we are making good progress in the provision of 1, 2 and 3 bed homes, but need to increase the supply of 4 bed and 4 bed plus homes<sup>18</sup>.

With regard to student homes, since 1<sup>st</sup> April 2018, as of July 2024, 4 sites within the OKR OA have been approved either for new developments with at least some Purpose Built Student Accommodation (PBSA) which amounts to 2,141 student beds in total. 524 student beds have been completed, 676 student beds are under construction, and 941 student beds are in the pipeline<sup>19</sup>.

With regard to co-living schemes, since 1<sup>st</sup> April 2018, as of July 2024, 2 sites within the OKR OA have received resolution to grant subject to S106 agreement for developments with at least some co-living units which amounts to 890 units<sup>20</sup>.

<sup>14</sup> Southwark's Joint Strategic Needs Assessment - East Central Southwark", Southwark Council, 2023, available at: <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>15</sup> Southwark's Joint Strategic Needs Assessment - East Central Southwark", Southwark Council, 2023, available at: <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>16</sup> Southwark's Joint Strategic Needs Assessment - East Central Southwark", Southwark Council, 2023, available at: <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>17</sup> Southwark's Joint Strategic Needs Assessment - East Central Southwark", Southwark Council, 2023, available at: <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>18</sup> Southwark Affordable Housing Delivery document, Southwark Council, 2023: available at: <https://oldkentroad.org.uk/wp-content/uploads/AffordableHousing180523.pdf>

<sup>19</sup> Housing Phasing Chart, Southwark Council, 2024, available at: <https://oldkentroad.org.uk/documents/>

<sup>20</sup> Housing Phasing Chart, Southwark Council, 2024, available at: <https://oldkentroad.org.uk/documents/>

## Economy and Employment

OKR OA is home to 9 industrial estates/areas, 3 retail parks and 2 high street locations<sup>21</sup>. It is also home to 716 businesses and 10,035 jobs over 592,568 sqm of employment floorspace and 168,636 sqm of operational yard space<sup>22</sup>. The Old Kent Road Business Survey published in 2019 indicates there was very little recorded vacancy of small industrial units or office spaces in most of the OKR OA. The Survey also identifies that the OKR OA has seen growth in creative industries, sectors including food-related activities such as breweries and food manufacturing, and increasing demand for smaller and hybrid workspaces<sup>23</sup>.

Despite changes in the number and composition of enterprises in the OKR OA, there remains a high proportion of small businesses in the area. The ONS data shows there was a reduction of the enterprises within the 6 MSOAs falling within the OKR OA from 2,175 units in 2019 to 2,050 in 2023. Whilst the number of micro enterprises (0-9 employees) decreased from 1,920 in 2019 to 1,810 in 2023, it still roughly represents 88% of the total enterprises within the OKR OA. On the other hand, the number of small enterprises (10 to 49 employees) has slightly increased from 195 units in 2019 to 200 units in 2023 which represents 9.8% of the total enterprises in 2023. The number of medium-sized enterprises (50 – 249 employees) decreased slightly from 40 in 2019 to 35 in 2023, which represents 1.7% of the total enterprises in 2023. The number of large enterprises (250+ employees) increased from 10 units in 2019 to 15 units in 2023, which represents 0.7% of the total enterprises in 2023.<sup>24</sup>

Based on the VOA statistics, the number of rateable properties in the industrial sector in the 6 MSOAs falling within the OKR OA decreased from 480 in 2019 to 410 in 2023. This is contrary to the general trend of an increase in Inner London, London and England during the same period, where growth of 0.2%, 0.7% and 6.6% respectively were observed. Similarly the number of rateable properties in the office sector in the 6 MSOAs falling within the OKR OA decreased from 570 in 2019 to 600 in 2023. This is also contrary to the general trend of an increase in London, London and England during the same period where growth of 2.4%, 0.8% and 2.6% were observed respectively<sup>25</sup>. These statistics together with the low vacancy identified in the Old Kent Road Business Survey indicate that policy interventions to reverse the decline in properties in the industrial and officers sectors in the OKR OA are needed.

The UK is fast becoming one of the leading hubs for life sciences on the global stage, with the industry generating over £80 billion in turnover. The Old Kent Road area benefits from being located in close proximity to the established medical and life sciences clusters at Guys and St Thomas's at London Bridge, the King's College and Maudsley hospitals in Camberwell/Herne Hill, and the emerging cluster in Canada Water. In addition, the Council plans to build its own affordable workspace hub in the OKR OA that could benefit life science start ups. As of 2023, there were 55 enterprises and 60 local units<sup>26</sup> in life science sectors in the 6 MSOAs falling with the OKA OA. Whilst the number of local units in life science sector in the OKR OA still represents a small proportion of the overall 16,440 local units in London, the number of local units within the OKR OA increased by 20% from 50 local units in 2019. This increase is higher than the 12% increase in London during the same period.<sup>27</sup> This indicates the potential growth in the life science sectors in OKR OA.

## Retail and Leisure

<sup>21</sup> "Old Kent Road Business Survey Update Findings Report", We Made That, 2019, available at:

<https://www.southwark.gov.uk/assets/attach/11363/SP421-Old-Kent-Road-Business-Survey-Update-2019-.pdf>

<sup>22</sup> "Old Kent Road Business Survey Update Findings Report", We Made That, 2019, available at:

<https://www.southwark.gov.uk/assets/attach/11363/SP421-Old-Kent-Road-Business-Survey-Update-2019-.pdf>

<sup>23</sup> "Old Kent Road Business Survey Update Findings Report", We Made That, 2019, available at:

<https://www.southwark.gov.uk/assets/attach/11363/SP421-Old-Kent-Road-Business-Survey-Update-2019-.pdf>

The Old Kent Road has a total of 41,198 sqm of retail floor space, and 18,700 sqm of community and leisure floor space.

In 2018, there were approximately 20 hot food takeaways within 400m of secondary schools in the OKR OA. 9% of commercial units on the Old Kent Road, East Street and Dunton Road Secondary Shopping Frontage are in use as hot food takeaways. 9% of commercial units on the Old Kent Road and Peckham Park Road Secondary Shopping Frontage are in use as hot food takeaways. 27% of commercial units on the Ilderton Road Secondary Shopping Frontage are in use as hot food takeaways<sup>28</sup>.

In 2022, 10.13% of all units in Old Kent Road North Town Centre is vacant, and 13.33% of all units in Old Kent Road South Town Centre is vacant<sup>29</sup>.

## Schools and Communities

As of 2024, there are 8 primary schools<sup>30</sup>, 2 secondary schools, 2 special schools and 46 places of worship<sup>31</sup> within the OKA OA.

<sup>24</sup> "UK Business Counts – Enterprises by industry", ONS, 2023, available at:

[https://www.nomisweb.co.uk/home/release\\_group.asp?g=20](https://www.nomisweb.co.uk/home/release_group.asp?g=20)

<sup>25</sup> NDR Stock of Properties Tables by region, county, local authority district and middle and lower super output area, Valuation Office Agency, available at: <https://www.gov.uk/government/statistics/non-domestic-rating-stock-of-properties-2024>

<sup>26</sup> In ONS data, a group of legal units under common ownership is called an Enterprise Group – an enterprise is the smallest combination of legal units (generally based on VAT and/or PAYE records), which has a certain degree of autonomy within an Enterprise Group; an individual site (for example, a factory or shop) in an enterprise is called a local unit.

<sup>27</sup> UK Business Counts - local units by industry", ONS, 2023, available at:

[https://www.nomisweb.co.uk/home/release\\_group.asp?g=20](https://www.nomisweb.co.uk/home/release_group.asp?g=20)

To adequately reflect the size and shape of the UK life science sector as a whole as many sub-sectors cannot be separately identified, we have extended the definition of life science to include the following industries in the Standard Industry Classification (SIC) codes (SIC 2007):

Industry	SIC code
Manufacture of basic pharmaceutical products	21
Manufacture of irradiation, electromedical and electrotherapeutic equipment	266
Manufacture of medical and dental instruments and supplies	325
Hospital activities	861
Medical and dental practice activities	862
Other human health activities	869
Wholesale of pharmaceutical goods	4646
Wholesale of chemical products	4675
Dispensing chemist in specialised stores	4773
Research and experimental development on biotechnology	7211
Research and experimental development on natural sciences and engineering	7219

<sup>28</sup> Retail and Town Centre Uses December 2019", Southwark Council, 2019, available at:

<https://www.southwark.gov.uk/assets/attach/11658/sp403-retail-background-paper.pdf>

<sup>29</sup> Protected Shopping Frontages Survey 2023, Summary Report, Southwark

<sup>30</sup> The school data in Southwark Maps was last updated in 2022. Since 2022, Townsend Primary School was closed and Cobourg Primary School was amalgamated with Camelot Primary School. So the number of primary schools within the OKR OA was reduced by 2 from the total in 2022.

<sup>31</sup> Places of worship registered for marriage, HM Passport Office, 2024, available at <https://www.gov.uk/government/publications/places-of-worship-registered-for-marriage>

## Transport

The Old Kent Road corridor is a major radial route linking central London with areas to the south east that forms part of the A2 corridor. It is designated as a 'red route', being part of the Transport for London Road Network (TLRN). It is an important transport corridor, catering for movement by a wide range of modes. As of 2016, the average AM peak hour corridor mode split (people/passengers) are as follows: Car/Van/Taxi (36%), Heavy Good Vehicles (2%), Bus/Coach (38%), Motorcycles (5%), Pedal Cycles (6%), and Pedestrians (13%).<sup>32</sup>

The PTAL ratings for the area differ significantly, with highest rating of 5-6 good accessibility around the north of the OA (in the vicinity of Bricklayers Arms) and near bus stops. In the southern part of the OA and the areas sited further away from the Old Kent Road, the PTAL ratings are as low as 1-2.

Based on Census 2021, public transport (33%) was the most common mode of travel to work for the usual residents aged 16 years and over in employment living in the 6 MSOAs falling within the OKR OA. This was significantly higher than those in London (24.1%) and England (8.2%). The second highest mode was private vehicles and taxi (11.7%) which was substantially lower than those in London (23.3%) and England (49.6%). 9.3% and 5.7% of residents in the OKR OA reported they walked and cycled to work.<sup>33</sup>

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<sup>32</sup> Old Kent Road Surface Transport Study, Steer Davies Gleave; Allies and Morrison, 2016, available at: <https://www.southwark.gov.uk/assets/attach/12815/EIP57A-Old-Kent-Road-Surface-Transport-Study-2016-Part-1.pdf>

<sup>33</sup> "TS061 - Method used to travel to work", Office for National Statistics, 2023, available at: <https://www.nomisweb.co.uk/query/construct/submit.asp?forward=yes&menuopt=201&subcomp=>

There are seven Controlled Parking Zones (CPZs) that overlap with the OKR OA. There is also one CPZ in development within the OKR OA (this is the “Old Kent Road CPZ”).<sup>34</sup>

## Energy and Climate Change

No data available at the Opportunity Area Level. Policy toward DHN under ‘Old Kent Road Area Action Plan AAP3: Climate Emergency’ aims to reduce Council’s Carbon Footprint of 432 ktCO<sub>2</sub>e, 16% of which is derived from heating buildings.

## Air Quality

As of 2022, there were 2 Automatic Monitoring sites on the Old Kent Road and 8 NO<sub>2</sub> diffuse tubes in the OKR OA.

The Old Kent Road corridor has experienced continuous improvement in Nitrogen Dioxide concentration which has fallen below the national objective since 2016.<sup>35</sup> The mean of the 8 NO<sub>2</sub> diffuse tube locations within the OKR OA recorded a significant drop of NO<sub>2</sub> concentration from 65.16 µg/m<sup>3</sup> in 2016 to 34.29 µg/m<sup>3</sup> in 2022.

In 2022, the 2 Automatic Monitoring sites on the Old Kent Road recorded an average annual mean PM<sup>10</sup> of 19.5 µg/m<sup>3</sup>. This shows a reduction of an annual mean of 24 µg/m<sup>3</sup> in 2016.

## Waste Management

The OKR OA contains a significant integrated waste management facility, processing 88,350 tonnes of waste per annum and improving levels of waste re-use and recycling.

## Biodiversity

There are no Local Nature Reserves or new protected sites within the OKR OA. There are 8 designated Sites of Importance for Nature Conservation (SINCs) within the OKA OA.

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<sup>34</sup> “Parking Annual Monitoring Report 2018/19”, Southwark Council, available at: <https://www.southwark.gov.uk/assets/attach/11828/Annual-Report-on-Parking-and-funding-2018-19-.pdf>

Parking zones, Southwark Council, available at: <https://www.southwark.gov.uk/parking/find-somewhere-to-park/parking-zones>

<sup>35</sup> Air Quality Annual Status Report for 2022”, Southwark Council, 2023, available at: <https://www.southwark.gov.uk/environment/air-quality/air-quality-monitoring-data>

## Open Space

There are 14 designated Open Space within the OKR OA including 2 x Metropolitan Open Space (MOL), 7 x Borough Open Space (BOL) and 5 x Other Open Space (OOS)<sup>36</sup>.

As of 2021, the OKR OA has 13.62ha of park space when the portion of Burgess Park that falls within the Opportunity Area is included. Burgess Park comprises around 47ha, if the Park is split into thirds to cover different parts of the borough and a third of it is captured within the Old Kent Road Opportunity Area the provision of open space within the Opportunity Area increases to 24ha. The population of the OKR OA in 2018 was approximately 35,686, as determined through considering the population within each of the wards within or partly within the Opportunity Area. This equates to 0.68ha of park space per 1,000 population which falls short of the standard of 0.72ha of park space per 1,000 of the population.

The OA contains areas of natural deficiency, priority areas for biodiversity enhancement. The area also has the potential to be a key wildlife corridor.

There are currently 6 parks in the OKR OA with play facilities. Burgess Park also accommodates play facilities and is located just outside the OKR OA

As of 2024, based on the data from Southwark Maps, there is accessibility to an existing park within 400m everywhere in the OKR OA, this comprises Metropolitan Open Land, Borough Open Land and Other Open Space.

## Flood Risk, Water Resources and Quality

Based on the data in the Southwark Maps, as of 2024, 87.92% of the land in the OKR OA is within Flood Zone 3 and 90% is within Flood Zone 2.

In 2018, the total water consumption was 111.33 litres per person per day (Old Kent Road).

Limited data in relation to flood risk, water resources and quality at the OKR OA level is currently available. Majority of the data is at the Southwark level.

## Heritage

The OKR OA is one of Southwark's distinct, vibrant and connected places that comprises an array of unique architecture and public realm. The road itself, which has a long history, maintains a high street character in places. Old Kent Road and its surrounding neighbourhoods has rich industrial and residential history contributing to the 8 conservation areas.

The other areas within the OA is mainly characterised by large industrial and commercial units, retail parks and car parking, – all typical of coarse grain post war redevelopment. Finer urban grain survives as ribbon development along much of the southern part of the Old Kent Road.

The archaeology of the Old Kent Road area is covered by a borough designated Archaeological Priority Area (APA) APA1 Northern Southwark and Roman Roads. The APA

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<sup>36</sup> "Old Kent Road - Background Paper - Open Spaces", Southwark Council, 2021, available at: <https://www.southwark.gov.uk/assets/attach/32962/EIP148-Old-Kent-Road-Open-Space-Background-Paper-Jan-2021.pdf>

Southwark Plan 2022, Southwark Council, available at: <https://www.southwark.gov.uk/assets/attach/94325/Southwark-Plan-2022.pdf> [p.576 specifically]

has the potential to contain features associated with the former route of 'Watling Street', the major Roman road between London and Canterbury. The London to Lewes Road follows the route of a secondary Roman road running south towards Lewes.

Significant archaeological remains predominately of prehistoric and Roman date have been discovered along the Old Kent Road from a number of sites. Prehistoric sites south of the Old Kent Road take the form of settlement and tool making sites, those north of the Old Kent Road, within the lake formerly occupying this area take the form of timber causeways or platforms to travel across wetlands or exploit lake resources. Roman remains are the surviving fabric of Watling Street, where it diverts south of the course of the modern alignment in the area of the Cantium Retail Park. Other remains consist of roadside shrine, or mausolea, and associated roman burials. In the area of Asylum Road possibly associated with the London to Lewes Road is evidence for Roman settlement. North of the Old Kent Road deposits containing environmental evidence of the changing, developing landscape since the end of the last Ice Age are preserved in geological deposits and remains that relate to the lost rivers which previously crisscrossed the area.

## **Conclusion**

In general, there is reasonably sufficient level of data for the OKR OA from various data sources covering various geographical areas such as wards and MSOAs. It is noted that relatively limited existing environmental data about climate change, waste management, and noise and water quality is available. In any case, it is expected that the OKR OA's existing circumstances in these environmental aspects would not be significantly different from those in Southwark. It is therefore considered reasonable to use the data at Southwark level as the Baseline Indicators and monitor these Southwark Baseline Indicators for these environmental aspects. The Baseline Indicators have been selected for monitoring as indicated and summarised.



## Southwark

### SOCIAL CONDITIONS

#### Population

##### Baseline indicators

No indicators from this section are included in the Sustainability Appraisal Framework.

##### Contextual characteristics

The following contextual information characterise the Southwark's population and is not included in the appraisal framework. This data is taken from the Joint Strategic Needs Assessment (JSNA) produced by the Health and Well-being Board at the council and published as part of our Annual Public Health Report

Contextual characteristics	
	Population change
	Age groups
	Diversity
	Density
	Faith

##### Population

Before January 2015, the largest London's population has ever been was in 1939 when it was around 8.6 million people. However, on the 6<sup>th</sup> of January 2015, for the first time London's population grew beyond its previous record. In 2021 the population in London grew to 8.8 million.<sup>38</sup> London is growing at a significant pace, and Southwark is part of this growth.

At the time of the 2011 census, Southwark's total population was 288,283. The total population at the time of the 2001 census was 244,866. This was an increase of 43,417 (18% increase).

At the time of the 2021 census, Southwark's total population was 307,637. This is an increase of 19,354 (6.7%). The GLA 2021 based housing-led population projections estimate Southwark's population will grow to 363,182 in 2036<sup>39</sup> which is an increase of 55,545.

<sup>38</sup> Population and household estimates, England and Wales: Census 2021, ONS, 2022, available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationandhouseholdestimatesenglandandwalescensus2021>

<sup>39</sup> Housing-led population projections, GLA, 2023, available at: <https://data.london.gov.uk/dataset/housing-led-population-projections>



## Age groups

The proportion of residents in each age group is as follows:

### Proportion of population by broad age band

	0–15 years	16–64 years	65+ years
	%	%	%
<b>Southwark</b>	16.8	74.9	8.4
<b>London</b>	19.2	68.8	11.9
<b>England</b>	18.5	63	18.3

Source: Office for National Statistics - Census  
2021 <sup>40</sup>

In 2021, the proportion of the population aged between 16-64 years in Southwark is 74.9 making it the largest age group in Southwark at 234,252 people. This is 6.1 percentage points (pp) higher than the London region as a whole, and 11.9 pp higher than the England. Southwark has a smaller proportion of people in the 0-15 (at 48,500 people) and 65+ (at 25,800 people) age groups than the London region and the UK as a whole.

Between 2011 to 2021, the proportion of 0-15 age group decreased from 18.4% to 16.3%. The proportion of 16-64 age group increased from 73.7% to 75.1% and the proportion of people in the 65+ age group increased from 7.8% to 8.6%. The average (median) age of a Southwark resident from 32 to 33 years of age between the last two censuses <sup>41</sup>

The GLA 2021 based housing-led population projections estimate that the population aged 65+ will further grow to 13.7% in 2036 while the proportion of 0-15 age group will continue to decrease to 13.2%.

## Diversity

Based on Census 2021, 51% of Southwark's residents reported their ethnicity to be White. This proportion is slightly lower than London and substantially below that for England.<sup>42</sup> The largest broad ethnic group is Black/African/Caribbean/Black British at 25.0% compared to London (14%) and England (4%). The next largest ethnic group in Southwark is Asian/Asian British, at 10% of the total population of Southwark which is notably smaller than London as a whole (21% of the population). The proportion of "Mixed or Multiple ethnic groups" is 7% which is slightly higher than those across London (6%) and England (3%). The proportion of residents reporting their ethnicity of 'Other' is 6% which is similar to London (6%) but higher than England (2%).

<sup>40</sup>Population and household estimates, England and Wales: Census 2021, ONS, 2022, available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationandhouseholdestimatesenglandandwalescensus2021>

<sup>41</sup> Age group of usual residents: Southwark - London - England (2011 to 2021), ONS, 2023, available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E09000028>

<sup>42</sup> "Census 2021 Results: Ethnicity, National Identity, Language and Religion", Southwark Council, 2023, available at: <https://www.southwark.gov.uk/assets/attach/169632/Census-2021-Profile-Ethnicity-Identity-Language-and-Religion-1-.pdf>

Percentage of population by broad ethnic group  
2021

	White %	Mixed/ multiple ethnic groups %	Asian/ Asian British %	Black/ African/ Caribbean/ Black British %	Other ethnic group %
<b>Southwark</b>	51.4	7.2	9.9	25.1	6.3
<b>London</b>	53.8	5.7	20.7	13.5	6.3
<b>England</b>	81.7	2.9	9.3	4	2.1

Source: 2021 Office for National Statistics - Census  
2021<sup>8</sup>

At the time of the Census 2021, 40% of Southwark's residents were born outside the UK and Ireland. This is comparable to London as a whole. . The largest migrant population outside UK and Ireland in Southwark is Nigerian, representing 4% of the population<sup>43</sup>

At the time of Census 2021, 21% of Southwark residents reported their main language to be non- English. This is comparable to London-wide figure of 24%.

### Density

Southwark has an geographical area of 29 km<sup>2</sup>. Based on Census 2021, Southwark has an average of 10,655 people per sq. km. This is roughly in line with the inner London average of just below 10,664 people per km<sup>2</sup><sup>44</sup>. This is a slight increase on the 2011 figure of 9,990 people per km<sup>2</sup><sup>45</sup>. Southwark's population density is almost double that of the London average (5,598 people per km<sup>2</sup>) and nearly 25 times that of England (434 people per km<sup>2</sup>) as a whole.

### Faith

The majority of residents in Southwark who stated their religion in the 2021 Census were of Christian faith (43%) with the second highest category being 'No religion' (36.4%) . By comparison 41% were of Christian faith in London and 46% in England and 27% and 37 of residents in London and in England expressing no religion respectively<sup>46</sup>

<sup>43</sup> "Census 2021 Results: Demography and Migration", Southwark Council, 2022, available at: <https://www.southwark.gov.uk/assets/attach/169610/Census-2021-Profile-Demography-and-Migration.pdf>

<sup>44</sup> Population and household estimates, England and Wales: Census 2021", ONS, 2022, available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationandhouseholdestimatesenglandandwalescensus2021>

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<sup>45</sup> Table P04UK 2011 Census: Population density, local authorities in the United Kingdom, ONS, 2013, available at:

[https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/2011censuspopulationestimatesbyfiveyearagebandsandhouseholdestimatesforlocalauthoritiesintheunitedkingdom/r12ukrttablep04ukv2\\_tcm77-304141.xls](https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/2011censuspopulationestimatesbyfiveyearagebandsandhouseholdestimatesforlocalauthoritiesintheunitedkingdom/r12ukrttablep04ukv2_tcm77-304141.xls)

<sup>46</sup> “Census 2021 Results: Ethnicity, National Identity, Language and Religion”, Southwark Council, 2023, available at: <https://www.southwark.gov.uk/assets/attach/169632/Census-2021-Profile-Ethnicity-Identity-Language-and-Religion-1-.pdf>

## Equality

### Baseline Indicators

The following indicators were used to characterise equality in the borough and included in the Sustainability Appraisal Framework.

Baseline indicators	
	Indices of deprivation <sup>47</sup>
	Percentage of children living in deprived households <sup>48</sup>
	Percentage of older people living in deprived households <sup>49</sup>

### Contextual characteristics

There are no further contextual characteristics in this section.

### Description

The English Indices of Deprivation 2019 measure relative levels of deprivation across England on a range of economic social and housing issues. The level of deprivation is ranked among 32,844 small areas or neighbourhoods, named Lower-layer Super Output Areas (LSOA), with an average population of 1,500.

There are seven domains of deprivation which combine to create the Index of Multiple Deprivation (IMD 2019), including:

- Income (including numbers of adults and children on a range of benefits)
- Employment (including numbers on a range of out of work benefits)
- Education (including a range of school attainment figures for children and young people and those for adults with few/no qualifications)
- Health (including figures on standardised measures of morbidity, disability and premature death)
- Crime (including figures for recorded crime in four key areas: violence, burglary, theft and criminal damage)
- barriers to housing and services (including the accessibility of housing and proximity of key local services)
- living environment (includes separate scores for the quality of indoor living environment and outside living environment)

Southwark's rankings as compared with London and the country in the above seven domains are set out in the following table, with detail to be described under related themes in the subsequent sections.

<sup>47</sup> English Indices of Deprivation 2019

<sup>48</sup> ibid

<sup>49</sup> ibid

	Ranking among 14 local authorities in Inner London	Ranking among 33 local authorities in Greater London	Ranking among 317 local authorities in England
Income rank	7	11	40
Employment rank	6	9	106
Education, skills and training rank	7	20	262
Healthy and Disability rank	5	5	107
Crime rank	7	9	37
Living environment rank	5	5	12
Barriers to housing and services	7	15	16

Overall, Southwark was ranked as 43<sup>st</sup> most deprived borough out of the 317 local authorities in England.<sup>50</sup> This is a gradual improvement from previous rankings of 41<sup>st</sup> in 2010 and 26<sup>th</sup> in 2007. Within London, Southwark was the 8<sup>th</sup> most deprived among all 14 inner boroughs and the 9<sup>th</sup> out of 33 local authorities.

Southwark has seen a slightly higher concentration of deprivation within the borough over the past nine years, with five (out of 166 LSOAs in Southwark) among the 10% most deprived in the country in 2019 as compared to four in 2010. Two of them were located in Faraday, others in Nunhead and Queen's Road, South Bermondsey and North Walworth.

Of all domains, living environment gave Southwark the highest national ranking of relative deprivation, with 12<sup>th</sup> among 317 local authorities across the country, followed by barriers to housing and services which made Southwark the 16<sup>th</sup> highest in the country. The borough had the lowest rank in education, skills and training nationally (262<sup>nd</sup> out of 317).

Besides the overall scoring for the borough, deprivation rankings were available at the LSOA level to provide a nuanced view of relative deprivation in smaller areas. Below are the number of smaller areas (LSOA) in Southwark that fall into the 20% and 10% most deprived areas across the country:

Domain of Deprivation	Number of LSOAs being the among 10% most deprived across the country	Number of LSOAs being the among 20% most deprived across the country
Income	56	13
Employment	25	1
Education, skills and training	-	-
Health	15	2
Barriers to housing and services	125	31
Crime	60	25
Living environment	86	31

Housing is the most challenging domain for Southwark to address deprivation. Ranked 7<sup>th</sup> in inner London and 15<sup>th</sup> in London overall, Southwark has the median level of relative deprivation in accessibility to housing and services. However,  $\frac{3}{4}$  of its LSOAs (125 out of 166) fell into 20% most deprived across the country, with almost  $\frac{1}{5}$  LSOAs (31 out of 166) were 10% most deprived nationally).

In education, skills and training domain, Southwark had a relatively low ranking (within 80% - 100% deciles) across the country, with 125 out of 166 LSOAs among the 20% least deprived.

### **The Income Deprivation Affecting Children Index 2019 (IDACI) and The Income Deprivation Affecting Older People Index 2019 (IDAOPI)**

There are two supplementary indices of deprivation which are not part of the Index of multiple deprivations, measuring the proportion of children and older people experiencing income deprivation. The definition of low income used includes both those people that are out-of-work, and those that are in work but who have low earnings (and who satisfy the respective means tests).

In terms of children aged 0 to 15 living income deprived families, Southwark had half of the LSOAs (81 out of 166) falling into the 20% most deprived across the country. The five most deprived areas were in South Bermondsey, Faraday (having two most deprived LSOAs), Peckham and Newington.

For older people aged 60 or over experiencing income deprivation, Southwark had 113 out of 166 LSOAs which were among the 20% most deprived in England. The five most deprived areas were located in London Bridge and West Bermondsey, Camberwell Green, Nunhead and Queen's Road, Peckham and Chaucer.

#### **Issues**

- Although the borough has seen improvement in relative deprivation since 2010, it remains one of the most relatively deprived areas in London and England for a number of deprivations
- There are high proportions of children and aged people living in income deprived families in Southwark

#### **Data gaps and updates**

- None identified

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<sup>50</sup> "English indices of deprivation 2019 – Local Authority District Summaries", 2019, available at: [https://assets.publishing.service.gov.uk/media/5d8b3cfbe5274a08be69aa91/File\\_10\\_-\\_IoD2019\\_Local\\_Authority\\_District\\_Summaries\\_lower-tier\\_.xlsx](https://assets.publishing.service.gov.uk/media/5d8b3cfbe5274a08be69aa91/File_10_-_IoD2019_Local_Authority_District_Summaries_lower-tier_.xlsx)

## Housing

**Baseline Indicators** The following indicators were used to characterise housing in the borough and included in the Sustainability Appraisal Framework.

<b>Baseline Indicators</b>	
	Provision of new homes against the demand set out in Southwark Strategic Housing Market Assessment (SHMA) 2019
	Provision and percentage of new affordable homes against the demand set out in Southwark SHMA 2019
	Provision of new family-sized social housing against the demand set out in Southwark SHMA 2019

## Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the Sustainability Appraisal Framework.

<b>Contextual characteristics</b>	
1) Housing affordability	Average house price
	Average rental price and index
	Ratio of median house price to median earnings
	Number of households on housing register
2) Housing stock and tenure	Number and percentage of council housing
	Number and percentage of homes provided by housing associations
	Number and percentage of private dwellings
	Breakdown between occupier-owned and private rented in private dwellings
	Housing typology <sup>59</sup>
3) New build homes (Use Class C3)	Housing targets in different versions of Draft New London Plan <sup>60</sup>
	Planning permissions and completions for new homes 2004 – 2019 <sup>61</sup>
	Affordable homes approved and delivered <sup>62</sup>
	Small development approved and delivered <sup>63</sup>
	Student accommodation approved and delivered <sup>64</sup>
4) Housing needs	General housing and affordable housing needs <sup>65</sup>
	Bedroom requirement by tenure <sup>66</sup>
	Housing needs of older households and those with disabilities and wheelchair requirements <sup>67</sup>
	Housing need of students <sup>68</sup>

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<sup>59</sup> Southwark Key Housing Data 2015/2016

<sup>60</sup> Draft New London Plan, Greater London Authority

<sup>61</sup> London Development Database, Greater London Authority

<sup>62</sup> *ibid*

<sup>63</sup> London Development Database, Greater London Authority

<sup>64</sup> *ibid*

<sup>65</sup> Southwark Strategic Housing Market Assessment 2019

<sup>66</sup> *ibid*

<sup>67</sup> *ibid*

<sup>68</sup> *ibid*



## Description

### 1) Housing affordability

#### - Average house price

In May 2024 , the average house price in Southwark was £470,000 . This compares favourably with the inner London average of £661,535 , however Southwark's average house price is more expensive than the London average of £523,376 . Across England as a whole, the average house price was £302,393 . This makes the cost of buying a house in Southwark around 1.5 times more expensive than in the rest of the <sup>69</sup>England

#### - Average rental price and index

The rental price index increased from 92.1 in October 2018 to 106.9 in Oct 2023, an increase of 16%. The average rental price increased from £1,819 to £2,114 in the same period. <sup>70</sup>

#### - Ratio of median house price to median earnings

In 2023 , the median household weekly income in Southwark was £799, higher than £796 in London and £683 in England . Despite higher weekly income, in 2022 Southwark residents have to spend around 13.38 times annual earnings on purchasing a home, which means to be relatively affordable than the inner London average of 14.6times but higher than the London-wide and England ratios of 12.66 and 8.14 respectively.<sup>71</sup>

#### - Number of households on housing register

In March 2020, there were 12,914 households on Southwark's housing register.<sup>72</sup> This is significantly higher than the approximate 1,800 local authority lettings and 550 council nominations to housing association properties that become available each year.

### 2) Southwark's housing stock and tenure

#### - Percentage of Southwark council's housing

In 2019 , Southwark Council is the largest landlord in London and the 4<sup>th</sup> largest in the country, following Birmingham, Leeds and Sheffield. It is responsible for 37,885 dwellings within its boundaries, equating to around 30% of the total homes in the borough.<sup>73</sup> This is a significantly higher proportion than Greater London as a whole, where 17.1% of the total housing stock is owned and managed by local authorities<sup>74</sup>.

#### - Number and percentage of homes provided by housing associations

In 2019, the number of total housing association housing was 20,223 units (Southwark key housing data 2019/2020). This represents an increase of 3305 units from 2015 (16,918 units)<sup>75</sup>. The largest proportion of the stock is one-bed at 35%, followed by two-bed 32% and three-bed 21%.<sup>76</sup>

#### - Number and percentage of households in private dwellings

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<sup>69</sup> UK House Price Index, Land Registry, May 2024, available at:

<https://landregistry.data.gov.uk/app/ukhpi/browse?from=2023-07-01&location=http%3A%2F%2Flandregistry.data.gov.uk%2Fid%2Fregion%2FUnited-kingdom&to=2024-07-01&lang=en>

<sup>70</sup> Redevelopment of private rental prices statistics, UK: impact analysis data, ONS, 2024, available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/redevelopmentofprivaterentalpricesstatisticsukimpactanalysisdata>

<sup>71</sup> Ratio to residence-based earnings ratio , ONS, 2023, available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian>

<sup>72</sup> Southwark Housing Strategy 2020 to 2043

<sup>73</sup> Southwark Housing Key Stats 2020, Southwark Council, 2020, available at :

<https://www.southwark.gov.uk/assets/attach/42459/Southwark-Key-Housing-Stats-2020.pdf>

<sup>74</sup> Southwark Housing Key Stats 2020, Southwark Council, 2020, available at :

<https://www.southwark.gov.uk/assets/attach/42459/Southwark-Key-Housing-Stats-2020.pdf>

<sup>75</sup> Southwark Key Housing Data 2015/2016, Southwark Council, 2016, available at:

[https://www.southwark.gov.uk/assets/attach/2683/Southwark\\_Housing\\_Key\\_Stats\\_October\\_v2\\_2015.pdf](https://www.southwark.gov.uk/assets/attach/2683/Southwark_Housing_Key_Stats_October_v2_2015.pdf)

<sup>76</sup> Southwark Housing Key Stats 2020, Southwark Council, 2020, available at :

<https://www.southwark.gov.uk/assets/attach/42459/Southwark-Key-Housing-Stats-2020.pdf>

Based on Census 2021, the majority of tenure in Southwark is private dwellings, including owner-occupied, private rented housing and Shared Ownership, with 78,829 households making up 60.3 % of the total households in the borough.. With Southwark being one of the largest landlords in the country, the borough's percentage of private dwellings is still significantly less than 75% in London as a whole and 82% in England<sup>77</sup>

- **Breakdown between owner-occupied and private rented in private dwellings**

Out of all tenures in 2021 , 31.3% of households are owner-occupied including Shared ownership, while 29% are rented to private tenants. Compared with 46.8% owner occupied and 30.1% private rented for London as a whole, the borough has a relatively lower share of home ownership<sup>78</sup>.

- **Housing typology**

Based on Southwark Private Sector House Condition Survey 2008, flats are the main private housing type in Southwark, comprising 48% of the total private homes. It was higher than the 37.1% London-wide figure. Of houses, most are terraced and there was only a small proportion of detached/semi-detached housing. Having a long history of development, Southwark has 43% of the private dwellings constructed before 1919, and 43% after 1964.

### 3) New build homes (Use Class C3) in Southwark

- **Southwark housing targets in various versions of New London Plan**

The adopted London Plan (2021) set a target of 440,035 new homes for Southwark between 2019 and 2036, averaging 2,355 net new homes every year. This includes new-build, conventional, self-contained homes, non-conventional and non-self contained homes (such as hostels, HMOs, care homes and student housing) and long term vacant properties brought back into use

As a component of the overall housing target for Southwark, an annual target of 601 homes are set for small sites , totalling 10,217 net new homes between 2019 and 2036.

- **Planning permissions and completions for new homes (2004 – 2024)**

Southwark Council is a top performing borough for providing social rented housing and other housing tenures. Between 2004 and July 2024, Southwark has approved more net new homes than required by the targets set out in different versions of London Plan, totalling 46,447 units in both conventional and non-conventional developments, with an annual average of 4,648 homes<sup>79</sup>.

Although the planning system has the power to guide and manage developments, whether and when the permitted private developments are out of the council's control. Over the above twenty years, a total of 29,720 new homes were completed with an annual average of 2,972 units between 2004 and July 2024<sup>80</sup>.

- **Affordable homes approved and delivered**

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<sup>77</sup> "Household characteristics by tenure, England and Wales: Census 2021", ONS, 2023, available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/householdcharacteristicsbytenureenglandandwalescensus2021>

<sup>78</sup> Household characteristics by tenure, England and Wales: Census 2021", ONS, 2023, available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/householdcharacteristicsbytenureenglandandwalescensus2021>

<sup>79</sup> Residential approvals dashboard, GLA, 2024, available at: <https://data.london.gov.uk/dataset/residential-approvals-dashboard>

<sup>80</sup> Residential completions dashboard, GLA, 2024, available at: <https://data.london.gov.uk/dataset/residential-completions-dashboard>

Between 2004 and 2024, 12,480 net affordable homes were secured from developments through the planning system, accounting for 27% of approved developments.<sup>81</sup> These include social rented, affordable rent, London Living Rent and other intermediate housing types.

Out of total net new 29,720 homes completed, 17 % affordable homes were delivered at 5,543 units. 1,154 units (Around 21% of these homes completed) were social rented.<sup>82</sup>

### **Small development approved and delivered**

Most new homes have been completed through major developments in Southwark, however small scale developments have also played an important role in the overall housing supply. Between 2004 and 2019, 2,275 applications were approved on developments of one to nine units, leading to 5,567 net approved new homes. In the same time period, 4,806 new homes were completed from the small developments, accounting for 16% of total new homes.<sup>83</sup>

### **Student accommodation approved and delivered**

Between 2004 and 2024, 7,540 Purpose Built Student Accommodation (PBSA) bedrooms were approved.<sup>84</sup> This represents 8.2% of the 92,472 PBSA bedrooms approved in London. In the last 4 years between 2020 and 2024, 2,229 PBSA bedrooms were approved in Southwark. This represents 14.8% of the 15,082 PBSA bedrooms approved in London. This indicates there has been a surge in interest in PBSA schemes in Southwark.

Between 2004 and 2024, 5,010 PBSA bedrooms were completed which is approximately 8.8% of the 56,623 PBSA bedrooms completed in London during the same period. In the last 4 years between 2020 and 2024, 1,884 PBSA bedrooms (37.6%) were completed in Southwark which is appropriately 20% of the 9,239 PBSA bedrooms completed in London during the same period<sup>85</sup>. This indicates Southwark has played an increasingly important role in the delivery of PBSA in London recently.

## **Housing needs**

### **General housing and affordable housing needs**

In South East London Strategic Housing Market Assessment (SHMA) 2014 which looked at housing needs across the South East London sub-region, Southwark was estimated to have an annual need of 1,647 new homes and 799 net affordable homes.

An updated SHMA specifically to Southwark undertaken in 2019 SHMA revised the annual need of new homes to be 2,932 units with additional needs of 2,077 affordable housing (71% of total need) per year using the new standard methodology in the planning practice guidance and the GLA-2016 based central trend household projections.

The updated evidence demonstrates that the need for new homes and affordable homes has become even more acute in Southwark over the past three years, where there are a 78% rise of the annual need for new homes overall and 1.6 times growth affordable housing needs.

The annual net affordable housing need is calculated from the aggregate of backlog needs, newly arising needs and existing households falling into need after deducting the annual supply of affordable homes estimated at 1,436 units:

- Backlog needs from 2,934 concealed households, 6,745 overcrowded households, and 2,336 homeless households who are currently living in temporary accommodation per year;
- 3,943 newly forming households per annum;
- 205 existing households falling into need per year.

- **Additional affordable housing need by tenure and size**

The Southwark's SHMA (2019) shows that the highest need for social rent and the sub-social rent (who can afford a social rent but not 50% of the lower quartile market rent and those who cannot afford a social rent) target group is two, three and four bedroom units. In this group, there is a shortfall of 659 units and an oversupply of one bed units of 200. For intermediate housing, it is estimated that there would be an oversupply of 198 x 1 bed units and require additional 359 x 2 beds units, 353 x 3 bed units and 309 x 4 beds units.

- **Housing needs of older households and those with disabilities and wheelchair requirements**

The Southwark's SHMA (2019) shows that there will be a 79% projected increase in the population of Southwark aged 65 or more by 2039, comprising 13% of the Southwark population

The housing requirements for those with disabilities are linked to the age of the population. The number of older people with mobility disabilities is forecast to increase from 4,544 in 2017 to 7,690 in 2035. People over 65 with dementia is projected to reach 2,369 by 2030.

Currently 613 households have unmet wheelchair accessible accommodation requirements, which is across all tenures. For care homes and dementia places, additional or improved 867 care beds will be required by 2029.

The borough will also need additional 780 units of specialist elderly accommodation by 2029, of which some 559 (72%) should be sheltered and 116 (14%) extra care.

- **Housing needs of students**

There are over 21,000 students aged 20 or over residing in the borough during term time and there are 23,500 places at the major Higher Education (HE) institutions in Southwark. At least 57% live in private rented accommodation and 15% live with their parents.

According to SHMA 2019, there are likely to be a significant supply of 7,800 units of purpose-built student accommodation (PBSA) in the borough. Meanwhile, the Mayor's Academic Forum indicates the forecast of student numbers in London to slow down.

- **Issues**

Housing supply and affordability is a pressing issue for Southwark, where building enough homes with right mixture of tenures is the strategic priority of the council to meet the housing needs of all residents. Southwark SHMA undertaken demonstrates there is an even more acute need for general and affordable housing as compared to the previous version South East SHMA 2014.

Even though Southwark has a good track record of delivering affordable homes, 2019 SHMA informs there is a greater demand for affordable homes than the current supply, where there is particularly a shortfall in family-sized (two to four bedroom) social rented housing.

#### **Data gaps and updates**

- There is a need for the more updated data of the current housing stock and tenure in the borough as the data currently analysed is based on the Key Housing Data 2015/2016 and SHMA 2019.

## Education, Skills and Training

### Overview

#### - Indicators

The following indicators have been incorporated into the Sustainability Appraisal Framework:

Baseline Indicators	
	Proportion of 16-17 year olds not in education, employment or training (NEET) or whose activity is not known <sup>86</sup>
	Proportion of people aged 16-64 years old who have attained a NVQ Level Four or higher <sup>87</sup>
	Proportion of residents with no qualifications <sup>88</sup>
	Education and skills deprivation <sup>89</sup>
	Number of apprenticeships created within the borough <sup>90</sup>

#### - Contextual characteristics

- The following information provides contextual characteristics of the borough and is not included in the Sustainability Appraisal Framework.

Contextual characteristics	
	Number of libraries <sup>91</sup>
	Current provision of school place <sup>92</sup>
	Demand for early years place <sup>93</sup>
	Demand for state-funded school places <sup>94</sup>

### Description

#### - Young people not in employment, education or training

In 2022, 2.6% of 16-17 year old residents, totalling 150 people, in Southwark were not engaged in education, employment or training or not known for any activity undertaken. This accounted for 2.6% missing from formal education,

<sup>86</sup> NEET and participation: local authority figures, Department for Education

<sup>87</sup> NOMIS Labour Market Survey

<sup>88</sup> NOMIS Labour Market Survey

<sup>89</sup> English indices of deprivation 2019, MHCLG

<sup>90</sup> Southwark Skills Strategy 2018

<sup>91</sup> Southwark Library and Heritage Strategy 2019 - 2022

<sup>92</sup> Pupil Place Planning 2019, Southwark

<sup>93</sup> Childcare Sufficiency Assessment 2019, Southwark

<sup>94</sup> 2018 School place demand projections, Greater London Authority



employment or training within this age group, compared to 3.4% in London and 5.2% in England<sup>95</sup>

- **Attainment of NVQ Level 4 and without qualification**

Southwark has a higher proportion of residents who receive university educations, compared to the rest of London and the country. In Dec 2023, 156,400 residents aged 16 – 64 in Southwark attained qualification level NVQ4 (National Vocational Qualification) or above, taking up 66.4 % of the age group.<sup>96</sup> It fares better than both the London-wide 60.7% and Great Britain's average of 47.3%

- On the other hand, 5.7% residents aged 16 – 64 were did not possess any qualification in the same year period, totalling a number of 13,900.

- **Number of apprenticeships in Southwark**

- Between 2016 and 2017, 842 apprenticeships were created in Southwark, equating 41% of the apprenticeships created by all London boroughs during that period.

- **Education and skills deprivation**

- For the education, skills and training domain set out in English indices of deprivation 2019, Southwark ranked lower than average across inner London (8<sup>th</sup> out of 14 local authorities), London-wide (22<sup>nd</sup> out of 33) and nationally (262<sup>nd</sup> out of 317), meaning it is relatively less deprived than average.

- **Number of libraries**

According to Southwark Library and Heritage Strategy 2019 – 2022, there were 12 libraries across the borough.

**School Places:**

- **Current supply of primary school places**

- Based on Southwark Council' Pupil Place Planning (2023), in October 2023, there were 3,401 available primary reception places (the equivalent of 125 forms of entry) in Southwark, and 25,055 year Reception to 6 primary places (the equivalent of 900 primary schools).

- **Current supply of secondary school places**

- There were 3,522 Year 7 places available in Southwark as of October 2023 . For Year 7 to 11, 16,234 places were available..

- **Special Education Needs and Disabilities (SEND) school attendance**

<sup>95</sup> NEET and participation: local authority figures, Department for Education, 2022, available at: <https://department-for-education.shinyapps.io/neet-comparative-la-scorecard/>

<sup>96</sup> NOMIS, Labour Market Statistics, ONS, 2023

- In October 2023 , there were 3,845 SEND children's attending primary schools and 3,133 going to secondary schools and post-16 combined.
- **Provision of free early education places (2-4 years old)**
- According to Nursery Schools and Early Years Provision (Southwark Cabinet report) and Department for Education (2024), for children that are eligible for receiving free early year education and childcare funded by the government, there were a total of 6,126 two to four year-old children receiving the free education in Southwark in 2023 . The number of children in free provision was reduced by 6% from 6,521 in 2022 , which was broadly in line with the national trends due to the declined birth rate.
- **Forecast needs for stated-funded places (2019 – 2028)**
- Projections of the needs for school places are provided by the GLA using a standard model for the majority of London local authorities. Taking into account the most up-to-date birth data and housing data, each annual round of projections may see a variation to the 10-year prediction trend. The longer-term prediction relate to projected rather than actual births so are less reliable than the short to medium term projections based on actual birth data.
- Based on 2018 GLA projections, there will be a total demand for state-funded primary and secondary school places at 21,912 and 14,641 annually.
- According to Southwark Childcare Sufficiency Assessment 2019, there were an estimated number of 20,954 children under age five in 2019, and 23,178 in 2039.
- Noting the updated forecast of primary and secondary school place needs from 2019-2020 onwards, the council published Pupil Place Planning Report in September 2019 to provide an update on the existing supply of primary and secondary places across the borough and set out actions to continually monitor to ensure supply matches demand. Currently, there are sufficient places to meet the demand in the early year's education and childcare for children under 5, and the primary and secondary phases of education in Southwark.
- **Issues**
- The proportion of NEETs is higher than London average, which demonstrates the need for training and employment opportunities for young people.
- **Data gap and updates**
- No significant data gaps have been identified

## Public health and wellbeing

### Baseline indicators

- The following indicators have been incorporated into the Sustainability Appraisal framework:

Baseline indicators	
	Life expectancy at birth for males and females <sup>97</sup>
	Healthy life expectancy at birth for males and females <sup>98</sup>
	Winter Mortality Index <sup>99</sup>
	Index of health deprivation and disabilities <sup>100</sup>
	Percentage of adult carers who have as much social contact as they would like <sup>101</sup>
	Percentage of physically active adults <sup>102</sup>
	Number and percentage of reception and Year 6 children who are overweight (including obesity) <sup>103</sup>

### Contextual characteristics

- The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
	Mental health <sup>104</sup>
	Projected ageing population <sup>105</sup>
	Projected number of 65 year-old or above residents with dementia <sup>106</sup>

### Description

- **Life expectancy at birth for males and females**
- Life expectancy is often used as the over-arching measure of the health of the population, and is a key indicator within Public Health Outcomes Framework. In 2020-2022, life expectancy at birth in Southwark was 78.4 years for males and 83.2 years for females, making a substantial improvement in the gap between

<sup>97</sup> Public Health Outcomes Framework, Public Health England; Joint Strategic Needs Assessment factsheet 2019 – life expectancy, Southwark

<sup>98</sup> ibid

<sup>99</sup> ibid

<sup>100</sup> English Indices of Deprivation, MCHLG

<sup>101</sup> Public Health Outcomes Framework, Public Health England

<sup>102</sup> ibid

<sup>103</sup> ibid

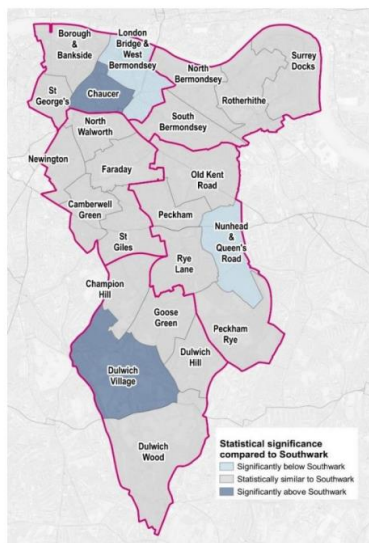
<sup>104</sup> Adult Psychiatric Morbidity Survey 2014, Southwark

<sup>105</sup> Southwark Strategic Housing Market Assessment, 2019

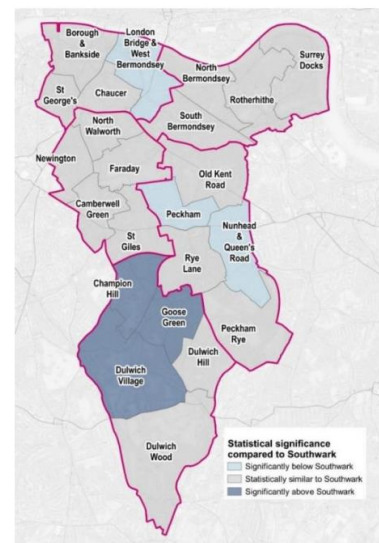
<sup>106</sup> ibid

Southwark and England (78.9 years for males and 82.8 years for females in the same period).

- However, Southwark had lower life expectancy at birth in London in 2020-2022, which had an average life expectancy of 79.1 years for males and 83.6 for females.
- There are significant inequalities in life expectancy at birth between communities in Southwark among both males and females. However, the life expectancy at birth in wards within the OKR OA is broadly align with the average in Southwark except the Peckham and Nunhead and Queens Road wards where small parts these wards are within the OKR OA (See Figure 1 above).



Significance of male life expectancy at birth, by ward, compared to the average male life expectancy in Southwark, 2016-20  
Source: [OHID, 2023, Local Health](#).  
© OS crown copyright and database rights 2021. Ordnance Survey (0)100019252.



Significance of female life expectancy at birth, by ward, compared to the average female life expectancy for Southwark, 2016-20. Source: [OHID, 2023, Local Health](#).  
© OS crown copyright and database rights 2021. Ordnance Survey (0)100019252.

Source: Joint Strategic Needs Assessment 2022

- Based on the Joint Strategic Needs Assessment Factsheet 2019-2020, several key causes of death has led to the gap in life expectancy among communities within the borough, including Cardiovascular Disease, Cancer and Respiratory Disease which account for 58% of the gap in life expectancy for males between communities and 48% for females.
- **Healthy life expectancy at birth for males and females**
- Healthy life expectancy is often considered a measure of the length of time spent living in good health. Based on Public Health Outcomes Framework (2023), in 2023, Southwark had an average of 63.4 years for males and 62 years for females, marking a gap of 15 years for men and 21.2 years for women from life expectancy.
- Trends indicate the gap between healthy life expectancy and overall life expectancy has narrowed, particularly among women. The gap among women

decreased from 21 years in 2010-2012 to 13.6 years in 2015-2017, whereas for men dropped from 18.2 years to 16.5 years in the same period.

- Across London, , the healthy life expectancy for male in 2023 is 63.8 years and 65 years for women
- **Winter Mortality Index**
- In common with other countries, more people die in the winter than in the summer in England, which also applies to Southwark. Based on the latest data from Public Health Outcomes Framework<sup>107</sup>, the winter mortality index for August 2021 and July 2022 in Southwark is 18.5%. During the same period, the winter mortality index is 10.3% in London and 8.1% in England.
- **Index of health deprivation and disability**
- Health is one of the seven domains forming the English Indices of Deprivation to compare areas across England in terms of the risk of premature death and the impairment quality of life through poor physical and mental health. In the 2019 index, Southwark performed better than London and the country on this measure, being the 5<sup>th</sup> least deprived out of 14 inner London boroughs, 28<sup>th</sup> among the 33 boroughs in London and 211<sup>th</sup> out of 317 areas across the country.
- **Percentage of adult carers who have as much social contact as they would like**
- As a proxy measure for social isolation, Personal Social Services Survey of Adult Carers in England – England finds that 26.8 % of adult carers in Southwark think that they have as much social contact as they would like in 2023 . It was the fourth best performing borough, faring better than the average 27.5% in London and 28% in England.
- **Percentage of adult social carers who have as much social contact as they would like**
- However, when it comes to the adult social carers, the other survey named Adult Social Care Survey shows that only 39.2% of the respondents living in Southwark think they have as much social contact as they would like. It was below the average 39.74% in London and 44.4% in England
- **Mental Health**
- Every seven years, the Adult Psychiatric Morbidity Survey (APMS) is conducted to provide an assessment of mental health in England. The results from the 2014 survey show that one in six adults had a common mental disorder (CMD) in the week prior to the survey, compared to one in five adults in London. Applying the London prevalence to Southwark, the borough is estimated to have almost 47,600 adults experiencing a CMD, which will be projected to rise to around 52,000 over the next decade.
- For child and adolescent mental health, nationally one in ten children and young people aged 5-16 have a clinically diagnosed mental health disorder. This

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<sup>107</sup> Winter Mortality Index, Office for Health Improvement & Disparities (2023), available at: <https://fingertips.phe.org.uk/indicator-list/view/ZNn1qFropE#page/1/gid/1/pat/6/ati/501/are/E09000028/iid/90360/age/1/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1>

equates to 1,460 children in Southwark with emotional disorders such as depression and anxiety, 2,300 children with conduct disorders such as oppositional defiant disorder and socialised conduct disorder, and 650 children with hyperkinetic disorders including attention deficit hyperactivity disorder (ADHD).

- According to the JSNA Annual Report 2023, In 2021, 13 suicides in Southwark residents were registered. The suicide rate in Southwark is the 5<sup>th</sup> highest of the London boroughs, though the difference between the boroughs is statistically insignificant.
- The same report shows there are 4,000 patients registered with a Southwark GP have been diagnosed with severe mental illness.
- **Percentage of physically active adults**
- Based on the Active Lives Adult Survey conducted by Sport England, 72.6% of Southwark residents were reported to be physically active, making Southwark Comparatively, the percentage was substantially higher than 66.3% in London and 67.1% in England.
- **Number and percentage of Reception and Year 6 children who are overweight (including obesity)**
- 21.7% of reception children are overweight and obese in 2022/2023. The proportion is slightly higher than those in London (20%) and England (21.3%).
- 41.5% of Year 6 children in London are overweight and obese in 2022/2023. The proportion is substantially higher than those in London (38.8%) and England (36.6%).
- **Projected ageing population and those with dementia**
- Based on SHMA 2019, the number of residents aged 65 or above is projected to rise by 79% to 48,000 by 2039, accounting for 13% of the Southwark population. Among the growth, those over the age of 75 will increase by 92% and those over 85 will have 87% growth.
- In the same report, there is a projection of 1,772 local residents aged 65 or above with dementia, and gradually growing to 2,369 by 2030.

## Issues

- Southwark's life expectancy at birth for males and females is among the lowest in London
- There are significant inequalities in life expectancy at birth between communities in Southwark
- Southwark has one of the highest healthy life expectancy for females in London, but one of the lowest for males.
- Further support is needed to tackle social isolation for adult social carers
- The projected ageing population that are often accompanied by health conditions such as dementia presents a public health challenge

- Child obesity in Southwark is more prevalent than London and the country on average.

**Data gap and updates**

- There is an evidence gap between the actual number of residents with common mental disorder and those who are diagnosed. Therefore, it is not advisable and useful to mark reduction in diagnosis as an indicator to measure the mental health condition of the population
- There is a potential need to identify the local profile of mental health apart from the estimation derived from London prevalence shown in the Adult Psychiatric Morbidity Survey (APMS).

## Safety

### Baseline indicators

The following indicators were used to characterise safety in the borough.

Baseline indicators	
	Crime rate per 1000 of the population for key offences and total number of key offences per year <sup>108</sup>
	Crime deprivation <sup>109</sup>
	Total number of pedestrians' and cyclists' casualties on road <sup>110</sup>
	Fatal and serious casualties on road <sup>111</sup>

### Contextual characteristics

No further contextual characteristics were used in this section.

### Description

- **Crime rates per 1000 people and total number of offences in Southwark per year**
- Between 2023 and 2024, 116 key offences per 1000 of the population in Southwark were recorded, totalling 35,343 offences overall. Therecorded. The crime rate per 1000 people made Southwark the 24<sup>th</sup> highest in England, Ireland and Northern Ireland.
- Of the key offences recorded, the majority were theft offences (17,587 offences), followed by violence (8,374 ), criminal damage and arson (1,986 ) and robbery (1,779).
- **Crime deprivation**
- Crime deprivation is one of the seven domains forming English Indices of Deprivation to rank areas across England based on the risk of personal and material victimisation at local level. In 2019 index, Southwark was ranked seventh of the 14 inner London boroughs, and the ninth among the 33 London boroughs. Nationally, it was the 37<sup>th</sup> most deprived among all 317 local authorities. Of 166 Lower-layer Super Output Areas (LSOA) within Southwark, 25 areas (equating to 1 every 8) are among the 10% most deprived areas within England.
- **Road safety**
- **Pedestrian and cyclists casualties**
- According to Transport for London's Casualties in Greater London, there were casualties of 179 pedestrians and 386 cyclists in Southwark in 2023 with a rise in 5% and a fall in 9% respectively compared to 2022 . During the same period,

<sup>108</sup> Office for National Statistics Local Profile

<sup>109</sup> English indices of Deprivation 2019, MHCLG

<sup>110</sup> Casualties in Greater London - Transport for London

<sup>111</sup> *ibid*



across London, the casualties of pedestrians do not change while the casualties of cyclist decreases by 5.6%.<sup>113</sup>

- **ssues**

- The number of offences remain high in Southwark as compared to the rest of London, especially theft offences
- Southwark is among the highest deprived areas in terms of crime regionally and nationally
- Casualties for pedestrians in Southwark increased between 2022 and 2023, above the average across London.

- **Data gaps and update**

- There is a need to understand the residents' perception of safety in the neighbourhood besides the reported and recorded offences. The gap of evidence will be filled upon the completion of the social research, purposed for the development of Social Regeneration Charter, which collects and analyses socio-economic data in five opportunity areas in the borough

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<sup>113</sup> Road danger reduction dashboard, TFL, 2023, available at:  
<https://app.powerbi.com/view?r=eyJrIjoiMTIzYzRiZDMtZDZiYS00OWYyLTk3YTQ0tN2RkMGNiZTRmOTJkIiwidCI6IjFmYmQ2NWJmLTVkZWYtNGVIYS1hNjkyLWEwODljMjU1MzQ2YiIsImMiOjh9>

## Social cohesion

### Baseline indicators

The following indicators were used to characterise safety in the borough.

Baseline indicators		
	Percentage of residents	being an active member of their community <sup>114</sup>
		feeling that they contribute to the local economy <sup>115</sup>
		volunteering in Southwark Council <sup>116</sup>
		who feel wholly or partly positive about change in the borough <sup>117</sup>
		who have personally benefitted from change <sup>118</sup>
	Perceptions of neighbourliness and how well local people get on well together (emerging) <sup>119</sup>	
	Local perception of the ability to have their voice heard and influence decisions (emerging) <sup>120</sup>	

### Contextual characteristics

- The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual Characteristics	
Percentage of residents	working in the borough <sup>121</sup>
	mentioning 'community' when they positively feel about change in Southwark <sup>122</sup>
	considering the community to play a role in helping young people and future generations to succeed in life <sup>123</sup>

### Description

Southwark appreciates community engagement; involvement and coproduction are keys to the social regeneration approach. Therefore, the council conducted Southwark Conversations, the most far-reaching and representative consultation in the council's history, in late 2017 to develop a deeper understanding of perceptions and experience of regeneration in the borough. The feedback was collected and summarised as follows:

- 1 in 4 people are active member of their community
- 1 in 5 people feel that they contribute to the local economy
- 1 in 7 people volunteer in the borough
- 70% of residents feel wholly or partly positive about change in the borough

<sup>114</sup> Southwark Conversations 2018, Southwark

<sup>115</sup> ibid

<sup>116</sup> ibid

<sup>117</sup> ibid

<sup>118</sup> ibid

<sup>119</sup> Available when social research for Southwark's Social Regeneration Charter is published

<sup>120</sup> ibid

<sup>121</sup> Southwark Conversations 2018, Southwark

<sup>122</sup> ibid

<sup>123</sup> ibid

- 52% of residents feel they have personally benefitted from change in the borough

One in six residents work in Southwark, meaning around 17% of Southwark residents are also working in the borough. When discussing how they feel positively about change in Southwark, 18% mentioned community with topics around the sense of community, community identity, diversity and vibrancy of communities, which was only after the most said housing theme.

During the consultation, community is the most mentioned theme in facilitating positive changes to the environment in terms of helping the young generation and creating a good neighbourhood.

17% of respondents consider community to be crucial in helping young people and future generation to succeed in life, developing them into well-rounded individuals by providing good role models for young people, helping them to improve confidence, motivation and good citizenship through community opportunities like volunteering, and helping to create an environment that discourages anti-social behaviour in public places.

When talking about creating a good neighbourhood to live in, people were most likely to mention 'community', taking up 58% of all the responses. Having friendly and helpful neighbours, stable, diverse and cohesive communities, as well as a sense of pride in their area are all felt to help to foster a sense of community and bring people together.

### **Issues**

- Southwark is a central London borough with a host of regeneration opportunities to unlock the development potentials and revitalise the neighbourhood, during which empowering communities and making sure regeneration works for all is at the strategic priority in driving the change
- Therefore, it is crucial to make residents feel their ability to have their voices heard and influence decisions

### **Data gaps and update**

- The community survey needs to be undertaken on a regular basis to reflect the up-to-date community's perception and experience of the ongoing regeneration programmes

## ECONOMIC CONDITIONS

### Economy and employment

#### Overview

#### Baseline indicators

The following indicators are used to character economy and employment in Southwark and included in the sustainability appraisal framework.

Baseline indicators	
	Number of employee jobs <sup>124</sup>
	Number of micro and small-to-medium sized enterprises <sup>125</sup>
	Percentage of unemployed population <sup>126</sup>

#### Contextual characteristics

The following contextual characteristics are used to give an overall description of employment and business in the borough. These are not included in the appraisal framework.

Contextual characteristics	
	Number of economically active and inactive populations <sup>127</sup>
	Gender breakdown of employed population <sup>128</sup>
	Breakdown of occupation by sector <sup>129</sup>

#### Description

##### The number of employee jobs

In 2023 , Southwark held over 291,000 “employee jobs” within its boundaries. This is an increase of 48% from the 2013 figure of 197,000. These figures however exclude self-employed people, government supported trainees and HM Forces.

##### Number of micro and small-to-medium sized enterprises in the borough

Over 99.3% of the businesses in Southwark are micro and small-to-medium sized enterprises. This equated to a total of 15,505 micro-SMEs in 2023 , having grown by 0.3% since 2018 . Over the same period, the largest percentage increase was in medium-sized businesses (employing 50-249 people), which grew by 16.2% from 370 to430 . Small sized-businesses (employing 10-49 people) grew by 14.7 % , from 1630 to1870, while micro-businesses (1 to 9 people) reduced by 5% from 13,910 to13,205 . Large businesses (employing 250 people or more) account for 0.8% of the borough’s total, at 120. The total number of businesses in Southwark in 2023 was 15,525 .<sup>131</sup>

##### Number of economically active and inactive populations

<sup>124</sup> Nomis Labour Market Statistics, Local Authority Profile <https://www.nomisweb.co.uk/reports/lmp/la/1946157256/report.aspx>

<sup>125</sup> ibid

<sup>126</sup> ibid

<sup>127</sup> ibid

<sup>128</sup> ibid

<sup>129</sup> ibid

Nearly three quarters (73%) of people in Southwark are aged 16-64 i.e. the age where they can be economically active between Oct 2022 – Sept 2023 . Of this percentage, 76.8% of 16-64 year olds are economically active. 23.2% of people aged 16-64 are economically inactive, accounting for 51,900 people. This is lower than the London average of 21.5% . The largest sections of the borough’s population that are economically inactive are 13,300 students, making up 29.2% . 17% are homebound with domestic and family duties (at 7000 people) while 30.2% are long term sick (13,700 people) .<sup>132</sup>

### **Gender breakdown of employed population**

The comparison of employment statistics between genders reveals that the proportion of females in employment has been consistently less than males, either as employees or self employed. For example, in 2023, 78.7% of economically active males in Southwark are in employment, compared with 74.2% of females. The difference between genders in the proportion of people that are employees (as opposed to self-employed) is not so stark, with 64.6% of males, compared to 62.9% of females. However, 16.3% of economically active males are self employed, whereas 12.4% of economically active females are self employed.<sup>133</sup> The proportion of economically active females that are unemployed is less than males, at 5% vs. 6%, Oct 2022 – Sept 2023 .<sup>134</sup>

### **Breakdown of occupation by sector**

The largest sector of employment in Southwark is “professional occupations.” This amounts to 34.3% of all jobs in the borough. This is 0.2% higher than London as a whole and 7.3% higher than Great Britain as a whole. This is followed by “Managers, Directors and Senior Officials” “”, at 17.7% .The third largest is “Associate Professionals Occupation” ,” making up 14.3% of employment in the borough.<sup>135</sup>

Several other occupation groups, namely “elementary occupations”, “caring leisure and other service occupations” and “administrative and secretarial” are all around 6-8%, making up the next largest sectors of employment in Southwark.<sup>136</sup>

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<sup>131</sup> Ibid.

<sup>132</sup> Ibid.

<sup>133</sup> Ibid.

<sup>134</sup> Ibid.

<sup>135</sup> Ibid.

<sup>136</sup> Ibid.

## Percentage of unemployed population

In 2023, of people who were economically active in Southwark, 3.9% were unemployed, this compares to 5% in London and 3.7% in the UK as a whole. 5.3% were claiming out-of-work benefits, compared with 5.2% for London and UK as a whole.<sup>137</sup> Under Universal Credit a broader span of claimants are required to look for work than under Jobseeker's Allowance. As Universal Credit Full service is rolled out in particular areas, the number of people recorded as being on the claimant count is therefore likely to rise.<sup>46</sup> In 2023, 3.8% of residents 16+ in Southwark were claimants of Universal Credit, this is lower than the average for London at 5.2% .<sup>138</sup> Of residents who are aged 50+, the proportion of out-of-work benefits rises to 6.3% , which is higher than the London average of 5.2%.<sup>139</sup>

## Issues

- The unemployment rate among economically active population in Southwark is higher than the London and national averages.
- Higher proportion of residents aged over 50 on out-of-work benefits in Southwark across London
- Higher proportion of residents aged over 16 claiming Universal Credit in Southwark across London
- Whilst the growth in total business and small, medium and large enterprises, there have been a decrease in micro-businesses.

## Data gaps and updates

None identified.

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<sup>137</sup> Ibid.

<sup>138</sup> Ibid.

<sup>139</sup> Ibid.

## Retail and town centres

### Overview

#### Baseline indicators

The following indicators are used to character economy and employment in Southwark and included in the sustainability appraisal framework.

Baseline indicators	
	Percentage of takeaways outlets within a walking distance (400m) of a secondary school
	Primary shopping frontage vacancy rates <sup>140</sup>
	Secondary shopping frontage vacancy rates <sup>141</sup>

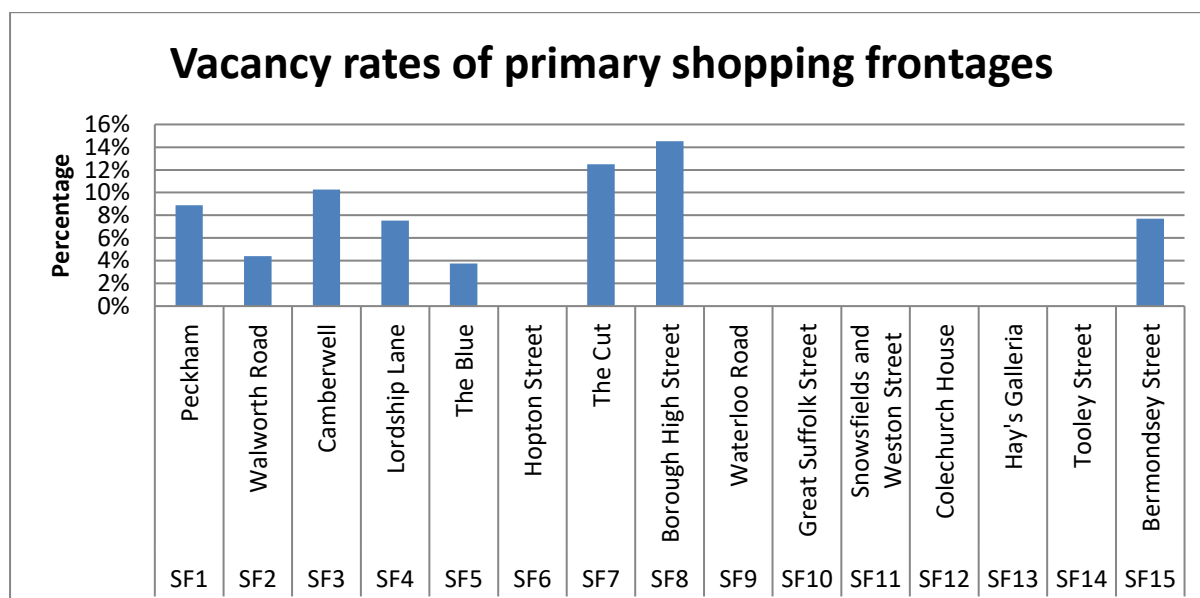
#### Contextual characteristics

The following contextual characteristics are used to give an overall description of employment and business in the borough. These are not included in the appraisal framework.

Contextual characteristics	
	Existing commercial floorspace in town centres, district centres and local centres <sup>142</sup>
	Breakdown of commercial uses in town centres

### Description

#### Primary shopping frontage vacancy rates



#### Secondary shopping frontage Vacancy rates

Schedule ID	Name	Vacancy rate (%)
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SF16	Dockhead	10%
SF17	Jamaica Road	0%
SF18	Jamaica Road	3%
SF19	Albion Street	0%
SF20	Harper Road	33%
SF21	Tower Bridge Road	10%
SF22	Lower Road and Plough Way	11%
SF23	Walworth Road, East Street and Camberwell Road	7%
SF24	Old Kent Road, East Street and Dunton Road	16%
SF25	Ilderton Road	0%
SF26	Maddock Way	0%
SF27	Peckham Park Road and Old Kent Road	29%
SF28	Camberwell	10%
SF29	Vestry Road	0%
SF30	Peckham	16%
SF31	Queens Road	7%
SF32	Bellenden Road	5%
SF33	Gibbon Road	0%
SF34	Evelina Road, Nunhead Green and Kirkwood Road	11%
SF35	Grove Vale	13%
SF36	East Dulwich Road	8%
SF37	Crosswaithe Avenue	0%
SF38	Lordship Lane	13%
SF39	North Cross Road	7%
SF40	Herne Hill	0%
SF41	Half Moon Lane	0%
SF42	Norwood Road	4%
SF43	Dulwich Village and Calton Avenue	0%
SF44	Dulwich Village	6%
SF45	Lordship Lane	11%
SF46	Forest Hill Road	14%
SF47	Forest Hill Road	18%
SF48	Lordship Lane	0%
SF49	Croxted Road and Park Hall Road	17%
SF50	Seeley Drive	10%
SF51	Nunhead Grove and Nunhead Lane	14%
SF52	Camberwell New Road	34%

<sup>140</sup> LB Southwark, 'Protected Shopping Frontages 2018' (published 2018)

<sup>141</sup> Ibid.

<sup>142</sup> LB Southwark, Place & Health Improvement Section, Southwark Public Health, *P45 Hot Food Takeaways – Review of the evidence*, (September 2018), 17



### **Percentage of takeaways outlets within a walking distance (400m) of a secondary school**

According to the P45 Hot Food Takeaways Review of the evidence prepared by Place & Health Improvement Section Southwark Public Health, Southwark Council informing Southwark Plan 2022', out of the 302 takeaway outlets which are situated in ward areas with the prevalence of excess weight, 86 (at 30%) are within a walking distance (400m) of a secondary school in 2017.

The number of takeaways within a walking distance is higher for schools located in the north of the borough, which is also where some of the wards with the highest prevalence of excess weight are found, showing a potential correlation.

### **Existing commercial floorspace in town centres, district centres and local centres**

In 2014, Southwark has a total of 208,666 gross of retail floorspace (270,500 sqm including food and beverage) within its town centres and other undesignated clusters. 44% of the total gross retail floorspace is accommodated within food stores and convenience goods (essential every day items) shops, while 56% of retail floor space is for non-essential, comparison goods.<sup>143</sup> Southwark's town centres are partially defined by the existing amount of commercial floor space. These include:

- Major town centres: Peckham (56,630 sqm), Elephant and Castle/Walworth Road (44,460sqm) and Canada Water (36,668 sqm) or;<sup>144</sup>
- District centres: Borough/Bankside/London Bridge (25,268 sqm), Camberwell (17,780 sqm) and Lordship Lane (in Dulwich) with 15,330 sqm) or;<sup>145</sup>
- Local centres: Nunhead Green/Evelina Road, Dulwich Village or the Blue, Bermondsey

Southwark has around 60,000 sqm net of convenience sales floor space in its town centres, relatively evenly spread between them. Southwark is well served by convenience food "superstore" supermarkets (of over 2,500 sqm net), having five within it's boundaries as well as having 8 large supermarkets over 1,000 sqm net, and ten between 500 sqm net and 1,000 sqm net.<sup>146</sup>

Comparison goods floor space (items such as clothes, shoes, music and books) is estimated to be approximately 93,100 sqm net across the borough. Peckham is the main centre for comparison goods floor space, taking 21% of the share. 18% lies in Elephant and Castle/Walworth Road, and 15% in Canada Water. Outside of the town centres Old Kent Road accounts for fewer than 19% of comparison sales floor space.<sup>147</sup>

Peckham, Elephant and Castle/Walworth Road and Canada Water all have a similar proportion of comparison goods shops when compared with the national average. Borough/Bankside and London Bridge both have less than half the national average.

### **Breakdown of commercial uses in town centres**

<sup>143</sup> Nathaniel Lichfield & Partners, *Southwark Retail Study* (2015), 7

<sup>144</sup> Ibid. 9

<sup>145</sup> Ibid.

<sup>146</sup> Ibid. 22

<sup>147</sup> Ibid.

In Southwark, there is currently a more balanced mix of commercial uses within the designated town centres. The Southwark Retail Study (2015) outlines the most recent data relating to commercial uses in the borough. Peckham has the highest proportion of A1 retail (now classed as E(a)) (71%) and A1 non-retail but a low proportion of drinking establishments (1%). 66% of units in Elephant and Castle/Walworth Road are A1 (with 51% retail and 15% non-retail). There are a smaller proportion of A1 units in Canada Water town centre (at 57%). The district town centres have a higher proportion of units in A3 (now classed as use E(b))/A4/A5 units (both are now classed as Sui Generis), totalling 34.4% versus the major town centres' average of 19% and local centres' 23%. The current retention rate for food and beverage expenditure varies across the borough from 52% to 60% in different areas. While this is reasonably high, there is scope to increase the retention rate through new development.<sup>70</sup>

As of 2015, banks, building societies, estate agents and employment agencies as well as betting shops and pay day loan shops account for 9% of all units in Southwark's town centres. They make up a slightly higher proportion of units in district and local centres, at 10%, than in major centres where they occupy 8% of units.<sup>72</sup>

Southwark's 43 betting shops which are located within town centres account for 26% of all old A2 uses and 2.4% of all old A Class units. This is significantly higher than the national average of 1.5%. Peckham, Walworth Road, Camberwell and the Blue together have 28 betting shops between them, taking up the majority share of the borough's stock. 11 of Southwark's 15 payday loan shops are also concentrated in Peckham, Walworth and Camberwell.<sup>73</sup>

Southwark's 37 banks/building societies are concentrated in Peckham, Borough/Bankside and Camberwell, together having 18 of the 37 units in those town centres. Estate agents are also concentrated in Borough/Bankside and Camberwell; however the highest concentrations are in Canada Water and Lordship Lane. Together, these estate agents account for 36% of all old A2 units (now classed as E(c)) in the borough's town centres, and 3.2% of all old A Class units.<sup>74</sup>

### **Issues**

- The concentration of takeaway outlets in proximity to secondary schools remains a critical threat to children obesity in Southwark

### **Data gaps and updates**

None identified

## Energy and Climate Change

### Overview

#### Baseline indicators

The following indicators were used to characterise energy use and carbon emissions in the borough and included in the sustainability appraisal framework.

Baseline indicators	
1) Consumption of gas and electricity	Energy consumption by sector <sup>148</sup> (Domestic and Industry/commerce)
	Domestic consumption per capita of natural gas <sup>149</sup>
	Domestic consumption per capita of electricity <sup>150</sup>
2) Carbon dioxide emissions	Total carbon emissions in the borough <sup>151</sup>
3) Fuel poverty	Number of households experiencing fuel poverty <sup>152</sup>

#### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
1) Consumption of gas and electricity	Consumption of domestic energy between lighting and appliances <sup>153</sup>
	Frequency of energy contracts (LASER) <sup>154</sup>
	Council expenditure on gas and electricity <sup>155</sup>
2) Carbon dioxide emissions	Carbon emissions breakdown by household ownership type (CO <sub>2</sub> ) <sup>156</sup>
	Carbon emissions breakdown by sector (CO <sub>2</sub> ) <sup>157</sup>
	Carbon emission breakdown by source (CO <sub>2</sub> ) <sup>158</sup>
	CO <sub>2</sub> Baseline data taken from Carbon Reduction Committee Baseline 2018 and new proposed targets <sup>159</sup>
3) Decentralised energy options	Number of households attached to SELCHP <sup>160</sup>

### Description

#### 1) Consumption of Gas and Electricity

##### Energy consumption by sector (Domestic and Industry/commerce)

In total 507.5 kCO<sub>2</sub> were consumed for industry and commercial sectors in 2017 and 312.5 kCO<sub>2</sub> for domestic sector in the most recent time period of 2017 as shown in **Table 2**. This is

<sup>148</sup> Department for Business, Energy and Industrial Strategy (BEIS), 'UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2017 – data tables' (published June 2019)

<sup>149</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>150</sup> *ibid*

<sup>151</sup> LB Southwark, 'Scrutiny Committee Briefing: Climate Strategy – progress update' (published 24<sup>th</sup> September 2019)

<sup>152</sup> LB Southwark, 'Annual Public Health Report for Southwark 2019 (published February 2019)

a 45% reduction in industry and commercial sector over the ten-year time period from 2007 to 2017, and a 37% reduction in the domestic sector over the same period.

Comparison between **Table 1** and **Table 2** shows percentage change in **Table 3**. Whilst in total industry and commercial have seen a greater reduction, domestic has experienced a decrease of 17% in gas use, whereas industry and commercial have seen an increase in gas. This could be for a shift to renewable energy sources more prevalent in domestic sources.

	Industry and Commercial (k2CO <sub>2</sub> )	Domestic (k2CO <sub>2</sub> )
Electricity	727.7	256.9
Gas	182.0	235.5
Total	925.9	496.3

Table 1: 2007 breakdowns between consumption of gas and electricity for industry and commercial versus domestic uses in Southwark (k2CO<sub>2</sub>)<sup>161</sup>

	Industry and Commercial (k2CO <sub>2</sub> )	Domestic (k2CO <sub>2</sub> )
Electricity	307.7	113.4
Gas	190.1	195.1
Total	507.5	312.5

Table 2: 2017 breakdowns between consumption of gas and electricity for industry and commercial versus domestic uses in Southwark (k2CO<sub>2</sub>)<sup>162163</sup>

Percentage Change 2007 to 2017 levels	Industry and Commercial (% change in (k2CO <sub>2</sub> ))	Domestic (% change in k2CO <sub>2</sub> )
Electricity	- 57.69%	-55.85%
Gas	4.26%	-17.16%
Total	-45.19%	-37%

Table 3: Percentage change from 2007 to 2017 figures representing fuel breakdown between consumption of gas and electricity for industry and commercial versus domestic uses in Southwark (k2CO<sub>2</sub>)<sup>164165</sup>

<sup>153</sup> ibid

<sup>154</sup> LB Southwark, 'Scrutiny Committee Briefing: Climate Strategy – progress update' (published 24<sup>th</sup> September 2019)

<sup>155</sup> LB Southwark, 'Climate Emergency Summit' (published 1 July 2019)

<sup>156</sup> LB Southwark, 'Energy and Carbon Reduction Strategy' (adopted September 2011)

<sup>157</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>158</sup> LB Southwark, 'Energy and Carbon Reduction Strategy' (adopted September 2011)

<sup>159</sup> LB Southwark, 'Scrutiny Committee Briefing: Climate Strategy – progress update' (published 24<sup>th</sup> September 2019)

<sup>160</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>161</sup> Department for Business, Energy and Industrial Strategy (BEIS), 'UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2017 – data tables' (published June 2019)

<sup>162</sup> ibid

<sup>163</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>164</sup> Department for Business, Energy and Industrial Strategy (BEIS), 'UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2017 – data tables' (published June 2019)

<sup>165</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

### Consumption of domestic energy between lighting and appliances

The majority of energy (81%) consumed in a home is used either for space heating or heating water. The remainder is split between lighting (16%) appliances and cooking (3%).<sup>166</sup>

### Frequency of energy contracts (LASER)

Southwark currently spends around £50.3m over a 4 year contract on gas and electricity, and through the LASER contract and on average, those sites that utilise our energy contracts are currently saving 38% on gas prices (operational), 41% on gas prices (housing), and 17% on electricity prices (housing) and 11% on electricity prices (operational) compared to individual procurements<sup>167</sup>.

National Grid's high voltage electricity overhead transmission lines / underground cables within Southwark's administrative area form an essential part of the electricity transmission network in England and Wales including a 275kV underground cable from Newcross substation (on the Old Kent Road) in Southwark to Wimbledon substation in Wandsworth as well as existing gas holders on the same site on the Old Kent Road.

### Domestic consumption per capita of electricity and natural gas

The most recent figures are the April 2010- March 2011 Annual monitoring report<sup>168</sup>. The average total gas consumption per capita has decreased to 11,530kWh, and the average total electricity consumption per capita has fallen to 3,300kWh.<sup>169</sup> Domestic consumption per capita of natural gas and electricity is below the national average in Southwark of 16,000 and 4,800 respectively.<sup>170</sup>

	April 2010 – March 2011 (kwh/ year)	April 2009 – March 2010 (kwh year)
Natural Gas	11,530	13,037
Electricity	3,300	3,778

Table 4: Domestic consumption per capita of natural gas (kwh/year) in Southwark between April 2010 and March 2011.<sup>171</sup>

### Council expenditure on gas and electricity

The Council's 2008 Private Sector Stock Condition survey estimated that it would cost £143 million if all remaining opportunities for these measures were carried out in the borough's 70,156 privately owned homes. This would reduce this sector's CO<sub>2</sub> by 23% reduction (equivalent to 76,600 tCO<sub>2</sub> pa– 4.5% of borough CO<sub>2</sub>).<sup>172</sup>

## 2) Carbon dioxide emissions

### Carbon emissions breakdown by household ownership type (CO<sub>2</sub>)

The majority of the remaining social-housing stock, which accounts for 5% of CO<sub>2</sub> is managed by ten large Residential Social Landlords (RSL's) who regularly engage with the Council and who have strong drivers to reduce CO<sub>2</sub> to tackle fuel poverty and increase the quality of their stock.

Tenure	Percentage of borough CO <sub>2</sub>	Number of Dwellings	Percentage of Stock
Council homes	12%	40,120	32%

<sup>166</sup> LB Southwark, 'Energy and Carbon Reduction Strategy' (adopted September 2011)

<sup>167</sup> LB Southwark, 'Scrutiny Committee Briefing: Climate Strategy – progress update' (published 24<sup>th</sup> September 2019)

<sup>168</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>169</sup> ibid

<sup>170</sup> ibid

<sup>171</sup> ibid

<sup>172</sup> LB Southwark, 'Scrutiny Committee Briefing: Climate Strategy – progress update' (published 24<sup>th</sup> September 2019)

RSL homes	2%	15,013	12%
Private Sector homes	16%	7,156	56%
Total	30%	125,289	100%

Table 4: Housing stock in Southwark split by tenure and percentage carbon emissions <sup>173</sup>

### Carbon emissions breakdown by sector (CO<sub>2</sub>)

	April 2010-March 2011 (tonnes of CO <sub>2</sub> )	April 2009 – March 2010 (tonnes of CO <sub>2</sub> )	April 2008 – March 2009 (tonnes of CO <sub>2</sub> )
Industry/commercial	789,000	925,000	927,000
Housing	456,000	502,000	504,000
Transport	258,000	265,000	281,000
Total	1,504,000	1,693,000	1,713,000
Per capita	5.3	6.0	6.1

Table 5: Total tonnes of carbon emitted in Southwark between April 2010 and March 2011 <sup>174</sup>

Carbon emissions in the borough reduced from 1,713,00 tonnes of CO<sub>2</sub> from the period between April 2008-2009 to 1,504,000 tonnes of CO<sub>2</sub> from April 2010-2011. This is a reduction of 13.8%, which indicate a consistent decline in carbon emissions. Southwark has declared a climate emergency, setting a target to reach carbon neutrality by 2030.

### Carbon emissions breakdown by source (CO<sub>2</sub>)

**Table 6** below gives a breakdown of where Carbon emissions come from in the borough indicating that workplaces are the biggest emitters and transport consisting of 15% of emissions.

Built Environment	84%	Transport	16%
Work places	54%	Cars and motorcycles	8%
Homes	30%	Freight	4%
		Public transport	3%
		Taxis	1%

Table 6: Percentage breakdown of carbon emissions between built environment and transport sectors in Southwark. <sup>175</sup>

### Total carbon emissions in the borough

In 2018, the Council's Carbon Reduction Committee provided updated Baseline tonnes of CO<sub>2</sub>, and proposed new reduction targets by respective years 2022, 2030 and 2050 targets as set out in the right hand column of the table below.

	Baseline (tCO <sub>2</sub> )	Current (tCO <sub>2</sub> )	Original target	Percentage Reduction to date	New proposed target
Council – operational estate and schools (2008/9 baseline)	41, 306	25,961 (2017/18)	26.6% reduction by 2016	36.7%	100% reduction by 2050

<sup>173</sup> LB Southwark, 'Energy and Carbon Reduction Strategy' (adopted September 2011)

<sup>174</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>175</sup> Southwark Energy and Carbon Reduction Strategy 2011

Council Housing (2005 baseline)	202,800	187,850	N/a	6.7%	50% reduction by 2022
Borough (2003 baseline)	1, 690 000	1, 671,020	80% reduction by 2050	1.1%	100% reduction by 2030

Table 7: CO<sub>2</sub> Baseline data taken from Carbon Reduction Committee Baseline 2018 and new proposed targets.<sup>176</sup>

The Council has been working towards the Council target of reducing the emissions from own operations by 50% by 2022, based on existing CRC baselines. The 2008 CO<sub>2</sub> baseline taken for the CRC was 41,306 tonnes per year. Against the same baseline, the figure for 2017-18 was 25,961 tonnes. This is a 36.7% reduction on 2008 and work is ongoing. We have largely achieved this through a mixture of energy efficiency, building improvements and capital investments and the consolidation of accommodation.

### Number of households experiencing fuel poverty

Fuel poverty is defined as spending more than 10% of disposable income on heating to minimal standard. Over 7,000 households in Southwark are living in fuel poverty (6.4% of all households). However fuel poverty is unequally distributed throughout the borough.<sup>177</sup>

## 3) Decentralised energy

### Number of households attached to SELCHP

The waste that cannot be recycled, reused, or recovered through processing in some way is incinerated at the SELCHP (South East London Combined Heat and Power) plant just across the border in Lewisham. This plant produces heating and hot water that supplies approximately **2,600** properties of nearby Southwark housing estates (fed from boiler houses at Abbeyfield, Clements Road, Pedworth and Tissington). The expansion of this network is being considered as part of a wider decentralised energy strategy and the regeneration of the Old Kent Road, exploring extending SELCHP links to Canada Water, Osprey Estate, the Old Kent Road Opportunity Area and Peckham.

### Issues

- CO<sub>2</sub> reduction is overall occurring in the borough, however not at a quick enough rate
- Industry and commercial sector has reduced by 45% in the period 2007-2017 whilst domestic has decreased by roughly 37%
- Smart metering could be a method towards continuing to reduce consumption
- Expanding our SELCHP heat networks towards Peckham and Canada Water requires more data and analysis, could involve heat metering to discourage wastage, could involve new technologies, could involve some long-term investment between partners (Veolia and Southwark)
- CO<sub>2</sub> tends to dominate the direction of clean energy policy and actions. On the other hand the impacts of NO<sub>x</sub> are proportionately underrated in decisions.
- Predominance of the Urban Heat Island will increase as development increases, localised figures are required to be developed
- Air Source Heat Pump is a project undertaken by the council to change carbon behaviours however this still needs to be better understood

<sup>176</sup> LB Southwark, 'Scrutiny Committee Briefing: Climate Strategy – progress update' (published 24<sup>th</sup> September 2019)

<sup>177</sup> LB Southwark, 'Annual Public Health Report for Southwark 2019 (published February 2019)

- With 86.5% of the borough's carbon emissions not directly controlled by the Council, meeting CO2 reduction targets will only be fully achieved by influencing the borough's businesses, residents, landlords and building owners<sup>178</sup>.

**Data gaps and updates**

- There is a lack of understanding of post-occupancy energy use and demand. Current decisions surrounding energy are based upon modelling of expected demand; however there is a discrepancy between modelling and real data. This understanding would provide more certainty to and build a stronger case for implementing decentralised and cleaner energy in the borough.
- Data needs to be updated
- Need a better understanding of the effects of climate change and adaptation measures at the local Southwark level.
- Data is needed to measure the proportion of energy generated from renewable sources.
- Data is needed to quantify energy efficiency and adaptation of existing building stock as per DECC, 2012.

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<sup>178</sup> LB Southwark, 'Energy and Carbon Reduction Strategy' (adopted September 2011)



## Air Quality

### Overview

#### Baseline indicators

The following indicators were used to characterise air quality in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Concentration level of NO <sub>2</sub>
	Concentration level of PM <sub>10</sub>
	Concentration level of PM <sub>2.5</sub>

#### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
1) Air Quality Monitoring	Air quality monitoring stations

### Description

#### 1) Air Quality Monitoring

##### Air Quality monitoring stations

In 2022, Southwark has six automatic air quality monitoring stations. Southwark also has an extensive network of diffusion tubes monitoring NO<sub>2</sub>. Spread throughout the borough there are 90 diffusion tubes at 86 sites across Southwark<sup>181</sup>.

The six automatic air quality monitoring stations measure air pollution every hour. They monitor Oxides of Nitrogen (NO + NO<sub>2</sub>, collectively referred to as NO<sub>x</sub>), particulate matter (PM<sub>10</sub>) and (PM<sub>2.5</sub>)<sup>182</sup>

##### Concentration level of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>

In 2022, none of the NO<sub>2</sub> Automatic Monitoring Stations in Southwark recorded exceedances of the hourly mean >200µg.m-3 objective permitted, meeting the NO<sub>2</sub> short term Air Quality Objective which permits exceedance of the hours mean >200µg.m-3 for 18 hours per year. The annual Mean NO<sub>2</sub> Ratified and Bias-adjusted Monitoring Results (µg/m<sup>3</sup>) calculated by the average of all monitoring stations and diffusion tubes us was 26.5 µg/m<sup>3</sup> in 2022 which decreased substantially from 49.95 µg/m<sup>3</sup> in 2016.<sup>185</sup>

<sup>181</sup> Two AQMS sites have three co-located NO<sub>2</sub> tubes: Elephant & Castle, and Old Kent Road. The remaining diffusion tube is used as a 'travel blank' necessary for accurate analysis

<sup>182</sup> Air Quality Annual Status Report, Southwark Council, 2023, available at: <https://www.southwark.gov.uk/environment/air-quality/what-we-re-doing/air-quality-strategies-plans-and-letters?chapter=2>

<sup>185</sup> Air Quality Annual Status Report, Southwark Council, 2023, available at: <https://www.southwark.gov.uk/environment/air-quality/what-we-re-doing/air-quality-strategies-plans-and-letters?chapter=2>

In 2022, the average PM<sub>10</sub> annual mean concentrations across all the monitoring stations in Southwark was 17 µg/m<sup>3</sup> which meet the national Air Quality Objective. This was a substantial reduction from the average 25 µg/m<sup>3</sup> in 2016<sup>186</sup> .

In 2022, the fine particular matter (new method concentrations of total PM<sub>2.5</sub>) was recorded 10.3 µg/m<sup>3</sup>. This data measures annual concentration of fine particulate matter at an area level, adjusted to account for population exposure. This was a reduction from 12.7 µg/m<sup>3</sup>.<sup>187</sup>

### Issues

- Transport contributes to the majority of pollution in the borough. This is particularly so, near large arterial roads throughout the borough and increased exposure to populations living within proximity to major roads, especially vulnerable groups such as children, the elderly and those with existing medical conditions. Air pollution has significant implications on health and life expectancy and is said to be the second largest contributor to deaths after smoking.
- Major hotspots for poor air quality are on the Transport for London Road Network, over which the borough has limited direct control. This reduces the borough's ability to improve air quality from vehicular traffic.
- Measures taken to reduce pollution, particularly targeting transport will have wider benefits to health, wellbeing and open spaces.

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<sup>186</sup> Air Quality Annual Status Report, Southwark Council, 2023, available at: <https://www.southwark.gov.uk/environment/air-quality/what-we-re-doing/air-quality-strategies-plans-and-letters?chapter=2>

<sup>187</sup> Southwark Air Quality Action Plan 2023-2027", Southwark Council, 2023, available at: <https://www.southwark.gov.uk/assets/attach/169719/Southwark-Air-Quality-Action-Plan-2023-to-2027.pdf>

## Transport

### Overview

#### Baseline indicators

The following indicators were used to characterise transportation in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Journey to work by mode <sup>192</sup>
	Frequency of Cycling as mode of transport in the borough <sup>193</sup>

#### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
1) Transportation patterns	Method of transportation
	Casualties
	Car ownership
2) Parking and Charging Points	Controlled Parking Zones
	Electric vehicles
3) Carbon Emissions	Transport-related CO <sup>2</sup>

#### Description

Southwark adopted its Movement Plan in 2019. This document is supported by the most recent Annual Monitoring Report to Delivering the Transport Plan which was published in December 2018. The Movement Plan has replaced Southwark's Transport Plan (2010). The objectives of the Movement Plan include encouraging sustainable travel choices and promoting active lifestyles, increasing the share of walking and cycling trips, reducing the number of casualties and reducing CO<sup>2</sup> emissions from road transport. With an increasing population and workforce in Southwark, it will be important that development contributes towards shaping sustainable travel choices, reducing pollution and improving safety in the future.

<sup>192</sup> LB Southwark, 'Annual Monitoring Report 2017/18: Delivering Southwark's Transport Plan: A summary of the progress made in achieving the targets set out in the Southwark Transport Plan 2011' (published December 2018)

<sup>193</sup> LB Southwark, 'Movement Plan 2019' (adopted April 2019)

## 1) Transportation patterns

### Reduction of people killed or seriously injured in road accidents

There has been a 32% decline in people killed and seriously injured on the streets and only a 1% increase in slight injuries 2005-2009 average baseline. However, we support Vision Zero principles that no number of deaths or serious injuries is acceptable and the ambition set out in the MTS of reducing fatalities and serious injuries on our streets to zero.

The number of casualties in which people are killed or seriously injured (KSI) appears to be decreasing and number of slight and all casualties has been stationary in recent years. Casualties are higher than the inner and greater London borough averages. The number of cyclist casualties is increasing in line with the growth in cycling.

In total of 5,325 casualties were recorded in Southwark between 2012 to 2016 including, there were 417 serious casualties and 26 fatalities. Of these serious and fatal accidents, 25% involved a powered two wheeler rider, 30% involved a cyclist and 33% involved a pedestrian. 36 HGVs are involved in 58% of fatalities in Southwark. Generally, young people from 20 to 29 are most at risk and the number of casualties decrease with increasing age. Young males aged 16 to 24 years old on motorcycles are the most at risk.<sup>195</sup>

### Frequency of Cycling as mode of transport

Since 2006, private motor vehicle trips have been decreasing as a percentage of the total trips and the percentage of trips on rail and the underground/DLR has increased. Percentage trips on foot and by bus have remained fairly stable. Cycling levels in the borough have increased from 3.3% (2008/11 average) to 4.3% (2009/12 average) which equates to an additional 10,200 trips by bike per day.

### Journey to work by mode

88% of traffic on our streets is cars and taxis, with the remaining 12% being buses, vans and larger vehicles. There has been no real change to these numbers since 2010. TfL estimate that delivery and servicing movements by Light Goods Vehicles (LGV) are expected to grow by 22% by 2031. We need to manage trips carefully to ensure that safety is not compromised for people walking, cycling and using public transport. Our first step must be to look to reducing competition for space on our kerbside by lowering the amount of individual freight trips in the borough.

- Rail – 8%
- Underground/DLR – 8%
- Bus/tram – 24%
- Taxi/other public – 1%
- Car/motorcycle – 23%
- Cycle – 4%
- Walking – 30%

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<sup>195</sup> LB Southwark, 'Movement Plan 2019' (adopted April 2019)

## Car ownership

Car ownership is static in the general population but for young people it is decreasing as is attainment of driving licenses. People are starting to drive later and drive less when they do start. It is likely that this behaviour will remain throughout their lives.

Southwark's transport strategy 2023 – 2030 set out the target to reduce the proportion of journeys by car from 21% to 13% by 2030. To achieve this, we need to be more ambitious than we currently are. Steps we plan to take include:

- Introducing a borough wide CPZ;
- Supporting car clubs models that reduce car ownership;
- Reviewing parking charges to charge most polluting vehicles more; and
- Ensuring consistency in parking restrictions on our streets or on our housing estates.

## 2) Parking and Charging Points

### Electric vehicles

Electric vehicles (EV's) are an important and growing part of the vehicle fleet. EV's are about 20% more efficient than petrol vehicles, but there is no guarantee that they will reduce pollution. As emissions from tailpipes decrease as vehicle technology improves, particulates from brake and tyre wear become more important to address as an issue.

### Controlled Parking Zones

At the end of 2018 there were 25 CPZs in Southwark, covering approximately 800 streets and 48% of the borough. This is low by London standards.

The ULEZ will cover the Congestion Charging Zone and come into effect from 2020. Subject to public consultation, ULEZ would set an emissions requirement for all types of vehicles entering central London with charges for noncompliance, discouraging all but the cleanest vehicles. The Mayor's Transport Emissions road map has identified an opportunity to apply the principles of the ULEZ in other areas of London. This could be in the form of Low Emission Neighbourhoods (LENS), which would be targeted in local hotspot areas of poor air quality.<sup>196</sup>

## 3) Carbon Emissions

### Transport-related carbon emissions

Drivers of reductions in transport-related CO2 emissions include the on-going long-term trend of vehicle fuel efficiency improvements driven by EU legislation, regional measures to drive modal shift, the decarbonisation of grid electricity and related incentives for electric vehicles and UK policy to increase the share of bio-fuel in transport fuel from 5 to 10% in the lead up to the 2020 renewables target<sup>197</sup>. The council already has a comprehensive focus on encouraging modal shift. This includes managing demand via car clubs, investing in cycling and walking infrastructure, cycle parking and working with public transport providers; encouraging sustainable travel choices through school and workplace travel plans and encouraging smarter driving to reduce emissions and improve air quality<sup>198</sup>.

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<sup>196</sup> Mayor of London, 'Ultra Low Emission Zone for London' (2019)

<sup>197</sup> Government Office for Science, 'Future of Mobility: Decarbonising road freight' (published February 2019)

<sup>198</sup> LB Southwark, 'Movement Plan 2019' (adopted April 2019)

## Issues

- There is a need to alleviate current and future capacity on trains, DLR, buses and local roads ongoing discussions regarding the Bakerloo Line Extension into our Old Kent Road regeneration area may support this.
- Parking is an on-going issue. There is a need to reduce parking as a disincentive to drive and subsequently alleviate congestion and improve air quality. This may include reviewing parking hours and parking associated with developments.
- There is a need to further encourage active modes of transport, particularly for local trips.
- There is a need to address road space conflicts between cyclists, pedestrians and motorists. This is particularly pertinent for 'pinch points' which have been identified through modelling.
- Locations of end of trip facilities such as bicycle parking and electric vehicle recharge points is also another issue given space constraints.

## Data Gaps and Updates

Whilst Census 2021 has a new data for Journey to Work by mode. However, Census 2021 took place during a national lockdown. People who were furloughed (about 5.6 million) were advised to answer the transport to work question based on their previous travel patterns before or during the pandemic. This means that the data does not accurately represent what they were doing on Census Day. Hence, this variable cannot be directly compared with the 2011 Census Travel to Work data.

## Biodiversity

### Overview

#### Baseline indicators

The following indicators were used to characterise biodiversity in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Number of SINC sites <sup>199</sup>
	Number of Local Nature Reserve Sites <sup>200</sup>
	Number of New Protected Sites <sup>201</sup>

#### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
1) Biodiversity monitoring	Wildlife recording <sup>202</sup>

#### Description

Southwark has a rich ecological resource with 516 hectares natural greenspace within the borough, including the Thames. Southwark has over 215 parks and open spaces. Of these sites 65 are designated as Sites of Importance for Nature Conservation (SINC) including 7 Local Nature Reserves (LNR's). Not all are publically accessible as railsides, golf courses, allotments and private land are included.

### Biodiversity monitoring

#### Number of Local Sites of Importance for Nature Conservation (SINCs) in Southwark

There are 65 SINC sites in Southwark, 5 are of Metropolitan Importance, 17 are of Borough Grade 1 importance, 22 are of Borough Grade II importance and 28 are of Local Importance. Saved Southwark Plan policy 3.28 protects SINC sites from inappropriate development and seeks enhancements for these sites. The New Southwark Plan proposes to revise the SINC designations of Borough Grade I and Borough Grade II to just Borough Importance.

#### Number of Local Nature Reserve Sites

Southwark has 7 Local Nature Reserves (LNR's) totalling 50.93ha, these are listed below.

- Sydenham Hill Wood
- Nunhead Cemetery
- Lavender Pond
- Dulwich Upper Wood
- One Tree Hill

<sup>199</sup> LB Southwark, 'Draft Biodiversity Action Plan 2020. Protecting Biodiversity and Making Nature Accessible for All' (in consultation 2019)

<sup>200</sup> *ibid*

<sup>201</sup> *ibid*

<sup>202</sup> *ibid*

- Stave Hill Ecological Park
- Russia Dock Woodland

### Number of New Protected Sites<sup>203</sup>

Biodiversity Net Gain is one of the key themes of the Biodiversity Action Plan (2019), and the creation of new protected sites designation allocated as part of the New Southwark Plan has identified **17 new sites** for designation as SINC's. This works towards the overarching environmental strategy for the UK (BAP) 'A green future' 25 Year Environmental Plan (DEFRA 2018) has been adopted and contains key targets for biodiversity including creating a Nature Recovery Network.

Habitat	By 2025	By 2050
Species-rich woodland	20 ha	200 ha
Flower-rich grassland	50 ha	250 ha
Rivers and streams	10 km	40 km
Reedbeds	5 ha	30 ha

Table 9: Habitat creation targets for London

### Wildlife Recording<sup>204</sup>

Understanding what species are present is important in managing habitats and measuring success. To enable individuals and groups to share wildlife sightings Southwark Council has an interactive mapping tool. See link.

<https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Wildlife%20sightings%20and%20reporting>

Citizen science can also contribute to recording specific species.

Southwark Council has a Service Level Agreement with the London Records Centre, Greenspace Information for Greater London CIC (GiGL).which provides up to date data on species and habitats and land designations.

### Issues

Southwark Council declared a climate emergency in March this year; this is inexorably linked to the biodiversity crisis. Creation of green infrastructure can help adaptation and to mitigate the impacts of climate change.

### Data Gaps and Updates

None identified.

<sup>203</sup> ibid

<sup>204</sup> ibid



## Open Spaces

### Overview

#### Baseline indicators

The following indicators were used to characterise open spaces in the borough and included in the sustainability appraisal framework.

Baseline indicators	
1) Provision of open space	Number of Open Spaces per 1,000 people <sup>205</sup>
	Provision of Public Parks per 1,000 people <sup>206</sup>
	Number of Allotments (Community gardens) <sup>207</sup>
2) Satisfaction with open space	Satisfaction with natural greenspace provision

#### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
3) Open space monitoring	Predicted impact of population growth on open space provision <sup>208</sup>
	Areas of Deficiency in access to nature <sup>209</sup>

### Description

Southwark is a borough that has a wealth of open space of different types including woodland, parks, community farms, Thames-side paths, and sports pitches. The survey of open spaces we prepared for our Open Space Strategy (2013) identified 215 open spaces in the borough which together comprise some 605.5 hectares of land, around 21% of the total land area in the borough. Around 58% are publically accessible.

#### 1) Provision of open space

##### Number of Open Spaces per 1,000 people

Southwark has many natural greenspaces and sites of importance for nature conservation. As with public parks, levels of greenspace vary in different areas of the borough. The borough's natural greenspace standard is 1.5 hectares per 1,000 population. Greenspace standards for each sub-area at present are as follows<sup>210</sup>:

<sup>205</sup> LB Southwark, 'Open Space Strategy' (adopted 2013)

<sup>206</sup> *ibid*

<sup>207</sup> *ibid*

<sup>208</sup> *ibid*

<sup>209</sup> *ibid*

<sup>210</sup> *ibid*

- Aylesbury and Walworth: 2.24 ha
- Bankside, Borough and London Bridge: 1.22 ha
- Bermondsey and Old Kent Road: 0.36 ha
- Camberwell: 0.47 ha
- Canada Water and Rotherhithe: 4.44 ha
- Dulwich: 4.23 ha
- Elephant and Castle: 0.38 ha
- Peckham and Nunhead: 1.92 ha.

### **Provision of Public Parks per 1,000 people<sup>211</sup>**

Open space provides essential habitats for plants and wildlife, in turn improving soil regeneration, water absorption and filtration. The Open Space strategy (2013) identified that there is a total of 0.85ha of park provision per 1,000 population. This is expected to fall to 0.72ha of park provision per 1,000 population in 2026, taking into account the projected increase in population of 54,000 people between 2011 and 2026. The residents' survey revealed that Southwark has a relatively high level of satisfaction with the current levels of provision and quality of open space. When combined with the results of the benchmarking exercise of open space provision in other London authorities, it is considered that a standard of 0.72ha per 1,000 population is realistic. The sub-areas which fall below the 0.72ha per 1,000 population, and should be prioritised for additional park provision, are:

- Bankside, Borough and London Bridge;
- Bermondsey and Old Kent Road;
- Camberwell; and
- Elephant and Castle

### **Number of Allotments (Community gardens)**

Our site surveys have shown that about 15.3 ha of land across the borough is used for allotments and a further 2.9 ha is used as community gardens. The vast majority of allotment provision is located in the south of the borough, with 8.5ha located in Dulwich and 5.9ha located in Peckham and Nunhead. By contrast, the majority of community gardens are located in the north of the borough. Canada water and Rotherhithe is the only area with no provision.

## **2) Satisfaction with open space**

### **Satisfaction with the quality of open space**

A telephone survey carried out with the Open Space Strategy (2013) suggested that most people consider the quality of open spaces to be either good or very good, with highest satisfaction levels for allotments (92%), large open spaces (86%) and the Thames Path (88%).

### **Satisfaction with natural greenspace provision**

The Open Space strategy (2013) identified that there is a total of 1.79ha of natural greenspace provision per 1,000 population. This is expected to fall to 1.51ha of park provision per 1,000 population in 2026, taking into account the projected increase in population of 54,000 people between 2011 and 2026. The residents' survey revealed that Southwark has a relatively high level of satisfaction with the current levels of provision natural greenspace and, as such, it is considered that a standard of 1.51ha per 1,000 population is realistic. The sub-areas which fall below the 1.51ha per 1,000 population, and should be prioritised for additional natural greenspace provision, are:

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<sup>211</sup> ibid

- Bankside, Borough and London Bridge;
- Bermondsey and Old Kent Road;
- Camberwell; and
- Elephant and Castle

### 3) Open space monitoring

#### Predicted impact of population growth on open space provision<sup>212</sup>

The purpose of the standards identified in the Open Space Strategy 2013 is to give adequate levels of provision for each type of open space within the borough based upon the existing needs and future needs of the borough up to 2026. All current figures are expected to decrease per population access to open space due to projected increase in population of 54,000 people between 2011 and 2026.

#### Areas of deficiency in access to nature<sup>213</sup>

The Open Space strategy identifies that all residents within the borough should have access to areas of formal and informal play provision for children and teenagers within 400m from home. Accessibility standards for different types of children's play provision should follow the GLA guidance as follows:

- small areas of play for younger children (maximum 100m walk);
- local facilities (maximum 400m walk); and
- larger equipped areas of play for older children (maximum 800m walk).<sup>214</sup>

Deficiency in access is quantified on a case-by-case basis and is therefore not possible to integrate into a baseline indicator.

#### Issues

- There is a clear need for additional allotment space to meet unmet demand. The Open Space Strategy identified at least 797 people on the waiting list for allotment spaces in the borough. At most sites, the waiting list is up to 10 years, although there may be a limited number of sites where waiting lists are around 1-2 years.
- The projected increase in population will result in diminishing access to public open space per 1,000 population, which will require minimising through designation of new open space.
- The NSP has already proposed an addition of 17 protected sites of open space and these figures will be continuously reviewed throughout the adoption of the plan.

#### Data Gaps and Updates

As population projections change, figures in the baseline data tables will change. The adequate levels of increase in public open space provision are dependent on the responsiveness of population projections as part of regeneration and growth in the borough.

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<sup>212</sup> *ibid*

<sup>213</sup> *ibid*

<sup>214</sup> *ibid*

## Soil Overview

### Baseline indicators

The following indicators were used to characterise soil and contaminated land in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Number of open space (hectares per 1,000 people)

### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
Site Contamination	Remediation of previously contaminated sites <sup>215</sup>
	Potentially contaminated sites <sup>216</sup>

## Description

### Number of Open Spaces per 1,000 people

Open space is an important habitat for plants and wildlife, which in turn promotes soil regeneration, and its water absorption and infiltration. Southwark has many natural greenspaces and sites of importance for nature conservation. As with public parks, levels of greenspace vary in different areas of the borough. The borough's natural greenspace standard is 1.5 hectares per 1,000 population. Greenspace standards for each sub-area at present are as follows<sup>217</sup>:

- Aylesbury and Walworth: 2.24 ha
- Bankside, Borough and London Bridge: 1.22 ha
- Bermondsey and Old Kent Road: 0.36 ha
- Camberwell: 0.47 ha
- Canada Water and Rotherhithe: 4.44 ha
- Dulwich: 4.23 ha
- Elephant and Castle: 0.38 ha
- Peckham and Nunhead: 1.92 ha.

### Contaminated Land Remediation of previously contaminated sites

<sup>215</sup> ibid

<sup>216</sup> ibid

<sup>217</sup> ibid

Southwark's approach to contamination can be found in our Contaminated Land Inspection Strategy (2012-2017). To date we have successfully effected contaminated land remediation via the planning system and by voluntary remediation. We have implemented a system of work which ensures that all historically contaminated or Brownfield sites are properly investigated and remediated, where required, with responsibility to properly address contamination found lying initially with the owner and or the developer of the site.

### **Potentially Contaminated sites**

In 2008/9, a total of 2016 potentially contaminated sites were identified in Southwark through examination of historic maps and other database.

From the 2016 sites identified, 1356 were found to be subject to sites uses that were considered non-polluting or low risk such as offices, dry goods warehouses, finish clothes manufacturing etc.

### **Issues**

The decline in the industrial sector began around the 1950's. Today, Southwark is fast becoming one of London's most regenerated Boroughs with large projects covering over 40% of the Borough taking place in over eleven areas. The breadth and pace at which regeneration and development are taking place within the borough is having the consequential effect that much of the industrial and potentially contaminated land within Southwark is being investigated and remediated as a matter of course, through the planning process.

### **Data Gaps and Updates**

None Identified.

## Flood risk, water resource and quality

### Overview

#### Baseline indicators

The following indicators were used to characterise flood risk, water resource and quality in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Domestic Water Demand across the entire borough, as a proxy measure of water consumption (expected) <sup>218</sup>
	Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence & water quality grounds <sup>219</sup> (to be updated)
	Quality of water at consumer's tap (zones) – against National Standards (number of tests failed) Thames Water Aggregated <sup>220</sup>

#### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
Flood Risk	Defenses against Thames Flooding <sup>221</sup>
	Surface Water Management <sup>222</sup>
Water Supply	Provider

### Description

#### Flood Risk

##### Defences against Thames flooding

Defences against Thames flooding is included in Southwark's Strategic Flood Risk Assessment (SFRA) and reflect policy from the Thames Catchment Flood Management Plan<sup>223</sup> and Thames Estuary 2100<sup>224</sup> will help manage flood risk from the Thames over the next 50 to 100 years. Whilst the Thames Barrier and flood walls along the riverside provide a degree of protection, consideration needs to be given to their potential failure or inability to contain very high floods as a result of climate change. Under the TE2100 plan, the recommended measures for defences within Southwark include:

<sup>218</sup> LB Southwark 'Old Kent Road Integrated Water Management Strategy (2018)' (published May 2018)<sup>219</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>219</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>220</sup> DEFRA, 'Drinking Water Inspectorate's Annual Report (DWI)', *Data summary tables for Thames Water (TMS)* <http://dwi.defra.gov.uk/about/annual-report/2018/company-data/tms.pdf> (published 11 July 2019)

<sup>221</sup> LB Southwark 'Strategic Flood Risk Assessment (January 2017)' (published January 2017)

<sup>222</sup> *ibid*

<sup>223</sup> Environment Agency 'Managing flood risk through London and the Thames Estuary (TE2100 Plan) November 2012' (published November 2012)

<sup>224</sup> Environment Agency 'Thames Catchment Flood Management Plan (summary report December 2009)' (published December 2009)

- An ongoing programme of inspection, maintenance, repair and replacement of defences;
- Raising of all flood defences by up to 0.5 m by 2065; and
- Raising of all flood defences by an additional 0.5 m by 2100. This allows for projected increases in sea level to 2135.

### **Surface Water Management**

The Council has undertaken a Surface Water Management Plan<sup>225</sup> for the whole borough which includes consideration of flooding from sewers, drains, groundwater and runoff from land, small watercourses and ditches that occurs as a result of heavy rainfall. Analysis of the number of properties at risk of flooding has been undertaken for the rainfall event with a 1 in 100 probability of occurrence in any given year (1% Annual Exceedance Probability, AEP). A review of the results demonstrate that 33,220 residential properties and 2,870 non-residential properties could be at risk of surface water flooding of greater than 0.03m depth during a rainfall event with a 1 in 200 annual chance of occurring. Of those, approximately 560 residential properties and 80 non-residential properties are estimated to be at risk of flooding to a depth of greater than 0.5m during the same modelled rainfall event.

The northern half of the borough is within the Thames flood plain, which contains over two thirds of Southwark's properties in well established communities. A large part of the borough is located within the indicative flood zone 3, which has the highest level of risk. The flood plain area also contains major regeneration and growth areas of importance to Southwark and London. However, it should be noted that all of the land in the borough is defended by the Thames Barrier and defences so that the risk from tidal flooding is a residual risk.

### **Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence & water quality grounds<sup>226</sup>**

For the financial year 2008/2009, no planning permissions were granted contrary to Environment Agency advice on flooding or water quality grounds, reflecting the borough's positive approach to protecting the flood plain from inappropriate development. A more up-to-date review of any planning permissions granted contrary to the advice of the Environment Agency will be submitted when the analysis is completed.

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<sup>225</sup> LB Southwark 'Strategic Flood Risk Assessment (January 2017)' (published January 2017)

<sup>226</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

## Water Demand

### Domestic Water Demand across the entire borough, as a proxy measure of water consumption (expected)<sup>227</sup>

To remain sustainable London needs to reduce the level of water consumption per person. Currently the average Londoner consumes 164 litres/day (l/d) around 20 l/d, which is above the national average of 150 l/d<sup>228</sup>. Projections for population growth in London and in the wider south-east will mean that new strategic water resources will be required. The need for this is exacerbated by the climate change predictions of more sporadic and intense rainfall and a higher likelihood of droughts, as well as the need to protect the water environment following Water Framework Directive requirements.

Baseline water consumption has been estimated by considering the modelled demand information supplied by Thames Water. The data included daily demands for each District Metered Areas (DMAs) within the OKR OA. No more borough-specific data could be found. Domestic demand was at 111.33 and non-domestic demand at 35.65 litres per day

### Water supply Provider

Thames Water currently supplies water to Southwark. Thirty-five per cent of the water Thames water supplies is pumped from natural underground reservoirs called aquifers. The other 65 per cent is pumped from rivers. However, the vast majority of river water is supplied from aquifers, making groundwater the most important source of water.

Currently, all mains water is treated to drinking standard. This is an expensive and energy intensive process, particularly considering that at least 40% of water consumed in homes and workplaces does not need to be of drinkable quality (for example water used for flushing toilets, washing laundry and watering parks and gardens). The current policy target for major housing development is to achieve a potable water use target of 105 litres per person per day.

### Quality of water at consumer's tap (zones) – against National Standards (number of tests failed) Thames Water Aggregated<sup>229</sup>

There is also increasing awareness and concern about micro-pollutants such as pharmaceuticals, micro-plastics, endocrine disruptors and metals. The Priority Substances Directive supplements the Water Framework Directive by establishing environmental quality standards for 'priority substances' and 'priority hazardous substances'. There are already targets in place for some substances, with future targets agreed for additional substances. This list of substances is updated periodically and there are a number of additional substances on the watch list for potential future inclusion.

These targets have been set by DEFRA and tested for the number of times that they fail (Thames Water aggregated).

## Issues

<sup>227</sup> LB Southwark 'Old Kent Road Integrated Water Management Strategy (2018)' (published May 2018)<sup>228</sup> Greater London Authority (GLA), New London Plan emerging 2019

<sup>228</sup> Greater London Authority (GLA), New London Plan emerging 2019

<sup>229</sup> DEFRA, 'Drinking Water Inspectorate's Annual Report (DWI)', *Data summary tables for Thames Water (TMS)* <http://dwi.defra.gov.uk/about/annual-report/2018/company-data/tms.pdf> (published 11 July 2019)



The discrepancy between Southwark's maintenance target for water demand at 105 litres per day and what is currently being achieved from the study at 111.35 litres per day.

#### **Data Gaps and Updates**

- Water demand in Southwark was most recently modelled in regard to the Old Kent Road Opportunity Area<sup>230</sup>
- The baseline data does not yet exist for the entire borough but is an average of the entire opportunity area
- More detailed analysis will be required at a later stage in each growth area in order to determine the exact volumes, and detailed design of the required infrastructure undertaken
- A more up-to-date review of any planning permissions granted contrary to the advice of the Environment Agency on flood defence and water quality grounds will be submitted when the analysis is completed
- Water quality is aggregated to Thames Water source, therefore not taking into consideration private providers or issues that may arise specific to the transportation of water to Southwark's homes.

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<sup>230</sup> LB Southwark 'Old Kent Road Integrated Water Management Strategy (2018)' (published May2018)

## Waste Overview

### Baseline indicators

The following indicators were used to characterise waste in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Recycling and composting rate (%) <sup>231</sup>
	Amount of municipal waste diverted from landfill (recovery rate %) <sup>232</sup>
	Total household waste collected (tonnes) <sup>233</sup>

### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
Waste Processing	London Plan targets for waste processing <sup>234</sup>
	Targets of the Southwark waste management strategy 2003-2021 <sup>235</sup>
	Integrated Waste Management Facility (IWMF) <sup>236</sup>

## Description

### Waste processing

#### London Plan targets for waste processing

Government has set targets for local authorities to increase recycling rates and reduce the amount of waste going to landfill. The Mayor has also set waste targets for the borough through the London Plan including the need to allocate enough land to process at least 243,000 tonnes (municipal as well as commercial) of waste by 2016, at least 275,000 tonnes by 2021 and at least 343,000 tonnes of waste by 2031. This will help meet the London-wide target of processing at least 85% of the city's waste within London by 2020.

<sup>231</sup> LB Southwark 'Waste Management Strategy 2003-2021' (published 2003)

<sup>232</sup> *ibid*

<sup>233</sup> *ibid*

<sup>234</sup> Greater London Authority (GLA), New London Plan emerging 2019

<sup>235</sup> LB Southwark 'Waste Management Strategy 2003-2021' (published 2003)

<sup>236</sup> *ibid*

**Total household waste collected (tonnes)<sup>237</sup>, Recycling and composting rate (%)<sup>238</sup> and Amount of municipal waste diverted from landfill (recovery rate %)<sup>239</sup>**

The table below sets out the figures related to waste processing in Southwark between 2010/2011 and 2014/2015.

	2010/11	2011/12	2012/13	2013/14	2014/15
Total household waste collected (tonnes)	110,236	106,121	111,081	116,663	118,814
Recycling and composting rate (%)	25.14%	27.43%	30.41%	34.30%	34.58%
Amount of municipal waste diverted from landfill (recovery rate %)	63.34%	79.65%	69.49%	86.40%	95.29%

Source: Waste strategy and Policy – Targets and Performance

**Total household waste collected (tonnes)**

Total tonnes of household waste collected in 2014/15 were 118,814. This increase in waste is related to the increase in population. Targets of the Southwark waste management strategy 2003-2021 was that a reduction in the amount of municipal solid waste generated in Southwark to below 3% by 2005, and below 2% by 2010. In real terms, due to population growth the absolute amount of waste will rise but the strategy aims to deliver a decrease in the actual rate of growth.

**Recycling and composting rate (%)**

Most recent figures suggest that 34.58% was the recycling and composting rate in 2014/15. Targets of the Southwark waste management strategy 2003-2021 was that an achievement of 30% recycling and composting standards for household waste by 2010-11 and 40% by 2015-16 and 50% standards by 2020-21.

**Amount of municipal waste diverted from landfill (recovery rate %)**

Most recent calculations suggest that 95.29% of municipal waste was diverted from landfill in 2014/15. Targets of the Southwark waste management strategy 2003-2021 was that a recovery of value from 45% of municipal solid waste by 2010-11, 67% by 2015-16 and 75% by 2020-21.

<sup>237</sup> *ibid*

<sup>238</sup> LB Southwark 'Waste Management Strategy 2003-2021' (published 2003)

<sup>239</sup> *ibid*

## **Integrated Waste Management Facility (IWMMF)**

Southwark is involved in a joint partnership to meet waste apportionment targets called the South East London Waste Joint Waste Partnership Group. Members of the group pool their apportionment requirements, allowing them collectively to meet their aggregated apportionment total is met. This is acceptable under the London Plan 2016 as boroughs are not required to meet either the municipal or commercial/industrial apportionment figures individually.

The IWMMF has current actual throughput of 173,000 tonnes per annum (excluding the waste transfer and household waste reuse and recycling functions (2017 figure)). The proportion of the IWMMF's waste processing capacity which contributes to the borough's apportionment target is, at 2016, 104,850 tonnes per annum (tpa). The borough's prescribed apportionment target is 172,000tpa, representing a shortfall of 67,150tpa in throughput capacity. According to the London Plan 2016, in 2036 the borough is required to have the capacity to meet an apportionment target of 247,000tpa. Where the modelled capacity of the IWMMF at 2036 is 111,150tpa, there is an anticipated shortfall of 135,850tpa.

### **Issues**

No issues are identified

### **Data Gaps and Updates**

No data gaps are identified

## Noise Overview

### Baseline indicators

The following indicators were used to characterise noise monitoring in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	The rate of complaints about noise <sup>240</sup>

### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
Harm Caused by Noise	The percentage of the population exposed to road, rail and air transport noise of 65dB(A) or more, during the daytime <sup>241</sup>
	The percentage of the population exposed to road, rail and air transport noise of 65dB(A) or more, during the daytime <sup>242</sup>

## Description

### Noise Complaints

The rate of complaints about noise in Southwark is 18.7 per 1000<sup>243</sup> in 2015/16. This has been decreasing in recent years however is worse than both the London and National Average

### Issues

No issues

### Data Gaps and Updates

No data gaps

<sup>240</sup> Public Health England, 'Wider Determinants of Health' <https://fingertips.phe.org.uk/profile/wider-determinants/data#page/1/gid/1938133043/pat/6/par/E12000007/ati/102/are/E09000028> (accessed 29 November 2019)

<sup>241</sup> *ibid*

<sup>242</sup> *ibid*

<sup>243</sup> *ibid*

## Play facilities

### Overview

#### Baseline indicators

The following indicators were used to characterise play facilities in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Number of open spaces with play facilities <sup>244</sup>
	Level of satisfaction with children's play facilities <sup>245</sup>

#### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
Play characteristics	Current participation rates in play <sup>246</sup>

#### Description

Open space provides an important role in serving children's play needs. It is widely acknowledged that the importance of children's play extends far beyond the activity itself. Play contributes towards child development through the development of a wide range of physical, social and emotional skills and abilities as well as having a positive impact on children's health. The Southwark Playing Pitch Strategy 2016, Southwark Physical and Activity and Sport Strategy (2014-2017), Southwark Health and Wellbeing Strategy (2015-2020) and Southwark Open Space Strategy (2013) inform policies for play facilities in the New Southwark Plan.

#### Current participation rates in play

The current participation rates indicate that 36.5% of adults (16+) participate in once a week sports, which is lower than the London average (37.4%) This has dropped in recent years from 40.4% in 2010/11.

#### Number of open spaces with play facilities

There are currently 78 open spaces that include some form of dedicated children's play provision, although there are a range of other amenity spaces which also include open space. Children need to be able to access play provision close to their home. Children find it difficult to travel long distances to use play areas, particularly if they have to cross busy roads. Lack of access to open space nearby, can mean that children have to rely on being supervised by parents or carers, which restricts a child's freedom to play.

<sup>244</sup> LB Southwark, 'Open Space Strategy' (adopted 2013)

<sup>245</sup> LB Southwark 'Playing Pitch Strategy' (published January 2016)

<sup>246</sup> LB Southwark 'Southwark Physical and Activity and Sport Strategy (2014-2017)' (published 2014)

**Level of satisfaction with Children's play facilities**

The telephone survey carried out with the Open Space Strategy (2013) suggested that over 80% of respondents consider the quality of children's play space in the borough to be good or very good. The increase in population expected over the coming years will put pressure on the supply of children's playspace and it will be important to ensure that adequate provision for playspace is made with new developments.

**Issues**

No issues are identified.

**Data Gaps and Updates**

No data gaps are identified

## Quality in Design and Conservation of Historic Environment

### Overview

#### Baseline indicators

The following indicators were used to characterise quality in design and conservation of the historic environment in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Number of Historic environment assets (Conservation areas, listed buildings and monuments, and Archaeological Priority Zones) <sup>247</sup>

#### Contextual characteristics

No further contextual characteristics of the borough are included in this section.

### Description

#### Number of Historic environment assets (Conservation areas, listed buildings and monuments, and Archaeological Priority Zones)

Throughout the borough there are many attractive and historic buildings, monuments and sites that reflect Southwark's rich history and add to the unique character and identity of places. We currently have 45 conservation areas and around 2,200 listed buildings and monuments. The Tower of London, a World Heritage Site, is located across the river from London Bridge. There are also archaeological remains that cannot be seen that provide important evidence of our past. We have identified 6 Archaeological Priority Zones (APZs).

#### Issues

Protecting and enhancing the character and historic value of places are important issues to be considered in the future growth and regeneration of the borough. Well designed buildings and spaces will help improve people's quality of life and make places more attractive. This can also help attract businesses to the area. It is important that the design of a development is carefully thought through and takes into account how the development is part of a wider place and how a place's uniqueness and historic value can be used to stimulate regeneration and improvements.

#### Data Gaps and Updates

No data gaps are identified.

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<sup>247</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)



## Conclusion

Only the baseline indicators have been selected for monitoring, as indicated and summarised in the following section.





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Integrated Impact Assessment Appendices

**Appendix 4: Sustainability Appraisal Framework**

Old Kent Road Area Action Plan 2024 Integrated Impact Assessment: Document Locator	
No.	Title
Appendix 1	SEA Directive Requirement
Appendix 2	Relevant Plans, Programmes and Strategies
Appendix 3	Baseline Data – Facts and Figures
Appendix 4	Sustainability Appraisal Framework
Appendix 5	Assessment of the Strategy and Vision
Appendix 6	Assessment of the Strategic and Development Management Policies
Appendix 7	Assessment of the Sub Areas and Site Allocations
Appendix 8	Monitoring Indicators against Sustainability Objectives
Appendix 9	Baseline Indicators Table
Appendix 10	Options Testing
Appendix 11	Scoping Report Consultation Summary and link to OKR AAP Scoping Report
Appendix 12	Reasonable Alternatives Considered
Appendix 13	Mental Well-being Impact Assessment Screening
Appendix 14	OKR AAP References

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## Appendix 4 – Sustainability Appraisal Framework

The following section sets out the appraisal framework for each sustainability objective by providing a list of prompt questions, which are used to elaborate the desired outcomes of achieving the objective and thus guide the assessment of policies set out in Old Kent Road Area Action Plan. To review the policies after they are implemented, a set of indicators are proposed in the right column to serve as the proxy measures for each objective's outcome.

IIA Objective	Prompt questions	Indicators/targets to monitor the effectiveness of the policy
<p><b>IIA01</b></p> <p>To tackle poverty and encourage wealth creation</p>	<ul style="list-style-type: none"> <li>&gt; Will it improve the range of job opportunities for all people?</li> <li>&gt; Will it help to diversify the economy?</li> <li>&gt; Will it increase the number of higher paid jobs in the borough?</li> <li>&gt; Will it help reduce overall unemployment, particularly long-term unemployment?</li> <li>&gt; Will it encourage the retention and / or growth of local employment and training opportunities in the most deprived areas?</li> <li>&gt; Will it assist in providing land and buildings of a type required by businesses, for a range of employment uses?</li> <li>&gt; Will it reduce poverty in those areas and communities / equalities groups most affected?</li> <li>&gt; Will it improve access to low-cost transport and other facilities?</li> <li>&gt; Will it provide for successful neighbourhoods for all?</li> <li>&gt; Will it promote and enable tourism opportunities to be exploited, and employment created?</li> <li>&gt; Will it result in a loss of employment land?</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Increase</b> number of employee jobs</li> <li>• <b>Increase</b> number of micro and small-to-medium sized enterprises</li> <li>• <b>Decrease</b> percentage of unemployed population</li> <li>• <b>Decrease</b> primary shopping frontage vacancy rates</li> <li>• <b>Decrease</b> secondary shopping frontage vacancy rates</li> </ul>
<p><b>IIA02</b></p> <p>To improve the education and skill of the population</p>	<ul style="list-style-type: none"> <li>&gt; Will it provide opportunities to improve the skills and qualifications of the population, particularly for young people and adults?</li> <li>&gt; Will it help improve employee education / training programmes?</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Increase</b> primary school places in accordance with the demand projections</li> <li>• <b>Increase</b> early education places in accordance with the demand projections</li> </ul>

	> Will it help reduce skills shortages?	<ul style="list-style-type: none"> <li>• <b>Increase</b> the proportion and number of residents who attain an NVQ4 or above</li> <li>• <b>Reduce</b> the proportion and number of residents with no qualification</li> <li>• <b>Reduce</b> the number and proportion of 16-17 years old not in education, employment or training</li> </ul>
<b>IIA03</b>		
To improve the health of the population	> Will it promote and facilitate healthy living and active lifestyles amongst different groups?	<ul style="list-style-type: none"> <li>• <b>Increase</b> life expectancy at birth for males and females</li> <li>• <b>Reduce</b> the level of health deprivation and disability</li> <li>• <b>Increase</b> the percentage of adult carers who have as much social contact as they would like (as a proxy measure of social isolation)</li> <li>• <b>Increase</b> percentage of physically active adults</li> <li>• <b>Reduce</b> the number of excess winter deaths</li> <li>• <b>Reduce</b> the fraction of mortality attributable to particulate air pollution</li> <li>• <b>Higher</b> utilisation of outdoor space for exercise/health reasons</li> <li>• <b>Reduce</b> the number of reception year children: prevalence of overweight (including obesity)</li> <li>• <b>Reduce</b> the number of year 6 children: prevalence of overweight (including obesity)</li> <li>• <b>Increase</b> the percentage of people with high or very high life satisfaction</li> </ul>
	> Will it improve access to health and social care / treatment for all sectors of the community?	
	> Will it maintain, enhance and create green infrastructure assets (e.g. green space, woodlands, recreation and sports facilities and allotments) for recreation, exercise and access to locally produced food?	
	> Will it improve access to jobs for all and otherwise reduce poverty?	
	> Will it encourage a range and mix of land uses that underpin local health; for example avoiding over concentration of hot food takeaways in one location?	
	> Will it reduce the prevalence of takeaways near schools?	
	> Will it help improve mental and emotional health, reducing social exclusion?	
	> Will it promote non-polluting forms of transport?	
	> Will it reduce exposure to poor air quality across all groups?	
<b>IIA04</b>		
To reduce the incidence of crime and the fear of crime	> Will it improve safety and security?	<ul style="list-style-type: none"> <li>• <b>Reduce</b> the level of crime deprivation</li> <li>• <b>Reduce</b> Crime rate per 1000 of the population for key offences including burglary</li> <li>• Local perception of safety and crime (available when Social Research for Southwark's <b>Social Regeneration Charter</b> is published)</li> </ul>
	> Will it incorporate measures to reduce crime and the fear of crime, including anti-social behaviour?	
	> Will it provide for a well maintained and inclusive public realm and other public facilities?	
	> Will it encourage an active and connected, strong and cohesive community?	

IIA05		
To promote social inclusion, equality, diversity and community cohesion	> Will it help support the voluntary and community sectors?	<ul style="list-style-type: none"> <li>• <b>Improve</b> the borough's relative ranking for the indices of multiple deprivations</li> <li>• <b>Decrease</b> the percentage of children living in deprived households</li> <li>• <b>Decrease</b> the percentage of older persons living in deprived households</li> <li>• <b>Reduce</b> the gap in pay inequality</li> <li>• <b>Increase</b> the percentage of adult carers who have as much social contact as they would like (as a proxy measure of social isolation)</li> <li>• Perceptions of neighbourliness and how well local people get on well together</li> <li>• Local perception of the ability to have their voice heard and influence decisions</li> </ul>
	> Will it support active community engagement?	
	> Will it support a diversity of lifestyles and communities?	
	> Will it promote accessibility for those people who are elderly or disabled?	
	> Will it improve access to low-cost transport and other facilities?	
	> Will it help sustain the provision of community facilities and open space that meets local needs?	
	> Will it facilitate the connection of existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?	
	> How will different groups of people be affected by the option or policy - including black and minority ethnic communities, women, disabled people, lesbians, gay men, bisexual and transgender people, children and faith groups? Will it benefit the groups listed above?	
IIA06		
To mitigate impacts of and adapt to climate change	> Will it reduce CO2 and other greenhouse gas emissions?	<ul style="list-style-type: none"> <li>• <b>Decrease</b> energy consumption by sector (Domestic and Industry/commerce)</li> <li>• <b>Decrease</b> domestic consumption per capita of natural gas</li> <li>• <b>Decrease</b> domestic consumption per capita of electricity</li> <li>• <b>Decrease</b> local carbon dioxide emissions</li> <li>• <b>Decrease</b> the number of households experiencing fuel poverty</li> <li>• <b>Increase</b> recycling and composting rate (%)</li> </ul>
	> Will it reduce consumption of energy?	
	> Will it use renewable sources of energy?	
	> Will it help local people cope with hotter/drier summers and warmer wetter winters?	
	> Will it mitigate the urban heat island effect?	
	> Will it encourage the re-use of resources?	
	> Will it encourage water efficiency and drought resilience?	
IIA07		
To improve the air quality of Old Kent Road	> Will it improve air quality?	<ul style="list-style-type: none"> <li>• <b>Decrease</b> concentration level of NO2, PM2.5 and PM10</li> <li>• <b>Decrease</b> percentage population exposed to levels</li> </ul>
	> Will it help to reduce emissions of PM10, PM2.5, NO2?	
	> Will it help reduce concentration levels of PM10, PM2.5	

	and NO <sub>2</sub> ? > Will it minimise construction impacts such as dust, noise, vibration and odours? > Will it encourage a reduction in amount and length of journeys made by car thus generating lower emissions overall?	of NO <sub>2</sub> above the annual average objective limits <ul style="list-style-type: none"> <li>• <b>Increase</b> frequency of cycling as mode of transport in the borough</li> <li>• <b>Decrease</b> number of private vehicles (cars/ motorcycles) used as a journey to work by mode</li> </ul>
<b>IIA08</b>		
To avoid waste and maximise, reuse or recycle waste arising as a resource	> Will it promote the reduction of waste during construction / operation? > Will it minimise the production of household and commercial waste? > Will it promote sustainable processing of waste?	<ul style="list-style-type: none"> <li>• <b>Increase</b> the amount of municipal waste diverted from landfill (recovery rate %)</li> <li>• <b>Increase</b> the recycling and composting rate (%)</li> <li>• <b>Increase</b> the number of buildings connected to SELCHP</li> </ul>
<b>IIA09</b>		
To encourage sustainable use of water resources	> Will it result in a net decrease in the demand for water and foul sewage disposal? > Will it encourage reuse of water?	<ul style="list-style-type: none"> <li>• <b>Increase</b> the quality of water at consumer's tap (zones) – against National Standards (number of tests failed)</li> <li>• <b>Reduce</b> domestic water demand (litres per person per day) as a proxy for Water consumption across the entire borough</li> </ul>
<b>IIA10</b>		
To maintain and enhance the quality of land and soil	> Will it result in the loss of open or previously undeveloped land? > Will it promote re-use of previously developed land and buildings? > Will it use land effectively and efficiently, including mixed use and higher density development? > Will it encourage the remediation of land identified as potentially contaminated? > Will it prevent further contamination of soils? > Will it improve soil quality?	<ul style="list-style-type: none"> <li>• <b>Increase</b> the number of open space (hectares per 1,000 people)</li> </ul>
<b>IIA11</b>		
To protect and enhance quality of landscape and townscape	> Will it conserve and enhance local landscape and townscape character and visual amenity? > Will it improve the relationship between different buildings, streets, parks and waterways and other spaces that make up the townscape character?	<ul style="list-style-type: none"> <li>• <b>Maintain</b> the number of historic environment assets</li> <li>• <b>Decrease</b> the percentage of takeaway outlets within a walking distance (400m) of a secondary school</li> <li>• <b>Decrease</b> primary shopping frontage vacancy rates</li> <li>• <b>Decrease</b> secondary shopping frontage vacancy</li> </ul>



	<p>&gt; Will it have a negative impact on important strategic/local views?</p>	<p>rates</p> <ul style="list-style-type: none"> <li>• <b>Increase</b> the number of open spaces per 1,000 people</li> <li>• <b>Increase</b> the hectares per 1,000 people of open spaces</li> <li>• <b>Increase</b> provision of public parks per 1,000 people</li> <li>• <b>Increase</b> publically accessible open space by area</li> <li>• <b>Increase</b> satisfaction with natural greenspace provision</li> <li>• <b>Decrease</b> the rate of complaints about noise</li> </ul>
	<p>&gt; Will it incorporate sustainable design and construction techniques?</p>	
<b>IIA12</b>		
To conserve and enhance the historic environment and cultural assets	<p>&gt; Will it protect, maintain and enhance the condition and setting of features and areas of cultural, historical and archaeological heritage in the environment?</p>	<ul style="list-style-type: none"> <li>• <b>Maintain</b> the number of historic environment assets</li> <li>• <b>Increase</b> the number of open spaces per 1,000 people</li> <li>• <b>Increase</b> the hectares per 1,000 people of open spaces</li> <li>• <b>Increase</b> provision of public parks per 1,000 people</li> <li>• <b>Increase</b> publically accessible open space by area</li> <li>• <b>Increase</b> satisfaction with natural greenspace provision</li> <li>• <b>Increase</b> the number of allotments (community gardens)</li> <li>• <b>Reduce</b> the number of people on the waiting list for allotment spaces in the borough</li> <li>• <b>Increase</b> number of open spaces with play facilities</li> <li>• <b>Increase</b> level of satisfaction with children's play facilities</li> <li>• <b>Decrease</b> the rate of complaints about noise</li> </ul>
	<p>&gt; Will it promote the historic environment and also contribute to better understanding of the historic environment?</p>	
	<p>&gt; Will it promote high quality design and sustainable construction?</p>	
	<p>&gt; Will it respect visual amenity and the spatial diversity of communities?</p>	
	<p>&gt; Will it maintain or increase access to leisure, sporting, cultural and arts destinations and facilities?</p>	
	<p>&gt; Will it improve leisure, sporting, cultural and arts provision?</p>	
<b>IIA13</b>		
To protect and enhance open spaces, green corridors and biodiversity	<p>&gt; Will it encourage development on previously developed land?</p>	<ul style="list-style-type: none"> <li>• <b>Increase</b> the number of open spaces per 1,000 people</li> <li>• <b>Increase</b> the hectares per 1,000 people of Open spaces</li> <li>• <b>Increase</b> provision of public parks per 1,000 people</li> </ul>
	<p>&gt; Will it improve the quality and access to open spaces in areas of deficiency?</p>	
	<p>&gt; Will it provide a range of play spaces for children and young people?</p>	

	<p>&gt; Will it maintain, enhance and create green infrastructure assets and networks (e.g. green space, woodlands, public rights of way, open recreation and sports recreation and sports facilities) across the area?</p> <p>&gt; Will it help protect and improve biodiversity in the area overall and in particular avoid harm to species and habitats protected by International and UK law?</p> <p>&gt; Will it protect and enhance natural habitats and protect priority species?</p> <p>&gt; Will it encourage the creation of new habitats, including through the provision of additional open space and green roofs?</p> <p>&gt; Will it help achieve the Biodiversity Action Plan (BAP) targets?</p> <p>&gt; Will it protect and provide opportunities for creating / enhancing / improving sites designated for their nature conservation value / geo-diversity level (local and national levels?)</p>	<ul style="list-style-type: none"> <li>• <b>Increase</b> publically accessible open space by area</li> <li>• <b>Increase</b> satisfaction with natural greenspace provision</li> <li>• <b>Increase</b> the number of allotments (community gardens)</li> <li>• <b>Reduce</b> the number of people on the waiting list for allotment spaces in the borough</li> <li>• <b>Decrease</b> the rate of complaints about noise</li> </ul>
<b>IIA14</b>		
To reduce vulnerability to flooding	<p>&gt; Will the development be an area at risk of flooding?</p> <p>&gt; Will it minimise the risk of and from flooding to people and property?</p> <p>&gt; Will it protect and improve flood defences and allow them to be maintained?</p> <p>&gt; Will it promote the use of sustainable urban drainage systems?</p>	<ul style="list-style-type: none"> <li>• <b>Reduce</b> the number of planning permissions granted contrary to the advice of the Environment Agency on flood defence &amp; water quality grounds</li> </ul>
<b>IIA15</b>		
To provide everyone with the opportunity to live in a decent home	<p>&gt; Will it improve the supply of housing?</p> <p>&gt; Will it contribute towards increasing the range of housing mix, sizes, tenures and affordability to meet the identified current and future needs of all social groups and local residents, including older households?</p> <p>&gt; Will it deliver 'healthy homes'? (e.g. in relation to warmth, overcrowding, noise and mental health?)</p> <p>&gt; Will it improve the quality of housing for all?</p>	<ul style="list-style-type: none"> <li>• <b>Contribute</b> towards the delivery of 2,932 additional homes in Southwark annually as informed by SHMA 2019</li> <li>• <b>Contribute</b> towards the provision of 2,077 net affordable homes in Southwark annually as informed by SHMA 2019</li> <li>• <b>Increase</b> delivery family-sized social housing tenure</li> <li>• <b>Reduce</b> the number of overcrowded households</li> </ul>

	> Will it improve overall design quality, including flexibility of stock to enable it to evolve to meet changing needs?	
<b>IIA16</b>		
To promote sustainable transport and minimise the need to travel by car	> Will it encourage development at locations that enable walking, cycling and / or the use of public transport and connected to local services and facilities?	<ul style="list-style-type: none"> <li>• <b>Reduce</b> the number of private vehicles used as journey to work by mode</li> <li>• <b>Increase</b> the frequency of cycling as mode of transport</li> <li>• <b>Increase</b> the coverage of controlled parking zones (CPZs)</li> <li>• <b>Reduce</b> the number of casualties</li> </ul>
	> Will it reduce car use?	
	> Will it reduce the number and length of journeys undertaken by car?	
	> Will it reduce road traffic accidents?	
	> Will it improve public transport?	
	> Will it promote walking and cycling?	
	> Will it allow people with mobility problems or a disability to access buildings and places?	
> Will it improve connections across the area to local services, facilities, places of employment and green infrastructure?		
<b>IIA17</b>		
To provide the necessary infrastructure to support existing and future development	> Will it provide enough social infrastructure and meet local needs?	<ul style="list-style-type: none"> <li>• A combination of above indicators used to measure are covered elsewhere</li> </ul>
	> Does the proposal explore opportunities for shared community use and co-location of services?	
	> Will it provide enough physical infrastructure?	
	> Will it provide enough green infrastructure?	

## Old Kent Road Area Action Plan

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### Integrated Impact Assessment Appendices

## Appendix 5: Assessment of the Strategy

<b>Old Kent Road Area Action Plan 2024 Integrated Impact Assessment: Document Locator</b>	
<b>No.</b>	<b>Title</b>
Appendix 1	SEA Directive Requirement
Appendix 2	Relevant Plans, Programmes and Strategies
Appendix 3	Baseline Data – Facts and Figures
Appendix 4	Sustainability Appraisal Framework
<b>Appendix 5</b>	<b>Assessment of the Strategy</b>
Appendix 6	Assessment of the Development Management Policies
Appendix 7	Assessment of the Sub Areas and Site Allocations
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## Appendix 5: Assessment of the Strategy

The following tables set out the sustainability impacts of the Old Kent Road AAP Strategy (which comprises the 'Vision', the 'Delivery' and the 'Plan Objectives'). These three strands of the Strategy are each appraised against 17 sustainability objectives (the "IIAOs"), encompassing economic, social and environmental aspects. Each objective is measured on a scoring scale (Key 1), with each grade assigned a numeric value, symbol and colour. Alongside the scoring, a detailed commentary on the item is provided.

### Key 1: Individual scoring against each objective

Symbol and colour	Scoring Value (%)	Score	Description
✓✓	100	Major or direct positive	The proposed option/policy contributes significantly to the achievement of the objective.
✓	50	Minor or indirect positive	The proposed option/policy contributes to the achievement of the objective but not significantly or indirectly.
-	0	Neutral	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
x	-50	Minor or indirect negative	The proposed option/policy detracts from the achievement of the objective but not significantly.
xx	-100	Major or direct negative	The proposed option/policy detracts significantly from the achievement of the objective.
?	N/A	Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.

At the bottom of the table, there is an averaged scoring of the 17 objectives to indicate each element's overall efficacy in meeting the sustainability objectives. The colour bar below (key 2) divides the overall scoring into three categories from positive, neutral to negative.

### Key 2: Averaged IIA objectives scoring for each element of the Strategy

Negative	Neutral	Positive
< 10 %	10 - 49%	50 - 100%

## Summary of the sustainability assessment for the Strategy

The Strategy comprises:

- the Vision;
- the Delivery and Funding; and
- the Plan Objectives.

The summary table is provided below. On the pages following the summary table is a series of three tables, one for each element of the Strategy, providing the detailed sustainability appraisal.

IIAO	Vision	Delivery and Funding	Plan Objectives
IIAO 1	✓✓	✓	✓✓
IIAO 2	✓✓	✓	✓✓
IIAO 3	✓✓	✓	✓✓
IIAO 4	✓	✓	-
IIAO 5	✓	✓	✓✓
IIAO 6	✓	✓✓	✓✓
IIAO 7	✓	✓✓	✓✓
IIAO 8	-	-	-
IIAO 9	-	-	-
IIAO 10	✓✓	-	-
IIAO 11	✓✓	-	✓✓
IIAO 12	✓✓	✓	✓✓
IIAO 13	✓✓	✓✓	✓✓
IIAO 14	-	-	-
IIAO 15	✓✓	✓✓	✓✓
IIAO 16	✓✓	✓✓	✓✓
IIAO 17	✓✓	✓	✓✓
<b>Averaged Scoring</b>	<b>71</b>	<b>50</b>	<b>71</b>
<b>Efficacy Category</b>	<b>Positive</b>	<b>Positive</b>	<b>Positive</b>

Vision							
IIA Objective	Description	Averaged Grading	Sub Grading	Timescales			Commentary
				S	M	L	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	-	✓✓	✓✓	Doubling the number of jobs in the area would create more employment opportunities overall. Increasing the range of different types of employment spaces and jobs across retail, office, creative, life sciences and industrial sectors would enable more local people to be able to access these opportunities. Sustaining existing business networks in the area would underpin this diversity and reduce relocations from the area so travelling to existing jobs remains convenient for local people. Supporting delivery of the Bakerloo Line Upgrade and Extension would speed up the delivery of employment and wealth creation. Creating more accessible town centre would encourage people into these locations to spend money in businesses, helping support the local business ecosystem, while also make services more readily available to all sections of society not least the socioeconomically disadvantaged.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	-	✓	✓✓	Creating an environment for people to fulfil their potential would encourage the uptake of education and training opportunities. Two new primary schools, the expansion of existing primary schools and a new secondary school would increase the educational options for local children and young people. A network of arts and cultural facilities for continuous learning would offer development opportunities amongst the adult population. Attract a higher education institution to the area would bring a range of direct or indirect educational and training opportunities closer to local people and support the citywide educational offer.
IIAO 3	To improve the health of the population	✓✓	✓✓	-	✓	✓✓	Promoting physical activity and social interaction would help deliver key health priorities of tackling obesity and associated diseases, poor mental health and social isolation. Creating mixed use, higher density, car free and walkable development would encourage both physical activity and social interaction, as would making sports, arts and leisure facilities in schools available to local people. A new town centre with leisure, entertainment, recreation and play facilities available at a range of time would improve the convenience of pursuing healthy behaviours. Co-location of schools and older people's accommodation could benefit the health and wellbeing of children and older people in particular. A new community health hub focused on health improvement as well as essential primary care services would help prevent poor health and encourage wellbeing.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	-	✓	✓	Creating an environment where people feel safe to walk would help decrease the fear of crime and opportunities for crime. A new town centre and mixed use neighbourhoods would encourage development with more active frontages and overlooking of public spaces and walking routes.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	?	✓	✓	With an overarching goal to benefit existing communities, the Vision --and by extension the AAP as a whole-- would support inclusion of existing residents, the diversity of people among existing communities and cohesion between existing residents and newcomers to the area. 7,000 new affordable homes of a mix of home types and sizes would give more people the opportunity to live at the centre of the city and access all the amenities and opportunities that offers. The innovative mixing of land uses would support greater interaction between resident and business communities. A new major town centre with a greater variety of shops and leisure, entertainment, recreation and play facilities open at different times would allow greater and more equitable access. It would also make sports, arts and leisure facilities in schools open to the wider community. Co-location of schools and older people's accommodation would support greater inclusion of older people. A network of arts and cultural facilities and a more diverse range of workplaces would increase work and training opportunities for all ages. In the short term residents may experience disturbance from high levels of construction, mitigated as far as possible through thorough engagement.
IIAO 6	To reduce contributions to climate change	✓	✓	?	✓✓	✓✓	Creating car free residential development, improved public transport and encouraging sustainable transport by mixing land uses at high density would contribute to carbon emission reductions. In the short term high levels of demolition and construction may contribute to emissions.
IIAO 7	To improve the air quality	✓	✓	?	✓	✓✓	The Old Kent Road area suffers from poor air quality and high levels of construction may constrain improvements to air quality in the short term. Car free residential development, electric vehicles for commercial development, consolidation of deliveries, promoting Last Mile Logistics and encouraging TfL to use a low emission bus fleet would contribute to reductions in air pollution. Locating schools away from main roads, greening the schools' immediate surroundings and creating new green links would reduce the exposure of people to poor air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	The Vision does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	-	The Vision does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	✓✓	✓✓	✓	✓	✓✓	Redevelopment of land in the area at optimum densities would make more efficient use of land. Redevelopment presents the opportunity to remediate contaminated land and improve soil quality with green infrastructure.

<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	✓	✓	✓✓	Integrating and celebrating the industrial heritage of the area with new development and creating new parks as part of a greener belt would enhance the townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	✓	✓	✓✓	Increasing the profile of the Old Kent Road area as a cultural destination and attracting a major cultural venue would enhance the cultural assets of the area. Integrating and celebrating the area's industrial heritage with development, protecting heritage assets and finding new uses for old buildings would conserve and enhance the historic environment.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	-	✓	✓✓	Various new parks, other new green spaces and green links (which together will create the Greener Belt) would expand and enhance the green infrastructure network in the area, which will support biodiversity as well as benefitting residents. These enhancements are deliverable in the medium and long term.
<b>IIAO 14</b>	To reduce vulnerability to flooding	-	-	-	-	-	The Vision does not explicitly address the issue of flooding but it does not negatively impact on it.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓	✓✓	✓✓	20,000 new homes --including 7,000 affordable homes of a mix of types and sizes-- would give people from all backgrounds the opportunity to live in the area. High standards for new housing would mean that these would be decent homes. Support for the Bakerloo Line Extension would speed up the delivery of new homes.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	✓	✓✓	✓✓	Delivering car free homes would encourage sustainable transport by new residents. Encouraging walking and cycling more widely, improving surface level public transport, upgrading and extending the Bakerloo Line, and introducing the Bakerloop Bus in advance of the upgrade/extension would increase sustainable transport use more broadly and minimise the need to travel by car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	-	✓✓	✓✓	The Vision would support infrastructure improvements including the Bakerloo Line Upgrade and Extension, enhanced surface-level public transport, the expansion and construction of new schools, a new community health hub, new parks, green spaces and green links for walking and cycling and new leisure facilities. These infrastructural improvements are deliverable in the medium and long term.



Delivery and Funding							
IIA Objective	Description	Averaged Grading	Sub Grading	Timescales			Commentary
				S	M	L	
IIO 1	To tackle poverty and encourage wealth creation	✓	✓	?	✓	✓	The phased delivery of housing, employment and community uses will improve accessibility to housing and employment for all, which will tackle poverty and encourage wealth creation, as these interventions will create more vibrant town centres and support a stronger local economy.
IIO 2	To improve the education and skill of the population	✓✓	✓✓	?	✓	✓✓	The strategy sets out the delivery of: new and improved FE and HE institutions; one potential new secondary school; and up to the equivalent of nine new forms of entry at local primary schools (including where necessary expansions to existing schools). All of this will improve the education and skills of the population across a wide range of age groups. This will have a long term positive benefit as the delivery of these educational places are phased.
IIO 3	To improve the health of the population	✓	✓	?	✓	✓	The delivery of affordable homes and education addresses issues of overcrowding which can impact negatively on mental health and wellbeing. The Greener Belt strategy will also deliver various new and improved green spaces and active travel links that will promote outdoor recreation, exercise and socialising – all of which has positive mental and physical health benefits. This has longer term impacts for people's health and wellbeing as people feel a greater sense of security and community through safe and decent homes and access to education.
IIO 4	To reduce the incidence of crime and the fear of crime	✓	✓	?	✓	✓	The 'Delivery and Funding' section of the Strategy does not directly reference the incidence of crime but the cumulative benefits of new homes, employment and community facilities may reduce crime and the perception and fear of crime for local residents.
IIO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	?	✓	✓	The delivery of new schools and education facilities, health centres and community facilities provide more opportunity for local people to engage with their local community and this promotes greater community cohesion. This benefit is a result of cumulative benefits from a number of interventions and therefore the benefits are long term, but also long lasting.
IIO 6	To reduce contributions to climate change	✓✓	✓✓	?	✓	✓✓	The delivery of the Bakerloo Line Upgrade and Extension, as well as bus improvements, will reduce reliance on private vehicles ; in turn, this will reduce combustion and the emission of carbon dioxide that contributes to climate change. This a long-term project and will therefore have long term benefits to reducing climate change.
IIO 7	To improve the air quality	✓✓	✓✓	?	✓	✓✓	The delivery of the Bakerloo Line Upgrade and Extension and bus improvements will reduce reliance on private vehicles and therefore reduce combustion and the emission of carbon dioxide that contributes to poor air quality. The interventions proposed to reduce climate change.
IIO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	The 'Delivery and Funding' section of the Strategy does not explicitly address the issue of waste but it does not negatively impact on it.
IIO 9	To encourage sustainable use of water resources	-	-	-	-	-	The 'Delivery and Funding' section of the Strategy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIO 10	To maintain and enhance the quality of land and soils	-	-	-	-	-	The 'Delivery and Funding' section of the Strategy does not explicitly address the issue of land soils but it does not negatively impact on it.
IIO 11	To protect and enhance quality of landscape and townscape	-	-	-	-	-	The 'Delivery and Funding' section of the Strategy does not explicitly address the issue of landscape and townscape but it does not negatively impact on it.
IIO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	?	✓	✓	The 'Delivery and Funding' section of the Strategy does not directly reference the historic environment and cultural assets. However, the deliverables it sets out (homes, facilities, infrastructure etc.) will have direct interrelationships with the historic environment and cultural assets. In the short-term, when construction projects are underway (including construction projects that affect heritage and cultural assets (including the settings of these assets)) there will potentially be a temporary negative change to the surroundings of these assets, but otherwise the impacts (medium and long-term) will be positive.
IIO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	-	✓	✓✓	The 'Delivery and Funding' section of the Strategy refers to the delivery of three new parks as part of the wider Greener Belt Strategy. This would expand and enhance the green infrastructure network in the area, which will support biodiversity as well as benefitting residents.
IIO 14	To reduce vulnerability to flooding	-	-	-	-	-	The 'Delivery and Funding' section of the Strategy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	✓✓	The 'Delivery and Funding' section of the Strategy sets out the aim to deliver 20,000 new homes of which 7,000 will be affordable homes to meet local housing demand. This is phased and will have positive impacts in the short, medium and long term.

<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	?	✓	✓✓	The 'Delivery and Funding' section of the Strategy sets out costs for bus and cycle improvements which will minimise the need for local residents to use the car by incentivising active travel modes of walking and cycling and public transport. It also attributes a figure of £8billion to the BLE, which will principally require Central Government funding. These investments will take some time to implement so the benefits will improve over time. There will be a long-term lasting benefit from the delivery of bus and cycle improvements.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	?	✓	✓	The 'Delivery and Funding' section of the Strategy explains how the Area Action Plan will deliver its objectives and support social regeneration through the delivery of homes, employment, transport infrastructure and social infrastructure that are necessary to support future sustainable development within the Old Kent Road Opportunity Area. It attributes a cost of £50 million to the education, leisure centre and health centre investments. The major new green infrastructure will be delivered through the equalisation mechanism, which forms part of the viability review underpinning the AAP. The delivery of all this new infrastructure will be phased over a long period of time and therefore have medium and long term benefits.

Plan Objectives							
IIA Objective	Description	Averaged Grading	Sub Grading	Timescale			Commentary
				S	M	L	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' cumulatively will deliver employment opportunities and upskill the local population to access employment opportunities through the delivery of schools which will tackle poverty and wealth creation, by creating more opportunities for all within the Old Kent Road Opportunity Area.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	?	✓✓	✓✓	The 'Plan Objectives' for <i>Schools, Community and Youth</i> set out the aim to provide improved access to social and physical infrastructure including cultural activities, parks and open spaces. This aims to provide opportunities for young people to be involved in their community and recreation. This will have long term benefits for education and skill of the population as it aims to engage with youth throughout their adolescence to ensure local residents receive maximum benefit from improved quality of opportunity to training, education and cultural attractions.
			✓✓	?	✓✓	✓✓	The 'Plan Objectives' for <i>Schools, Community and Youth</i> ensures that the whole community can benefit from the delivery of educational facilities and can benefit from the facilities. The delivery of these uses is phased and therefore has medium and long term benefits.
IIAO 3	To improve the health of the population	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' will cumulatively deliver community facilities that will support the local population in regards to health, housing, employment and education, as well as recreation and leading healthier active lives as local residents will benefit from sports facilities, improved access to green and open space and improved walking and cycling routes. The 'Plan Objectives' for Health and Wellbeing also sets out the need to reduce air pollution. This cumulatively will have a beneficial impact on local residents physical and mental health and wellbeing long term because the delivery of these interventions is phased.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	-	-	-	The 'Plan Objectives' does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' cumulatively will deliver equality of opportunity for all because the Old Kent Road AAP aims to deliver improved housing, employment, green and open space and community facilities for all. It aims to ensure that design is sensitive to existing character, and that new development is accessible and has good connectivity with existing development to ensure greater cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	?	✓	✓	The 'Plan Objectives' for <i>Energy and Climate Change</i> set out aim to achieve carbon neutrality in the Old Kent Road by 2030. This includes creating low carbon jobs and businesses and supporting existing individuals to move towards zero carbon.
IIAO 7	To improve the air quality	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' for <i>Health and Wellbeing</i> set out objectives to improve air quality around the Old Kent Road and tackle associated inequality. This will have medium- and long-term benefits because it will create behavioural change for local people to use more public transport, and reduce combustion. Increased urban greening will also have long term benefits by creating cleaner air.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	The 'Plan Objectives' do not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	-	The 'Plan Objectives' do not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	-	The 'Plan Objectives' do not explicitly address the issue of land and soils but it does not negatively impact on it.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' for <i>Culture and Heritage</i> set out that the identity of the Old Kent Road should be strengthened and integrated and that historic value and character should be integrated into design. This will ensure that the quality of landscape and townscape is protected and enhanced medium and long term as new development will protect and enhance existing assets and character.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' for <i>Culture and Heritage</i> aim to conserve and enhance the historic environment and cultural assets by protecting and enhancing listed and non-listed heritage assets and buildings and spaces of townscape value. It aims to preserve and enhance the industrial character of the Old Kent Road area and find new uses for existing buildings.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' for <i>Parks and Open Space</i> set out objectives to ensure residents lead more healthy and active lives which is delivered by the improvement of new and existing open and green spaces and by improving the environmental quality through urban greening incentivising more active recreation and travel.

		✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' cumulatively address the biodiversity crisis by promoting planting, food growing and greening which will improve the local green and open spaces and provide secondary benefits like improved air quality and incentivise walking and cycling as the pedestrian experience is improved.
<b>IIAO 14</b>	To reduce vulnerability to flooding			-	-	-	The 'Plan Objectives' do not explicitly address the issue of flooding but it does not negatively impact on it.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	✓✓	The 'Plan Objectives' for <i>New Homes</i> sets out that a range sizes and tenures of homes should be delivered to meet local housing need. The delivery of homes is phased and will therefore have short, medium- and long-term benefits.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	?	✓	✓✓	Extension of the Bakerloo Line and creation of transport interchanges at stations would encourage the use of public transport, as will the delivery of the Bakerloop Bus.
			✓✓	?	✓	✓✓	The 'Plan Objectives' for <i>Movement</i> set out that Old Kent Road high street will be a Healthy Street with safe walking and cycling routes that will minimise the need to travel by car for all as sustainable travel modes will be more accessible for local residents.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	✓✓	✓✓	✓✓	Ensuring development is in conformity with masterplans and site allocations would coordinate the delivery of the land uses and their supporting infrastructure anticipated by the plan. Working with infrastructure, digital infrastructure and utility companies and neighbouring boroughs would help ensure that sufficient physical and social infrastructure for largescale development is in place.
			✓✓	✓✓	✓✓	✓✓	The 'Plan Objectives' for <i>Energy and Climate Change</i> set out aim to provide infrastructure and work with infrastructure providers of transport, energy and other utilities to enable reduction in carbon.

## Old Kent Road Area Action Plan

### Proposed Submission Version

October 2024

### Integrated Impact Assessment Appendices

## Appendix 6: Assessment of the Strategic and Development Management Policies

Old Kent Road Area Action Plan 2024 Integrated Impact Assessment: Document Locator	
No.	Title
Appendix 1	SEA Directive Requirement
Appendix 2	Relevant Plans, Programmes and Strategies
Appendix 3	Baseline Data – Facts and Figures
Appendix 4	Sustainability Appraisal Framework
Appendix 5	Assessment of the Strategy
Appendix 6	Assessment of the Development Management Policies
Appendix 7	Assessment of the Sub Areas and Site Allocations
Appendix 8	Monitoring Indicators against Sustainability Objectives
Appendix 9	Baseline Indicators Table
Appendix 10	Options Testing
Appendix 11	Scoping Report Consultation Summary and link to OKR AAP Scoping Report
Appendix 12	Reasonable Alternatives Considered
Appendix 13	Mental Well-being Impact Assessment Screening
Appendix 14	OKR AAP References

## Appendix 6: Assessment of the Development Management Policies

The following tables set out the sustainability impacts of the Old Kent Road AAP 'Policies' (these are Policy AAP1 to Policy AAP16) identified through the IIA process. Each of the 16 development management policies is appraised against 17 sustainability objectives (the "IIAOs"), encompassing economic, social and environmental aspects. Each objective is measured on a scoring scale (Key 1), with each grade assigned a numeric value, symbol and colour. Alongside the scoring, a detailed commentary on the policy is provided.

### Key 1: Individual scoring against each objective

Symbol and colour	Scoring Value (%)	Score	Description
✓✓	100	Major or direct positive	The proposed option/policy contributes significantly to the achievement of the objective.
✓	50	Minor or indirect positive	The proposed option/policy contributes to the achievement of the objective but not significantly or indirectly.
-	0	Neutral	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
x	-50	Minor or indirect negative	The proposed option/policy detracts from the achievement of the objective but not significantly.
xx	-100	Major or direct negative	The proposed option/policy detracts significantly from the achievement of the objective.
?	N/A	Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.

At the bottom of the table, there is an averaged scoring of the 17 objectives to indicate each development management policy's overall efficacy in meeting the sustainability objectives. The colour bar below (key 2) divides the overall scoring into three categories from positive, neutral to negative.

### Key 2: Averaged IIA objectives scoring for each policy

Negative	Neutral	Positive
< 10 %	10 - 49%	50 - 100%

## Summary of the sustainability appraisal for each policy

The development management policies comprise:

- AAP1 – Delivery of the Masterplan;
- AAP2 – Bakerloo Line Upgrade and Extension;
- AAP3 – Homes for All;
- AAP4 – Student Homes;
- AAP5 – Businesses and workspace – The Bow Tie;
- AAP6 – Life Sciences;
- AAP7 – Town Centres, Leisure and Entertainment;
- AAP8 – Movement – People, Place and Experience;
- AAP9 – The Greener Belt – Parks and Healthy Streets;
- AAP10 – Tall Buildings Strategy – The Stations and the Crossings;
- AAP11 – Character and Heritage;
- AAP12 – Design;
- AAP13 – Climate Emergency;
- AAP14 – Water Management, Air and Noise Quality;
- AAP15 – Great Start in Life; and
- AAP16 – Child and Youth Provision.

The summary table is provided overleaf. On the pages following the summary table is a series of sixteen tables, one per development management policy, providing the detailed sustainability appraisal.



Summary of the sustainability appraisal for each policy

IIAO	Description	AAP1	AAP2	AAP3	AAP4	AAP5	AAP6	AAP7	AAP8	AAP9	AAP10	AAP11	AAP12	AAP13	AAP14	AAP15	AAP16
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	-	-	-	-	-	-	✓✓	✓✓
IIAO 2	To improve the education and skill of the population	✓✓	-	-	✓	✓✓	✓	✓✓	-	-	-	-	-	-	-	✓✓	✓✓
IIAO 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓✓	✓✓	-	-	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	-	-	-	-	-	-	-	-	-	-	✓✓	-	-	✓✓	✓✓
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	-	✓	✓✓	-	✓✓	✓✓	✓✓
IIAO 6	To reduce contributions to climate change	✓✓	✓	✓	✓	✓	✓	✓	✓✓	✓	✓	✓	✓✓	✓✓	✓✓	✓	✓
IIAO 7	To improve the air quality	✓✓	✓	-	-	-	-	-	✓✓	-	-	-	-	✓✓	✓✓	-	-
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	-	-	-	-	-	-	-	-	-	-	-	✓✓	✓	-	-
IIAO 9	To encourage sustainable use of water resources	✓	-	-	-	-	-	-	-	-	-	-	-	✓✓	✓✓	-	-
IIAO 10	To maintain and enhance the quality of land and soils	✓	-	-	-	-	-	-	-	-	-	-	-	✓✓	✓✓	-	-
IIAO 11	To protect and enhance quality of landscape and townscape	✓	-	✓	✓	✓✓	✓	✓✓	-	-	✓✓	✓✓	✓✓	-	-	-	-



IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	✓	-	✓	-	-	✓✓	✓✓	✓✓	-	-	-	-
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	-	-	-	-	-	-	✓✓	-	-	-	-✓✓	✓✓	✓	✓
IIAO 14	To reduce vulnerability to flooding	✓	-	-	-	-	-	-	-	-	-	-	-	✓	✓✓	-	-
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	✓✓	✓✓	-	-	-	-	-	-	-	✓✓	✓	-	-	-
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓✓	-	-	-	-	-	✓✓	✓✓	-	-	-	✓✓	-	-	-
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	-	-	-	-	✓✓	✓✓	-	-	-	-	✓✓	-	✓✓	✓✓
<b>Averaged Scoring</b>		<b>76</b>	<b>29</b>	<b>32</b>	<b>35</b>	<b>32</b>	<b>21</b>	<b>38</b>	<b>38</b>	<b>26</b>	<b>15</b>	<b>18</b>	<b>41</b>	<b>59</b>	<b>50</b>	<b>41</b>	<b>41</b>
<b>Efficacy category</b>		<b>Positive</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Neutral</b>	<b>Positive</b>	<b>Positive</b>	<b>Neutral</b>	<b>Neutral</b>

**AAP1 – The Masterplan**

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The delivery of the Masterplan will provide opportunities for jobs within construction, offices, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The delivery of the Masterplan will provide new and improved facilities for education and employment that will contribute to improving the skills of the local population.
IIAO 3	To improve the health of the population	✓✓	✓✓	The provision of a new Health facility will increase the capacity of the local health service and address the overcrowding issue, which is one of the key determinants of health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The retention or provision of active frontages will open up spaces to promote social interaction and the feeling of public safety. Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The Masterplan will aid in the delivery of new Class F uses on site could provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.
			✓✓	The Masterplan seeks to improve areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, and community halls.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	The Masterplan will deliver development that must be in conformity with water management, District Heat Networks, open space and sustainable construction to reduce contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	The Masterplan sets out that development must be in conformity with policies set out in the OKR AAP, which include policies to reduce combustion and increase urban greening to improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	Substantial demolition and intensification of development will create new waste demands to be managed. Southwark Plan 2022 policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	✓	✓	The Masterplan will deliver development that must be in conformity with water management policies.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	The Masterplan will ensure that development is consistent with policy that ensures good environmental quality including that of land and soils. Policies in the Southwark Plan 2022 which also apply to development in the Old Kent Road Opportunity Area will ensure that contamination of soil is mitigated against properly.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	All development will be required to be in keeping with the local townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The Old Kent Road Opportunity Area has a number of listed buildings and conservation areas and development should conserve the setting and the assets themselves.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The Masterplan will deliver a series of improvements to and new green and open spaces through the delivery of the Greener Belt.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The Masterplan policy will ensure that development is in conformity with policy that states development should follow the drainage hierarchy to reduce vulnerability to flooding.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	The Masterplan policy will ensure the delivery of affordable homes in a range of sizes and tenures to meet local needs.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	The Masterplan policy ensures that all development is in conformity with policy set out in the OKR AAP. Policy AAP8 'Movement' sets out a strategy for a modal shift away from cars to more active modes of travel such as cycling and walking but improving infrastructure and safer routes for pedestrians and cyclists.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.



## AAP2 – Bakerloo Line Upgrade and Extension

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIO 1	To tackle poverty and encourage wealth creation	✓	✓	The Bakerloo Line Upgrade and Extension will unlock further capacity in town centres for development and therefore provide opportunities for jobs within construction, offices and retail. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of education and training but it does not negatively impact on it. The extension and upgrade of the Bakerloo Line could have secondary effects for local businesses and employers which could enable them to upskills staff.
IIO 3	To improve the health of the population	✓	✓	The delivery of public transport reduces the dependency of individuals on cars. This reduces combustion and the emission of carbon dioxide and other pollutants which will contribute to improved air quality and therefore impact positively on the health of the local population.
IIO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it. The provision of more public transport will provide an alternative mode of transit that some may feel safer using.
IIO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	The delivery of the Bakerloo Line Upgrade and Extension improves permeability and connectivity across the Old Kent Road Opportunity Area will combat severance between communities and encourage community interaction.
IIO 6	To reduce contributions to climate change	✓	✓	The delivery of the Bakerloo Line Upgrade and Extension increases accessibility to public transport, which reduces combustion from individual vehicles and reduce the emission of carbon dioxide which mitigates against the issues of global warming and climate change.
IIO 7	To improve the air quality	✓	✓	The delivery of the Bakerloo Line Upgrade and Extension increases accessibility to public transport, less reliance on private vehicles which results in less combustion and carbon emitted as well as other pollutants which creates cleaner air improving air quality.
IIO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of soil quality but it does not negatively impact on it.
IIO 11	To protect and enhance quality of landscape and townscape	-	-	This policy does not explicitly address the issue of landscape and townscape quality but it does not negatively impact on it. Any associated development with the Bakerloo Line Upgrade and Extension will be sensitive to and enhance landscape and townscape quality.
IIO 12	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of biodiversity but it does not negatively impact on it.
IIO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	The delivery of the Bakerloo Line Upgrade and Extension increases the capacity for the Opportunity Area to delivery more homes and more affordable homes to meet local needs.
IIO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	The delivery of the Bakerloo Line Upgrade and Extension improves accessibility to public transport for residents in the Old Kent Road Opportunity Area and beyond by improving connectivity to other parts of the borough. This minimises the need to travel by car.
IIO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The delivery of the Bakerloo Line Upgrade and Extension provides the necessary infrastructure to support the increase in housing and employment in the local area and to provide greater opportunities for local residents.

AAP3 – Homes for All				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Delivering development that provides space for employment as well as homes would help increase the job opportunities in the area. Delivering 7,000 affordable homes and further endeavouring for 50% of all homes (with a minimum requirement of 35%) to be affordable would contribute to tackling housing poverty.
IIO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of training and education but it does not negatively impact on it.
IIO 3	To improve the health of the population	✓✓	✓✓	High density development would support walking for more active lifestyles. Delivering homes for all people would provide the opportunity for people to remain or move to the area and benefit from the healthy environment created through redevelopment. Ensuring vulnerable residents are helped to live independently would support their health and wellbeing.
IIO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
IIO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Delivering 7,000 affordable homes and endeavouring for 50% of homes (with a minimum requirement of 35%) to be affordable would give people on lower incomes the opportunity for a home in the area and support diversity in the population. 4,000 family homes would give that opportunity to households with children; likewise, 2,000 accessible and adaptable homes would give that opportunity to people with disabilities. Ensuring vulnerable residents are helped to live independently would make the area more inclusive. Enabling residents to take pride in their homes and the area would support community cohesion.
IIO 6	To reduce contributions to climate change	-	-	The delivery of homes must meet BREEAM excellent standards and reduce carbon emissions onsite. The delivery of homes in the Old Kent Road is through medium to high densities which is a more sustainable density to reduce carbon emissions further through construction, operation of the building by occupants and the movement of occupants following the 15 minute city theory.
IIO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
IIO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly reference land and soils quality but high-density development would make efficient use of land.
IIO 11	To protect and enhance quality of landscape and townscape	✓	✓	The provision of decent homes will enhance the quality of landscape and townscape as the new homes will be of good design and sensitive to the character and existing local landscape and townscape.
IIO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The provision of decent homes will enhance the quality of landscape and townscape as the new homes will be of good design and sensitive to the existing historic environment and cultural assets.
IIO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of biodiversity but it does not negatively impact on it.
IIO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Delivering 20,000 new homes of every kind, including 7,000 affordable homes, 4,000 family homes and 2,000 accessible and adaptable homes would greatly increase opportunities to live in the area for diverse groups of people. Endeavouring for 50% of homes to be affordable would extend those opportunities as far as possible to people on lower incomes. Ensuring housing across different tenures meets the same high quality standards would ensure that all new homes are decent homes.
IIO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it.
IIO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.

AAP4 – Student Homes				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Delivering development that provides space for employment as well as student homes would help increase the job opportunities in the area. The Policy is clear that student homes must be brought forward in tandem and in proportion with Class C3 housing, and Class C3 affordable homes, in order that housing poverty is tackled.
IIO 2	To improve the education and skill of the population	✓	✓	Increasing the supply of student housing will ensure high quality managed housing options are available to those in higher education, improving their overall education experience. A sufficient supply of student housing locally will help support the growth of the HE institutions operating in and around the Opportunity Area, potentially expanding the availability of higher education opportunities amongst the local population.
IIO 3	To improve the health of the population	✓✓	✓✓	High density development would support walking for more active lifestyles. Delivering homes for the student population would provide opportunities for people to remain or move to the area and benefit from the healthy environment created through redevelopment. Ensuring wheelchair user residents in HE are helped to live independently would support their health and wellbeing.
IIO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
IIO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Delivering student homes alongside conventional housing, and requiring those PDSA developments to provide facilities where the student population can interact with the wider community, will help contribute towards mixed and balanced neighbourhoods. Ensuring vulnerable residents are helped to live independently would make the area more inclusive. Enabling residents to take pride in their homes and the area would support community cohesion.
IIO 6	To reduce contributions to climate change	✓	✓	The delivery of homes must meet BREEAM excellent standards and reduce carbon emissions onsite. The delivery of homes in the Old Kent Road Opportunity Area is through medium to high densities which is a more sustainable density to reduce carbon emissions further through construction, operation of the building by occupants and the movement of occupants following the 15 minute city theory.
IIO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
IIO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly reference land and soils quality but high-density development would make efficient use of land.
IIO 11	To protect and enhance quality of landscape and townscape	✓	✓	The provision of decent student homes will enhance the quality of landscape and townscape as the new homes will be of good design and sensitive to the character and existing local landscape and townscape.
IIO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The provision of decent student homes will enhance the quality of landscape and townscape as the new homes will be of good design and sensitive to the existing historic environment and cultural assets.
IIO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of biodiversity but it does not negatively impact on it.
IIO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy sits under the 'parent' student homes policies of the London Plan and Southwark Plan, which provide a route for affordable student rooms to be delivered where viability allows – which would potentially enable local lower-income young people entering higher education to live affordably in their local area. In addition to this, AAP4 promotes high quality residential design to ensure the student demographic can enjoy the same high quality living standards as other sections of the population.
IIO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it.
IIO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.



**AAP5 – Businesses and workspace – The Bow Tie**

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Creating 10,000 new jobs by 2036 —achieved through retaining and increasing floorspace as well as increasing jobs density— would greatly increase employment opportunities in the area. Delivering a more diverse mix of light industrial, offices, manufacturing, distribution, and creative workspaces suitable for occupiers would make these opportunities accessible to people from different groups. The creation of a new major town centre with jobs in retail, leisure, education, health and entertainment would also diversify the jobs offer. Space for existing small and independent businesses to grow through retention, managed relocation and provision of managed workspace and affordable workspace would support local wealth creation and a healthy local economy.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Working with businesses to deliver specific training to enable access to new job opportunities would build work skills of residents. Informal education in a network of cultural spaces would improve the wellbeing of people of all ages.
IIAO 3	To improve the health of the population	✓✓	✓✓	The innovative mixing of uses and an improved pedestrian environment both on the Old Kent Road and in a wider network of shopping frontages, streets and squares across the new town centre would encourage walking for active lifestyles. The creation of spaces to gather and socialise in the town centre would encourage social interaction. More opportunities for leisure, entertainment, recreation, play and culture would support improved wellbeing. A new community health hub would improve the delivery of primary and community healthcare services and support health improvement and healthy lifestyles.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Increasing the numbers and types of jobs in the area would create more opportunities for working age people of all backgrounds. Affordable workspace for non-profits could provide accommodation for community groups and organisations that support diversity in the local population. Convenient facilities would make town centre amenities more accessible and inclusive. Space to gather and socialise and for events would encourage community cohesion.
IIAO 6	To reduce contributions to climate change	✓	✓	Transforming the format of retail from car-based warehouses to city centre shops and an environment to encourage walking would discourage private car use and contribute to carbon emission reductions.
IIAO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it. Delivering an innovative mix of land uses would encourage the efficient use of land.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Development creating a more attractive street environment with buildings of an innovative design would improve the townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	Stitching together the historic high street with new shopping frontages on the Old Kent Road would enhance the historic environment by recovering the character of the street that has been lost. Raising the profile of the area as a cultural destination would improve its cultural assets.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open spaces but it does not negatively impact on it.
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIAO 15	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of new homes delivery but it does not negatively impact on it.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it. Mixing land uses and providing improved pedestrian routes would encourage walking and discourage car use.
IIAO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.

**AAP6 – Life Sciences**

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Creating 10,000 new jobs by 2036 by retaining and increasing floorspace and increasing jobs density would greatly increase employment opportunities in the area. Policy AAP6 is important in this regard in its aim to expand the range of employment uses, including in a higher paid and higher skilled emerging sector. The creation of a new major town centre with jobs in retail, leisure, education, health and entertainment would also diversify the jobs offer. This would support local wealth creation and a healthy local economy.
IIAO 2	To improve the education and skill of the population	✓	✓	Policy AAP6 requires life sciences developments to demonstrate a strategy for working with the local medical and higher education sectors to create new employment, training and research opportunities for those living, studying and working locally. This will help to build the work skills of residents.
IIAO 3	To improve the health of the population	✓	✓	Providing new employment opportunities for the resident working population in an emerging sector would support local wealth creation, impacting positively on the mental health of the local beneficiary population.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	Increasing the numbers and types of jobs in the area would create more opportunities for working age people of all backgrounds, and in so doing would foster community integration and cohesion.
IIAO 6	To reduce contributions to climate change	✓	✓	Life sciences developments must meet excellent standards and reduce carbon emissions on-site. New life science land uses would be delivered in medium to high densities, and often in co-location with other non-employment uses, creating more sustainable densities. Carbon emissions would be reduced further through the construction stage, the operation of the building by occupants and the movement of occupants following the 15 minute city theory.
IIAO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it. Delivering an innovative mix of land uses would encourage the efficient use of land.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	Development creating a more attractive street environment with life sciences buildings of high quality design would improve the townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of heritage assets but it does not negatively impact on it
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open spaces but it does not negatively impact on it.
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIAO 15	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of new homes delivery but it does not negatively impact on it.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it.
IIAO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.



**AAP7 – Town Centres, Leisure and Entertainment**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The creation of active ground floor uses and vibrant town centres will create employment opportunities for local people. This would support local wealth creation and a healthy local economy.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	The creation of a healthy local economy and diversifying uses creates opportunity for local people to benefit from employment, skills and training.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	By improving accessibility to more vibrant town centres and employment opportunities, it will improve the mental wellbeing of local residents as they are able to experience a better high street experience in a safer way, with more opportunities for social interaction. This reduces social isolation for local residents as well.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	This policy aims to deliver a mixed-use high street to improve the high street experience by making it feel safer and more inclusive as well as successfully integrating with surrounding development. Attracting people back to the high street, creating a stronger sense of place, and enabling social encounters all help to promote community cohesion. A critical element in achieving this is the ground floor strategy for the Old Kent Road, which seeks to diversify uses and creating smaller local shopping frontages that are quieter and more accessible for all residents.
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	By altering the format of town centres and attracting pedestrians back to the high street, the high street is transformed from car-based warehouses to city centre shops and an environment to encourage walking would discourage private car use and contribute to carbon emission reductions.
<b>IIAO 7</b>	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	By creating active ground floor frontages this improves the landscape and townscape of the by making them more vibrant and attractive.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The policy requires ground floor uses to be visible from the street and sets out a preference for shutters not to be used. This enhances the historic environment and cultural assets by improving the appearance of the high street and ensuring it is sensitively designed with these assets in mind.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open spaces but it does not negatively impact on it.
<b>IIAO 14</b>	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of new homes delivery but it does not negatively impact on it.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	This policy aims to deliver social and health infrastructure in town centres to improve accessibility to vital services and infrastructure needed to support existing and future development to meet local need.

**AAP8 – Movement – People, Place and Experience**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓	✓	The 'Movement' policy aims to address the issue of poverty by providing opportunities for safer and more active movement and travel for all. By improving walking and cycling routes this improves accessibility to active travel and ensures that all are able to benefit from the opportunities associated with greater mobility.
<b>IIAO 2</b>	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of education and training but it does not negatively impact on it.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	The 'Movement' policy aims to improve walking and cycling routes to encourage more people to travel more sustainably. This has multiple benefits, for air quality improvements, to reduced combustion of carbon dioxide, to promoting more active travel modes. All of the foregoing would ensure local residents are able to lead more healthy and active lifestyles and rely less on private vehicles.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	By increasing the availability, appeal and ease of walking, cycling and public transport options, the accessibility of amenities, services and community facilities will be improved for everyone living in, working in and visiting the Opportunity Area. It also enables residents to engage more in their local communities, as well as encounter people on their more active commutes. As new and existing communities in and around the Old Kent Road Opportunity Area become more accessible for all, this promotes a sense of inclusion and community cohesion.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	Ensuring that walking, cycling and public transport are the first choice for movement in the Old Kent Road Opportunity Area will reduce reliance on private vehicles and therefore reduce combustion of carbon dioxide which contributes to climate change.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	By ensuring that walking, cycling and public transport are the first choice for movement in the Old Kent Road Opportunity Area this will reduce reliance on private vehicles and therefore reduce combustion of nitrogen dioxide and other pollutants which contribute to poor air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	-	-	This policy does not explicitly address the issue of townscape but it does not negatively impact on it
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of heritage assets but it does not negatively impact on it
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open spaces but it does not negatively impact on it
<b>IIAO 14</b>	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of homes but it does not negatively impact on it. The provision of sustainable transport does increase the capacity of new homes in the Opportunity Area.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	-✓✓	-✓✓	By ensuring that walking, cycling and public transport are the first choice for movement in the Old Kent Road Opportunity Area, AAP8 will reduce reliance on private vehicles and therefore reduce combustion. This is achieved by delivering the Bakerloo Line Upgrade and Extension to improve access to public transport alongside the delivery of a safe, segregated cycle and bus lanes, complemented by quiet walking routes. All of the latter would incentivise sustainable and active travel modes to reduce the reliance on the car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	-✓✓	This policy focuses on the delivery of sustainable transport infrastructure which is necessary to support existing and future development, to ensure that local residents can access employment, servicing and recreation easily and safely.

## AAP9 – The Greener Belt – Parks and Healthy Streets

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIO 1	To tackle poverty and encourage wealth creation	-	-	This policy does not explicitly address the issue of wealth creation but it does not negatively impact on it
IIO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of skills and training but it does not negatively impact on it.
IIO 3	To improve the health of the population	✓✓	✓✓	The Greener Belt would improve existing residents' quality of life, thereby ensuring they benefit from regeneration. AAP9 would encourage these residents –as well as all (existing and future) visitors, residents and workers in the Opportunity Area– to walk and cycle more, rather than rely on motorised vehicle travel options. The Greener Belt strategy would minimise everybody's exposure to air pollution, provide easy healthy food options, create affordable places to meet throughout the year, and improve mental health and wellbeing with urban greening.
IIO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
IIO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The Greener Belt would ensure development benefits existing residents as well as newcomers, tackling health inequalities and supporting community cohesion. Social interaction across communities would also be facilitated in new affordable places to meet throughout the seasons.
IIO 6	To reduce contributions to climate change	✓	✓	The delivery of more green and open spaces would encourage local residents to walk, cycle and/or use more sustainable modes of travel. AAP9's aspiration to deliver green space within walking distance of the home would help reduce the need to get into the car in order to access places of recreation. This reduces combustion of carbon dioxide which contributes to climate change.
IIO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
IIO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it.
IIO 11	To protect and enhance quality of landscape and townscape	-	-	This policy does not explicitly address the issue of townscape but it does not negatively impact on it.
IIO 12	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of heritage assets, other than promoting the retention of heritage assets where they exist in existing green spaces to lend those spaces a greater sense of place and 'rootedness', but it does not negatively impact on it.
IIO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The plan would deliver access to more and better green spaces, including new parks and improved existing parks. This would address the open space deficiency in the Old Kent Road Opportunity Area and therefore enhance the urban environment and biodiversity.
IIO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it
IIO 15	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of homes but it does not negatively impact on it
IIO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Delivering the Greener Belt (including the associated sustainable travel arteries such as the Trim Trail) would ensure that walking and cycling are safe, convenient and pleasurable activities.
IIO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.

**AAP10 – Tall Buildings Strategy – The Stations and the Crossings**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	-	-	This policy does not explicitly address the issue of wealth creation but it does not negatively impact on it
<b>IIAO 2</b>	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of training and education but it does not negatively impact on it
<b>IIAO 3</b>	To improve the health of the population	-	-	This policy does not explicitly address the issue of health but it does not negatively impact on it
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	-	-	This policy does not explicitly address the issue of inclusion but it does not negatively impact on it
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	Building at higher densities is more sustainable as it allows occupants to live closer to employment, amenities and services – which helps to make cycling and walking the preferred means of travel instead of private vehicle usage. This typology is also an efficient use of land.
<b>IIAO 7</b>	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Tall Buildings will be built around stations and crossings to reinforce these locations as transport nodes and landmarks. This will distribute tall buildings to reinforce the proposed hierarchy of built form, places and streets, all of which is intended to improve legibility and create a well-articulated townscape and skyline. Tall buildings must be of an exemplary design and preserve the Borough and LVMF views.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Having a strategy for the delivery of tall buildings in the Old Kent Road Opportunity Area ensures that the historic environment and cultural assets are conserved and enhanced. Design of all tall buildings must be exemplary and they must only be located at key junctions and nodes so as to not negatively impact on the historic environment or cultural assets.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open spaces but it does not negatively impact on it
<b>IIAO 14</b>	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of homes but it does not negatively impact on it
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.

**AAP11 – Character and Heritage**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	-	-	This policy does not explicitly address the issue of wealth creation but it does not negatively impact on it
<b>IIAO 2</b>	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of education and training but it does not negatively impact on it
<b>IIAO 3</b>	To improve the health of the population	-	-	This policy does not explicitly address the issue of health but it does not negatively impact on it
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓	✓	The character and heritage of the Old Kent Road Opportunity Area will be protected and enhanced in such a way to promote inclusion, diversity and community cohesion through ensuring that existing neighbourhoods are conserved to ensure that residents have a secure sense of place and that these new and existing neighbourhoods will be well connected and cohesive with one another.
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	The OKR AAP encourages retrofitting to reuse materials and make use of existing embodied carbon in existing buildings, this also plays an important role in conserving and enhancing existing character and heritage.
<b>IIAO 7</b>	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	By conserving and enhancing the existing character and heritage of the Old Kent Road Opportunity Area the policy aims to protect and enhance the quality of the landscape and townscape by retaining identified buildings and features of townscape merit and repurposing existing landmarks and designating new conservation areas to protect heritage assets. The policy also aims to conserve the rich local social history which will further enhance the landscape and townscape in the Old Kent Road Opportunity Area.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	By conserving and enhancing the industrial character and heritage assets in the Old Kent Road Opportunity Area it will conserve and enhance the wider historic environmental and cultural assets. The policy identifies that both listed buildings and buildings and features of townscape merit and buildings of architectural and historic interest should be retained and protected. New development must improve the Old Kent Road's historic fabric in order to enhance the historic environment.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open spaces but it does not negatively impact on it
<b>IIAO 14</b>	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Conserving existing character and heritage contributes positively to creating a strong sense of place and community cohesion, this creates a decent place to live when delivering new homes.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.



AAP12 – Design				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIO 1	To tackle poverty and encourage wealth creation	-	-	This policy does not explicitly address the issue of wealth creation but it does not negatively impact on it
IIO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of education and training but it does not negatively impact on it
IIO 3	To improve the health of the population	✓✓	✓✓	Design of new development in the Old Kent Road should be designed with proper ventilation and heating and cooling to regulate temperature and ensure access to green space and amenity is delivered to ensure that residents have opportunities to exercise and socialise in outdoor spaces to benefit their physical and mental wellbeing.
IIO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Design of new development should be adhere to secure by design principles with security measures proportionate to their use and function. This will reduce the incidence and fear of crime.
IIO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Design of new development should be inclusive and achieve an exemplary standard of residential design to ensure it is accessible and inclusive for all. This applies to residential and public buildings to ensure inclusion and equality of opportunity for all in accessing housing, and amenities. Community cohesion is delivered through ensuring the design of schemes will foster a positive relationship with existing development and communities.
IIO 6	To reduce contributions to climate change	✓✓	✓✓	Design of new development should be of sustainable design and reuse materials. This is achieved by ensuring all development meets the net zero carbon target, uses high performing building fabric, connects to SELCHP and makes efficient use of materials.
IIO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
IIO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it.
IIO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	New development will respond to the emerging and existing character and context of the area. For each sub area further guidance is set out to further ensure that the quality of landscape and townscape are high.
IIO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Design of new development should incorporate and safeguard buildings and features of architectural and historic interest. The retention of traditional design features and materials is set out in the sub areas to ensure consistency of design and style which will conserve and enhance the historic environment and cultural assets.
IIO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open space but it does not negatively impact on it.
IIO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	All homes should be designed to an exemplary standard of residential design to ensure that everyone lives in a good quality home.
IIO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it
IIO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.

AAP13 – Climate Emergency				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIO 1	To tackle poverty and encourage wealth creation	-	-	This policy does not explicitly address the issue of wealth creation but it does not negatively impact on it.
IIO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of education and training but it does not negatively impact on it.
IIO 3	To improve the health of the population	✓✓	✓✓	The reduction of carbon emissions and other pollutants improves air quality and therefore improves respiratory health of local people.
			✓✓	By addressing the Climate Emergency, heating and cooling is improved in the public realm and in homes to minimise the adverse effects of temperature change on the health of vulnerable people.
			✓✓	The provision of promotion of urban greening and new public open spaces will provide opportunities for play and open-air sports facilities, enabling exercise which supports good physical health and mental health as well as facilitate relaxation and socialising is also beneficial for health and wellbeing.
IIO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of fear of crime but it does not negatively impact on it.
IIO 5	To promote social inclusion, equality, diversity and community cohesion	-	-	This policy does not explicitly address the issue of inclusion but it does not negatively impact on it.
IIO 6	To reduce contributions to climate change	✓✓	✓✓	New development should connect to the DHN to access a more sustainable source of heat and to reduce carbon emissions from heating. Gas boilers are not permitted in new development unless they are an interim solution before connection to the DHN.
			✓✓	Retrofitting is encouraged to ensure that embodied carbon is accounted for and materials are reused. This aims to achieve higher carbon savings onsite to reduce the emission of carbon in construction and throughout the life and use of the building.
			✓✓	New public spaces will encourage urban greening to adapt to the effects of climate change, reduce the urban heat island effect and increase ecological resilience. Creating a new walkable public realm will reduce car use and therefore CO2 emissions and contributions to climate change. CO2 emissions may suffer as a result of accelerated levels of construction and demolition. Southwark Plan 2022 policies seek to minimise carbon dioxide emissions from development.
IIO 7	To improve the air quality	✓✓	✓✓	AAP13 sets out that development must reduce carbon emission onsite through improved and more sustainable design and more sustainable connections to heat. This improved air quality as there are fewer emissions from construction and operation of buildings.
			✓✓	A walkable public realm will reduce car use and therefore CO2 emissions will promote active and sustainable transport modes, improving air quality and mitigating greenhouse gas emissions.
IIO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	Substantial demolition and intensification of development will create new waste demands to be managed. The policy sets out new development should retrofit and reuse older materials for new development in order to avoid waste.
IIO 9	To encourage sustainable use of water resources	✓✓	✓✓	Water as a resource should be used sustainably as part of the construction process and operation of the building.
IIO 10	To maintain and enhance the quality of land and soils	✓✓	✓✓	This policy does not explicitly address the issue of landscape and soils. But it does deliver positive impacts for the use and improvement of green and open space and to utilise soils and greening for carbon sequestration.
IIO 11	To protect and enhance quality of landscape and townscape	-	-	This policy does not explicitly address the issue of landscape and townscape quality but it does not negatively impact on it.
IIO 12	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	New green spaces, parks and green infrastructure provided are a major part of the vision, creating opportunities to improve biodiversity.
IIO 14	To reduce vulnerability to flooding	✓	✓	AAP13 sets out that development should be sustainable and use resources in a sustainable way which includes water use and reducing vulnerability to flooding.
IIO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	AAP13 sets out that design should be sustainable and have effective systems of heating and cooling which reduce emissions and costs for occupiers, which improves the quality of the housing stock in the Old Kent Road Opportunity Area and therefore access to decent homes for local people.
IIO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	AAP13 sets out that movement should be people centred to address the issue of carbon emissions. This means influencing behavioural change in movement and consumption to allow for locals to use more active travel modes and less private vehicles to reduce combustion and pollution.

<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.
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**AAP14 – Water Management, Air and Noise Quality**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	-	-	This policy does not explicitly address the issue of wealth creation but it does not negatively impact on it
<b>IIAO 2</b>	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of skills and training but it does not negatively impact on it.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Reintegrating the urban environment and designing new buildings so that people can walk and cycle around easily would encourage physical activity. Providing leisure facilities and fun environments that encourage exercise would also enable active lifestyles.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The delivery of improved streets and open spaces through urban greening and improved biodiversity will integrate new development with existing neighbourhoods would encourage community cohesion.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	This policy aims to help development and the existing built environment adapt to climate change through ensuring that greenfield run off rates do not exceed existing water and sewer capacities.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Urban greening would improve air quality. 3D modelling of development impacts would avoid or mitigate air pollutant hot spots. Serving new commercial development with the least polluting vehicles would prevent them from worsening air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	✓	This policy does not address the issue of waste directly, but has indirect benefits for sustainable use of resources which will reduce waste.
<b>IIAO 9</b>	To encourage sustainable use of water resources	✓✓	✓✓	Ensuring that drainage from development achieves 100% greenfield runoff rates and a minimum of 70% greenfield run off rates onsite using sustainable urban drainage systems would reduce the risk of surface water flooding. This also ensures that water is used in a sustainable way.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓✓	✓✓	Urban greening would create areas of enhanced soil quality.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	-	-	This policy does not explicitly address the issue of townscape but it does not negatively impact on it.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of heritage assets but it does not negatively impact on it.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	This policy ensures that development delivers urban greening and opportunities for improved biodiversity to address the
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	Ensuring that drainage from development achieves 100% greenfield runoff rates and a minimum of 70% greenfield run off rates onsite using sustainable urban drainage systems would reduce the risk of surface water flooding.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of homes but it does not negatively impact on it
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	Providing an energy centre and decentralised heat networks, green infrastructure and sustainable urban drainage systems would support development with essential new infrastructure.

**AAP15 – Great Start in Life**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	New early years childcare places would allow parents to choose to work.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	Education choices would be improved and match the level of housing growth with the expansion of existing schools and the provision of 2 new primary schools and a new secondary school. Learning conditions would be supported by schools that meet high design standards responding to context, protecting pupils from air pollution, including safe and welcoming entrances, safeguarding children and protecting privacy of neighbours and providing light, airy and connected teaching rooms. New and improved higher and further education facilities would bring opportunities to continue education closer to residents.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Improvement of child and youth play space in existing parks and sharing indoor and outdoor facilities in schools for community use would support physical activity and social interaction. Good-sized entrances to schools located away from busy junctions would encourage walking to school.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Designing schools for safeguarding and protecting privacy of neighbours would prevent opportunities for crime.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The delivery of improved schools and associated facilities it will promote a greater sense of inclusion as it has wider benefits for the residents of all ages as they will have greater access to services and facilities for sports and recreation too. This also promotes community cohesion as it connects new and existing communities and promotes greater social interaction.
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	The delivery of schools closer to the homes of local residents will reduce the need to travel by car by parents and encourage more active travel by children and young people, which would reduce carbon emissions which contribute to climate change.
<b>IIAO 7</b>	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	-	-	This policy does not explicitly address the issue of townscape but it does not negatively impact on it.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of heritage assets but it does not negatively impact on it
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The improvement of child and youth play space would enhance existing parks.
<b>IIAO 14</b>	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of homes but it does not negatively impact on it
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	Development would be supported by childcare places, space for schools to expand in the future, further and higher education places and the improvement of child and youth play spaces.

**AAP16 – Child and Youth Provision**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The provision of child and youth facilities and services will enable parents to work and the creation of these services themselves will deliver employment opportunities for local people.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	Development must contribute to mentorship schemes and encourage children and young people to get involved in community groups and projects to further develop their personal skills.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Improvement of child and youth play space in existing parks and sharing indoor and outdoor facilities in schools for community use would support physical activity and social interaction. Good-sized entrances to schools located away from busy junctions would encourage walking to school.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Designing child and youth services for safeguarding and protecting privacy of neighbours would prevent opportunities for crime.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The delivery of child and youth services for a range of ages will promote social inclusion and meet the needs of local young people to ensure that they are able to move around the area safely and access recreation, sports and education facilities. This also promotes equality of opportunity for all.
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	The delivery of child and youth services closer to the homes of local residents will reduce the need to travel by car by parents and encourage more active travel by children and young people, which would reduce carbon emissions which contribute to climate change.
<b>IIAO 7</b>	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	-	-	This policy does not explicitly address the issue of townscape but it does not negatively impact on it
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of heritage assets but it does not negatively impact on it
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The delivery of play facilities will enhance open spaces.
<b>IIAO 14</b>	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of homes but it does not negatively impact on it
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The delivery of social infrastructure is necessary to support existing and future development to ensure that there are enough facilities to support the development of young people.



## Old Kent Road Area Action Plan

Proposed Submission Version

October 2024

Integrated Impact Assessment Appendices

### Appendix 7: Assessment of the Sub Areas and Site Allocations

<b>Old Kent Road Area Action Plan 2024 Integrated Impact Assessment: Document Locator</b>	
<b>No.</b>	<b>Title</b>
Appendix 1	SEA Directive Requirement
Appendix 2	Relevant Plans, Programmes and Strategies
Appendix 3	Baseline Data – Facts and Figures
Appendix 4	Sustainability Appraisal Framework
Appendix 5	Assessment of the Strategy and Vision
Appendix 6	Assessment of the Strategic and Development Management Policies
<b>Appendix 7</b>	<b>Assessment of the Sub Areas and Site Allocations</b>
Appendix 8	Monitoring Indicators against Sustainability Objectives
Appendix 9	Baseline Indicators Table
Appendix 10	Options Testing
Appendix 11	Scoping Report Consultation Summary and link to OKR AAP Scoping Report
Appendix 12	Reasonable Alternatives Considered
Appendix 13	Mental Well-being Impact Assessment Screening
Appendix 14	OKR AAP References

## Appendix 7: Assessment of AAP15 – Sub Areas 1 – 5 and 18 site allocations

The following tables set out the impacts identified through IIA of AAP15, consisting of Sub Areas 1 to 5 and the 18 site allocations, on the sustainability implications. Of the total 5 sub areas set out in the plan, each area's vision and their respective site allocations is appraised against 17 sustainability objectives, encompassing economic, social and environmental aspects. Each objective is measured on a scoring scale (Key 1), with each grade assigned a numeric value, symbol and colour. Alongside the scoring, a detailed commentary on the policy is provided.

### Key 1: Individual scoring against each objective

Symbol and colour	Scoring Value (%)	Score	Description
✓✓	100	Major or direct positive	The proposed option/policy contributes significantly to the achievement of the objective.
✓	50	Minor or indirect positive	The proposed option/policy contributes to the achievement of the objective but not significantly or indirectly.
-	0	Neutral	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
x	-50	Minor or indirect negative	The proposed option/policy detracts from the achievement of the objective but not significantly.
xx	-100	Major or direct negative	The proposed option/policy detracts significantly from the achievement of the objective.
?	N/A	Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.

At the bottom of the table, there is an averaged scoring of the 17 objectives to indicate each strategic policy's and development management policy's overall efficacy in meeting the sustainability objectives. The colour bar below (key 2) divides the overall scoring into three categories from positive, neutral to negative.

### Key 2: Averaged IIA objectives scoring for each policy

Negative	Neutral	Positive
< 10 %	10 - 49%	50 - 100%

Summary of the sustainability assessment for each sub area:

IIAO	Description	Sub Area 1				Sub Area 2				Sub Area 3				Sub Area 4				Sub Area 5 – Option 1				Sub Area 5 – Option 2							
		Area wide	S	M	L	Area wide	Area wide	S	M	L	S	M	L	Area wide	S	M	L	Area wide	S	M	L	Area wide	S	M	L				
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 7	To improve the air quality	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 9	To encourage sustainable use of water resources	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 14	To reduce vulnerability to flooding	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓
<b>Averaged Scoring</b>		<b>76%</b>	<b>26%</b>	<b>76%</b>	<b>76%</b>	<b>79%</b>	<b>32%</b>	<b>79%</b>	<b>79%</b>	<b>79%</b>	<b>32%</b>	<b>79%</b>	<b>79%</b>	<b>79%</b>	<b>32%</b>	<b>79%</b>	<b>79%</b>	<b>65%</b>	<b>35%</b>	<b>65%</b>	<b>65%</b>	<b>65%</b>	<b>35%</b>	<b>65%</b>	<b>65%</b>				

Detailed integrated Impact Assessment for:

Sub Area 1: Mandela Way, Crimscott Street and Old Kent Road (North)

Including:

- OKR 1 – Bricklayers Arms Roundabout
- OKR 2 – Land bounded by Glengall Road, Latona Road and Old Kent Road
- OKR 3 – Mandela Way
- OKR 4 – Dunton Road (Tesco Store and Car Park) and Southernwood Retail Park
- OKR 5 – Salisbury Estate Garages
- OKR 6 – 96 – 120 Old Kent Road (Lidl Store)
- OKR 7 – Former Petrol Filling Station, 233 – 247 Old Kent Road
- OKR 8 – Kinglake Street Garages
- OKR 9 – 4/12 Albany Road

IIAO	Sub Area 1				OKR1/ NSP56	OKR2/ NSP57	OKR3/ NSP58	OKR4/ NSP59	OKR5/ NSP60	OKR6/ NSP61	OKR7/ NSP62	OKR8/ NSP63	OKR9/ NSP64
	Area wide	S	M	L									
IIAO 1	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 2	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 3	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 4	✓	-	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 5	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 6	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓
IIAO 7	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓
IIAO 8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓✓
IIAO 10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 11	✓	✓	✓	✓	✓✓	✓	✓	✓	✓✓	✓	✓	✓	✓
IIAO 12	✓	-	✓	✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 13	✓	-	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓
IIAO 14	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 15	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 16	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓
IIAO 17	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
Avg.	76%	26%	76%	76%	85%	79%	82%	82%	85%	76%	79%	82%	76%



Sub Area 1: Mandela Way, Crimscott Street and Old Kent Road (North)

Sub Area 1: Mandela Way, Crimscott Street and Old Kent Road (North)						
IIA Objective	Description	Area-wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	The area-wide redevelopment will revitalise the neighbourhood with an improved living environment that will encourage inward investment and boost local economy such as retail uses serving the local community. For example, OKR2 (Crimscott Street and Pages Walk), current home to existing 170 jobs and 16 businesses, will be redeveloped in a mixed-use scheme which sees 760 new homes and 2,301 new jobs.
		✓✓	✓	✓✓	✓✓	The growing population under the intensification and revitalisation of the existing industrial and residential area will produce economic synergy by creating new job opportunities for local residents and providing enterprise opportunities in the business area.
		✓✓	✓	✓✓	✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
	<b>Average Scoring</b>	✓✓	✓	✓✓	✓✓	
IIAO 2	To improve the education and skill of the population	✓✓	✓	✓	✓✓	Potential expansion of existing primary schools to provide high quality education opportunities for the new generations in the area.
		✓✓	✓✓	✓✓	✓✓	Aligning with the policies in the plan, major developments in the sub area will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
		✓✓	✓✓	✓✓	✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated in the sub area as the provision is required for planning applications during the construction phase and in completed developments.
	<b>Average Scoring</b>	✓✓	✓✓	✓✓	✓✓	
IIAO 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	The area vision looks to deliver excellent design that expresses timeless quality and variety within buildings and public spaces in between, contributing to the sense of different districts and to the health and well-being of communities across the development area.



		✓✓	✓	✓✓	✓✓	The sub area aims to connect communities by requiring development to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, the new tube station and other local facilities such as Walworth Academy, primary schools and shops on the Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.
	<b>Average Scoring</b>	✓✓	✓	✓✓	✓✓	
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	-	✓✓	✓✓	Aligning with the policies in the plan, it will deliver mixed communities on different income levels and social backgrounds with the tenure-blind approach and at least 35% affordable housing with preference to social rented housing.
		✓✓	-	✓✓	✓✓	Recognising the potential of regeneration with new residents whilst protecting existing communities, the redevelopment will offer a range of housing tenures and sizes, phased over a number of years, to attract and facilitate existing residents to stay and benefit from the improved connections, facilities and communities.
		✓✓	-	✓✓	✓✓	A wide range of community infrastructure will be provided to serve the area, including schools, re-landscaped Burgess Park, sports facilities, new civic spaces and 231 Old Kent Road to promote social interaction, participation and cohesion among residents on different backgrounds.
		✓✓	✓✓	✓✓	✓✓	To ensure planning works to benefit all from regeneration, a Social Regeneration Charter is drawn up for the area which sets out detailed aims for reducing social, economic and health inequalities and explains how the council will monitor the progress towards achieving a number of promises which the council has made to the community.
		<b>Average Scoring</b>	✓✓	-	✓✓	✓✓
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
		✓✓	✓✓	✓✓	✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.

		✓✓	✓	✓✓	✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
	<b>Average Scoring</b>	✓✓	✓✓	✓✓	✓✓	
<b>IIAO 7</b>	To improve the air quality	✓✓	-	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
		✓✓	-	✓✓	✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
	<b>Average Scoring</b>	✓✓	-	✓✓	✓✓	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development in the sub area services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
		✓✓	✓✓	✓✓	✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
	<b>Average Scoring</b>	✓	✓	✓	✓	
<b>IIAO 9</b>	To encourage sustainable use of water resources	✓	✓	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in

						the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will be redeveloped on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	As part of Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	-	✓	✓	<p>Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. Meanwhile, the plan requires flood risk to be reduced through implementing onsite sustainable urban drainage measures.</p> <p>Strategic flood risk assessment Level 2 has been prepared to assess the site allocations within the sub area. It provides evidence to ensure the proposed land uses are compatible with the relevant flood zone (i.e. passed the sequential test) and the sites having 'a more vulnerable use' have satisfied the exception test whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p> <p>Moreover, a detailed site-specific SFRA will be required for development on each site allocation to ensure flood risks will be properly mitigated and minimise flood risk to the wider area through measures on site as mentioned above.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	-	✓✓	✓✓	It delivers homes and a wider urban environment suitable for residents at all stages in their lives, encouraging people to live and work locally. This will include excellent cycling provision, safe secure streets with good building frontages and a choice of homes including a range of different sized homes, generous space standards and provision of specialist housing.

		✓✓	-	✓✓	✓✓	<p>Aiming to deliver regeneration that works for all, the redevelopment will provide a range of housing tenures and sizes to attract both new and existing residents, phased over a number of years to facilitate existing residents to move in to benefit the improved connections, facilities and communities.</p> <p>A Community Review Panel is also set up to help the council better understand the needs of the local community. This panel will comment on plans for development in the area, giving independent advice on planning and discussing important issues including housing, transport, public and green spaces, and the environment</p>
	<b>Average Scoring</b>	✓✓	-	✓✓	✓✓	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	-	✓✓	✓✓	<p>In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New walkable neighbourhoods will benefit from the new parks and spaces in the greener belt, new developments that will be car free and the proximity to the new tube stations of the Bakerloo line extension.</p> <p>The transition to less polluting and low carbon vehicles, such as electric vehicles, will be supported especially for commercial vehicles, which are using the street the most. As such, the sub area will provide the required infrastructure to support the transition to net zero carbon with the reliable source of fuel or electricity for the convenient and security of business operation.</p>
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	<p>The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development in the area to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.</p> <p>In addition, a wide range of infrastructure, serving economic, social and environmental purposes will be delivered to increase the capacity in supporting the existing and new residents and fostering cohesive and well-connected communities.</p>

OKR1: Bricklayers Arms (NSP56)

Site requirements

Redevelopment of the site must:

- Provide new homes; and

Redevelopment of the site should:

- Provide a new high street format with new retail, employment and community uses.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices and retail. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The site will enable skills to be developed amongst workers employed to undertake the construction of new homes as well as skills developed in the town centre, employment and community establishments that the development will provide.
IIAO 3	To improve the health of the population	✓✓	✓✓	The redevelopment will also bring forward positive impacts in walkability and connectivity with the provision of green pedestrian links, promoting active lifestyle and mental well-being. The redevelopment will also draw on its proximity to open water and green spaces, including Surrey Water and Deal Porters Walk, to promote the access to the open space.
			✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is a key determinants of health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and activation of frontages, particularly along the low-line route, will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The proposal will provide new community uses which should help encourage more community interaction with different groups within the local area, providing more awareness of the diverse groups living within the area and encouraging community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.



IIAO 7	To improve the air quality	✓✓	✓✓	Priority given to walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality. In addition, AAP policies require development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development in the sub area services will be provided by the Old Kent Road integrated waste management facility
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Improving the quality of townscape and landscape creating a new network of streets, improved connectivity and new green spaces is a strong part of this site allocation in requiring the junction to be re-modelled and improved for the purposes of pedestrian experience, convenience and place making. This would have significant public realm and townscape benefits for the local area. This would create opportunities to improve health and wellbeing and security, which could affect groups such as the homeless, women, older people and those with physical disabilities.  The site seeks to encourage landscaping as part of the development and the provision of new trees which will help in softening the landscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓	The site is within proximity of Bermondsey Street and Page's Walk Conservation Areas. The site should improve the settings of Paragon Gardens and Grade II listed Driscoll House. Part of the site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster. Part of the site lies within the Borough View of St Paul's Cathedral from One Tree Hill.  Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads. A strategy for archaeological investigation and mitigation is required for this site.  Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.
			✓✓	The allocation and others seek to promote new cultural, leisure and sports facilities through required and suggested community use classes.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to Paragon Gardens (Borough Open Land). All existing open space near the site area will be retained.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level II, Analysis 14) will have a "more vulnerable" use (mixed use including residential, town centre, employment and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:  <ul style="list-style-type: none"> <li>- The site will enable skills to be developed amongst workers employed do undertake the construction of new homes as well as skills developed in the town centre, employment and community establishments the development will provide.</li> <li>- The redevelopment will also bring forward positive impacts on walkability and connectivity with green pedestrian links, promoting active lifestyle and mental well-being.</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> </ul>

				<ul style="list-style-type: none"> <li>- New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health</li> <li>- The proposal will provide new community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.</li> <li>- The improved connectivity and walkability within the site and with the wider area promotes active travel modes including walking and cycling, thus reducing the reliance on private vehicles and lowering the use of fossil fuels</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality.</li> <li>- The improved connectivity and walkability within the site and with the wider area will promote active travel modes including walking and cycling, which will help reduce the reliance on private vehicles.</li> <li>- The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums,, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>No basement dwellings should be permitted in this area. Non- domestic basement thresholds must be raised above the 2100 maximum water level, anticipated through breach of the River Thames defences. Internal access to upper floors must be provided and flood resilient design and construction techniques employed.</p> <p>SuDS selection and design should be in accordance with the sustainable drainage hierarchy and provide sufficient capacity to cater for all events up to the 1 in 100 year storm event, incorporating the latest allowances for climate change. Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home		✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The improved connectivity and walkability within the site and with the wider area will promote active travel modes including walking and cycling, which will help reduce the reliance on private vehicles.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development
			✓✓	The efficient delivery of quality development on the site will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development on site to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.
				In addition, a wide range of infrastructure, serving economic, social and environmental purposes will be delivered to increase the capacity in supporting the existing and new residents and fostering cohesive and well-connected communities.





**OKR2: Crimscott Street and Pages Walk (NSP57)**

Site requirements

Redevelopment of the site must:

- Provide new homes; and
- Replace existing employment floorspace and provide a range of employment spaces which are consistent with the building and land use types shown in Figure SA1.3 ; and
- Provide community uses including gallery space/artist’s studios.

Redevelopment of the site may:

- Provide retail.

Relevant planning applications

**12/AP/2702 (Built)**

Marshall House, 6 Pages Walk. Demolition of existing warehouse building and construction of buildings ranging in height from 4 storeys to 6 storeys, plus basement, to provide 82 residential units with landscaping, refuse/recycling facilities, cycle storage and car parking, access and associated works.

**15/AP/2474 (276 homes under construction and 130 homes approved)**

Rich Industrial Estate. Demolition of four existing buildings and electricity substation and the development of a phased mixed-use scheme ranging from 3-9 storeys plus basements (maximum height 34.03m AOD) comprising a series of new buildings and retained/refurbished/extended buildings to provide a total of 19,468sqm (GIA) of commercial, retail, art gallery and storage floorspace (Use Classes A1, A2, A3, B1, B8 and D1) and 406 residential units (Use Class C3) plus associated highway and public realm works, landscaping, car and cycle parking, infrastructure works and associated works.

**17/AP/3170 (Under construction)**

18-19 Crimscott Street. Redevelopment of the site to provide a part 6 / part 9 storey building (plus basement) with 1835sqm GIA of Class B1 office floorspace and 55 residential units (Class C3) and associated car and cycle parking and landscaping.

**19/AP/1286 (Approved)**

20 Crimscott Street. Two storey extension above existing light industrial building to provide 9 new flats with associated cycle and waste storage.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices and retail. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	The growing population under the intensification and revitalisation of the existing industrial and residential uses on site will produce economic synergy by creating new job opportunities for local residents and providing enterprise opportunities in the business area.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	A wider provision employment will help the population become more skilled, particularly in commercial uses.
IIAO 3	To improve the health of the population		✓✓	More job opportunities will be generated by the increase in employment space, which will help reduce poverty as residents will be more likely to be employed.

		✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is a key determinants of health
				The site allocation constitutes part of the masterplan with the view to connecting communities, by requiring development on site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, the new tube station and other local facilities such as Walworth Academy, primary schools and shops on the Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Improved permeability across the site will combat severance between communities and encourage community interaction
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓		Carbon offset fund will be collected from the development if it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, the new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new development within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
			✓✓	The typologies in the masterplan promote mixed-use development on site including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. Services for the new development be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.

<b>IIAO 9</b>	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The site is not within a conservation area but development should enhance the setting of the Pages Walk and Bermondsey Street conservation areas.</p> <p>The site includes part of Grade II listed buildings 44 and 45 Grange Road.</p> <p>Part of the site lies within the Background Assessment Area of LVMF view 3A.1 from the Kenwood viewing gazebo to St Paul's Cathedral. Part of the site falls within the Borough View of St Paul's Cathedral from Nunhead Cemetery.</p> <p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.</p> <p>A strategy for archaeological investigation and mitigation is required for this site.</p> <p>Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	As part of Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In accordance with the masterplan, development on the site allocation will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 14) will have a "more vulnerable" use (mixed use including residential, employment, community and town centre uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will bring forward job opportunities with the retail and employment space reprovided at least the same amount currently on site, which will help tackle poverty</li> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> </ul>

				<ul style="list-style-type: none"> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Improved permeability across the site will combat severance between communities and encourage community interaction</li> <li>- Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety</li> <li>- AAP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to manmade climate change</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site-specific emergency evacuation procedures, flood resilient construction techniques and SuDS.</p> <p>No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Applications 15/AP/2474, 17/AP/3170 and 19/AP/1286 are relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with each application and has been considered in the decision making process. The site-specific FRAs demonstrate that the developments will be safe for their lifetimes, taking account of the vulnerability of its users, that the developments will not increase flood risk elsewhere, and that, where possible, flood risk will be reduced overall by the measures introduced by these schemes. The Environment Agency were consulted during the planning process for all applications and they have advised that they would have no objection to the proposals. A Basement Impact Assessment is required for any development proposals incorporating new or extended basement areas, and for the cases already granted on this site this assessment was submitted either at the point of application or has been secured by condition.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓ ✓✓ ✓✓ ✓✓ ✓✓	<p>The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP 14's fast track route for planning applications which trigger the affordable housing requirement.</p> <p>Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p> <p>By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.</p> <p>The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.</p>
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	<p>In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced</p>

				with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New development will create walkable neighbourhoods, being car free and the proximity to the new tube stations of the Bakerloo line extension.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The granted permissions within the site allocation will deliver a new gallery space or artist studios. This is an important part of infrastructure providing cultural uses within the borough.
			✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward the enhancement in infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development to ensure it is well supported by the essential travel infrastructure.



**OKR3: Mandela Way (NSP58)**

Site requirements

Redevelopment of the site must:

- Replace existing employment floorspace and provide a range of employment spaces, which are consistent with the building and land use types shown in Figure SA1.3 ; and
- Provide light industrial or warehouse distribution uses as part of mixed use development on Locally Significant Industrial Land; and
- Provide new homes; and
- Provide a new primary school; and
- Provide community uses ; and
- Provide a new park shown in Figure SA1.2; and
- Provide a pedestrian and cycle link from East Street via Hendre Road to Willow Walk and on to Bermondsey Spa.

Redevelopment of the site may:

- Provide retail; and
- Provide the option of relocating Tesco from its existing site onto Mandela Way in order to deliver the Burgess Park Bakerloo Line Station and maintain continuity of trade for Tesco

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The growing population under the intensification and revitalisation of the existing industrial and residential uses on site will produce economic synergy by creating new job opportunities for local residents and providing enterprise opportunities in the business area. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Aligning with the policies in the plan, the development will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated in the sub area as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space will help reduce poverty as an underlying determinant.
			✓✓	The provision of new public open space will provide opportunities for play and open-air sports facilities, enabling exercise which supports good physical health and mental health as well as facilitate relaxation and socialising is also beneficial for health and well being.
			✓✓	The provision of a new link from Hendre Way to Cycleway1 on Willow Walk will encourage more opportunities for walking and cycling contributing to good physical health and mobility through exercise.
			✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and activation of frontages and new open spaces will promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Improved permeability across the site will help combat severance between communities and encourage community interaction.

			✓✓	A new public space for people to sit and gather will enable people from different cultures and backgrounds to interact in a shared space, encouraging community cohesion.
			✓✓	New entertainment and arts facilities will benefit the entire community, and may encourage more community interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through the new development within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
			✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development on site services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The site allocation will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development on site ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site partially lies within the Page's Walk Conservation Area and should enhance its setting.
			✓	The site should enhance the setting of Grade II listed building The White House.
			✓	Much of the site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster. Much of the site falls within the Borough Views of St Paul's Cathedral from Nunhead Cemetery and One Tree Hill.  Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads lies within the 'Bermondsey Lake' Archaeological Priority Area. A strategy for archaeological investigation and mitigation is required.

				<p>The site is in proximity of the Bermondsey Abbey Buildings.</p> <p>Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
			✓	<p>The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	<p>As part of the Greener Belt Strategy, the sub area provides a strategic planning for new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces providing a tranquil environment and comfortable places to sit and socialise or rest.</p>
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 14) will have a "more vulnerable" use (mixed use including residential, employment, community and town centre uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will bring forward job opportunities with the retail and employment space reprovided at least the same amount currently on site, which will help tackle poverty</li> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Improved permeability across the site will combat severance between communities and encourage community interaction</li> <li>- Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety</li> <li>- AAP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to manmade climate change</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site-specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>Basement dwellings should not be permitted within this area (Flood Zone 3). A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas for non-domestic use.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	<p>The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.</p>
			✓✓	<p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement.</p>
		✓✓	✓✓	<p>Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p>



			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. The provision of a new link from Hendre Way to Quietway 1 on Willow Walk through the site allocation will encourage more opportunities for walking and cycling contributing to good physical health and mobility through exercise will further promote active transport modes.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward the enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development on site to ensure it is well supported by the essential travel infrastructure.  In addition, a wide range of infrastructure, serving economic, social and environmental purposes will be delivered to increase the capacity in supporting the existing and new residents and fostering cohesive and well-connected communities

**OKR4: 107 Dunton Road (Tesco store and car park) and Southernwood Retail Park (NSP59)**

Site requirements

Redevelopment of the site must:

- Replace existing retail floorspace, including a new supermarket; and
- Provide new homes (C3); and
- Provide community uses; and
- Provide public open space to support a connection to Burgess Park; and
- Provide a tube station, tunnelling and worksite requirements will need to be incorporated into the site design and phasing.

Redevelopment of the site should:

- Provide employment uses, consistent with the building and land use types shown in Figure SA1.3.

Redevelopment of the site may:

- Provide new visitor accommodation.

Relevant planning applications

18/AP/3551 (Approved subject to S106)or

Southernwood Retail Park. Hybrid planning application for detailed permission for Phase 1 and outline planning permission for Phase 2 comprising:

Application for full planning permission for 'Phase 1' comprising demolition of existing buildings and the erection of a part 9, part 14, part 15, part 48 storey development (plus basement) up to 161.25m AOD, with 940 sqm GIA of (Class A1) retail use, 541 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use, 8671 sqm GIA (Class C1) hotel; 541 (class C3) residential units (51,757 sqm GIA); landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works.

Application for outline planning permission (with details of internal layouts and external appearance reserved) for 'Phase 2' comprising demolition of existing buildings and the erection of a part 9, part 12, storey development (plus basement) up to 42.80m AOD, with 1049 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use; 183 (Class C3) residential units (17,847sqm GIA), 1141 sqm GIA (Class D2) cinema and the creation of a 475 sqm GIA (Class C1) hotel service area at basement level; landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail, and leisure facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	A wider provision of employment will help the population become more skilled, particularly in commercial uses.
			✓✓	Aligning with the policies in the plan, major development on site will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space will help reduce poverty as an underlying determinant.
			✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The provision of new public open space will provide opportunities for play and open-air sports facilities, enabling exercise which supports good physical health and mental health as well as facilitate relaxation and socialising is also beneficial for health and well being.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.

IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Improved permeability across the site will help combat severance between communities and encourage community interaction.
			✓✓	A new café will be provided where people can sit and gather which will enable people from different cultures and backgrounds to interact in a shared space, encouraging community cohesion.
			✓✓	The scheme will provide D2 uses (including a cinema) for the whole community to use which may help to encourage more community interaction and community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through the new development within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
			✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For the site allocation services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development on site ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height. As such, the site will provide and new landscaping and improved public realm.

				Enhanced high-quality public realm should also provide for a much improved engaging townscape which allows for freer movement and social interaction.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.</p> <p>The site is in close proximity of the Coburg Road Conservation Area.</p> <p>The site is in close proximity of the Grade II listed Former Fire Station.</p> <p>Part of the site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster. Part of the site lies within the Borough View of St Paul's Cathedral from Nunhead Cemetery.</p> <p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.</p> <p>Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	New landscaping and green infrastructure provided are a major part of the site vision, creating opportunities to improve biodiversity.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 14) will have a "more vulnerable" use (mixed use including residential, employment, community open space new visitor accommodation and town centre uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will bring forward job opportunities with the retail and employment space reprovided at least the same amount currently on site, which will help tackle poverty</li> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The provision of new public open space will provide opportunities for play and open-air sports facilities, enabling exercise which supports good physical health and mental health as well as facilitate relaxation and socialising is also beneficial for health and well being</li> <li>- Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Improved permeability across the site will combat severance between communities and encourage community interaction</li> <li>- Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety</li> <li>- AAP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to manmade climate change</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS.</p> <p>No basement dwellings should be permitted in this area (Flood Zone 3).</p>

				<p>Application 18/AP/3551 is relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment and Drainage Strategy were submitted with this application and have been considered in the decision making process. The site-specific FRA and drainage strategy have been reviewed by the Environment Agency and the Drainage Team respectively. The drainage strategy has confirmed that:</p> <ul style="list-style-type: none"> <li>- All sleeping accommodation has been set above the flood protection level of 2.65mAOD; and</li> <li>- 30% of the ground floor of the site is permeable amenity space.</li> </ul> <p>The targeted discharge rates from the site, in line with greenfield rates for each duration are as follows:</p> <ul style="list-style-type: none"> <li>- 1 in 1 year storm - 3.60 l/s;</li> <li>- 1 in 30 year storm - 9.77 l/s; and</li> <li>- 1 in 100 year storm - 13.55 l/s.</li> </ul> <p>The site will also include blue and green roofs as well as permeable paving and underground storage tanks.</p> <p>The scheme includes provision for a large basement to be delivered across two phases. A basement impact assessment has been submitted and no concerns were raised from a flood risk perspective and would not have a detrimental impact on the environment. The assessment concluded that the proposed development can be constructed without adverse impacts to groundwater, surface water, and ground movements. As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New walkable neighbourhoods will benefit from the new parks and spaces in the greener belt, new developments that will be car free and the proximity to the new tube stations of the Bakerloo line extension.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The delivery of a new Health Centre will ensure sufficient, accessible and higher quality primary and community health services for a growing population.
			✓✓	The scheme will provide community uses (including a cinema) which will act as important community facilities for cultural uses within the borough to support existing and future development.
			✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development in the area to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.





**OKR5: Salisbury estate car park (NSP60)**

Site requirements

Redevelopment of the site must:

- Provide new homes.

Redevelopment of the site may:

- Provide community uses.

Relevant planning applications

19/AP/1506 (Approved)

Salisbury Estate Car Park, Balfour Street. Redevelopment of the existing car park to provide 26 residential units in a 5 storey block with maximum height of 21.8m AOD (5 x 3 bed 5 person flats, 9 x 2 bed four person flats & 9 x 1 bed 2 person flats, 2 x 2 bed wheelchair units and 1 x 1 bedroom wheelchair unit) together with new private amenity space located within a rear courtyard as well as improving the landscaping of the existing pedestrian link between Chatham Street and the open green space to the south of the site for public use. Two disabled parking spaces to be provided to the north of the site accessed off Chatham Street.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs during construction and in the new community facilities once they are completed. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Aligning with the policies in the plan, major development on the site allocation will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The site will improve the pedestrian link between Chatham Street and the open green space to the south of the site for public use this will improve walkability in the area encouraging more active modes of transport which is beneficial for health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion.

IIAO 6	To reduce contributions to climate change	✓✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	<p>It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change, with requirements as follows:</p> <p>The cycle storage proposed for the development (46 cycle spaces) meets the requirements of the London Plan however falls significantly short of the emerging New Southwark Plan recommendation of 76 spaces, this will still however contribute to creating opportunities for more sustainable travel and reducing the carbon footprint.</p> <p>The prospective residents of this development (with the exception of wheelchair users) will be barred from obtaining car parking permits under the CPZ in this locality, reducing opportunities for car parking will encourage occupants of the development to use more sustainable modes of transport.</p> <p>The site will improve the pedestrian link between Chatham Street and the open green space to the south of the site for public use this will improve walkability in the area encouraging more active modes of transport which will contribute to creating opportunities for more sustainable travel and reducing the carbon footprint.</p>
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
IIAO 7	To improve the air quality	✓✓	✓✓	<p>The application site is located within an Air Quality Management Area. An Air Quality Assessment has identified that concentrations of all pollutants are below the air quality objectives, with the exception of NO2. Filters will be used to ensure compliance as a mitigation measure.</p> <p>In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.</p>
			✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development on site services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height.



				The development on this site will provide improved landscaping and public realm improvements contributing to a welcoming pedestrian environment and townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height.</p> <p>The site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster and LVMF view 1A.2 Alexandra Palace viewing terrace to St Paul's Cathedral.</p> <p>The site is adjacent to Grade II listed Lady Margaret Church.</p> <p>Development will be respectful to the designations of conservation areas and listed buildings and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	As part of the Greener Belt Strategy, the sub area provides a strategic planning for new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces providing a tranquil environment and comfortable places to sit and socialise or rest.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 14) will have a "more vulnerable" use residential use) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will bring forward job opportunities with the retail and employment space reprovided at least the same amount currently on site, which will help tackle poverty</li> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The site will improve the pedestrian link between Chatham Street and the open green space to the south of the site for public use this will improve walkability in the area encouraging more active modes of transport which is beneficial for health</li> <li>- Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Application 19/AP/1506 is relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with this application and has been considered in the decision making process. The site-specific FRA demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. The Environment Agency were consulted during the planning process and they have advised that they would have no objection to the proposals.</p>

				As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New walkable neighbourhoods will benefit from the new parks and spaces in the greener belt, new developments that will be car free and the proximity to the new tube stations of the Bakerloo line extension.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development in the area to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.

**OKR6: 96-120 Old Kent Road (Lidl store) (NSP61)**

Site requirements

**Redevelopment of the site must:**

- Provide new homes and replace the amount of retail currently on the site

**Redevelopment of the site may:**

- Provide community and employment uses.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail and community facilities. The provision of new (B1 uses) and new town centre (including shops and retail outlets, professional services, food and drink, drinking establishments) and community uses will allow staff to gain new skills whilst working in these establishments. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Aligning with the policies in the plan, major developments in the sub area will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated in the sub area as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health
			✓✓	The sub area aims to connect communities by requiring development on site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, the new tube station and other local facilities such as Walworth Academy, primary schools and shops on the Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime. The activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The proposal will provide new community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion

IIAO 6	To reduce contributions to climate change	✓✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
			✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development in the sub area services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.  The site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster. The site falls within the Borough View of St Paul's Cathedral from One Tree Hill.  Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of conservation areas and listed buildings and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	As part of Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level 2 - Analysis 14) will have a "more vulnerable" use (mixed use including residential, town centre, employment and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:



				<ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality and contributing to reduction in greenhouse emissions</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>No basement dwellings should be permitted in this area (Flood Zone 3). Basement thresholds must be raised above the 2100 maximum water level, anticipated through breach of the River Thames defences. Internal access to upper floors must be provided and flood resilient design and construction techniques employed. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>SuDS selection and design should be in accordance with the sustainable drainage hierarchy and provide sufficient capacity to cater for all events up to the 1 in 100 year storm event, incorporating the latest allowances for climate change. Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. In keeping with this strategic objective, new development will be car free and encourage active travel mode with new green links and the proximity to the new tube stations of the Bakerloo line extension.
IIAO 17		✓✓	✓✓	The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.

	To provide the necessary infrastructure to support existing and future development		✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development in the area to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.
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**OKR7: Former petrol filling station, 233-247 Old Kent Road (NSP62)**

Site requirements

Redevelopment of the site must:

- Provide new homes and replace the amount of retail currently on the site

Redevelopment of the site may:

- Provide community and employment uses.

Relevant planning applications

18/AP/0928 (Under construction)

233-247 Old Kent Road. Demolition of existing buildings and structures and erection of a new part 3, 4 and 5 storey building to provide three retail units (flexible A1/A2 use) at part ground floor and 24 residential units (C3 use) at part ground floor and on the upper floors, including the provision of secure cycle parking facilities, bin stores and communal amenity space (revised application). (11 x 2 bed private units & 6 x 1 bed, 2 x 7 bed affordable units).

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, retail and the community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new town centre uses (including shops and retail outlets, professional services, food and drink, drinking establishments) will allow staff to gain new skills whilst working in these establishments.
			✓✓	Aligning with the policies in the plan, new development on this site will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health
			✓✓	The sub area aims to connect communities by requiring new development on this site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, the new tube station and other local facilities such as Walworth Academy, primary schools and shops on the Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime. Activation of frontages will open up spaces to promote overlooking of communal areas and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.

IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Activation of frontages and the communal amenity spaces will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the site allocation requirement as part of the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓	✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
			✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	✓	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development on this site services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development on this site ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height. In addition, the shared communal space on the ground floor will contribute to softening the landscape and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.  The site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster. The site falls within the Borough View of St Paul's Cathedral from One Tree Hill.  Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.



				Development will be respectful to the designations of conservation areas and listed buildings and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	As part of Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.
<b>IIO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 14) will have a "more vulnerable" (residential and town centre uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will bring forward job opportunities with the retail and employment space reprovided at least the same amount currently on site, which will help tackle poverty</li> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction.</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The provision of new town centre uses (including shops and retail outlets, professional services, food and drink and drinking establishments) will allow staff to gain new skills whilst working in these establishments</li> <li>- Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>Application 18/AP/0928 is relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with this application and has been considered in the decision making process. The site-specific FRA and drainage strategy demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. Recommendations were set out in the case report to ensure this.</p> <p>No basements dwellings should be permitted in this area (Flood Zone 3).</p> <p>The Environment Agency were consulted during the planning process and they have advised that they would have no objection to the proposals.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.

<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. Development on this site will create new walkable neighbourhood that is car free, provides cycle storage and enjoys the proximity to the new tube stations of the Bakerloo line extension.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development on site to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.

**OKR8: Kinglake Street Garages (NSP63)**

Site requirements

Redevelopment of the site must:

- Provide new homes and retail uses.

Redevelopment of the site may:

- Provide community uses.

Relevant planning applications

16/AP/4589 (Under construction)

282-286 Old Kent Road. Construction of a part 4, 6 and 7 storey mixed use development providing 105sqm commercial use (Class A1 and A2 Use), 68sqm community use (Class D Use) and 6 x 1 bed flats (including one wheelchair accessible flat), 9 x 2 bed flats (including one wheelchair accessible flat), 2 x 3 bed flats and 4 x part 2 / part 3 storey 3 bed mews houses together with associated landscaping works to Ivy Church Lane including the provision of two dedicated wheelchair accessible parking bays.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new town centre (including shops and retail outlets, professional services, food and drink, drinking establishments) and community uses will allow staff to gain new skills whilst working in these establishments.
			✓✓	Aligning with the policies in the plan, major developments in the sub area will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated in the sub area as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The sub area aims to connect communities by requiring development on this site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, the new tube station and other local facilities such as Walworth Academy, primary schools and shops on the Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime. In keeping with this design principle, the activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.

IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The proposal will provide new community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development on this site services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height. The site will provide and new landscaping and improved public realm. Enhanced high-quality public realm should also provide for a much improved engaging townscape which allows for freer movement and social interaction.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.
				The site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster. The site falls within the Borough View of St Paul's Cathedral from One Tree Hill.
				Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of conservation areas and listed buildings and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	As part of Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.  The proposal would include shrub planting in front of the new houses and 4 new trees on the parking/access strip on Ivy Church Lane A biodiverse roof is also proposed to development granted which will encourage biodiversity.

<p><b>IIAO 14</b></p>	<p>To reduce vulnerability to flooding</p>	<p>✓</p>	<p>✓</p>	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 15) will have a “more vulnerable’ use (mixed use including town centre, residential and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4’s fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The creation of new green links will combat severance between communities and encourage community interaction</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality and contributing to reduction in greenhouse emissions</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The accessibility to Brockwell Park will be enhanced by the new pedestrian link of Half Moon Line, which will promote the public appreciation of the significant green space and improve the green linkages. As such it will promote the green corridors and biodiversity</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Application 16/AP/4589 is relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with this application and has been considered in the decision making process. The site-specific FRA proposes flood resilience measures, emergency evacuation procedures and construction techniques such as water tight doors, water proof construction techniques and usage of sensitive materials above ground.</p> <p>The Environment Agency were consulted during the planning process for all applications and they have advised that they would have no objection to the proposals.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<p><b>IIAO 15</b></p>	<p>To provide everyone with the opportunity to live in a decent home</p>	<p>✓✓</p>	<p>✓✓</p>	<p>The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4’s fast track route for planning applications which trigger the affordable housing requirement.</p> <p>Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p> <p>By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.</p> <p>The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.</p>



<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	<p>In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area.</p> <p>The development proposals include a total of 36 cycle spaces for the residential scheme. The terrace of houses will have private cycle stores, (2 per dwelling) within the gardens. Storage for 28 bicycles would be provided within the ground floor of the flatted block. Two spaces would also be provided for the commercial unit. Ensuring provision for cycle storage will help to encourage residents to use more active modes of transport and minimise the need to travel by car. In addition, The proposal would result in the loss of 48 garages and 4 external parking spaces.</p>
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	<p>The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres which are all important facilities for community and cultural uses within the borough to support existing and future development.</p> <p>The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development on this site to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.</p>

Site requirements

## Redevelopment of the site must:

- Provide new homes, retail uses on the Old Kent Road frontage and replace the existing employment uses on the site.

## Redevelopment of the site may:

- Provide community uses.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new town centre (including shops and retail outlets, professional services, food and drink, drinking establishments) and community uses will allow staff to gain new skills whilst working in these establishments.
			✓✓	Aligning with the policies in the plan, major developments in the sub area will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated in the sub area as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The sub area aims to connect communities by requiring development on this site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, the new tube station and other local facilities such as Walworth Academy, primary schools and shops on the Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime. In keeping with this design principle, the activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The proposal will provide new D uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.

IIAO 6	To reduce contributions to climate change	✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
			✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development on this site services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓✓	✓✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development on this site ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.  The site is in close proximity of the Grade II listed former Fire Station on Shorncliffe Road. The unlisted Thomas A. Beckett Pub adjacent to the site is of architectural and historic interest.  The site lies within the Borough View of St Paul's Cathedral from Nunhead Cemetery.  1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of conservation areas and listed buildings and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity of the entrance to Burgess Park (Metropolitan Open Land).  Development should seek to enhance open spaces near the site.



			✓	As part of Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 15) will have a “more vulnerable” use (mixed use including residential, employment, town centre and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4’s fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The proposal will provide new community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4’s fast track route for planning applications which trigger the affordable housing requirement. .
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.

<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New development will create a new walkable neighbourhood that will be car free, provide cycle storage and enjoy the proximity to the new tube stations of the Bakerloo line extension.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate D uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
		✓✓	✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development on this site to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.

Detailed integrated impact assessment for:

**Sub Area 2: Cantium Retail Park and Marlborough Grove**

Including:

- OKR 10 – Land bounded by Glengall Road, Latona Road and Old Kent Road (NSP66)
- OKR 11 – Marlborough Grove and St. James’s Road (NSP64)
- OKR 12 – Former Southern Railway Stables (NSP62)

IIAO	Sub Area 2				OKR10/ NSP66	OKR11/ NSP67	OKR12/ NSP65
	Area wide	S	M	L			
IIAO 1	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 2	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 3	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 4	✓	-	✓	✓	✓✓	✓✓	✓✓
IIAO 5	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 6	✓✓	✓✓	✓✓	✓✓	✓	✓	✓✓
IIAO 7	✓✓	-	✓✓	✓✓	✓	✓✓	✓✓
IIAO 8	✓	✓	✓	✓	✓✓	✓	✓
IIAO 9	✓	✓	✓	✓	✓	✓	✓
IIAO 10	✓	✓	✓	✓	✓	✓	✓
IIAO 11	✓	✓	✓	✓	✓	✓	✓
IIAO 12	✓	-	✓	✓	✓	✓	✓✓
IIAO 13	✓	-	✓	✓	✓✓	✓✓	✓✓
IIAO 14	✓	-	✓	✓	✓	✓	✓
IIAO 15	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 16	✓✓	-	✓✓	✓✓	✓	✓	✓
IIAO 17	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓
<b>Avg.</b>	<b>79%</b>	<b>32%</b>	<b>79%</b>	<b>79%</b>	<b>79%</b>	<b>76%</b>	<b>82%</b>

Sub Area 2: Cantium Retail Park and Marlborough Grove

Sub Area 2: Cantium Retail Park and Marlborough Grove						
IIA Objective	Description	Area-wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	The area-wide redevelopment will revitalise the neighbourhood with an improved living environment that will encourage inward investment and boost local economy such as retail uses serving the local community. For example, OKR10 (Land bounded by Glengall Road, Latona Road and Old Kent Road), current home to existing 41 businesses will be redeveloped into a mixed-use scheme which see 2,430 new jobs and 4,800 new homes.
		✓✓	✓	✓✓	✓✓	The growing population under the intensification and revitalisation of the existing industrial and residential area will produce economic synergy by creating new job opportunities for local residents and providing enterprise opportunities in the business area.
		✓✓	✓	✓✓	✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
	<b>Average Scoring</b>	✓✓	✓	✓✓	✓✓	
IIAO 2	To improve the education and skill of the population	✓✓	✓	✓	✓✓	Opportunities for the potential expansion of existing schools to provide high quality education opportunities for the new generations in the area.
		✓✓	✓✓	✓✓	✓✓	Aligning with the policies in the plan, major developments in the sub area will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
		✓✓	✓✓	✓✓	✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated in the sub area as the provision is required for planning applications during the construction phase and in completed developments.
	<b>Average Scoring</b>	✓✓	✓✓	✓✓	✓✓	
IIAO 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	The area vision looks to deliver excellent design that expresses timeless quality and variety within buildings and public spaces in between, contributing to the sense of different districts and to the health and well-being of communities across the development area.

		✓✓	✓	✓✓	✓✓	The sub area aims to connect communities by requiring development to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, the new tube station and other local facilities such as a new sports hall, primary schools and shops on the Peckham Park Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.
	<b>Average Scoring</b>	✓✓	✓	✓✓	✓✓	
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	-	✓✓	✓✓	Aligning with the policies in the plan, it will deliver mixed communities on different income levels and social backgrounds with the tenure-blind approach and at least 35% affordable housing with preference to social rented housing.
		✓✓	-	✓✓	✓✓	Recognising the potential of regeneration with new residents whilst protecting existing communities, the redevelopment will offer a range of housing tenures and sizes, phased over a number of years, to attract and facilitate existing residents to stay and benefit from the improved connections, facilities and communities.
		✓✓	-	✓✓	✓✓	A wide range of community infrastructure will be provided to serve the area, including schools, new parks, sports facilities and new civic spaces such as Frensham Street and Leyton Square to promote social interaction, participation and cohesion among residents on different backgrounds.
		✓✓	✓✓	✓✓	✓✓	To ensure planning works to benefit all from regeneration, a Social Regeneration Charter is drawn up for the area which sets out detailed aims for reducing social, economic and health inequalities and explains how the council will monitor the progress towards achieving a number of promises which the council has made to the community.
		<b>Average Scoring</b>	✓✓	-	✓✓	✓✓
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
		✓✓	✓✓	✓✓	✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.

		✓✓	✓	✓✓	✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
	<b>Average Scoring</b>	✓✓	✓✓	✓✓	✓✓	
<b>IIAO 7</b>	To improve the air quality	✓✓	-	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
		✓✓	-	✓✓	✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
	<b>Average Scoring</b>	✓✓	-	✓✓	✓✓	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. The sub area consists of an integrated waste management facility for the development within the opportunity area.
		✓✓	✓✓	✓✓	✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
	<b>Average Scoring</b>	✓	✓	✓	✓	
<b>IIAO 9</b>	To encourage sustainable use of water resources	✓	✓	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal



						sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance. For example, for OKR11, the scale of development will be the highest at the crossing of the junction of Rotherhithe New Road with Old Kent Road and in the centre of the site reducing in scale towards the school and the residential fringes of the sites.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level, including the bottling factory on Ossory Road and the chimneys on Bianca Road. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	As part of the Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.
IIAO 14	To reduce vulnerability to flooding	✓	-	✓	✓	<p>Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. Meanwhile, the plan requires flood risk to be reduced through implementing onsite sustainable urban drainage measures.</p> <p>Strategic flood risk assessment Level 2 has been prepared to assess the site allocations within the sub area. It provides evidence to ensure the proposed land uses are compatible with the relevant flood zone (i.e. passed the sequential test) and the sites having 'a more vulnerable use' have satisfied the exception test whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p> <p>Moreover, a detailed site-specific SFRA will be required for development on each site allocation to ensure flood risks will be properly mitigated and minimise flood risk to the wider area through measures on site as mentioned above.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	-	✓✓	✓✓	It delivers homes and a wider urban environment suitable for residents at all stages in their lives, encouraging people to live and work locally. This will include excellent cycling provision, safe secure streets with good building frontages and a choice of

						homes including a range of different sized homes, generous space standards and provision of specialist housing.
		✓✓	-	✓✓	✓✓	<p>Aiming to deliver regeneration that works for all, the redevelopment will provide a range of housing tenures and sizes to attract both new and existing residents, phased over a number of years to facilitate existing residents to move in to benefit the improved connections, facilities and communities.</p> <p>A Community Review Panel is also set up to help the council better understand the needs of the local community. This panel will comment on plans for development in the area, giving independent advice on planning and discussing important issues including housing, transport, public and green spaces, and the environment</p>
	<b>Average Scoring</b>	✓✓	-	✓✓	✓✓	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	-	✓✓	✓✓	<p>In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New walkable neighbourhoods will benefit from the new parks and spaces in the greener belt, new developments that will be car free and the proximity to the new tube stations of the Bakerloo line extension.</p> <p>The transition to less polluting and low carbon vehicles, such as electric vehicles, will be supported especially for commercial vehicles, which are using the street the most. As such, the sub area will provide the required infrastructure to support the transition to net zero carbon with the reliable source of fuel or electricity for the convenient and security of business operation.</p>
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	<p>The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development in the area to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.</p> <p>In addition, a wide range of infrastructure, serving economic, social and environmental purposes will be delivered to increase the capacity in supporting the existing and new residents and fostering cohesive and well-connected communities.</p>



**OKR10: Land bounded by Glengall Road, Latona Road and Old Kent Road (NSP66)**

Site requirements

**Redevelopment of the site must:**

- Provide new homes); and
- Replace existing employment floorspace and provide a range of employment spaces which is consistent with the building and land use types shown in Figure SA2.3; and
- Provide retail space on the Old Kent Road high street ; and
- Provide active frontages on Old Kent Road through provision of retail, business or community and cultural uses; and
- Provide community uses and cultural uses; and
- Provide open space including the Surrey Canal Linear Park and the pocket parks at Asda and Mcdonalds.

**Redevelopment of the part of the site designated as a Locally Significant Industrial Site (west of Ossory Road) must:**

- Provide new homes; and
- Provide industrial uses (light industrial uses and warehouse/distribution).

Applications relevant to this site

**17/AP/2773 (Approved)**

**Malt Street**

Hybrid application comprising a full planning application for Phase 1 (the 'Detailed Component') and outline planning permission (the 'Outline Component') for Phases 2 & 3:

**Detailed Component (Phase 1):**

Full planning permission for the demolition of existing buildings and structures and redevelopment of the central area for the erection of a total of 4 buildings, two at 7 storeys (Buildings B9& part B12), one at 15 storeys (Building B10), and one at 44 storeys (Building B4) (max height 147.12m AOD) to provide 420 homes, 1,197 sqm GEA of Class B1(c) floorspace and 785 sqm GEA of non-residential floor space within classes A1-A4 (retail), Class B1 (business) and Class D1 (public services) and D2 (entertainment and leisure) use, an energy centre (750 sqm) and new public open space and public realm with on street and basement car parking spaces and cycle spaces.

**Outline Component (Phase 2 & 3):**

Outline planning permission (scale, layout, landscaping, access and appearance reserved) for the demolition of existing buildings and structures and the erection of eight buildings (B1, B2, B3, B5, B6, B7, B11 and part B12) ranging in height from 5 to 35 storeys (max height 132.9m AOD) to provide up to 88,052sqm floorspace GEA, comprising up to 880 residential units, up to 3,316 sqm GEA of Class B1(c) floorspace and up to 1,702sqm GEA of non-residential floor space within Classes A1-A4 (retail), Class B1 (business), Class D1 (public services) and D2 (entertainment and leisure) use and car parking spaces at ground level and cycle spaces, with associated new open space, public realm, car parking and associated works.

Totals: Up to 1,300 homes and up to 7,000sqm commercial floorspace.

**17/AP/2952 (Approved)**

**57 Glengall Road**

Refurbishment of existing building, redevelopment of outbuildings and addition of two storeys to provide 5 no. B1 commercial units and 9 no. residential flats

**17/AP/4612 (Approved)**

**49 – 53 Glengall Road**

Demolition of all existing buildings and structures (excluding some of the facades along Glengall Road and Bianca Road and the industrial chimney) and erection of a part 6, 8 and 15 storey mixed-use development comprising 3,716 sqm (GIA) of flexible workspace (Use Class B1(c) and B2/B8) and 181 residential units (Use Class C3) with amenity spaces and associated infrastructure.

**18/AP/0564 (Approved)**

**16 Peckham Park Road and 1 Livesey Place**

Demolition of existing buildings and construction of a part three, part four storey building with retail and warehouse (A1) use on the ground floor and 5 residential units (3 x 2-bedroom and 2 studio flats) on upper floors.

17/AP/4596 (Approved)

Nyes Wharf, Frensham Street

Demolition of existing buildings and erection of mixed-use scheme comprising 1,193sqm Class B1 floorspace at ground and mezzanine levels; with 153 Residential units (Class C3) above in a building ranging from 9 to 18 storeys (max height 56.202m) with hard and soft landscaping including a new park and associated infrastructure works, including three disabled spaces and cycle parking.

18/AP/3246 (Approved subject S106)

Cantium Retail Park

Demolition of existing buildings and redevelopment of the site to provide a new basement level and buildings ranging from 3 to 48 storeys in height (max height 159.05m above ground level) comprising up to 1,113 residential units (Class C3), up to 5,659 sq. m of office floorspace (Class B1(a)), up to 2,228 sq. m of retail floorspace (Class A1), up to 2,336 sq. m of flexible space including use within Classes A1, A3, D1, D2 and / or Sui Generis (Theatre) within Block B and up to 596 sq. m of flexible space within Classes A1, A2 and / or A3 within Block C together with associated access, car parking, landscaping and infrastructure works.

18/AP/4003 (Approved subject to S106)

3-5 Latona Road

Proposed development to add three new storeys of residential accommodation to the existing building at 3-5 Latona Road. The existing Ground, First and Second floor will retain its commercial use. The proposed residential accommodation comprises ten flats in total; 2x1-Beds, 6x2-Beds and 2x3-Beds.

18/AP/3284 (Approved subject to S106)

596 – 608 Old Kent Road and Livesey Place

Mixed-use redevelopment comprising the demolition of all existing buildings and structures (listed mural to be removed and stored prior to demolition, and incorporated into proposed development); construction of three buildings arranged around a central plinth ranging in height from 10 to 38 storeys (maximum height +144.2m AOD) above single basement, ground and mezzanines floors, to provide a range of uses including 372 residential units (Use Class C3), place of worship (Use Class D1), retail (Use Classes A1-A4), and office / light industrial (Use Classes B1(a)/B1(c)); means of access, public realm and landscaping works, parking and cycle storage provision, energy centre / plant and servicing areas, and associated ancillary works.

20/AP/0039 (Approved subject to S106)

LSE, 43 – 47 Glengall Road

Demolition of the existing building and erection of a new mixed use building of up to 15 storeys (plus lower ground and basement) (51.525m AOD) to provide a Halls of Residence for the London School of Economics and Political Science consisting of 676 student rooms, replacement commercial floorspace of 2,375sqm consisting of 1190sqm of B1c, and 1,185sqm of flexible B1c/D1/A3 Use as a Creative Commercial Centre that includes University related community uses, a community café; and new areas of public realm.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail and community and leisure facilities. The increase in the number of local jobs will tackle poverty by decreasing the unemployment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment and retail uses will allow staff to gain new skills whilst working in these establishments.
			✓✓	Aligning with the policies in the plan, major developments on this site area will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.

		✓✓	✓✓	<p>The sub area aims to connect communities by requiring development on this site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, the new tube station and other local facilities such as a new sports hall, primary schools and shops on the Peckham Park Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.</p> <p>The provision of new open space will enable opportunities for play and open-air sports facilities, enabling exercise which supports good physical and mental health.</p>
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime. In keeping with this design principle, provision of a new open space for people to sit and gather will also provide natural surveillance within the area. In addition, the activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	<p>The proposal will provide new community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.</p> <p>Aligning with the policies in the plan, it will deliver mixed communities on different income levels and social backgrounds with the tenure-blind approach and at least 35% affordable housing with preference to social rented housing.</p>
IIAO 6	To reduce contributions to climate change	✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
			✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. The sub area consists of an integrated waste management facility for the development within the opportunity area.
			✓✓	The development on this site will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development on this site ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.

IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance. For example, a new public space will form part of this site allocation and will help soften and enhance the landscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level, including the bottling factory on Ossory Road and the chimneys on Bianca Road. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.</p> <p>The site includes the Grade II listed mural depicting the history of Old Kent Road and is in proximity of Grade II listed buildings on Glengall Road. The site contains buildings and features of townscape merit and two chimneys of historic interest.</p> <p>The western part of the site lies within the Borough View of St Paul's Cathedral from One Tree Hill.</p> <p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.</p> <p>Development should enhance the setting of the adjacent Glengall Road Conservation Area.</p>
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	<p>As part of the Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.</p> <p>The site allocation must provide new public open space. The provision of green spaces would improve the long term health and wellbeing of the population. This will help to enhance biodiversity and ecological resilience.</p>
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 15) will have a "more vulnerable" use (mixed use including residential, employment, town centre, open space and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment and retail uses will allow staff to gain new skills whilst working in these establishments</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The provision of new open space will enable opportunities for play and open-air sports facilities, enabling exercise which supports good physical and mental health</li> <li>- The proposal will provide new community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p>



				<p>Applications 17/AP/2773, 17/AP/2952, 17/AP/4612, 17/AP/4596, 18/AP/3246, 18/AP/4003, 18/AP/3284 and 20/AP/0039 are relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with each application where relevant and has been considered in the decision making process. The site-specific FRAs demonstrate that the developments will be safe for their lifetime taking account of the vulnerability of users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.</p> <p>The Environment Agency was consulted during the planning process for all applications which were within their remit and they have advised that they would have no objection to the proposals. Planning conditions in relation to flood risk management, including meeting greenfield runoff rates and paying financial contributions where there is a shortfall, have formed part of the permission.</p> <p>Where necessary, a Basement Impact Assessment has been submitted or secured by condition for proposals incorporating new or extended basement areas.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New development on this site will create a walkable neighbourhood that is car free, provides cycle storage and enjoys the proximity to the new tube stations of the Bakerloo line extension.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development on this site to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.

**OKR11: Marlborough Grove and St James's Road (NSP67)**

Site requirements

Redevelopment of the site must:

- Provide new homes; and
- Replace existing employment floorspace and provide a range of employment spaces which is consistent with the building and land use types shown I Figure SA2.3; and
- Provide retail space on the Old Kent Road high street; and
- Provide frontage on the Old Kent Road through provision of retail, and or community uses with business above; and
- Provide land for closing the central part of Marlborough Groe and providing open space, sports and play, for use of Phoenix Primary School and surrounding neighbourhoods; and
- Provide a new park between the Selco and Six Bridges estate sites.

Relevant planning applications

18/AP/0156 (Under construction)

272 St James's Road. Demolition of existing building and erection of a student accommodation building of up to nine storeys (maximum height 30.815m AOD, 29.525m from ground), to comprise 250 student rooms and associated communal facilities, 73 sqm cafe/retail space (A1/A3 use class), hard and soft landscaping, 2 disabled parking spaces and cycle parking.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these establishments.
			✓✓	Aligning with the policies in the plan, major developments on this site area will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The sub area aims to connect communities by requiring development on this site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, the new tube station and other local facilities such as a new sports hall, primary schools and shops on the Peckham Park Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.  The provision of new open space will enable opportunities for play and open-air sports facilities, enabling exercise which supports good physical and mental health. The provision of green spaces would improve the long term health and wellbeing of the population.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime. In keeping with this design principle, the provision of a new open space for people to sit and gather will also provide natural surveillance within the area. Moreover, the activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.

IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The proposal will provide new community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
			✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. The sub area consists of an integrated waste management facility for the development within the opportunity area.
			✓✓	The development on this site will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development on this site ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance. For example, a new public space will form part of this site allocation and will help soften and enhance the landscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.  The site is in close proximity to the Grade II listed Evelina Lowe School. The site contains buildings of townscape merit and buildings of architectural and historic interest.

				<p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.</p> <p>The site is in close proximity of Evelina Lowe Nature Garden (Other Open Space).</p> <p>Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	<p>As part of the Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.</p> <p>The site allocation must provide new public open space. This will help to enhance biodiversity and ecological resilience.</p>
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 15) will have a “more vulnerable” use (mixed use including residential, town centre, employment, open space and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4’s fast track route for planning applications which trigger the affordable housing requirement.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The creation of new green links will combat severance between communities and encourage community interaction</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality and contributing to reduction in greenhouse emissions</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Applications 18/AP/0156 is relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with the application and has been considered in the decision making process. The site-specific FRA proposes measures such as ensuring finished floor levels are at least 300mm above the maximum breach flood level on site, ensuring residential accommodation is above basement and lower ground floor as well as adopting flood resilient construction techniques such as the use of plasterboards and air bricks.</p> <p>The Environment Agency were consulted during the planning process for all applications and they have advised that they would have no objection to the proposals.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>		✓✓	✓✓	<p>The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.</p>



	To provide everyone with the opportunity to live in a decent home		✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
<b>I1AO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New development on this site will create a walkable neighbourhood that is car free, provides cycle storage and enjoys the proximity to the new tube stations of the Bakerloo line extension.
<b>I1AO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development on this site to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.

**OKR12: Former Southern Railway Stables (NSP65)**

Site requirements

Redevelopment of the site must:

- Retain the existing commercial floorspace and reuse for employment purposes; and
- Provide new public open space.

Redevelopment of the site should:

- Provide new homes).

Redevelopment of the site may:

- Provide community uses.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new office uses will allow staff to gain new skills whilst working in these establishments.
			✓✓	Aligning with the policies in the plan, major developments on this site area will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The sub area aims to connect communities by requiring development on this site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, the new tube station and other local facilities such as a new sports hall, primary schools and shops on the Peckham Park Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime. In keeping with this design principle, provision of a new open space for people to sit and gather will also provide natural surveillance within the area. Moreover, the activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The proposal will provide new community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.

			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
			✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. The sub area consists of an integrated waste management facility for the development within the opportunity area.
			✓✓	The development on this site will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development on this site ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance. For example, a new public space will form part of this site allocation and will help soften and enhance the landscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.
			✓	The unlisted former Southern Railway Stables, horse hospital and the forge are identified as buildings of architectural and historic interest and are subject to an Article 4 Direction. The stables, the horse hospital and the forge should be retained or repurposed for employment uses. The site is in proximity to the Grade II listed Eveline Lowe School.
			✓	Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.

IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	As part of the Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest. For example, the site allocation must provide new public open space.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 15) will have a “more vulnerable’ use (mixed use including residential, employment, and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4’s fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The proposal will provide new community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. No basement dwellings should be permitted in this area (Flood Zone 3). A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	<p>The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4’s fast track route for planning applications which trigger the affordable housing requirement.</p> <p>Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p> <p>By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.</p> <p>The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.</p>

<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New development on this site will create a walkable neighbourhood that is car free, provides cycle storage and enjoys the proximity to the new tube stations of the Bakerloo line extension.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development on this site to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.

Detailed integrated impact assessment for:

Sub Area 3: Sandgate Street, Verney Road and Old Kent Road (South)

Including

OKR 13 – Sandgate Street and Verney Road (NSP65)

OKR 14 – 634 – 636 Old Kent Road (NSP70)

OKR 15 – 684 – 698 Old Kent Road (Kwik Fit Garage) (NSP69)

	Sub Area 3			OKR13/ NSP68	OKR14/ NSP73	OKR15/ NSP72
	Area wide	S	M			
IIAO 1	✓✓	✓	✓✓	✓✓	✓✓	✓✓
IIAO 2	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 3	✓✓	✓	✓✓	✓✓	✓✓	✓✓
IIAO 4	✓	-	✓	✓✓	✓✓	✓✓
IIAO 5	✓✓	-	✓✓	✓✓	✓✓	✓✓
IIAO 6	✓✓	✓✓	✓✓	✓	✓✓	✓
IIAO 7	✓✓	-	✓✓	✓✓	✓✓	✓
IIAO 8	✓	✓	✓	✓	✓	✓
IIAO 9	✓	✓	✓	✓	✓	✓
IIAO 10	✓	✓	✓	✓	✓	✓
IIAO 11	✓	✓	✓	✓	✓	✓
IIAO 12	✓	-	✓	✓✓	✓	✓
IIAO 13	✓	-	✓	✓✓	✓	✓
IIAO 14	✓	-	✓	✓	✓	✓
IIAO 15	✓✓	-	✓✓	✓✓	✓✓	✓✓
IIAO 16	✓✓	-	✓✓	✓✓	✓✓	✓✓
IIAO 17	✓✓	✓	✓✓	✓✓	✓✓	✓✓
Avg.	79%	32%	79%	79%	82%	74%



Sub Area 3: Sandgate Street, Verney Road and Old Kent Road (South)

Sub Area 3: Sandgate Street, Verney Road and Old Kent Road (South)						
IIA Objective	Description	Area-wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	The area-wide redevelopment will revitalise the neighbourhood with an improved living environment that will encourage inward investment and boost local economy such as retail uses serving the local community. For example, OKR13 (Sandgate Street and Verney Road), current home to existing 59 businesses and 1,449 jobs, will be redeveloped into a mixed-use scheme which see 2,666 new jobs and 5,300 new homes, along with three parks, one sports hall, and a potential option for one school.
		✓✓	✓	✓✓	✓✓	The growing population under the intensification and revitalisation of the existing industrial and residential area will produce economic synergy by creating new job opportunities for local residents and providing enterprise opportunities in the business area.
		✓✓	✓	✓✓	✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
	<b>Average Scoring</b>	✓✓	✓	✓✓	✓✓	
IIAO 2	To improve the education and skill of the population	✓✓	✓	✓	✓✓	The sub area 3 will see a potential option for a new school as part of the site allocation requirement for OKR 13 alongside the expansion of existing schools to provide high quality education opportunities for the new generations in the area.
		✓✓	✓✓	✓✓	✓✓	Aligning with the policies in the plan, major developments in the sub area will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
		✓✓	✓✓	✓✓	✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated in the sub area as the provision is required for planning applications during the construction phase and in completed developments.
	<b>Average Scoring</b>	✓✓	✓✓	✓✓	✓✓	
IIAO 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	The area vision looks to deliver excellent design that expresses timeless quality and variety within buildings and public spaces in between, contributing to the sense of

						different districts and to the health and well-being of communities across the development area.
		✓✓	✓	✓✓	✓✓	The sub area aims to connect communities by requiring development to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, a tube station, workplaces and other local facilities such as a new sports hall, primary schools and shops on Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.
	<b>Average Scoring</b>	✓✓	✓	✓✓	✓✓	
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	-	✓✓	✓✓	Aligning with the policies in the plan, it will deliver mixed communities on different income levels and social backgrounds with the tenure-blind approach and at least 35% affordable housing with preference to social rented housing.
		✓✓	-	✓✓	✓✓	Recognising the potential of regeneration with new residents whilst protecting existing communities, the redevelopment will offer a range of housing tenures and sizes, phased over a number of years, to attract and facilitate existing residents to stay and benefit from the improved connections, facilities and communities.
		✓✓	-	✓✓	✓✓	A wide range of community infrastructure will be provided to serve the area, including schools, new parks, sports facilities and new civic spaces such as Gasholder Park and Caroline Gardens to promote social interaction, participation and cohesion among residents on different backgrounds.
		✓✓	✓✓	✓✓	✓✓	To ensure planning works to benefit all from regeneration, a Social Regeneration Charter is drawn up for the area which sets out detailed aims for reducing social, economic and health inequalities and explains how the council will monitor the progress towards achieving a number of promises which the council has made to the community.
	<b>Average Scoring</b>	✓✓	-	✓✓	✓✓	
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
		✓✓	✓✓	✓✓	✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a



					supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.	
		✓✓	✓	✓✓	✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
	<b>Average Scoring</b>	✓✓	✓✓	✓✓	✓✓	
<b>IIAO 7</b>	To improve the air quality	✓✓	-	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
		✓✓	-	✓✓	✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
	<b>Average Scoring</b>	✓✓	-	✓✓	✓✓	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development in the sub area services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
		✓✓	✓✓	✓✓	✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
	<b>Average Scoring</b>	✓	✓	✓	✓	

IIAO 9	To encourage sustainable use of water resources	✓	✓	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance. For example, the masterplan sets out the tallest 'Tier One' buildings should be located close to Old Kent Road, around the point where the Surrey Canal Park crosses the road and in conjunction with the Ruby Triangle open space proposed towards the centre of the site. Whereas, building heights should reduce immediately adjacent to the Canal Grove cottages in order to respect their more domestic scale.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level, including the listed large gasholder, the Canal Grove Cottages and the cobblestone paving as a feature of local townscape merit. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	As part of the Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.
IIAO 14	To reduce vulnerability to flooding	✓	-	✓	✓	<p>Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. Meanwhile, the plan requires flood risk to be reduced through implementing onsite sustainable urban drainage measures.</p> <p>Strategic flood risk assessment Level 2 has been prepared to assess the site allocations within the sub area. It provides evidence to ensure the proposed land uses are compatible with the relevant flood zone (i.e. passed the sequential test) and the sites having 'a more vulnerable use' have satisfied the exception test whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>

						Moreover, a detailed site-specific SFRA will be required for development on each site allocation to ensure flood risks will be properly mitigated and minimise flood risk to the wider area through measures on site as mentioned above.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	-	✓✓	✓✓	It delivers homes and a wider urban environment suitable for residents at all stages in their lives, encouraging people to live and work locally. This will include excellent cycling provision, safe secure streets with good building frontages and a choice of homes including a range of different sized homes, generous space standards and provision of specialist housing.
		✓✓	-	✓✓	✓✓	Aiming to deliver regeneration that works for all, the redevelopment will provide a range of housing tenures and sizes to attract both new and existing residents, phased over a number of years to facilitate existing residents to move in to benefit the improved connections, facilities and communities.  A Community Review Panel is also set up to help the council better understand the needs of the local community. This panel will comment on plans for development in the area, giving independent advice on planning and discussing important issues including housing, transport, public and green spaces, and the environment
	<b>Average Scoring</b>	✓✓	-	✓✓	✓✓	
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	-	✓✓	✓✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New walkable neighbourhoods will benefit from the new parks and spaces in the greener belt, new developments that will be car free and the proximity to the new tube stations of the Bakerloo line extension.  The transition to less polluting and low carbon vehicles, such as electric vehicles, will be supported especially for commercial vehicles, which are using the street the most. As such, the sub area will provide the required infrastructure to support the transition to net zero carbon with the reliable source of fuel or electricity for the convenient and security of business operation.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development in the area to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.  In addition, a wide range of infrastructure, serving economic, social and environmental purposes will be delivered to increase the capacity in supporting the existing and new residents and fostering cohesive and well-connected communities.

OKR13: Sandgate Street and Verney Road (NSP68)

Site requirements

Redevelopment of the site must:

- Provide new homes; and
- Provide the same amount of retail floorspace currently on the site and activate the Old Kent Road high street frontage; and
- Provide community uses; and
- Provide an option for a potential for new school; and
- Provide a sports hall; and
- Explore the potential for a new health hub on Verney Way; and
- Provide the same amount of employment floorspace currently on the site and provide a range of employment spaces which is consistent with the building and land use types shown in Figure SA3.3; and
- Provide public open space including the Surrey Canal Linear Park, gasholder park and new pocket park at the Ruby Triangle and on the KFC site.

Relevant planning applications

16/AP/5235 (Built)

Varcoe Service Station, 1 Varcoe Road. Demolition of existing building and development comprising a part six, part 7 and part eight storey building to accommodate 57 new affordable residential units (Use Class C3) and provision of flexible employment / retail space on ground floor (Use Class B1, A1-A3).

18/AP/0897 (Approved)

Ruby Triangle. full planning permission is sought for demolition of existing buildings and structures on the site, and redevelopment consisting of three buildings at maximum heights of 17 storeys (including mezzanine) (+64.735m AOD), 48 Storeys (+170.830m AOD) and 40 storeys (including mezzanine) (+144.750m AOD), plus single storey basement under part of the site. Development would provide 1,152 residential dwellings (Class C3), retail, business and community spaces (Classes A1, A2, A3, A4, B1(a),(b),(c) and D1), public sports hall and gym (Class D2), public and private open space, formation of new accesses and alterations to existing accesses, energy centre, associated car and cycle parking and other associated works.

17/AP/4508 (Approved subject to S106)

6-12 Verney Road. Redevelopment of the site for a mixed use development comprising three buildings (Building 1: basement, ground, ground mezzanine plus 17 storeys (AOD 66.975m); Building 2: basement, ground, ground mezzanine plus 22 storeys (AOD 81.975m); Building 3: basement, ground, ground mezzanine plus 16 storeys (AOD 62.675m) to accommodate 338 residential unit, 5,234 Sqm GEA of commercial floor space (Class B1(c)), associated cycle and car parking, servicing, refuse and recycling, landscaping including contribution towards the new Surrey Canal linear park, and private and communal residential amenity space and children's playspace.

18/AP/0196 (Approved subject to S106)

Ruby Street, Murdoch Street and 685-695 Old Kent Road. Demolition of existing buildings and erection of and construction of a part 3, part 7, part 22 storey building (76.6m from ground level), with roof level amenity space, comprising 111 dwellings, 1,151 sqm (GIA) of D1 floorspace for a church with ancillary communal facilities, 2,173 sqm (GIA) of workspace (B1 (a/b/c) Use Class) and 87 sqm (GIA) of A1/A2/B1 floorspace, with associated landscaping, car and cycle parking, servicing and refuse and recycling facilities.

18/AP/2895 (Under construction)

Varcoe Road

Demolition of existing buildings and erection of a new mixed use development comprising a part 7, part 9 storey (maximum height above ground of 29.99m) building of 288sqm commercial floor space (Use Class B1) and 74 residential dwellings (Use Class C3) with associated bin stores, cycle stores, plant rooms and hard and soft landscaping.

19/AP/1710 (Approved subject to S106)

Carpet Right Site, 651 – 657 Old Kent Road

Full planning permission is sought for the demolition of existing buildings on the site and the comprehensive mixed-use redevelopment of the site comprising of two buildings of 10-storeys plus mezzanine (up to 38.900m AOD) and 19-storeys plus mezzanine (up to 71.500m AOD), comprising 262 residential units (Use Class C3 use), 2,736sqm GEA of flexible retail and commercial floorspace (Class A1/A2/A3/A4/B1 uses) at ground and mezzanine level, new public park, private and communal amenity space, associated car and cycle parking, access and servicing arrangements, plant and other associated works.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail, community facilities and the newly provided educational facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these establishments.
			✓✓	Aligning with the policies in the plan, major developments on this site will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The sub area aims to connect communities by requiring development on this site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, a tube station, workplaces and other local facilities such as a new sports hall, primary schools and shops on Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities. For example, the provision of new open space will enable opportunities for play and open-air sports facilities, enabling exercise which supports good physical and mental health. The provision of green spaces would improve the long term health and wellbeing of the population.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime. In keeping with this principle, provision of a new open space for people to sit and gather will also provide natural surveillance within the area. Moreover, the activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The application at the Ruby Triangle (18/AP/0892) will provide a gym and new public hall, and the application at the site (Land Bounded By Ruby Street Murdock Street) will provide floor space for a church. These community uses will help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
IIAO 6	To reduce contributions to climate change	✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.



			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the site allocation requirements to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
			✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development on this site services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance. For example, a new public space will form part of this site allocation and will help soften and enhance the landscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.
				The site includes Grade II listed buildings Canal Grove Cottages and the Grade II listed Gasholder no.13 from the former gasworks. The site contains buildings and features of townscape merit.
				Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	As part of the Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest. The site allocation must provide new public open space. This will help to enhance biodiversity and ecological resilience.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level 2 - Analysis 17) will have a "more vulnerable" use (mixed use including residential, town centre, employment, open space and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:

				<ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these</li> <li>- A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough. By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing. It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The creation of new green links will combat severance between communities and encourage community interaction</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality and contributing to reduction in greenhouse emissions</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Applications 16/AP/5235, 18/AP/0897, 17/AP/4508 and 18/AP/0196, 18/AP/2895 and 19/AP/1710 are relevant to this site allocation, as planning permission has been granted. All approved applications on site have provided a site specific flood risk assessment and drainage strategy which demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. The recommendations proposed by the FRA and drainage strategy have been accepted by the Environment Agency and Flood and Drainage Team.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New development on this site will create a walkable neighbourhood that is car free, provides cycle storage and enjoy the proximity to the new tube stations of the Bakerloo line extension.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site will provide a new gym, church and community hall. These are all important facilities for community uses within the borough to support existing and future development.
			✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough

				phasing plan for new development in the area to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.
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**OKR14: 636 Old Kent Road (NSP73)**

Site requirements

Redevelopment of the site must:

- Provide new homes; and
- Provide retail space.

Redevelopment of the site may:

- Provide community uses.

Relevant planning applications

17/AP/1646 (Under construction)

634-636 Old Kent Road. Demolition of the existing buildings to facilitate the redevelopment of the site to create 42x residential units and 272 sq m (GIA) of flexible commercial floorspace (Class A1/A2/A3/B1) in a new building of between three and six storeys in height, together with disabled car parking, cycle parking, landscaping, plant, and associated works.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, retail and community facilities. The increase in the number of local jobs will tackle poverty and encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment and retail use will allow staff to gain new skills whilst working in these establishments.
			✓✓	Aligning with the policies in the plan, major developments on this site will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The sub area aims to connect communities by requiring development on this site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, a tube station, workplaces and other local facilities such as a new sports hall, primary schools and shops on Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime. In keeping with this design principle, the retention or provision of active frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.



IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The site will provide opportunities for the local community to sit and gather through A3 uses such as restaurants, which will increase opportunities for the community interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the site allocation requirements to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
			✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development on this site services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.
				Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.

IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	As part of the Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 15) will have a “more vulnerable” use (mixed use including residential, town centre, employment and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4’s fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Application 17/AP/1646 is relevant to this site allocation, as planning permission has been granted subject to S106 legal agreement. A Flood Risk Assessment was submitted with the application and considered in the decision making process.</p> <p>The FRA noted that the ground floor has a number of more vulnerable uses including sleeping accommodation, kitchen, living-dining, stores and bathrooms. There is also a water tank room, communal area and wheelchair parking, post and meter room at ground level. The FRA states that the proposed ground floor FFL for the proposed development will be +3.43mAOD which is the highest level achievable on site whilst maintaining safe access to the site from the adjacent public Highway. This FFL is circa 0.23m above the 2065 modelled flood for an extreme inundation event. It is 0.3m below the 2100 modelled level. To compensate for this considerations for flood resistant construction and safe access and egress are mentioned.</p> <p>The FRA makes consideration for the following mitigation measures that should be adhered to:</p> <ul style="list-style-type: none"> <li>- Flood resilience: the proposed development provides the opportunity to protect inhabitants by adopting flood resilience measures that take into account predicted effects of climate change</li> <li>- Flood warning: there is a recommendation to notify residents and encourage them to sign up to the EA flood warning systems to provide them with advanced notice in the unlikely case of a flood event.</li> </ul> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	<p>The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy AAP14’s fast track route for planning applications which trigger the affordable housing requirement.</p> <p>Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p> <p>By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.</p>

			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New development on this site will create a walkable neighbourhood that is car free, provides cycle storage and enjoy the proximity to the new tube stations of the Bakerloo line extension.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development in the area to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.

**OKR15: 684-698 Old Kent Road (Kwikfit garage) (NSP72)**

Site requirements

Redevelopment of the site must:

- Provide new homes; and
- Provide retail space.

Redevelopment of the site may:

- Provide community uses.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these establishments.
			✓✓	Aligning with the policies in the plan, major developments on this site will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The sub area aims to connect communities by requiring development on this site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, a tube station, workplaces and other local facilities such as a new sports hall, primary schools and shops on Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The retention or provision of active frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	New community uses on site could provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.
			✓✓	The site could seek to improve areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, and community halls.

			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the site allocation requirements to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development on this site services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets  The site is adjacent to the Grade II listed Camberwell Public Library and Livesey Museum.  1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	As part of the Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.



IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 17) will have a “more vulnerable’ use (mixed use including residential, town centre, employment and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes._The increased provision of affordable homes is encouraged through AAP4’s fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- New community uses on site which will provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	<p>The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes._The increased provision of affordable homes is encouraged through AAP4’s fast track route for planning applications which trigger the affordable housing requirement</p> <p>Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p> <p>By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.</p> <p>The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.</p>
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	<p>In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New development on this site will create a walkable neighbourhood that is car free, provides cycle storage and enjoy the proximity to the new tube stations of the Bakerloo line extension.</p>
IIAO 17		✓✓	✓✓	<p>The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</p>

	To provide the necessary infrastructure to support existing and future development		✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development in the area to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.
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Detailed integrated impact assessment for:

Sub Area 4: Hatcham, Ilderton and Old Kent Road (South)

Including:

OKR 16 – Hatcham Road and Ilderton Road (NSP67)

OKR 17 – South of Old Kent Road (760, 812 and 840 Old Kent Road, Toys'R'Us and Aldi Stores) (NSP68)

OKR 18 - Devon Street and Sylvan Grove (NSP66)

IIAO	Sub Area 4			OKR 16 (NSP70)	OKR 17 (NSP71)	OKR 18 (NSP69)	
	Area wide	S	M				L
IIAO 1	✓✓	✓	✓✓	✓✓	✓✓	✓✓	
IIAO 2	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	
IIAO 3	✓✓	✓	✓✓	✓✓	✓✓	✓✓	
IIAO 4	✓	-	✓	✓✓	✓✓	✓✓	
IIAO 5	✓✓	-	✓✓	✓✓	✓✓	✓✓	
IIAO 6	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	
IIAO 7	✓✓	-	✓✓	✓✓	✓✓	✓	
IIAO 8	✓	✓	✓	✓	✓	✓	
IIAO 9	✓	✓	✓	✓	-	✓	
IIAO 10	✓	✓	✓	✓	-	✓	
IIAO 11	✓	✓	✓	✓	✓	✓✓	
IIAO 12	✓	-	✓	✓	✓	✓	
IIAO 13	✓	-	✓	✓✓	✓	✓✓	
IIAO 14	✓	-	✓	✓	✓	✓	
IIAO 15	✓✓	-	✓✓	✓✓	✓✓	✓✓	
IIAO 16	✓✓	-	✓✓	✓✓	✓	✓	
IIAO 17	✓✓	✓	✓✓	✓✓	✓✓	✓✓	
Avg.	79%	32%	79%	79%	94%	71%	85%



Sub Area 4: Hatcham, Ilderton and Old Kent Road (South)

Sub Area 4: Hatcham, Ilderton and Old Kent Road (South)						
IIA Objective	Description	Area-wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	The area-wide redevelopment will revitalise the neighbourhood with an improved living environment that will encourage inward investment and boost local economy such as retail uses serving the local community. For example, OKR16 (Hatcham Road and Ilderton Road), current home to existing 84 businesses and 859 jobs, will be redeveloped into a mixed-use scheme which see 2,200 new jobs and 2,746 new homes, along with two parks.
		✓✓	✓	✓✓	✓✓	The growing population under the intensification and revitalisation of the existing industrial and residential area will produce economic synergy by creating new job opportunities for local residents and providing enterprise opportunities in the business area.
		✓✓	✓	✓✓	✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
	<b>Average Scoring</b>	✓✓	✓	✓✓	✓✓	
IIAO 2	To improve the education and skill of the population	✓✓	✓	✓	✓✓	The sub area 4 will see the expansion of existing schools to provide high quality education opportunities for the new generations in the area.
		✓✓	✓✓	✓✓	✓✓	Aligning with the policies in the plan, major developments in the sub area will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
		✓✓	✓✓	✓✓	✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated in the sub area as the provision is required for planning applications during the construction phase and in completed developments.
	<b>Average Scoring</b>	✓✓	✓✓	✓✓	✓✓	
IIAO 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	The area vision looks to deliver excellent design that expresses timeless quality and variety within buildings and public spaces in between, contributing to the sense of different districts and to the health and well-being of communities across the development area.

		✓✓	✓	✓✓	✓✓	The sub area aims to connect communities by requiring development to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, a tube station, workplaces and other local facilities such as churches, schools and shops on Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.
	<b>Average Scoring</b>	✓✓	✓	✓✓	✓✓	
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	-	✓✓	✓✓	Aligning with the policies in the plan, it will deliver mixed communities on different income levels and social backgrounds with the tenure-blind approach and at least 35% affordable housing with preference to social rented housing.
		✓✓	-	✓✓	✓✓	Recognising the potential of regeneration with new residents whilst protecting existing communities, the redevelopment will offer a range of housing tenures and sizes, phased over a number of years, to attract and facilitate existing residents to stay and benefit from the improved connections, facilities and communities.
		✓✓	-	✓✓	✓✓	A wide range of community infrastructure will be provided to serve the area, including schools, new parks, sports facilities and new civic spaces such as Pat Hickson Park to promote social interaction, participation and cohesion among residents on different backgrounds.
		✓✓	✓✓	✓✓	✓✓	To ensure planning works to benefit all from regeneration, a Social Regeneration Charter is drawn up for the area which sets out detailed aims for reducing social, economic and health inequalities and explains how the council will monitor the progress towards achieving a number of promises which the council has made to the community.
	<b>Average Scoring</b>	✓✓	-	✓✓	✓✓	
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
		✓✓	✓✓	✓✓	✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.

		✓✓	✓	✓✓	✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
	<b>Average Scoring</b>	✓✓	✓✓	✓✓	✓✓	
<b>IIAO 7</b>	To improve the air quality	✓✓	-	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
		✓✓	-	✓✓	✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
	<b>Average Scoring</b>	✓✓	-	✓✓	✓✓	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development in the sub area services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
		✓✓	✓✓	✓✓	✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
	<b>Average Scoring</b>	✓	✓	✓	✓	
<b>IIAO 9</b>	To encourage sustainable use of water resources	✓	✓	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in

						the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance. For example, the masterplan sets out the key elements of the building heights strategy for the site allocations and makes sure the new developments are respectful to the immediate context.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level, including the Penarth Centre as a building of townscape merit and the Caroline Gardens conservation area. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	As part of the Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.
IIAO 14	To reduce vulnerability to flooding	✓	-	✓	✓	<p>Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. Meanwhile, the plan requires flood risk to be reduced through implementing onsite sustainable urban drainage measures.</p> <p>Strategic flood risk assessment Level 2 has been prepared to assess the site allocations within the sub area. It provides evidence to ensure the proposed land uses are compatible with the relevant flood zone (i.e. passed the sequential test) and the sites having 'a more vulnerable use' have satisfied the exception test whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p> <p>Moreover, a detailed site-specific SFRA will be required for development on each site allocation to ensure flood risks will be properly mitigated and minimise flood risk to the wider area through measures on site as mentioned above.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	-	✓✓	✓✓	It delivers homes and a wider urban environment suitable for residents at all stages in their lives, encouraging people to live and work locally. This will include excellent cycling provision, safe secure streets with good building frontages and a choice of

						homes including a range of different sized homes, generous space standards and provision of specialist housing.
		✓✓	-	✓✓	✓✓	Aiming to deliver regeneration that works for all, the redevelopment will provide a range of housing tenures and sizes to attract both new and existing residents, phased over a number of years to facilitate existing residents to move in to benefit the improved connections, facilities and communities.  A Community Review Panel is also set up to help the council better understand the needs of the local community. This panel will comment on plans for development in the area, giving independent advice on planning and discussing important issues including housing, transport, public and green spaces, and the environment
	<b>Average Scoring</b>	✓✓	-	✓✓	✓✓	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	-	✓✓	✓✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New walkable neighbourhoods will benefit from the new parks and spaces in the greener belt, new developments that will be car free and the proximity to the new tube stations of the Bakerloo line extension.  The transition to less polluting and low carbon vehicles, such as electric vehicles, will be supported especially for commercial vehicles, which are using the street the most. As such, the sub area will provide the required infrastructure to support the transition to net zero carbon with the reliable source of fuel or electricity for the convenient and security of business operation.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development in the area to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.  In addition, a wide range of infrastructure, serving economic, social and environmental purposes will be delivered to increase the capacity in supporting the existing and new residents and fostering cohesive and well-connected communities.



OKR16: Hatcham Road, Penarth Street and Ilderton Road (NSP70)

Site requirements

Redevelopment of the site must:

- Provide new homes; and
- Replace existing employment floorspace and provide a range of employment spaces which is consistent with the building land use types shown in Figure SA4.3; and
- Provide industrial uses; and
- Provide mixed use industrial and new homes typologies in the area designated as a Locally Significant Industrial Site; and
- Retain the land on the west side of Ormside Street and the Penarth Centre as Strategic Protected Industrial Land, suitable for employment uses and other sui generis transport related uses, such as car repairs. In addition, arts and cultural uses will be permitted in the Penarth Centre. Residential and other sensitive uses will not be permitted in SPIL; and
- Provide land for expansion of Ilderton Primary School
- Provide a new park with a commercial focus on Hatcham Road; and
- Enable new east to west walking and cycling links to the proposed Livesey Park; and
- Provide a new cut through pedestrian link from the north of Ilderton Road through the arch at South Bermondsey Station.

Redevelopment of the site may:

- Provide retail); and
- Provide community and education uses.

Relevant planning applications

16/AP/2436 (Built)

Atar House, 179 Ilderton Road. Redevelopment of existing site to provide 2 x business units, 9 x residential flats, cycle spaces, motorcycle parking, car parking, bin spaces and ancillary works.

18/AP/2497 (Approved subject to S106)

79-161 Ilderton Road. Redevelopment of 79 - 161 Ilderton Road to provide two separate buildings, a north building and a south building separated by a publicly accessible childrens playspace.

The erection of a north building to include a part 5, part 6, part 16 and part 28 storey development (93.350m AOD max).

The erection of a south building to include a part 3, part 5, part 8, part 13 storey development (49.275m AOD max). To deliver a total of 312 residential units, 448.6sqm GIA of retail floorspace (Use Class A1), 1,817.98sqm GIA of commercial floorspace (Use Class B1) and associated basement provision, disabled parking, cycle parking, childrens playspace, public realm improvements and landscaping.

16/AP/1092 (Under construction)

171-177 Ilderton Road. Erection of a new four storey building plus basement to provide 9 new residential homes (Use Class C3 - 2 x 1 bed, 4 x 2-bed, 3 x 3 bed) and two new ground floor commercial units providing a total of 338sqm commercial (B1) floor space, together with associated landscaping, amenity and playspace, car and cycle parking and plant space.

17/AP/3757 (Under construction)

62 Hatcham Road and 134-140 Ilderton Road. Full planning permission for mixed use redevelopment comprising: demolition of existing buildings and construction of a building ranging in height from four to nine storeys to provide 1,179 sqm (GIA) of commercial space (use class B1) at ground floor, 86 residential dwellings above (30 x 1 bed, 39 x 2 bed and 17 x 3 bed), with associated amenity areas, cycle and disabled car parking and refuse/recycling stores.

17/AP/4546 (Under construction)

180 Ilderton Road. Demolition of existing building and erection of a part 5, 8 and 9 storey plus basement mixed-use development (max height 29.98m) comprising 2,351 sqm (gia) of flexible workspace (Use Class B1) and 84 residential apartments (Use Class C3) with associated amenity space and ancillary infrastructure.

18/AP/1049 (Approved)

78-94 Ormside Street. Redevelopment of the site, involving the demolition of existing buildings and structures, to deliver a mixed use building of up to nine storeys (ten storeys including the mezzanine at entrance level) plus rooftop plant. The building will comprise 2058 square metres of new and replacement commercial floor space (Class B1) together with 56 residential units (Class C3) and will include the creation of a new basement, hard and soft landscaping, reconfigured servicing arrangements and other associated works.

17/AP/4649 (Approved subject to S106)

Iberia House, 2 Hatcham Road. Demolition of existing light industrial building and construction of a building ranging in height from 2 to 9 storeys comprising 915.5sqm of B1 commercial and employment space at ground and first floor levels and 33 residential flats over the second to eight floor levels, with 3 residential parking spaces accessed from Hatcham Road.

18/AP/2761 (Approved)

301-303 Ilderton Road. Demolition of existing buildings and construction of a 12 storey building (plus basement) comprising 46 residential dwellings (Class C3) and commercial floorspace (Class B1(c)), creation of a new vehicular access from Hornshay Street with landscaping (including a communal roof garden), cycle parking and associated ancillary development.

19/AP/1773 (Approved subject to S106)

Demolition of existing buildings and the erection of a part 2/3, 9 and 28 storey (up to 94.65m AOD) mixed-use development comprising 2,538 sqm of industrial floorspace (Use Classes B1c/B8) at ground and intermediate levels and an internal loading yard, and 254 residential apartments (C3); and other associated infrastructure.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, office, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these establishments.
			✓✓	Aligning with the policies in the plan, major development on this site will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated in the sub area as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The sub area aims to connect communities by requiring development on this site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, a tube station, workplaces and other local facilities such as churches, schools and shops on Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities. For example, the provision of new open space on site will enable opportunities for play and open-air sports facilities, enabling exercise which supports good physical and mental health. The provision of green spaces would improve the long term health and wellbeing of the population.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime. In keeping with this design principle, the provision of a new open space for people to sit and gather will also provide natural surveillance within the area. Moreover, the activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.

IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	New community uses on site which will provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.
			✓✓	The site will seek to improve areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, and community halls.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through site allocation requirements as part of the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
			✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development in the sub area services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance. A new public space will form part of this site allocation and will help soften and enhance the landscape.



IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.</p> <p>The site contains some buildings of townscape merit and buildings of architectural and historic interest.</p> <p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.</p> <p>Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	<p>As part of the Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest. For example, the site allocation must provide new public open space. This will help to enhance biodiversity and ecological resilience.</p>
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 -Analysis 16) will have a “more vulnerable” use (mixed use including residential, town centre, employment, open space and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4’s fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The creation of new green links will combat severance between communities and encourage community interaction</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality and contributing to reduction in greenhouse emissions</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. Applications 16/AP/2436, 18/AP/2497, 16/AP/1092, 17/AP/3757, 17/AP/4546, 18/AP/1049, 17/AP/4819, 17/AP/4649, 18/AP/2761 and 19/AP/1773 are relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with each application where relevant and has been considered in the decision making process, demonstrating that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas, although no basement dwellings are permitted. All of the granted schemes in this area have submitted the required basement assessment at the point of application or will provide an assessment as secured by condition.</p> <p>The recommendations proposed by the FRA and drainage strategy have been accepted by the Environment Agency and Flood and Drainage Team.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>

<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New walkable neighbourhoods will benefit from the new parks and spaces in the greener belt, new developments that will be car free and the proximity to the new tube stations of the Bakerloo line extension.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development in the area to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.

**OKR17: 760 and 812 Old Kent Road (Former Toy 'R' us store) and 840 Old Kent Road (Aldi store) (NSP71)**

Site requirements

Redevelopment of the site must:

- Replace existing retail and employment floorspace ; and
- Provide new homes; and
- Provide a new tube station. The station, tunnelling and worksite requirements will need to be incorporated into th site design and phasing; and
- Provide a new green park between Asylum Road and Brimington Park; and

Redevelopment of the site should:

- Provide community uses; and
- Provide employment uses.

Relevant planning applications

19/AP/1322 (Approved subject to S106)

227-255 Ilderton Road. Demolition of existing building and redevelopment of the site to provide a new building of up to 13 and 21 storeys in height (maximum height 73.60m above ground level). Redevelopment to comprise 170 residential units (Class C3), a 1,778 sqm (GIA) retail unit (Class A1) and a 52 sqm (GIA) flexible retail unit (Class A1/A3), with associated landscaping, car parking, servicing, refuse and plant areas, and all ancillary or associated works.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these establishments.
			✓✓	Aligning with the policies in the plan, major developments on this site will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The sub area aims to connect communities by requiring development on this site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, a tube station, workplaces and other local facilities such as churches, schools and shops on Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime. In keeping with this design principle, the activation of frontages will open up spaces to promote social interaction and the feeling of public safety. The site allocation does not have a specific impact on this objective but development is required to ensure that it is safe and designs out opportunities for crime
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion.

IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	New community uses on site which will provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	The site will seek to improve areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, and community halls.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the site allocation requirements as part of the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
			✓✓	The typologies in the masterplan promote mixed-use development including innovative solutions for mixing industrial development with new homes. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development in the sub area services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIAO 9	To encourage sustainable use of water resources	-	-	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance. For example, the masterplan sets out the key elements of the building heights strategy for the site allocations and makes sure the new developments are respectful to the immediate context.



IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.</p> <p>The site is in close proximity of the Caroline Gardens Conservation Area.</p> <p>The site is within proximity of the Grade II listed Licensed Victuallers Benevolent Institution (Caroline Gardens).</p> <p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.</p> <p>Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	<p>As part of the Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest.</p>
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 17) will have a “more vulnerable’ use (mixed use including residential, town centre, employment and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4’s fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety. The site allocation does not have a specific impact on this objective but development is required to ensure that it is safe and designs out opportunities for crime</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Application 19/AP/1322 is relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with this application and has been considered in the decision making process. A site-specific FRA is required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. The FRA proposes the use of SUDS namely an attenuation tank, flow control chamber and green roof with the surface water destination being to a combined sewer. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>The recommendations proposed by the FRA and drainage strategy have been accepted by the Environment Agency and Flood and Drainage Team.</p>

				As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New development on this site will create a new walkable neighbourhood that is car free, has cycle storage and enjoys the proximity to the new tube stations of the Bakerloo line extension.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development on this site to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.

**OKR18: Devon Street and Sylvan Grove (NSP69)**

Site requirements

Redevelopment of the site must:

- Replace existing employment space; and
- Provide retail on the Old Kent Road high street ; and
- Provide new homes; and
- Provide community uses; and
- Provide a new public square at Devonshire Grove and Sylvan Grove; and
- Provide a new access road into the Integrated Waste Management Facility.

Relevant planning applications

15/AP/1330 (Built)

8-24 Sylvan Grove. Redevelopment of the site to construct a part two, part five, part six and part eight storey building comprising 80 residential units ( 23 x one bed, 41 x two bed and 16 x three bed) for both private and affordable tenures with associated car parking and landscaping.

19/AP/1239 (Approved subject to S106)

Devonshire Square, 747-759 Old Kent Road

Hybrid application consisting of:

Full planning permission for the demolition of all existing structures on site, the stopping up of the existing Devonshire Grove major arm (IWMF egress road) and redevelopment to include formation of a new road reconfiguration and widening of Devonshire Grove, widening of the foot ways on Sylvan Grove and Old Kent Road, construction of Building A at ground plus 38 storeys (137.26m AOD) to provide 264 residential units (Class C3), flexible retail/employment floorspace (Class A1/A2/A3/A4/B1a-c), creation of a new public realm including new public squares and spaces ,associated landscaping and highways works and a new substation and all associated works.

Outline planning permission (all matters reserved) for comprehensive mixed-use development for the following uses in four Buildings (B, C, D and E) up to a maximum height of 81.3m AOD, and a basement level shared with Building A: Up to a maximum of 301 residential units (Class C3); employment workspace floorspace (Class B1a-c); flexible retail, financial and professional services, food and drink uses (Class A1/A2/A3/A4/A5), flexible non-residential institutions (Class D1) and Assembly and leisure uses (Class D2); Storage, car and cycle parking; Energy centre; Substations; Formation of new pedestrian and vehicular access and means of access and circulation within the site together; and new private and communal open space. The application is accompanied by an Environmental Statement.

19/AP/2307 (Approved subject to s106)

Daisy Business Park, 19-35 Sylvan Grove. Demolition of existing buildings and redevelopment of the site to provide a mixed use development comprising of 219 residential dwellings ( Use Class C3) and 3,088 sqm (GIA); commercial workspace (Use Class B1) within two buildings of 5 storeys (24.55m AOD) and 32 storeys (106.43m AOD); and associated car and cycle parking, landscaping, and public realm and highways improvements.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail, and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
			✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
IIAO 2		✓✓	✓✓	The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these establishments.

	To improve the education and skill of the population		✓✓	Aligning with the policies in the plan, major developments on this site will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
			✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated as the provision is required for planning applications during the construction phase and in completed developments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The sub area aims to connect communities by requiring development on this site to improve the environment for people walking and cycling, strengthening the network of parks and improve the links between parks, a tube station, workplaces and other local facilities such as churches, schools and shops on Old Kent Road. The positive environment will help to encourage behavioural changes for active travel and social interaction and as a result reduce health inequalities.  The provision of new open space will enable opportunities for play and open-air sports facilities, enabling exercise which supports good physical and mental health. The provision of green spaces would improve the long term health and wellbeing of the population.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
			✓✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime. In keeping with this design principle, the activation of frontages will open up spaces to promote social interaction and the feeling of public safety. Moreover, the provision of a new open space for people to sit and gather will also provide natural surveillance within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	New community uses on site which will provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.
			✓✓	The site will seek to improve areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, and community halls.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more communi
IIAO 6	To reduce contributions to climate change	✓✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
			✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the site allocation requirements as part of the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.



<b>IIAO 7</b>	To improve the air quality	✓	✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development in the sub area services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
			✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
<b>IIAO 9</b>	To encourage sustainable use of water resources	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓	✓	New development will come forward on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance. For example, the masterplan sets out the key elements of the building heights strategy for the site allocations and makes sure the new developments are respectful to the immediate context. For example, a new public space will form part of this site allocation and will help soften and enhance the landscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level. It informs both the site allocation requirements and the strategic planning for the whole sub area to enhance the historic environment and cultural assets.  The site is in proximity to the Caroline Gardens Conservation Area.  The site contains buildings of townscape merit.  Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	As part of the Greener Belt Strategy, the sub area provides a strategic planning for new parks, new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces including play facilities and greenery, providing a tranquil environment and comfortable places to sit and socialise or rest. The site allocation must provide new public open space. This will help to enhance biodiversity and ecological resilience.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level 2 - Analysis 17) will have a "more vulnerable" use (mixed use including residential, town centre, employment, open space and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:  <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through AAP4's fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> </ul>

				<ul style="list-style-type: none"> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The creation of new green links will combat severance between communities and encourage community interaction</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality and contributing to reduction in greenhouse emissions</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>Applications 15/AP/1330, 19/AP/1239 and 19/AP/2307 are relevant to this site allocation, as planning permission has been granted. Site-specific flood Risk Assessments were submitted with the applications and have been considered in the decision making process, demonstrating that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. The recommendations proposed by the FRA and drainage strategy have been accepted by the Environment Agency and Flood and Drainage Team. Conditions in relation of flood risk management as recommended by the Environmental Agency have formed part of the planning permission.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New development on this site will create a new walkable neighbourhood that is car free, has cycle storage and enjoys the proximity to the new tube stations of the Bakerloo line extension.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓✓	The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough

				phasing plan for new development on this site to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.
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Detailed integrated impact assessment for:

- Option 1 for industrial intensification in Sub Area 5, South Bermondsey (Sites 1 and 2)
- Option 2 for industrial intensification in Sub Area 5, South Bermondsey (Sites 1 – 4)

	Option 1 for Sub Area 5				Option 2 for Sub Area 5			
	Area wide	S	M	L	Area wide	S	M	L
IIAO 1	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓
IIAO 2	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 3	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 4	✓	-	✓	✓	✓	-	✓	✓
IIAO 5	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 6	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 7	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓
IIAO 8	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 9	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 10	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 11	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 12	✓	-	✓	✓	✓	-	✓	✓
IIAO 13	✓	-	✓	✓	✓	-	✓	✓
IIAO 14	✓	-	✓	✓	✓	-	✓	✓
IIAO 15	-	-	-	-	-	-	-	-
IIAO 16	✓✓	-	✓✓	✓✓	✓✓	-	✓✓	✓✓
IIAO 17	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓
Avg.	65%	35%	65%	65%	65%	35%	65%	65%

Option 1 for industrial intensification in Sub Area 5, South Bermondsey (Sites 1 and 2)

Option 1 for industrial intensification in Sub Area 5, South Bermondsey (Sites 1 and 2)						
IIA Objective	Description	Area-wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	✓✓	✓✓	The option 1 for industrial intensification in South Bermondsey comprises sites 1 and 2 within South Bermondsey diveunder and Bermondsey trading estate sites. It provides opportunities in the short term for refurbishment of the arches and development of Site 1 and part of Site 2 without impacting on the more established warehouse units within the trading estate. This would generate up to 38,338 sqm of additional industrial floorspace and provide enterprise opportunities in the business area. As a result, new job opportunities will be created to boost local economy.
		✓✓	✓	✓✓	✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
	<b>Average Scoring</b>	✓✓	✓	✓✓	✓✓	
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	✓✓	✓✓	Aligning with the policies in the plan, major developments in the sub area will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
		✓✓	✓✓	✓✓	✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated in the sub area as the provision is required for planning applications during the construction phase and in completed developments.
	<b>Average Scoring</b>	✓✓	✓✓	✓✓	✓✓	
IIAO 3	To improve the health of the population	✓	✓	✓	✓	The area vision looks to carefully design the servicing and road network in order to minimise disruption to the surrounding residential area in terms of air pollution, safety, convenience and attractiveness of routes for people walking and cycling.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	The creation of new walking and cycling routes around the railway arches and South Bermondsey Station, designed through the excellent design in accordance with the 'design out crime principles', will become a pleasant and safe environment with well-lit routes and vibrant activities that will provide natural surveillance to reduce the perception of crime and incidence of crime.

IIO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	A well-connected network will be in place to link the sites to the other uses in the wider areas, including the Southwark Bermondsey Station, Quiet Way 1, Old Kent Road, the local shopping parade and Bolina Road at the borough border with Lewisham. It aims to promote connection and social interaction between communities.
IIO 6	To reduce contributions to climate change	✓	✓	✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
		✓✓	✓✓	✓✓	✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
		✓✓	✓	✓✓	✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
	<b>Average Scoring</b>	✓✓	✓✓	✓✓	✓✓	
IIO 7	To improve the air quality	✓✓	-	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
		✓✓	-	✓✓	✓✓	The typologies in the masterplan promotes innovative solutions such as 'stacking' industrial uses in multi-storey buildings from 2 to 5 storeys across the sites. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.
	<b>Average Scoring</b>	✓✓	-	✓✓	✓✓	



IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development in the sub area services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
		✓✓	✓✓	✓✓	✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
	<b>Average Scoring</b>	✓	✓	✓	✓	
IIAO 9	To encourage sustainable use of water resources	✓	✓	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will be redeveloped on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level, including the railway bridge at Rotherhithe new Road as a structure of historical significance. It informs the strategic planning for the whole sub area to enhance the historic environment and cultural assets.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	As part of the Greener Belt Strategy, the sub area provides a strategic planning for new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site allocations will be required to provide open and green spaces providing a tranquil environment and comfortable places to sit and socialise or rest.

IIAO 14	To reduce vulnerability to flooding	✓	-	✓	✓	<p>Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. Meanwhile, the plan requires flood risk to be reduced through implementing onsite sustainable urban drainage measures.</p> <p>A detailed site-specific SFRA will be required for development in the sub area to ensure flood risks will be properly mitigated and minimise flood risk to the wider area through measures on site as mentioned above.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	-	-	-	-	<p>The purpose of industrial intensification around the area is to generate new employment floorspace for industrial uses which are not necessarily compatible with residential or other sensitive areas. This means that the number of new homes to be delivered in this area will be limited to infill sites in the surrounding area. However, it aligns with the strategic objective of the plan to meet excellent living standard for new homes with protected amenity through careful spatial planning.</p>
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	-	✓✓	✓✓	<p>In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New walkable neighbourhoods will benefit from the new parks and spaces in the greener belt, new developments that will be car free and the proximity to the new tube stations of the Bakerloo line extension.</p> <p>The transition to less polluting and low carbon vehicles, such as electric vehicles, will be supported especially for commercial vehicles, which are using the street the most. As such, the sub area will provide the required infrastructure to support the transition to net zero carbon with the reliable source of fuel or electricity for the convenient and security of business operation.</p>
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	<p>The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development in the area to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.</p> <p>In addition, the area shares the border boundary with Lewisham, which sees a planning application granted at Silwood Street for 61 homes and 1,616 sqm commercial floorspace and a masterplan for the development of land around Millwall Football Stadium to provide 2,400 new homes and commercial floorspace and a new overground station at new Bermondsey. It presents a significant opportunity for new homes, jobs and activity to South Bermondsey which requires collaboration between Southwark and Lewisham for business relocation and growth across both boroughs.</p>



Option 2 for industrial intensification in Sub Area 5, South Bermondsey (Sites 1 – 4)

Option 2 for industrial intensification in Sub Area 5, South Bermondsey (Sites 1 - 4)						
IIA Objective	Description	Area-wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	✓✓	✓✓	The option 2 for industrial intensification in South Bermondsey comprises sites 1 to 4 within South Bermondsey diveunder and Bermondsey trading estate sites. It provides opportunities for an uplift of 78,492sqm additional floorspace including in the arches. As a result, new job opportunities will be created to boost local economy.
		✓✓	✓	✓✓	✓✓	Aligning with the policies in the plan, at least 10% affordable workspace at discount market rents will be provided over 30 years by new development of over 500 sqm GIA (gross) of employment floorspace. This is part of the bow tie employment strategy, which works to prioritise industrial, distribution, warehousing and creative makerspaces in the area and ensure the residents are trained and ready to access the new job opportunities.
	<b>Average Scoring</b>	✓✓	✓	✓✓	✓✓	
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	✓✓	✓✓	Aligning with the policies in the plan, major developments in the sub area will be required to provide specific programmes for mentorship, training or jobs for young people. As such, it will support the young generations to build up skills for employability and benefit from social regeneration.
		✓✓	✓✓	✓✓	✓✓	Aligning with the policies in the plan, many new jobs and training opportunities will be generated in the sub area as the provision is required for planning applications during the construction phase and in completed developments.
	<b>Average Scoring</b>	✓✓	✓✓	✓✓	✓✓	
IIAO 3	To improve the health of the population	✓	✓	✓	✓	The area vision looks to carefully design the servicing and road network by carefully assessing and monitoring the potential impact of development which intensifies industrial uses on both the condition of the public realm and road network and the impacts on congestion, pollution and require development to contribute or offset these impacts, particularly around Rotherhithe New Road and Ilderton Road.  Proposals for additional vehicle servicing routes on to the local network will not be acceptable except where they improve traffic impacts.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	The creation of new walking and cycling routes around the railway arches and South Bermondsey Station, designed through the excellent design in accordance with the 'design out crime principles', will become a pleasant and safe environment with well-

						lit routes and vibrant activities that will provide natural surveillance to reduce the perception of crime and incidence of crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	A well-connected network will be in place to link the sites to the other uses in the wider areas, including the Southwark Bermondsey Station, Quiet Way 1, Old Kent Road, the local shopping parade and Bolina Road at the borough border with Lewisham. It aims to promote connection and social interaction between communities.
IIAO 6	To reduce contributions to climate change	✓	✓	✓	✓	Carbon offset fund will be collected in the area from development where it is not feasible to achieve zero carbon emission on site. The planning contributions, paid as the shortfall in on site carbon saving, will be spent on offsetting measures to reduce carbon emission in the existing buildings across the area. As a result, this will help to achieve carbon reduction.
		✓✓	✓✓	✓✓	✓✓	Being a net zero carbon Area Action Plan, all new development will achieve net zero carbon by meeting the highest on site performance including the highest environmental building standards and net zero electricity and heating systems, banning gas boilers as the permanent heating solutions. They will also be required to connect to or enable future connection to a district heat network, which provides a supply of low carbon heat to homes, businesses and public buildings. The current district heat network for Old Kent Road is SELCHP.
		✓✓	✓	✓✓	✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
	<b>Average Scoring</b>	✓✓	✓✓	✓✓	✓✓	
IIAO 7	To improve the air quality	✓✓	-	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars (through phased plans for reducing parking provision and construction and transport management). It The design for green infrastructure will also effectively absorb greenhouse gases and reduce the concentration of air pollutants. It will significantly contribute to improving air quality and health of the communities.
		✓✓	-	✓✓	✓✓	The typologies in the masterplan promotes innovative solutions such as 'stacking' industrial uses in multi-storey buildings from 2 to 5 storeys across the sites. Recognising that servicing is considered carefully to enable commercial premises to function without conflict with residential development, the plan sets out consolidation of servicing to enable more efficient movement of vehicles and reduce the pressure on the road network and improve air quality. It aims to maintain good air quality whilst ensuring efficient transport service is in place to support the vibrancy of businesses.

	Average Scoring	✓✓	-	✓✓	✓✓	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. In order to effectively manage waste and reduce waste going to landfill, new development is required to provide adequate management of waste from construction and intensified development in accordance with the waste management hierarchy. For new development in the sub area services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.
		✓✓	✓✓	✓✓	✓✓	The development in the sub area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
	Average Scoring	✓	✓	✓	✓	
IIAO 9	To encourage sustainable use of water resources	✓	✓	✓	✓	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. The masterplan for the sub area and policies for new development in the area ensure proper water management is in place, including communal sustainable urban drainage systems (SuDS), to reduce water use, improve water quality, reuse rainwater and contain rainwater discharge.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will be redeveloped on brownfield sites, providing opportunities to remediate contaminated land and utilise urban greening through the choice of the appropriate types and design of trees planting. As such, it helps to improve the soil quality with the creation of new green public space.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	A masterplan has been created for the sub area with respect to the history of the area, its existing character and townscape and strategic viewing considerations at a granular level. Informed by the masterplan, requirements for each site allocation within the sub area are carefully designed in terms of design guidance, heritage reservation and building height guidance.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	The masterplan also takes into consideration for the sub area the history of the area, cultural assets and community heritage at a granular level, including the railway bridge at Rotherhithe new Road as a structure of historical significance. It informs the strategic planning for the whole sub area to enhance the historic environment and cultural assets.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	As part of the Greener Belt Strategy, the sub area provides a strategic planning for new pedestrian and cycle links providing safe walking routes and green corridors between schools and local community facilities. In addition, development on the site

						allocations will be required to provide open and green spaces providing a tranquil environment and comfortable places to sit and socialise or rest.
IIAO 14	To reduce vulnerability to flooding	✓	-	✓	✓	<p>Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. Meanwhile, the plan requires flood risk to be reduced through implementing onsite sustainable urban drainage measures.</p> <p>A detailed site-specific SFRA will be required for development in the sub area to ensure flood risks will be properly mitigated and minimise flood risk to the wider area through measures on site as mentioned above.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	-	-	-	-	The purpose of industrial intensification around the area is to generate new employment floorspace for industrial uses which are not necessarily compatible with residential or other sensitive areas. This means that the number of new homes to be delivered in this area will be limited to infill sites in the surrounding area. However, it aligns with the strategic objective of the plan to meet excellent living standard for new homes with protected amenity through careful spatial planning.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	-	✓✓	✓✓	<p>In response to the Climate Emergency, the action area takes a people centred approach to movement with a particular focus on reducing the impact of carbon emissions from vehicles. Traffic movements will be reduced with the creation of safe and accessible walking and cycling routes, which become the first choice for moving around the area. New walkable neighbourhoods will benefit from the new parks and spaces in the greener belt, new developments that will be car free and the proximity to the new tube stations of the Bakerloo line extension.</p> <p>The transition to less polluting and low carbon vehicles, such as electric vehicles, will be supported especially for commercial vehicles, which are using the street the most. As such, the sub area will provide the required infrastructure to support the transition to net zero carbon with the reliable source of fuel or electricity for the convenient and security of business operation.</p>
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	<p>The efficient delivery of quality development in the area will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions toward enhancement to infrastructure capacity and the cost of Bakerloo Line Extension. This is planned alongside the thorough phasing plan for new development in the area to ensure the growth and regeneration of the area is well supported by the essential travel infrastructure.</p> <p>In addition, the area shares the border boundary with Lewisham, which sees a planning application granted at Silwood Street for 61 homes and 1,616 sqm commercial floorspace and a masterplan for the development of land around Millwall Football Stadium to provide 2,400 new homes and commercial floorspace and a new overground station at new Bermondsey. It presents a significant opportunity for new homes, jobs and activity to South Bermondsey which requires collaboration between Southwark and Lewisham for business relocation and growth across both boroughs.</p>

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**Appendix 8: Monitoring Indicators against Sustainability Objectives**

<b>Old Kent Road Area Action Plan 2024 Integrated Impact Assessment: Document Locator</b>	
<b>No.</b>	<b>Title</b>
Appendix 1	SEA Directive Requirement
Appendix 2	Relevant Plans, Programmes and Strategies
Appendix 3	Baseline Data – Facts and Figures
Appendix 4	Sustainability Appraisal Framework
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## Appendix 8: Monitoring indicators against sustainability objectives

The extent to which each proposed monitoring indicator relates with and reflects the sustainability effects has been examined, to ensure the monitoring regime is robust and effective in identifying any trends in the sustainability effects, both predicted and unforeseen, of the local plan where preventative or mitigation measures can be undertaken. The results are set out in the following table.

Baseline indicators		Sustainability objective(s) which can contribute to effecting the positive change																	
		1 To tackle poverty and encourage wealth creation	2 To improve the education and skill of the population	3 To improve the health of the population	4 To reduce the incidence of crime and the fear of crime	5 To promote social inclusion, equality, diversity and community cohesion	6 To mitigate impacts of and adapt to climate change	7 To improve the air quality of Southwark	8 To avoid waste and maximise, reuse or recycle waste arising as a resource	9 To encourage sustainable use of water resources	10 To maintain and enhance the quality of land and soil	11 To protect and enhance quality of landscape and townscape	12 To conserve and enhance the historic environment and cultural assets	13 To protect and enhance open spaces, green corridors and biodiversity	14 To reduce vulnerability to flooding	15 To provide everyone with the opportunity to live in a decent home	16 To promote sustainable transport and minimise the need to travel by car	17 To provide the necessary infrastructure to support existing and future development	
<b>Equality</b>																			
Southwark	Index of multiple deprivation	√	√	√	√	√										√			
	The Income Deprivation Affecting Children Index 2019 (IDACI)	√	√	√	√	√										√			
	The Income Deprivation Affecting Older People Index 2019 (IDAOPI)	√	√	√	√	√										√			
Old Kent Road	Index of Multiple deprivation	√	√	√	√	√													
	Child poverty rate	√	√	√	√	√													
	Unemployment rate	√	√			√													
	Percentage of working age population who are claiming out of work benefit	√	√			√													
<b>Housing</b>																			
Southwark	Provision of new homes against the demand set out in Southwark SHMA 2019	√				√										√		√	
	Provision and percentage of new affordable homes against the demand set out in Southwark SHMA 2019	√		√	√	√										√		√	
	Provision of new family-sized social housing against the demand set out in Southwark SHMA 2019	√		√	√	√										√		√	
Old Kent Road	Provision of new homes in the Old Kent Road Opportunity Area	√		√	√	√										√		√	
	Percentage and number of new affordable homes approved in the OKR OA	√		√		√										√			
	Provision of affordable housing size mix in the OKR OA against the housing waiting list	√				√										√			
	Provision of student homes															√			
	Provision of co-living homes															√			
<b>Social cohesion</b>																			
Southwark	The percentage of residents being an active member of their community		√	√	√	√												√	
	The percentage of residents feeling they contribute to the local economy	√	√	√	√	√										√		√	
	The percentage of residents volunteering in Southwark Council		√	√		√												√	
	The percentage of residents who feel wholly or partly positive about change in the borough	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√
	The percentage of residents who have	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√



	personally benefitted from change																	
	Local perceptions of neighbourliness and how well local people get on well together (emerging) <sup>1</sup>	√		√	√	√												
	The local perceptions of the ability to have their voice heard and influence decisions (emerging) <sup>2</sup>	√	√			√												
Old Kent Road	Not clear specific indicator for the Old Kent Road but ongoing research and consultation will reflect social cohesion in the Old Kent Road																	
<b>Public health and well-being</b>																		
Southwark	Life expectancy at birth for males and females	√	√	√	√	√	√	√						√	√	√	√	√
	Healthy life expectancy at birth for males and females	√	√	√	√	√	√	√						√	√	√	√	√
	The number of excess winter deaths	√	√	√		√	√									√		√
	The percentage of adult carers who have as much social contact as they would like	√		√	√	√										√	√	√
	The percentage of physically active adults	√	√	√	√							√		√		√	√	√
	The number and percentage of reception and Year 6 children who are overweight (including obesity)	√	√	√	√							√		√		√	√	√
Old Kent Road	Life expectancy at birth for males and females	√	√	√	√							√		√		√	√	√
	The number and percentage of reception and Year 6 children who are overweight or obese	√	√	√	√							√		√		√	√	√
<b>Education, skills and training</b>																		
Southwark	The number and percentage of 16-17 year olds not in education, employment or training (NEET) or whose activity is not known	√	√	√	√							√		√		√	√	√
	The number and percentage of people aged 16-64 attaining a NVQ Level Four or higher	√	√	√	√							√		√		√	√	√
	The number and percentage of residents with no qualifications	√	√	√	√							√		√		√	√	√
	The ranking in Education and Skills deprivation	√	√	√	√							√		√		√	√	√
	The number of apprenticeships created within the borough	√	√	√	√							√		√		√	√	√
Old Kent Road	Percentage of pupils achieving a good level of development at age 5 years old	√	√	√	√							√		√		√	√	√
<b>Safety</b>																		
Southwark	Crime rate per 1000 of the population for key offences	√	√	√	√	√								√		√		√
	The total number of key offences	√	√	√	√	√								√		√		√
	The ranking in crime deprivation	√	√	√	√	√								√		√		√
	The number of pedestrians' cyclists' casualties	√	√		√	√		√						√		√	√	√
	The number of fatal and serious casualties of pedestrians and cyclists	√	√		√	√		√						√		√	√	√
	The local perception of safety and crime	√	√		√	√		√						√		√	√	√
Old Kent Road	crimes per 1000 residents	√	√		√	√		√					√		√	√	√	
<b>Economy and employment</b>																		
Southwark	Number of employee jobs	√	√			√							√	√		√	√	√
	Number of micro and small-to-medium sized enterprises	√	√	√		√									√	√	√	√
	Percentage of unemployed population	√	√	√		√									√	√	√	√
Old Kent Road	Number of micro and small-to-medium sized enterprises	√	√	√		√									√	√	√	√
	Employment floorspace	√	√	√		√												√
	Number of rateable properties in industrial sector		√			√												√

<sup>1</sup> Available when social research for Southwark's Social Regeneration Charter is published

<sup>2</sup> Available when social research for Southwark's Social Regeneration Charter is published

	Number of rateable properties in the office sector		√			√												√
	Number of life science local units		√			√												√
<b>Retail and town centres</b>																		
Southwark	Percentage of takeaways outlets within a walking distance (400m) of a secondary school	√	√	√														√
	Primary shopping frontage vacancy rates												√					
	Secondary shopping frontage vacancy rates												√					
Old Kent Road	Percentage of takeaway outlets within a walking distance (400m) of a secondary school	√	√	√														√
	Old Kent Road frontage vacancy rates												√					
<b>Energy and Climate Change</b>																		
Southwark	Energy consumption per sector							√	√									
	Domestic consumption per capita of natural gas							√	√									
	Domestic consumption per capita of electricity							√	√									
	Local carbon dioxide emissions (tonnes of CO2)							√	√									
	Number of households experiencing fuel Poverty	√	√				√										√	
Old Kent Road	Levels of Nitrogen Dioxide and other pollutants in the Old Kent Road							√	√					√		√	√	√
<b>Air Quality</b>																		
Southwark	Concentration level of NO2							√	√					√		√	√	√
	Concentration level of PM10							√	√					√		√	√	√
	Concentration level of PM2.5																	
Old Kent Road	Concentration Level of NO2 in Old Kent Road OA							√	√					√		√	√	√
	Concentration Level of PM10 on Old Kent Road																	
<b>Transport</b>																		
Southwark	Journey to work by mode		√	√	√	√	√	√						√			√	√
	Frequency of Cycling as mode of Transport		√	√	√	√	√	√						√			√	√
Old Kent Road	Journey to work by mode			√				√	√								√	√
	Number of Controlled Parking Zones (CPZs) in the Old Kent Road Opportunity Area							√									√	
<b>Biodiversity</b>																		
Southwark	Number of SINC Sites												√		√	√		√
	Number of Local Nature Reserves												√		√	√		√
	Number of New Protected Sites												√		√	√		√
Old Kent Road	Number of SINC Sites												√		√	√		√
	Number of Local Nature Reserves												√		√	√		√
	Number of New Protected Sites												√		√	√		√
<b>Open Spaces/soil</b>																		
Southwark	Open Spaces (hectares per 1,000 people)												√	√	√	√	√	√
	Park provision (hectares per 1,000 people)												√	√	√	√	√	√
	Satisfaction with the quality of open space												√	√	√	√	√	√
	Satisfaction with natural greenspace provision												√	√	√	√	√	√
	Number of Allotments (Community gardens)												√	√	√	√	√	√
Old Kent Road	Hectares of open space per 1,000 population												√	√	√	√	√	√
	% of land in the OKR OA within 400m catchment of parks												√	√	√	√	√	√
<b>Flood Risk, Water Resources and Quality</b>																		
Southwark	Domestic Water Demand across the entire borough, as a proxy measure of water consumption (expected)												√					
	Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence & water quality												√			√		



	grounds																	
	Quality of water at consumer's tap (zones) – against National Standards (number of tests failed) Thames Water Aggregated									√						√		
Old Kent Road	Domestic water demand									√						√		
<b>Waste management</b>																		
Southwark	Recycling and composting rate (%)		√							√								
	Amount of municipal waste diverted from landfill (recovery rate %)		√							√								
Old Kent Road	Data unavailable at this level																	
<b>Noise management</b>																		
Southwark	The rate of complaints about noise												√				√	
Old Kent Road	Data unavailable at this level																	
<b>Play facilities</b>																		
Southwark	Number of open spaces with play facilities					√							√	√	√			
	Level of satisfaction with children's play spaces					√							√	√	√			
Old Kent Road	Number of open spaces with play facilities					√							√	√	√			
<b>Quality in Design and Conservation of Historic Environment</b>																		
Southwark	Number of historic environment assets												√	√				
Old Kent Road	Number of historic environment assets												√	√				



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**Appendix 9: Baseline Indicators Table**

<b>Old Kent Road Area Action Plan 2024 Integrated Impact Assessment: Document Locator</b>	
<b>No.</b>	<b>Title</b>
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## Appendix 9: Baseline Indicators Table

Summary of baseline indicators as taken from Appendix 3 – Baseline Data. These indicators will be monitored on an ongoing basis as part of the IIA.







The Baseline data has been set out for the Old Kent Road Below. The Baseline data for Southwark has also been set out as some data is not available for this geographical area level of the Opportunity Area.

### Old Kent Road Specific Baseline Indicators

Objective & indicator for assessment	Old Kent Road statistic	Direction of change	London statistic	National statistic	Source	Most recent data	Frequency of collection
<b>Population</b>							
Indices of Deprivation	<p>Southwark as a whole has an ID score of <b>25.8</b>, and is one of the most deprived boroughs in England, ranked <b>43rd out of 326 local authorities</b> <b>~</b>.</p> <p>The average ID score across the six MSOAs falling within the OKR OA is <b>34.7</b> <b>†</b>, which indicates higher levels of deprivation than Southwark as a whole.</p> <p>Within the Old Kent Road Ward, the ID score is <b>31.9</b> <b>‡</b>, which indicates higher levels of deprivation than Southwark as a whole.</p> <p>The <b>majority of the LSOAs within the OKR OA are in the top 30%</b> most deprived in England <b>**</b></p>	N/A <b>#</b>	N/A	N/A	<p><b>~</b> “English indices of deprivation 2019 – Local Authority District Summaries”, 2019, available at:  <a href="https://assets.publishing.service.gov.uk/media/5d8b3cfbe5274a08be69aa91/File_10_-_IoD2019_Local_Authority_District_Summaries_lower-tier_.xlsx">https://assets.publishing.service.gov.uk/media/5d8b3cfbe5274a08be69aa91/File_10_-_IoD2019_Local_Authority_District_Summaries_lower-tier_.xlsx</a></p> <p><b>†</b> “English Indices of Deprivation 2019 maps”, My Society, 2019, available at:  <a href="https://research.mysociety.org/sites/imd2019/media/data/imd2019_msoa_level_data.csv">https://research.mysociety.org/sites/imd2019/media/data/imd2019_msoa_level_data.csv</a></p> <p><b>‡</b> “Southwark’s Joint Strategic Needs Assessment - East Central Southwark”, Southwark Council, 2023, available at:  <a href="https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf">https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf</a></p> <p><b>**</b> “Indices of Deprivation – London Datastore”, Mayor of London, 2019, available at:  <a href="http://dclgapps.communities.gov.uk/imd/ioid_index.html">http://dclgapps.communities.gov.uk/imd/ioid_index.html</a></p>	2023; 2019	As available

Objective & indicator for assessment	Old Kent Road statistic	Direction of change	London statistic	National statistic	Source	Most recent data	Frequency of collection
					# By their nature, The English indices of deprivation relate to relatively small geographic areas (lower-layer super output areas), and as such there is no regional or national ID data.		
Child poverty	<p>The average child poverty rate across the two parliamentary consistencies in which the OKR OA is located is <b>35.6%</b>▲.</p> <p>This is slightly lower than Southwark as a whole, which has a child poverty rate of 36.2%▲.</p>	Decrease▲	33%	31%	<p>▲End Child Poverty estimates, 2022, available at:  <a href="https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Child-Poverty-AHC-estimates-2015-2022_final.xlsx">https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Child-Poverty-AHC-estimates-2015-2022_final.xlsx</a></p> <p>▲ Based on comparison with the 2014/2015 rate (a decrease of 12%) reported by End Child Poverty</p>	2022	Yearly
Unemployment	<p>The average unemployment level across the six MSOAs falling within the OKR OA is <b>6.82%</b>▲.</p> <p>This is higher than Southwark as a whole, which has an average unemployment level of 5.6%▲.</p>	N/A#	4.8%	3.5%	<p>▲ “Economically active and unemployed, usual residents aged 16 years and over, 2021, local authorities in England and Wales”, ONS Census data, 2021, available at:  <a href="https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/economicactivitystatusenglandandwales/census2021#economically-active-unemployed">https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/economicactivitystatusenglandandwales/census2021#economically-active-unemployed</a></p> <p># The 2011 census did not collect data about the ‘economically active and unemployed’ population, preventing a comparison from being made.</p>	2021	Ten yearly
Benefit claimants	<p><b>8.6%</b> of the working age population in the East Central Southwark MWA are claiming out of work benefit▲. Within the Old Kent Road Ward, the rate is <b>9.7%</b>▲.</p> <p>This is higher than Southwark as whole, which has a benefits claimants rate of 6.9%▲.</p>	N/A#	6.3%	5.0%	<p>▲Southwark’s Joint Strategic Needs Assessment - East Central Southwark”, Southwark Council, 2023, available at:  <a href="https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf">https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf</a></p> <p># Earlier versions of the JSNA did not collect data about those claiming out of</p>	2023	Yearly

Objective & indicator for assessment	Old Kent Road statistic	Direction of change	London statistic	National statistic	Source	Most recent data	Frequency of collection			
					work benefit, preventing a comparison from being made.					
<b>Housing</b>										
Provision of new homes in the OKR OA	Since 2016, as of May 2023:		Increase	-	-	Southwark Affordable Housing Delivery document, Southwark Council, 2023, available at: <a href="https://oldkentroad.org.uk/wp-content/uploads/AffordableHousing180523.pdf">https://oldkentroad.org.uk/wp-content/uploads/AffordableHousing180523.pdf</a>	2023	As available		
	Status	Unit								
	Completed	708								
	Under construction	1,825								
	In the pipeline	800								
Total	3,333									
% and number of new affordable homes approved in the OKR OA	Since 2016, as of May 2023:		Increase	-	-	Southwark Affordable Housing Delivery document, Southwark Council, 2023, available at: <a href="https://oldkentroad.org.uk/wp-content/uploads/AffordableHousing180523.pdf">https://oldkentroad.org.uk/wp-content/uploads/AffordableHousing180523.pdf</a>	2023	As available		
	Status	Unit								
	Completed	338								
	Under construction	1,059								
	In the pipeline	312								
Total	1,709									
This is equivalent to 51.2% of the total homes approved.										
Provision of affordable housing size mix in the OKA OA against the housing waiting list	Social rent homes – built, under construction, in the pipeline	Demand for Social Rent homes	% of demand for social rent homes met	Increase	-	-	Southwark Affordable Housing Delivery document, Southwark Council, 2023, available at: <a href="https://oldkentroad.org.uk/wp-content/uploads/AffordableHousing180523.pdf">https://oldkentroad.org.uk/wp-content/uploads/AffordableHousing180523.pdf</a>	2023	As available	
	1 bed	335	935							35.8%
	2 bed	329	1190							27.7%
	3 bed	297	928							32%
	4 bed	40	444							9%
Provision of student homes	Since 1st April 2018, as of July 2024		Increase	-	-	Housing Phasing Chart, Southwark Council, 2024, available at: <a href="https://oldkentroad.org.uk/documents/">https://oldkentroad.org.uk/documents/</a>	2024	Monthly		
	No.of sites approved with some PBSA	4								
	Since 1st April 2018, as of July 2024									

Objective & indicator for assessment	Old Kent Road statistic		Direction of change	London statistic	National statistic	Source	Most recent data	Frequency of collection						
		No. of student beds approved												
	Completed	524												
	Under construction	676												
	In the pipeline	941												
	Total	2,141												
Provision of co-living homes	<table border="1"> <tr> <td colspan="2" data-bbox="320 435 831 462">Since 1st April 2018, as of July 2024</td> </tr> <tr> <td data-bbox="320 462 719 549">No. of sites received resolution of grant subject to S106 agreement with some co-living units</td> <td data-bbox="719 462 831 549">2</td> </tr> </table>		Since 1st April 2018, as of July 2024		No. of sites received resolution of grant subject to S106 agreement with some co-living units	2	Increase	-	-	Housing Phasing Chart, Southwark Council, 2024, available at: <a href="https://oldkentroad.org.uk/documents/">https://oldkentroad.org.uk/documents/</a>	2024	Monthly		
Since 1st April 2018, as of July 2024														
No. of sites received resolution of grant subject to S106 agreement with some co-living units	2													
	<table border="1"> <tr> <td colspan="2" data-bbox="320 588 831 616">Since 1st April 2018, as of July 2024</td> </tr> <tr> <td data-bbox="320 616 577 671"></td> <td data-bbox="577 616 831 671">No. of co-living units</td> </tr> <tr> <td data-bbox="320 671 577 756">Received resolution to grant subject to S106 agreement</td> <td data-bbox="577 671 831 756">890</td> </tr> </table>		Since 1st April 2018, as of July 2024			No. of co-living units	Received resolution to grant subject to S106 agreement	890						
Since 1st April 2018, as of July 2024														
	No. of co-living units													
Received resolution to grant subject to S106 agreement	890													
Education, skills and training														
School readiness	69.9% of children achieved a good level of development at the end of Reception 2022/2023 		Increase 	69.1% 	67.2% 	 “Academic year 2022/23 - Early years foundation stage profile results - Good level of development by region and local authority”, available at: <a href="https://explore-education-statistics.service.gov.uk/find-statistics/early-years-foundation-stage-profile-results/2022-23">https://explore-education-statistics.service.gov.uk/find-statistics/early-years-foundation-stage-profile-results/2022-23</a>   Based on comparison with “Southwark’s Joint Strategic Needs Assessment - East Central Southwark”, Southwark Council, 2019, which reports a good level of development at age 5 years being achieved at the following rates: - 63.7% in the Old Kent Road ward; - 65.3% in the East Central Southwark MWA; - 65.3% across the borough as a whole;	2023	As available						










Objective & indicator for assessment	Old Kent Road statistic	Direction of change	London statistic	National statistic	Source	Most recent data	Frequency of collection
					- 62.2% across London; and - 60.4% at the national level. The above data is available at: <a href="https://www.southwark.gov.uk/assets/attach/10642/Multi-Ward-Area-Profiles-East-Central-Final.pdf">https://www.southwark.gov.uk/assets/attach/10642/Multi-Ward-Area-Profiles-East-Central-Final.pdf</a>		
<b>Health and Wellbeing</b>							
Childhood obesity	<b>42.5%</b> of Year 6 children in the East Central Southwark MWA are overweight or obese. Within the Old Kent Road Ward, the rate is <b>50.0%</b> .  41.5% of Year 6 children in Southwark are overweight and obese.	Decrease in the MWA; Increase in the Ward#	38.1%# <b>38.8%</b>	34.2%# <b>36.6%</b>	# "Southwark's Joint Strategic Needs Assessment - East Central Southwark", Southwark Council, 2023, available at: <a href="https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf">https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf</a>  # Based on a comparison with the JSNA Annual Report 2019, which reports 42.6% in East Central Southwark and 46.5% in the Old Kent Road Ward.	2023	Annual
Life expectancy	East Central Southwark MWA - Male life expectancy at birth: <b>77.8</b> years**	Increase	79.1 years#	78.9 years#	** Census 2021 (covering the 2020-2022 period), available at: <a href="https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/lifeexpectancies/bulletins/nationallifetablesunitedkingdom/2020to2022#:~:text=Life%20expectancy%20at%20birth%20in%2020%20to%202022%20was%20estimated,and%2082.8%20years%20for%20females">https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/lifeexpectancies/bulletins/nationallifetablesunitedkingdom/2020to2022#:~:text=Life%20expectancy%20at%20birth%20in%2020%20to%202022%20was%20estimated,and%2082.8%20years%20for%20females</a>  # "Southwark's Joint Strategic Needs Assessment – Annual Report" (covering the 2020-2022 period), Southwark Council, 2023, available at: <a href="https://moderngov.southwark.gov.uk/documents/s115562/Apendix%201%20-%20JSNA%20Annual%20Report%202023%20Southwarks%20Joint%20Strategic%20Needs%20Assessment.pdf">https://moderngov.southwark.gov.uk/documents/s115562/Apendix%201%20-%20JSNA%20Annual%20Report%202023%20Southwarks%20Joint%20Strategic%20Needs%20Assessment.pdf</a>	2021	Ten yearly
	Southwark as a whole – Male life expectancy at birth: <b>78.2</b> years#	Increase					
	East Central Southwark MWA – Female life expectancy at birth: <b>82.7</b> years**	Increase	83.6 years#	82.8 years#			
	Southwark as a whole – Female life expectancy at birth: <b>83.3</b> years#	Increase					








Objective & indicator for assessment	Old Kent Road statistic	Direction of change	London statistic	National statistic	Source	Most recent data	Frequency of collection
					# "Life expectancy for local areas in England, Northern Ireland and Wales: between 2001 to 2003 and 2020 to 2022", ONS, available at: <a href="https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/bulletins/lifeexpectancyforlocalareasoftheuk/between2001to2003and2020to2022">https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/bulletins/lifeexpectancyforlocalareasoftheuk/between2001to2003and2020to2022</a>		
<b>Safety</b>							
Crime rates	<p><b>111.1</b> crimes per 1000 residents in the East Central Southwark MWA. Within the Old Kent Road Ward, the rate is <b>132.3</b> per 1000. ~</p> <p>Southwark as a whole has a rate of either:</p> <ul style="list-style-type: none"> <li>- <b>130.8</b> per 1000. **; or</li> <li>- <b>124</b> per 1000 M depending on the source.</li> </ul>	Increase	100.9**	92.8**	<p>~ "Southwark's Joint Strategic Needs Assessment – East Central Southwark", Southwark Council, 2023, available at: <a href="https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf">https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf</a></p> <p>**ONS Centre of Data and Justice "Crime in England and Wales: Police Force Area data tables", available at: <a href="https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/crimeandjustice/datasets/policeforceareadatatables/yearendingmarch2023/pfatableyemar231.xlsx">https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/crimeandjustice/datasets/policeforceareadatatables/yearendingmarch2023/pfatableyemar231.xlsx</a></p> <p>M "JSNA Annual Report 2023 - Southwark's Joint Strategic Needs Assessment". Southwark Council, 2023, available at: <a href="https://www.southwark.gov.uk/assets/attach/206524/JSNA-Annual-Report-2023.pdf">https://www.southwark.gov.uk/assets/attach/206524/JSNA-Annual-Report-2023.pdf</a></p>	2023	As available
<b>Economy and Employment</b>							
Number of micro and small to medium sized enterprises	Within the 6 MSOA falling within the OKAOA ~			-	-	2023	Annually
		2023	2019				
	Micro (0 to 9)	1,810 (88%)	1,920 (88%)	Decrease			
					~ "UK Business Counts – Enterprises by industry", ONS, 2023, available at: <a href="https://www.nomisweb.co.uk/home/release_group.asp?g=20">https://www.nomisweb.co.uk/home/release_group.asp?g=20</a>		

Objective & indicator for assessment	Old Kent Road statistic		Direction of change		London statistic	National statistic	Source	Most recent data	Frequency of collection
	Small (10 to 49)	200 (9.8%)	195 (9%)	Increase					
	Medium-sized (50 to 249)	35 (1.7%)	40 (1.8%)	Decrease					
	Large (250+)	15 (0.7%)	10 (0.5%)	Increase					
	Total	2,050	2,175	Decrease					
Employment floorspace	<ul style="list-style-type: none"> <li>over 592,568 sqm of employment floorspace; and</li> <li>168,636 sqm of operational yard space.</li> </ul>		N/A		N/A	N/A	“Old Kent Road Business Survey Update Findings Report”, We Made That, 2019, available at: <a href="https://www.southwark.gov.uk/assets/attach/11363/SP421-Old-Kent-Road-Business-Survey-Update-2019-.pdf">https://www.southwark.gov.uk/assets/attach/11363/SP421-Old-Kent-Road-Business-Survey-Update-2019-.pdf</a>	2019	As available
Number of rateable properties in the industrial sector	410 rateable properties in industrial sector within the 6 MSOA falling within the OKAOA in 2023 🟢		Decrease 2019: 480		49,930	521,970	🟢 NDR Stock of Properties Tables by region, county, local authority district and middle and lower super output area, Valuation Office Agency, available at: <a href="https://www.gov.uk/government/statistics/non-domestic-rating-stock-of-properties-2024">https://www.gov.uk/government/statistics/non-domestic-rating-stock-of-properties-2024</a>	2023	Annually
					2019: 49,570				
Number of rateable properties in the office sector	600 rateable properties in office sector within the 6 MSOA falling within the OKAOA in 2023 🟢		Decrease 2019: 570		105,650	414,110	🟢 NDR Stock of Properties Tables by region, county, local authority district and middle and lower super output area, Valuation Office Agency, available at: <a href="https://www.gov.uk/government/statistics/non-domestic-rating-stock-of-properties-2024">https://www.gov.uk/government/statistics/non-domestic-rating-stock-of-properties-2024</a>	2023	Annually
					2019: 104,860				
					Inner London				
					24,560				
					2019: 24,500				
					Inner London				
					79,660				
					2019:				



Objective & indicator for assessment	Old Kent Road statistic	Direction of change	London statistic	National statistic	Source	Most recent data	Frequency of collection																								
			77,780																												
Number of life science local units	60 life science local units in the 6 MSOAs falling within the OKA OA	Increase  2019: 50	16,440  2019: 14,690	81,775  2019: 75,855	<p>“UK Business Counts – Local Units by industry”, ONS, 2023, available at: <a href="https://www.nomisweb.co.uk/home/release_group.asp?g=20">https://www.nomisweb.co.uk/home/release_group.asp?g=20</a></p> <p>To adequately reflect the size and shape of the UK life science sector as a whole as many sub-sectors cannot be separately identified, we have extended the definition of life science to include the following industries in the Standard Industry Classification (SIC) codes (SIC 2007):</p> <table border="1"> <thead> <tr> <th>Industry</th> <th>SIC code</th> </tr> </thead> <tbody> <tr> <td>Manufacture of basic pharmaceutical products</td> <td>21</td> </tr> <tr> <td>Manufacture of irradiation, electromedical and electrotherapeutic equipment</td> <td>266</td> </tr> <tr> <td>Manufacture of medical and dental instruments and supplies</td> <td>325</td> </tr> <tr> <td>Hospital activities</td> <td>861</td> </tr> <tr> <td>Medical and dental practice activities</td> <td>862</td> </tr> <tr> <td>Other human health activities</td> <td>869</td> </tr> <tr> <td>Wholesale of pharmaceutical goods</td> <td>4646</td> </tr> <tr> <td>Wholesale of chemical products</td> <td>4675</td> </tr> <tr> <td>Dispensing chemist in specialised stores</td> <td>4773</td> </tr> <tr> <td>Research and experimental development on biotechnology</td> <td>7211</td> </tr> <tr> <td>Research and experimental development on natural sciences and engineering</td> <td>7219</td> </tr> </tbody> </table>	Industry	SIC code	Manufacture of basic pharmaceutical products	21	Manufacture of irradiation, electromedical and electrotherapeutic equipment	266	Manufacture of medical and dental instruments and supplies	325	Hospital activities	861	Medical and dental practice activities	862	Other human health activities	869	Wholesale of pharmaceutical goods	4646	Wholesale of chemical products	4675	Dispensing chemist in specialised stores	4773	Research and experimental development on biotechnology	7211	Research and experimental development on natural sciences and engineering	7219	2023	Annually
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Objective & indicator for assessment	Old Kent Road statistic	Direction of change	London statistic	National statistic	Source	Most recent data	Frequency of collection
Hot food takeaways in proximity of schools	There are approximately 20 hot food takeaways within 400m of secondary schools in the Old Kent Road Opportunity Area.	Decrease 	N/A	N/A	“P45 Hot Food Takeaways – Review of the evidence”, Southwark Place and Health Improvement Section 2018”, Southwark Council, available at: <a href="https://www.southwark.gov.uk/assets/attach/11225/SP501-Southwark-Hot-Food-Takeaways-Report-2018-.pdf">https://www.southwark.gov.uk/assets/attach/11225/SP501-Southwark-Hot-Food-Takeaways-Report-2018-.pdf</a>   Attributable to the introduction of Policy P48 of the Southwark Plan in 2022	2018	As available
Hot food takeaways concentration within Secondary Shopping Frontages	<b>9%</b> of commercial units on the Old Kent Road, East Street and Dunton Road Secondary Shopping Frontage are in use as hot food takeaways. <b>9%</b> of commercial units on the Old Kent Road and Peckham Park Road Secondary Shopping Frontage are in use as hot food takeaways. <b>27%</b> of commercial units on the Ilderton Road Secondary Shopping Frontage are in use as hot food takeaways. 	Decrease 	N/A	N/A	 “Retail and Town Centre Uses December 2019”, Southwark Council, 2019, available at: <a href="https://www.southwark.gov.uk/assets/attach/11658/sp403-retail-background-paper.pdf">https://www.southwark.gov.uk/assets/attach/11658/sp403-retail-background-paper.pdf</a>   Attributable to the introduction of Policy P48 of the Southwark Plan in 2022	2019	
Vacancy rates	Class E Retail: 10.13% of all units in Old Kent Road North Town Centre is vacant.  Class E Retail: 13.33% of all units in Old Kent Road South Town Centre is vacant.	N/A	N/A	N/A	Protected Shopping Frontages Survey 2023, Summary Report, Southwark	2024	As available
<b>Energy and Climate Change</b>							
Energy and Climate Change	No data available at the Opportunity Area Level. This is to refer to the Southwark wide data						
<b>Air Quality</b>							
Concentration of Nitrogen Dioxide	Mean of 8 NO2 diffuse tube locations in the Old Kent Road OA for between 2012 – 2022 	Decrease 	Average NO2	N/A	 “Air Quality Annual Status Report for 2022”, Southwark Council, 2023, available at:	2023; 2022	As available

Objective & indicator for assessment	Old Kent Road statistic		Direction of change	London statistic	National statistic	Source	Most recent data	Frequency of collection														
	<table border="1"> <thead> <tr> <th>Year (December)</th> <th>Mean µg/m3</th> </tr> </thead> <tbody> <tr> <td>2012</td> <td>44.49</td> </tr> <tr> <td>2014</td> <td>69.18</td> </tr> <tr> <td>2016</td> <td>65.16</td> </tr> <tr> <td>2018</td> <td>49.02</td> </tr> <tr> <td>2020</td> <td>34.00</td> </tr> <tr> <td>2022</td> <td>34.29</td> </tr> </tbody> </table>	Year (December)	Mean µg/m3	2012	44.49	2014	69.18	2016	65.16	2018	49.02	2020	34.00	2022	34.29		A general pattern of decrease in all other pollutants  .	µg/m3 in London  Roadside (Inner) location  2019: 45  2023: 29		<a href="https://www.southwark.gov.uk/environment/air-quality/air-quality-monitoring-data">https://www.southwark.gov.uk/environment/air-quality/air-quality-monitoring-data</a>   "London Borough of Southwark - Nitrogen dioxide diffusion tube survey", Southwark Council, 2022, available at: <a href="https://www.southwark.gov.uk/assets/attach/7491/NO2-Diffusion-survey-data-2012-2022-all-data.xlsx">https://www.southwark.gov.uk/assets/attach/7491/NO2-Diffusion-survey-data-2012-2022-all-data.xlsx</a>  "Southwark Air Quality Action Plan 2023-2027", Southwark Council, 2023, available at: <a href="https://www.southwark.gov.uk/assets/attach/169719/Southwark-Air-Quality-Action-Plan-2023-to-2027.pdf">https://www.southwark.gov.uk/assets/attach/169719/Southwark-Air-Quality-Action-Plan-2023-to-2027.pdf</a> Air quality in London 2016 – 2024, p.52, see: <a href="https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/environment-and-climate-change-publications/air-quality-london-2016-2024">https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/environment-and-climate-change-publications/air-quality-london-2016-2024</a>		
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2012	44.49																					
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2018	49.02																					
2020	34.00																					
2022	34.29																					
Concentration of PM10	Average annual mean PM <sub>10</sub> from 2 Automatic Monitoring sites on the Old Kent Road: 19.5 µg/m3 		Decrease 2016: 24 µg/m3	-	-	 "Air Quality Annual Status Report for 2022", Southwark Council, 2023, available at: <a href="https://www.southwark.gov.uk/environment/air-quality/air-quality-monitoring-data">https://www.southwark.gov.uk/environment/air-quality/air-quality-monitoring-data</a>	2022	As available														
<b>Transport</b>																						
Journey to work by mode	The method of travel to work for all usual residents aged 16 years and over in employment the week before the census 2021 living in 6 MSOAs falling within the OKA OA:		Census 2021 took place during a national lockdown. People who were furloughed (about 5.6 million) were advised to answer the transport to work question based on their previous travel patterns <i>before or</i>			"TS061 - Method used to travel to work", Office for National Statistics, 2023, available at: <a href="https://www.nomisweb.co.uk/query/construkt/submit.asp?forward=yes&amp;menuopt=201&amp;subcomp=">https://www.nomisweb.co.uk/query/construkt/submit.asp?forward=yes&amp;menuopt=201&amp;subcomp=</a>	2021	As available														
	Work mainly at or from home	38.7%		42.1%	31.0%																	
	Underground, metro, light rail, tram, train, bus, minibus or coach	33.3%		24.1%	8.2%																	

Objective & indicator for assessment	Old Kent Road statistic		Direction of change	London statistic	National statistic	Source	Most recent data	Frequency of collection
	Taxi, motorcycle, scooter or moped, driving a car or van, passenger in a car or van	11.7%	<i>during</i> the pandemic. This means that the data does not accurately represent what they were doing on Census Day. Hence, this variable cannot be directly compared with the 2011 Census Travel to Work data.	23.3%	49.6%			
	Bicycle	5.7%		3%	2.1%			
	On foot	9.3%		6.4%	7.6%			
	Other method of travel to work	1.2%		1.2%	1%			
Number of Controlled Parking Zones	There are seven Controlled Parking Zones (CPZs) that overlap with the Old Kent Road Opportunity Area. There is also one CPZ in development within the Old Kent Road OA (this is the "Old Kent Road CPZ").		Decrease <span style="color: green;">---</span>	N/A	N/A	<p>"Parking Annual Monitoring Report 2018/19", Southwark Council, available at: <a href="https://www.southwark.gov.uk/assets/attachment/11828/Annual-Report-on-Parking-and-funding-2018-19-.pdf">https://www.southwark.gov.uk/assets/attachment/11828/Annual-Report-on-Parking-and-funding-2018-19-.pdf</a></p> <p>Parking zones, Southwark Council, available at: <a href="https://www.southwark.gov.uk/parking/find-somewhere-to-park/parking-zones">https://www.southwark.gov.uk/parking/find-somewhere-to-park/parking-zones</a></p> <p><span style="color: green;">---</span> Attributable to the Council's pledge to reduce trips made by car/motorbike to 13% by 2041, the introduction/expansion of CPZs being a part of this strategy.</p>	2019; 2024	As available
<b>Biodiversity</b>								

Objective & indicator for assessment	Old Kent Road statistic	Direction of change	London statistic	National statistic	Source	Most recent data	Frequency of collection
Number of SINC Sites	8	N/A	N/A	N/A	<p>“Old Kent Road - Background Paper - Open Spaces”, Southwark Council, 2021, available at:  <a href="https://www.southwark.gov.uk/assets/attach/32962/EIP148-Old-Kent-Road-Open-Space-Background-Paper-Jan-2021.pdf">https://www.southwark.gov.uk/assets/attach/32962/EIP148-Old-Kent-Road-Open-Space-Background-Paper-Jan-2021.pdf</a></p> <p>Southwark Plan 2022, Southwark Council, available at:  <a href="https://www.southwark.gov.uk/assets/attach/94325/Southwark-Plan-2022.pdf">https://www.southwark.gov.uk/assets/attach/94325/Southwark-Plan-2022.pdf</a> [p.576 specifically]</p>	2021; 2022	As available
Range of Local Nature Reserves	The Old Kent Road OA has 0 Local Nature Reserves (LNR's) totalling 0 ha.	N/A	N/A	N/A	<p>“Southwark Nature Action Plan 2020 Protecting Biodiversity and Making Nature Accessible for All”, Southwark Council, available at:  <a href="https://www.southwark.gov.uk/assets/attach/13066/Complete-SNAP-2020.pdf">https://www.southwark.gov.uk/assets/attach/13066/Complete-SNAP-2020.pdf</a></p>	2020	As available
Range of New Protected Sites	There are no new protected sites in the Old Kent Road OA.	N/A	N/A	N/A	<p>Southwark Nature Action Plan 2020 Protecting Biodiversity and Making Nature Accessible for All”, Southwark Council, available at:  <a href="https://www.southwark.gov.uk/assets/attach/13066/Complete-SNAP-2020.pdf">https://www.southwark.gov.uk/assets/attach/13066/Complete-SNAP-2020.pdf</a></p> <p>“London Environment Strategy”, Mayor of London, 2017, accessible at:  <a href="https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf">https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf</a>  [specifically: Habitat creation targets for London (Table 9)]</p> <p>“A Green Future: Our 25 Year Plan to Improve the Environment”, DEFRA, 2018, accessible from:  <a href="https://assets.publishing.service.gov.uk/media/65fd713d65ca2f00117da89e/CD1.H_HM_Government_A_Green_Future_Our_25_Year_Plan_to_Improve_the_Environment.pdf">https://assets.publishing.service.gov.uk/media/65fd713d65ca2f00117da89e/CD1.H_HM_Government_A_Green_Future_Our_25_Year_Plan_to_Improve_the_Environment.pdf</a></p>	2020; 2018	As available

Objective & indicator for assessment	Old Kent Road statistic	Direction of change	London statistic	National statistic	Source	Most recent data	Frequency of collection
<b>Soil and Open Space</b>							
Hectares of open space per 1,000 population	In 2021, 0.68 hectares of open space per 1,000 population 	The Open Space Strategy (2013) sets a standard for the provision of parks which is 0.72ha per 1,000 of the population.	-	-	Old Kent Road Background Paper Southwark Council, 2021, available at : <a href="https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-guidance/development-plan/area-action-plans-section/old-kent-road-aap/evidence-base">https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-guidance/development-plan/area-action-plans-section/old-kent-road-aap/evidence-base</a>   This is based on the population of 35,686 in 2018 within the OKR OA and inclusion of 1/3 of the Burgess Park.	2021	As available
% of the land within the OKAOR within 400m catchment of designated open space	In 2021, 100% of the land within the OKAOR is within 400m catchment of designated open space	-	-	-	Southwark Maps	2024	As available
<b>Flood Risk, Water Resources and Quality</b>							
Domestic Water Demand across the whole borough (as a proxy measure of water consumption)	111.33 litres per person per day (Old Kent Road)	Decrease  (105 litres per person per day)	144.3 litres per person per day, 2021 – 22 average (Thames Water)	-	Old Kent Road Integrated Water Management Strategy  Page 13, table 3.3 'Revised Draft Water Resources Management Plan (2024)  <a href="https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/wrmp24-draft/technical-report/demand-forecast.pdf">https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/wrmp24-draft/technical-report/demand-forecast.pdf</a>	2018	As Available
<b>Waste Management</b>							



Waste management	No data available at the Opportunity Area Level						
<b>Noise Management</b>							
Noise Management	No data available at the Opportunity Area Level						
<b>Play Facilities</b>							
Number of open spaces with play facilities	6 parks within play facilities within the OKR OA  Burgess Park also accommodates play facilities and is just outside the OKROA	-	-	-	Old Kent Road Background Paper Southwark Council, 2021, available at: : <a href="https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-guidance/development-plan/area-action-plans-section/old-kent-road-aap/evidence-base">https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-guidance/development-plan/area-action-plans-section/old-kent-road-aap/evidence-base</a>	2021	As Available
<b>Quality in Design and Conservation of Historic Environment</b>							
Number of historic environment assets	Protected vista: 2 (One Tree Hill to St Paul's Cathedral and from Nunhead Cemetery to St Paul's Cathedral)	-	-	-	Southwark Maps	2024	As available
	Conservation areas: 8						
	Listed buildings: 76 (Grade II), 1 (Grade II*)						
	Locally Listed Buildings: 129						
	Archaeology priority areas: 1 (North Southwark and Roman Roads)						

## Contextual characteristics

Objective & indicator for assessment	Old Kent Road statistic			Direction of change	London statistic	National statistic	Source	Most recent data	Frequency of collection
<b>Population</b>									
Demographic	Ethnic Group	East Central Southwark MWA	Old Kent Road Ward				<p>ONS Census data 2021, available at: <a href="https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/lifeexpectancies/bulletins/nationallifetablesunitedkingdom/2020to2022#:~:text=Life%20expectancy%20at%20birth%20in%202020%20to%202022%20was%20estimated,and%2082.8%20years%20for%20females">https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/lifeexpectancies/bulletins/nationallifetablesunitedkingdom/2020to2022#:~:text=Life%20expectancy%20at%20birth%20in%202020%20to%202022%20was%20estimated,and%2082.8%20years%20for%20females</a></p> <p>“Southwark’s Joint Strategic Needs Assessment - East Central Southwark”, Southwark Council, 2023, available at: <a href="https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf">https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf</a></p> <p><b>Note: figures have been rounded to the nearest whole number to standardise across the two data sources</b></p>	2021 ; 2023	Ten yearly; Yearly
	White	43%	35%	N/A	54%	81%			
	Black, Black British, Caribbean or African	35%	38%	N/A	14%	4%			
	Asian or Asian British	8%	9%	N/A	21%	10%			
	Mixed or Multiple Ethnic Groups	8%	7%	N/A	6%	3%			
	Chinese/Other	7%	11%	N/A	6%	2%			
<b>Housing</b>									
Social housing occupancy	<p>48% of housing in the East Central Southwark MWA is managed by Southwark Council or a TMO. Within the Old Kent Road Ward, the rate is 58%*.</p> <p>This is higher than Southwark as whole, where the rate is 40%*. Out of all local authorities in England, Southwark ranks joint highest with Hackney and Islington for the proportion of households that are socially rented.</p>			Increase#	23%	17%	<p>* “Southwark’s Joint Strategic Needs Assessment - East Central Southwark”, Southwark Council, 2023, available at: <a href="https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf">https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf</a></p> <p>#The JSNA Annual Report 2019 reports 30.1% in East Central Southwark and 26.1% in the Old Kent Road Ward.</p>	2023	As available

Social Cohesion							
Social Cohesion	Old Kent Road Placemaking Study Outcomes: Suitable uses, typology, density and design options for the OKR AAP	Increase	N/A	N/A	Allies and Morrison – Placemaking Study	2016	As available
	Sense of community	Increase	N/A	N/A	Old Kent Road Social Life Research	2019	ongoing
Economy and Employment							
Employment land and job numbers	Old Kent Road is home to: • 9 industrial estates/areas; • 3 retail parks; • 2 high street locations; • 716 businesses; • 10,035 jobs; • over 592,568 sqm of employment floorspace; and 168,636 sqm of operational yard space.	N/A	N/A	N/A	“Old Kent Road Business Survey Update Findings Report”, We Made That, 2019, available at: <a href="https://www.southwark.gov.uk/assets/attach/11363/SP421-Old-Kent-Road-Business-Survey-Update-2019-.pdf">https://www.southwark.gov.uk/assets/attach/11363/SP421-Old-Kent-Road-Business-Survey-Update-2019-.pdf</a>	2019	As available
Number of life science enterprises	55 life science enterprises in the 6 MSOA falling within the OKA OA	Decrease 2019: 60	15,715 2019: 14,015	70,035 2019: 64,535	“UK Business Counts – Enterprises by industry”, ONS, 2023, available at: <a href="https://www.nomisweb.co.uk/home/release_group.asp?g=20">https://www.nomisweb.co.uk/home/release_group.asp?g=20</a>  See also above ‘Number of life science local units’ dataset which sets out the industries that are included in the life science sector.	2023	Annually
Climate							
Employment land and job numbers	The Council’s Carbon Footprint from its own assets and operations is 432 ktCO2e, 16% of which is derived from its buildings.	A decrease in energy consumption and carbon emissions.. An increase in connections to District Heating Networks.	N/A	N/A	Old Kent Road Studies include: • “Local Development Order Southwark District Heating Network”, Southwark Council, 2023, available at: <a href="https://www.southwark.gov.uk/assets/attach/195041/Statement-of-reasons-LDO-Adoption-Version.pdf">https://www.southwark.gov.uk/assets/attach/195041/Statement-of-reasons-LDO-Adoption-Version.pdf</a> • “Old Kent Road Decentralised Energy Strategy”, Southwark Council, 2016, available at:	2023 ; 2020 ; 2016	As available

					<p><a href="https://www.southwark.gov.uk/assets/attach/12827/EIP61-Old-Kent-Road-Decentralised-Energy-Strategy-2016-.pdf">https://www.southwark.gov.uk/assets/attach/12827/EIP61-Old-Kent-Road-Decentralised-Energy-Strategy-2016-.pdf</a></p> <ul style="list-style-type: none"> <li>“Decentralised Energy Feasibility Study”, Southwark Council, 2020, available at: <a href="https://www.southwark.gov.uk/assets/attach/23930/102046-LBS-OKR-REP-1-Decentralised-Energy-Feasibility-Study-V1A.pdf">https://www.southwark.gov.uk/assets/attach/23930/102046-LBS-OKR-REP-1-Decentralised-Energy-Feasibility-Study-V1A.pdf</a></li> </ul> <p>Borough Wide Studies;</p> <p>“Tackling the Climate Emergency Together: Our strategy for a carbon neutral Southwark by 2030” available at: <a href="https://www.southwark.gov.uk/environment/climate-emergency/reaching-net-zero/our-plan-for-net-zero">https://www.southwark.gov.uk/environment/climate-emergency/reaching-net-zero/our-plan-for-net-zero</a>.</p>		
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**Air Quality**

Location of diffuse tubes in the OKR OA	SDT1	AQMS Old Kent Road - Tube 1 -		-	-	“Air Quality Annual Status Report for 2022”, Southwark Council, 2023, available at: <a href="https://www.southwark.gov.uk/environment/air-quality/air-quality-monitoring-data">https://www.southwark.gov.uk/environment/air-quality/air-quality-monitoring-data</a>	2023	As available
	SDT2	AQMS Old Kent Road - Tube 2						
	SDT3	AQMS Old Kent Road - Tube 3						
	SDT31	Bricklayers Arms West						
	SDT49	Lamppost 129/08 Lynton Road west						
	SDT90	Lamppost Adjacent to 375 Old Kent Road						
	SDT91	Lamppost adjacent to 221 Old Kent Road						
	SDT92	Ilderton Primary School Ilderton Road						
Location of Automatic Monitoring Sites in the OKR OA	SWK 5	Old Kent Road -		-	-	“Air Quality Annual Status Report for 2022”, Southwark Council, 2023, available at: <a href="https://www.southwark.gov.uk/environment/air-quality/air-quality-monitoring-data">https://www.southwark.gov.uk/environment/air-quality/air-quality-monitoring-data</a>	2023	As available
	SWK 9	Old Kent Road						

**Open Space**

	MOL	2		-	-		2023	
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Number of ranges of Open Space		-				<p>“Old Kent Road - Background Paper - Open Spaces”, Southwark Council, 2021, available at:  <a href="https://www.southwark.gov.uk/assets/attach/32962/EIP148-Old-Kent-Road-Open-Space-Background-Paper-Jan-2021.pdf">https://www.southwark.gov.uk/assets/attach/32962/EIP148-Old-Kent-Road-Open-Space-Background-Paper-Jan-2021.pdf</a></p> <p>Southwark Plan 2022, Southwark Council, available at:  <a href="https://www.southwark.gov.uk/assets/attach/94325/Southwark-Plan-2022.pdf">https://www.southwark.gov.uk/assets/attach/94325/Southwark-Plan-2022.pdf</a> [p.576 specifically]</p>	As available
	BOL	7					
	OOS	5					
<b>Flood Risk</b>							
Areas in the OKROA within Flood Zone 2	90% of the land within the OKROA is within Flood Zone 2	-	-	-	Southwark maps	2024	As available
Areas in the OKROA within Flood Zone 3	87.92% of the land within the OKROA is within Flood Zone 3	-	-	-	Southwark maps	2024	As available

# Southwark Baseline Data

## Social Conditions

### Population

#### Contextual characteristics

Baseline data	Southwark			Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
% of population demographic	White	Black	Asian	-	-	-	ONS 2023. Census 2021 – Age and ethnic group	2021	Annually
	51%	25%	10%						
	Mixed		Other						
	7%		6%						
% of population that are:	Religious	LGBT		-	-	-	ONS 2023. Census 2021 – Religion; ONS 2023. Census 2021 – Sexual Orientation; ONS 2023. Census 2021 – Health, disability and unpaid care;	2021	Annually
	<b>Christian</b> 43.3%	8%							
	<b>Muslim</b> 9.4%)								
	<b>Buddhist</b> 1.1%								
	<b>Hindu</b> 5.9%	Residents identifying as disabled							
	<b>Jewish</b> - 0.4%	14% of working-aged people (16-64))							
	<b>Sikh</b> 0.2%								
	<b>Other faith</b> 0.7%								
	<b>No faith</b> 36.4%								

## Equality

### Baseline Indicators

Baseline data	Southwark	Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
Index of multiple deprivation	43 <sup>rd</sup> most deprived out of 317 local authorities in England; 8 <sup>th</sup> most deprived among 14 inner London boroughs; 9 <sup>th</sup> out of 33 local boroughs in London	Lower	-	-	English Indices of Deprivation 2019	Sep 2019	Annually
The Income Deprivation Affecting Children Index 2019 (IDACI)	81 out of 166 lower-layer super output areas (LSOAs) fell into the 20% most deprived across the country	Decrease	-	-	English Indices of Deprivation 2019	Sep 2019	Annually
The Income Deprivation Affecting Older People Index 2019 (IDAOPI)	113 out of 166 lower-layer super output areas (LSOAs) fell into the 20% most deprived across the country	Decrease	-	-	English Indices of Deprivation 2019	Sep 2019	Annually

## Social cohesion

### Baseline Indicators

Baseline data	Southwark	Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
Active member of their community	1 in 4 people	increase	-	-	Southwark Conversation	2018	Annually
Feeling of contributing to the local economy	1 in 5 people	Increase	-	-	Southwark Conversation	2018	Annually
Volunteer in Southwark	1 in 7 people	Increase	-	-	Southwark Conversation	2018	Annually
Work in the borough	1 in 6 people	-	-	-	Southwark Conversation	2018	Annually
Percentage of residents who feel wholly or partly positive about change in the borough	70%	Increase	-	-	Southwark Conversation	2018	Annually
Percentage of residents who have personally benefitted from change in the borough	52%	Increase	-	-	Southwark Conversation	2018	Annually



Baseline data	Southwark	Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
How positive/happy residents feel about change in Southwark	18% mentioned community	-	-	-	Southwark Conversation	2018	Annually

## Housing

### Baseline Indicators

Baseline data	Southwark		Southwark's maintenance target	London	National (England)	Source	Most recent data	Frequency of collection
Provision of new homes against the demand set out in Southwark Strategic Housing Market Assessment (SHMA) 2019	SHMA Target: Between 2019 and 2036	Completed between 2019 and 2023	Increase supply	-	-	London Development Database (LDD)	2023	As available
	440,035 homes	7,615 homes						
	Annualised SHMA Target between 2019 and 2023	Completed between 2019 and 2023						
	11,775 homes	7,615 homes						
Provision and percentage of new affordable homes against the demand set out in Southwark SHMA 2019	Annualised SHMA Target between 2019 and 2023	Completed between 2019 and 2023	Increase supply	-	-	London Development Database (LDD)	2022	As available
	10,385	1,628 homes						
Provision of new family-sized social housing against the demand set out in Southwark SHMA 2019	Annualised SHMA Target between 2019 and 2023	Completed between 2019 and 2023	Increase supply	-	-	London Development Database (LDD)	2022	As available
	2,120	325 homes						

## Contextual Characteristics

Baseline data	Southwark	Southwark's maintenance target	London		National (England)	Source	Most recent data	Frequency of collection
Average house price	£470,000	-	Inner London £661,535	£523,376	302,393	Land Registry UK House Price Index.	May 2024	Annual
Weekly median income	£799	-	£796		£683	ONS Annual Survey of Hours and Earnings Resident Analysis	2023 (Provisional)	Annual
Ratio of median house price in borough to median annual residence based earnings	13.38 (2022)	Decrease	Inner London 14.6	12.66	8.14	ONS – House price to residence-based earnings ratio	2023	Annual
Average rental price and index	£2,114	-	-		-	Redevelopment of private rental prices statistics, UK: impact analysis data, ONS, 2024	2023	Annual
No. of households on housing register	12,914 (July 2020)	Decrease	-		-	Southwark Housing Strategy 2020	2020	As available
No. and % of council housing in the borough	37,066	25.93%	-		-	Southwark Key Housing Data 2020	2019	As available
Stock of housing associations	20,223 units 1-bed: 35% 2-bed: 32% 3-bed: 21%	-	-		-	Southwark Key Housing Data 2020	2019	As available
No. and % of households in private dwellings	78,829 households 60.3% of total households	-	76.9%		82.9%	Tenure of Households by Borough, Office for National Statistics	2021	Annual

Baseline data	Southwark	Southwark's maintenance target	London	National (England)	Source	Most recent data	Frequency of collection
% of households in Owner-occupied and private rent (including Shared Ownership (of all tenure)	Owned or Shared Ownership: 31.3% Private rented or lives rent free: 29%	-	Owned or Shared Ownership: 46.8% Private rented or lives rent free: 30.1%	-	- Tenure of Households by Borough, Office for National Statistics	2021	Annual
Housing typology	Majority of private dwellings are flats at 48% in 2008	-	37.1% in 2001	-	Southwark Key Housing Data 2020	2020	As available
Age of private dwellings	43% constructed before 1919; 43% after 1964	-	-	-	Southwark Key Housing Data 2020	2020	As available
Net approved homes (2004 – 2024)	46,447, units (including conventional housing and non-conventional equivalent units)	Increase supply	-	-	London Development Database (LDD)	July 2024	As available
Net completed homes (2004 – 2024)	29,720, units (including conventional housing and non-conventional equivalent units)	Increase supply	-	-	London Development Database (LDD)	July 2024	As available
Net approved affordable homes (2004 – 2024)	12,480 units (27% of the total homes approved)	Increase	-	-	London Development Database (LDD)	July 2024	As available
Net completed affordable homes (2004 – 2024)	5,543 units (17% of the total homes completed)	Increase	-	-	London Development Database (LDD)	July 2024	As available
Net approved homes in minor developments (2004 – 2019)	5,567 units (2,275 schemes)	Increase	-	-	London Development Database (LDD)	Nov 2019	As available
Net completed homes in minor	4,806 units (16% of total new homes)	Increase	-	-	London Development Database (LDD)	July 2024	

Baseline data	Southwark	Southwark's maintenance target	London	National (England)	Source	Most recent data	Frequency of collection
developments (2004 – 2024)							
Net approved student accommodation (2004 – 2024)	7,540 bedrooms	-	92,472	-	London Development Database (LDD)	July 2024	As available
Net completed student accommodation (2004 – 2024)	5,010 bedrooms	-	56,623	-	London Development Database (LDD)	July 2024	As available
Additional general housing needs	South East SHMA (2014): 1,647 units	Increase supply	-	-	South East London Strategic Housing Market Assessment (SHMA, (2014); Southwark's SHMA (2019)	Jul 2019	As available
	Southwark SHMA (2019): 2,932 units						
Net affordable housing needs per year	Backlog needs from 2,934 concealed households	Increase supply	-	-	Southwark's SHMA (2019)	Jul 2019	As available
	Backlog needs from 6,745 overcrowded households						
	Backlog needs from 2,336 homeless households who are currently living in temporary accommodation						
	3,943 newly forming households per annum						
	205 existing households falling into need for affordable homes per year						
	Annual supply of affordable homes: 1,436 units						
	Net additional affordable homes need: 2,077 units						

Baseline data	Southwark						Southwark's maintenance target	London	National (England)	Source	Most recent data	Frequency of collection
Additional affordable housing need by tenure and size		1 bed	2 beds	3 beds	4 beds	Total	Increase supply	-	-	Southwark's SHMA (2019)	Jul 2019	As available
	Social rent and sub-social rent	- 200	235	51	373	458						
	Intermediate housing	- 198	359	353	309	1,619						
Additional requirement for care beds	867 beds by 2029						Increase supply	-	-	Southwark's SHMA (2019)	Jul 2019	As available
Additional requirement for specialist elderly accommodation	780 units by 2029 (72% sheltered and 14% extra care)						Increase supply	-	-	Southwark's SHMA (2019)	Jul 2019	As available

## Education, skills and training

### Baseline Indicators

Baseline data	Southwark		Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
<b>NEETs</b> No and % of 16-17 year olds not in education, employment or training or whose activity is not known	150	2.6%	Decrease	3.4 %	5.2%	NEET and participation: local authority figures, Department for Education	Dec 2022	Annually
No. and % of residents who have attained NVQ4 and above	156,400	66.4%	Increase	60.7%	47.3% (Great Britain)	NOMIS, Labour Market Statistics	Dec 2023	Annually
No. and % of residents with no qualification	13,900	5.9%	Decrease	5.2%	6.5 (Great Britain)	NOMIS, Labour Market Statistics	Dec 2023	Annually
No. of apprenticeships created within the borough	842 (41% of all apprenticeships created by London boroughs in 2016-2017)		Create another 2,500 Southwark apprenticeships	-	-	Southwark Skills Strategy	Jun 2018	Annually
Education and skills deprivation (the higher rank the more deprived)	8 <sup>th</sup> out of 14 (Inner London)		Decrease	22 <sup>nd</sup> out of 33 (London Wide)	262 <sup>nd</sup> out of 317 (National)	English indices of deprivation, MHCLG	Sep 2019	Annually

Contextual characteristics

Baseline data	Southwark		Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
Provision of school places in the borough (Sep 2019)	Primary school	3,401 primary reception place,	-	-	-	Pupil Place Planning, Southwark Council	Oct 2023	As available
		25,055 year R to 6 primary places.						
	Secondary school	3,522 Year 7 places						
		16,234 for Year 7-11						
SEND school attendance (Primary, secondary and 16 plus)	Primary schools: 3,845 children	Secondary schools + post-16: 3,133 children	-	-	-	Pupil Place Planning, Southwark Council	Oct 2023	As available
Provision of free early education places (2-4 years old)	6,521 (2022)	6,126 (2023)	-	-	-	Nursery Schools and Early Years Provision (Southwark Cabinet report) and Department for Education	Feb 2024	As available
Demand for state-funded school places (2019-2028)	Primary school: 21,912 per year	Secondary school: 14,641 per year	-	-	-	2018 School place demand projections, Greater London Authority	Jan 2018	As available
Demand for early year places affected by:	Estimated number of 20,954 children under 5 (2019)	Estimated number of 23,178 children under 5 (2039)	-	-	-	Childcare Sufficiency Assessment, Southwark	Sep 2019	As available
No. of libraries in the borough	12		-	-	-	Southwark Library and Heritage Strategy 2019-2022	2019	As available



## Health and well-being

### Healthy life expectancy

#### Baseline Indicators

Baseline data	Southwark		Southwark's maintenance target	London	England	Source	Most recent data	Frequency of collection
Life expectancy at birth	Male life expectancy at birth (2020-2022)	78.4 years	Increase	79.1 years	78.9 years	Public Health Outcomes Framework, Public Health England	2023	Annual
	Female life expectancy at birth (2020-2022)	83.2 years	Increase	83.6 years	82.8 years			
Healthy Life expectancy at birth	Male	63.4 years	Increase	63.8 years	63.1 years	Public Health Outcomes Framework, Public Health England	2023	Annual
	Female	62.0 years	Increase	65 years	63.9 years			
Winter Mortality Index	August 2021 – July 2022: 18.5%		Decrease	10.3%	8.10%	Public Health Outcomes Framework, Public Health England	2023	Annually
Health deprivation and Disability (the higher rank the more deprived)	10 <sup>th</sup> out of 14 (inner London boroughs)		Decrease	28 <sup>th</sup> out of 33 (London wide)	211 <sup>th</sup> out of 317 (National)	English Indices of Deprivation	Sep 2019	Annual

Baseline data	Southwark	Southwark's maintenance target	London	England	Source	Most recent data	Frequency of collection
Percentage of adult carers who have as much social contact as they would like	26.8%	Increase	27.5%	28.0%	Public Health Outcomes Framework, Public Health England	2023	Annual
Percentage of adult social carers who have as much social contact as they would like	39.2%	Increase	39.7%	44.4%	Public Health Outcomes Framework, Public Health England	2023	Annual
Percentage of physically active adults	72.6%	Increase	66.3%	67.1%	Public Health Outcomes Framework, Public Health England	2023	Annual
Number and percentage of reception children who are overweight and obese 2022/2023	21.7%	Decrease	20%	21.3%	Public Health Outcomes Framework, Public Health England	2023	Annual
Number and percentage of Year 6 children who are overweight and obese 2022/2023	41.5%	Decrease	38.8%	36.6%	Public Health Outcomes Framework, Public Health England	2023	Annual

## Contextual characteristics

Baseline data	Southwark	Southwark's maintenance target	London	England	Source	Most recent data	Frequency of collection
Causes of the gap in life expectancy: Cardiovascular Disease, Cancer and Respiratory Disease	Male: 58%	-	-	-	Joint Strategic Needs Assessment Factsheet 2019-2020, Southwark	Sep 2019	As available
	Female: 48%						
Mental health	Estimate 47,600 in the borough suffer from a common mental disorder	-	1 every 5 adults	1 every 6 adults	Adult Psychiatric Morbidity Survey 2014	2014	As available
Projected ageing population	79% increase in residents aged 65 or more by 2039, reaching 48,000 at 13% of the Southwark population (92% increase in those over 75 and 87% growth in those over 85)	-	-	-	Southwark SHMA 2019	2019	As available
Projected 65 year-old or above residents with dementia	1,772 by 2020; 2,369 by 2030	-	-	-	Southwark SHMA 2019	2019	As available

## Safety

### Baseline Indicators

Baseline data	Southwark			Southwark's maintenance target	Old Kent Road's maintenance target	London	National	Source	Most recent data	Frequency of collection
Recorded crime per 1000 population for headline offences	116 Southwark 24 <sup>th</sup> highest in England, Ireland and Northern Ireland			Decrease	Decrease	105		Crime Rate	June 2024	Annual
No. Crimes recorded per annum	35,343 )			Decrease; Lower rating	Decrease; Lower rating	-	-	Recorded crime data by Community Safety Partnership area, ONS	Year ending Dec 2023	Annual
No. of crime types recorded	Theft offences	Violence against the person	Robbery	Decrease	Decrease	-	-	Recorded crime data by Community Safety Partnership area, ONS	Year Ending December 2023	Annual
	17,587	8,374	1,779							
	Sexual offences	Drug offences	Criminal damage and arson							
	999	1,819	1,986							
	Public order offences	Possession of weapons offences	Miscellaneous crimes against society							
1,979	408	360								

Baseline data	Southwark		Southwark's maintenance target	Old Kent Road's maintenance target	London		National	Source	Most recent data	Frequency of collection
Crime deprivation (the higher rank the more deprived)	7 <sup>th</sup> out of 14 inner London boroughs; 9 <sup>th</sup> out of 33 London boroughs; 37 <sup>th</sup> within England; 25 out of 166 Lower-layer Super Output Areas (LSOA) within Southwark are among the 10 <sup>th</sup> most deprived area within England		Lower ranking		-		-	English Indices of Deprivation	Sep 2019	Annual
Total No. of pedestrians and cyclists' casualties on road	Pedestrians: 188 (+5% from 2022)	Cyclists: 350 (-9% from 2022)	Reduce to zero		Pedestrians : 4,555 (+0% from 2022)	Cyclists: 4,802 (-5.6% from 2022)	-	Casualties in Greater London - Transport for London <sup>1</sup>	2023	Annual
Fatal and serious casualties on road	168		Reduce to zero				-	Casualties in Greater London - Transport for London	September 2023	Annual

<sup>1</sup> Road danger reduction dashboard, TFL, 2023, available at:

<https://app.powerbi.com/view?r=eyJrIjoiMTIzYzRiZDMtZDZiYS00OWYyLTk3YTQtN2RkMGNiZTRmOTJkIiwidCI6IjFmYmQ2NWJmLTVhZmVtZWYtNGVIYS1hNjkyLWUwODlmMjU1MzQ2YiIsImMiOiJh9>

## Economic conditions

### Economy and employment

#### Baseline Indicators

Baseline data	Southwark			Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
Number of employee jobs	291,000			Increase	-	-	Nomis Labour Market Statistics, Local Authority Profile	Dec 2023	Annually
Number of micro and small-to-medium sized enterprises	99.3% of the total business in the borough, equating a total of 15,505 micro-SMEs			Increase			Nomis Labour Market Statistics, Local Authority Profile	Dec 2023	Annually
Percentage of unemployed population	3.9% unemployed	5.3% claiming out-of-work benefits	3.8% claiming Universal Credit	Decrease	5% unemployed	3.7%	Nomis Labour Market Statistics, Local Authority Profile	Dec 2023	Annually

## Contextual Characteristics

Baseline data	Southwark	Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
Number of economically active and inactive populations	Economically active: 192,700 Economically Inactive: 51,900	-	-	-	Nomis Labour Market Statistics, Local Authority Profile	Dec 2023	Annually
Gender breakdown of employed population	76.5% economically active and are in employment: 78.7% males / 74.2% females	-	-	-	Nomis Labour Market Statistics, Local Authority Profile	Dec 2023	Annually

## Retail and town centres

### Baseline Indicators

Baseline data	Southwark	Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
Percentage of takeaways outlets within a walking distance (400m) of a secondary school	86 out of 302 (30%) takeaways (situated in ward areas with the prevalence of excess weight) are within a 400m walking distance of a secondary school	Decrease	-	-	Southwark Public Health, <i>P45 Hot Food Takeaways – Review of the evidence</i> , Southwark Place & Health Improvement Section	2018	As available
Primary shopping frontage vacancy rates	out of 14 town centres only 3 have fewer vacant shops from 2019 to 2023.	Decrease	-	-	Protected Shopping Frontages Survey 2023, Summary Report	2024	As available
Secondary shopping frontage vacancy rates	11 out of 38 having 0%	Decrease	-	-	Protected Shopping Frontages, Southwark	2018	As available

### Contextual Characteristics

Baseline data	Southwark	Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection			
Percentage of takeaways outlets within a walking distance (400m) of a secondary school	86 (at 30%) are within a walking distance (400m) of a secondary school.	-	-	-	P45 Hot Food Takeaways Review of the evidence, Place & Health Improvement Section Southwark Public Health, Southwark Council	2018				
Existing commercial floorspace in town centres, district centres and local centres	208,666 gross retail floorspace (270,500 sqm including food and beverage)	-	-	-	Southwark Retail Study, Nathaniel Lichfield & Partners	2015	As available			
Breakdown of commercial uses in town centres	<table border="1"> <tr> <td>Class A2: 9% of all units in town centres</td> <td>Betting shops in town centres: 26% of all A2 uses and 2.4% of all A class units</td> <td>Banks and building societies in town centres: 37</td> </tr> </table>	Class A2: 9% of all units in town centres	Betting shops in town centres: 26% of all A2 uses and 2.4% of all A class units	Banks and building societies in town centres: 37	-	-	-	Southwark Retail Study, Nathaniel Lichfield & Partners	2015	As available
Class A2: 9% of all units in town centres	Betting shops in town centres: 26% of all A2 uses and 2.4% of all A class units	Banks and building societies in town centres: 37								



## Environment conditions

### Energy and Climate Change

Objective & indicator for assessment	Southwark		Direction of change	London	National	Source	Most recent data	Frequency of collection
Energy Consumption by Sector	Industry and commerce	507.5	Decrease	-	-	UK Local Authority and Regional Carbon Dioxide Emissions National Statistics 2005 to 2017	2017	Annually
	Domestic Sector	312.5						
Domestic consumption per capita of natural gas	11,530 kwh/year		Decrease	-	16,000 kwh/year	Annual Monitoring Report 2010 - 2011	2010-2011	As available
Domestic consumption per capita of electricity	3,300 kwh/year		Decrease	-	4,800 kwh/year	Annual Monitoring Report 2010 - 2011	2010-2011	As available
Total Carbon emissions in borough(tonnes of CO2)	Industry/commercial	789,000	Decrease	-	-	Annual Monitoring Report 2010 - 2011	2010-2011	As available
	Housing	456,000	Decrease	-	-			
	Transport	258,000	Decrease	-	-			
	Total	1,504,000	Decrease	-	-			
	Per capita	5.3	Decrease	-	-			
Fuel Poverty	7,000 households (6.4% of all households)		Decrease	-	-	-	2013/14	As available

## Contextual characteristics

Data	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Council's Carbon Footprint from its own assets and operations	432 ktCO <sub>2</sub> e, 16% of which is derived from its buildings.	A decrease in energy consumption and carbon emissions.. An in increase in connections to District Heating Networks.	-	-	<p>Old Kent Road Studies include:</p> <ul style="list-style-type: none"> <li>• “Local Development Order Southwark District Heating Network”, Southwark Council, 2023, available at: <a href="https://www.southwark.gov.uk/assets/attach/195041/Statement-of-reasons-LDO-Adoption-Version.pdf">https://www.southwark.gov.uk/assets/attach/195041/Statement-of-reasons-LDO-Adoption-Version.pdf</a></li> <li>• “Old Kent Road Decentralised Energy Strategy”, Southwark Council, 2016, available at: <a href="https://www.southwark.gov.uk/assets/attach/12827/EIP61-Old-Kent-Road-Decentralised-Energy-Strategy-2016-.pdf">https://www.southwark.gov.uk/assets/attach/12827/EIP61-Old-Kent-Road-Decentralised-Energy-Strategy-2016-.pdf</a></li> <li>• “Decentralised Energy Feasibility Study”, Southwark Council, 2020, available at: <a href="https://www.southwark.gov.uk/assets/attach/23930/102046-LBS-OKR-REP-1-Decentralised-Energy-Feasibility-Study-V1A.pdf">https://www.southwark.gov.uk/assets/attach/23930/102046-LBS-OKR-REP-1-Decentralised-Energy-Feasibility-Study-V1A.pdf</a></li> </ul> <p>Borough Wide Studies;</p> <p>“Tackling the Climate Emergency Together: Our strategy for a carbon neutral Southwark by 2030” available at: <a href="https://www.southwark.gov.uk/environment/climate-emergency/reaching-net-zero/our-plan-for-net-zero">https://www.southwark.gov.uk/environment/climate-emergency/reaching-net-zero/our-plan-for-net-zero</a>.</p>	2023; 2020; 2016	As available

## Air Quality

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Concentration level of PM10 (Annual)	PM10 (average of all monitoring stations): 17 µg/m <sup>3</sup>	Decrease 2016: 25 µg/m <sup>3</sup>	-	-	Air Quality Annual Status Report, Southwark Council, 2023, available at: <a href="https://www.southwark.gov.uk/environment/air-quality/what-we-re-doing/air-quality-strategies-plans-and-letters?chapter=2">https://www.southwark.gov.uk/environment/air-quality/what-we-re-doing/air-quality-strategies-plans-and-letters?chapter=2</a>	2022	Annually
Concentration level of NO2 (Annual)	Annual Mean NO2 Ratified and Bias-adjusted Monitoring Results (average of all monitoring stations and diffusion tubes): 26.5 µg/m <sup>3</sup>	Decrease 2016: 49.95 µg/m <sup>3</sup>	-	-	Air Quality Annual Status Report, Southwark Council, 2023, available at: <a href="https://www.southwark.gov.uk/environment/air-quality/what-we-re-doing/air-quality-strategies-plans-and-letters?chapter=2">https://www.southwark.gov.uk/environment/air-quality/what-we-re-doing/air-quality-strategies-plans-and-letters?chapter=2</a>	2022	Annually
Air pollution: fine particulate matter (new method concentrations of total PM2.5)	10.3	Decrease	9.6	7.8	Officer for Health Improvement and Disparities, 2024, available at: <a href="https://fingertips.phe.org.uk/search/air%20pollution#page/1/gid/1000002/ati/502/cid/4/tbm/1/page-options/car-do-0">https://fingertips.phe.org.uk/search/air%20pollution#page/1/gid/1000002/ati/502/cid/4/tbm/1/page-options/car-do-0</a>	2022	Annually

## Transport

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Journey to work by mode	Driving: 21% Cycling: 7% Walking: 37% Public transport: 33%	Decrease  (Southwark's transport strategy 2023 – 2030 aims to reduce the proportion of journeys by car from 21% to 13% by 2030)	-	-	London Travel Demand Survey 2017/18 – 2019/20, Transport for London, Available at: <a href="https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports">https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports</a>	2019/20 <sup>2</sup>	As available
Frequency of Cycling as mode of Transport	4.3%	Increase	-	-	Movement Plan 2019	2009/12	As available
Number of Controlled Parking Zones	As of 2024, there are 30 CPZs in Southwark, covering approximately 50% of the borough	Increase  (Introducing a borough wide CPZ by 2041)	-	-	Southwark Parking Zones website <a href="https://www.southwark.gov.uk/parking/find-newwhere-to-park/parking-zones">https://www.southwark.gov.uk/parking/find-newwhere-to-park/parking-zones</a>	2024	As available

<sup>2</sup> Whilst Census 2021 has a new data for Journey to Work by mode. However, Census 2021 took place during a national lockdown. People who were furloughed (about 5.6 million) were advised to answer the transport to work question based on their previous travel patterns before or during the pandemic. This means that the data does not accurately represent what they were doing on Census Day. Hence, this variable cannot be directly compared with the 2011 Census Travel to Work data.

## Biodiversity

Objective & indicator for assessment	Southwark		Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of SINC Sites	Total	66	Increase	-	-	Open Space Strategy (2013)	2013	As available
	MOL	5						
	BOL Grade 1	17						
	BOL Grade 2	22						
	Local Importance	28						
Number of Local Nature Reserves	Southwark has 7 Local Nature Reserves (LNR's) totalling 50.93ha, these are listed below.		Increase	-	-	Biodiversity Action Plan 2019	2019	As available
Number New Protected Sites	17 new protected sites		Increase	Habitat creation targets for London (Table 9)	DEFRA 2018 ' A green future' 25 Year Environmental Plan	Biodiversity Action Plan 2019	2019	As available

## Open Spaces and Soil

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of Open spaces (hectares per 1,000 people)	215 open spaces in the borough which together comprise some 605.5 hectares of land, around 21% of the total land area in the borough  1.5 hectares per 1,000 population	Increase	-	-	Open Space Strategy (2013)	2026 – with projected increase in population	-
Park provision (hectares per 1,000 people)	0.7 hectares per 1,000 population	Increase	-	-	-	2026 – with projected increase in population	-
Satisfaction with natural greenspace provision	Satisfaction levels for allotments (92%), large open spaces (86%) and the Thames Path (88%).	Higher	-	-	Open Space Strategy (2013)	-	-
Number of Allotments (Community gardens)	15.3 ha of land across the borough is used for allotments and a further 2.9 ha is used as community gardens	Increase	-	-	Open Space Strategy (2013)	-	-
	797 people on the waiting list for allotment spaces in the borough	Decrease					

## Flood Risk, Water Resources and Quality

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Domestic Water Demand across the whole borough (as a proxy measure of water consumption)	111.33 litres per person per day (Old Kent Road)	Decrease (105 litres per person per day)	164 litres per person per day (emerging New London Plan consumption levels)	-	Old Kent Road Integrated Water Management Strategy	2018	As available
Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence & water quality grounds	None	Decrease	-	-	Annual Monitoring Report 2010/2011	2010/11	As available
Quality of water at consumer's tap (zones) – against National Standards (number of tests failed) Thames Water Aggregated	15	Decrease	15		Drinking Water Inspectorate Annual Monitoring Report	2018	Annual

## Waste management

Objective & indicator for assessment	Authority					Direction of change	Source	Most recent data	Frequency of collection
<b>Southwark</b>									
Total household waste collected (tonnes)	2010/11	2011/12	2012/13	2013/14	2014/15	Decrease	Southwark's Waste Management Strategy 2003-2021 <sup>3</sup>	2014/2015	Annual
	110,236	106,121	111,081	116,663	118,814				
Recycling and composting rate (%)	25.14	27.43	30.41	34.30	34.58	Increase	Southwark's Waste Management Strategy 2003-2021	2014/2015	Annual
Amount of municipal waste diverted from landfill (recovery rate %)	63.34	79.65	69.49	86.40	95.29	Increase	Southwark's Waste Management Strategy 2003-2021	2014/2015	Annual
<b>London</b>									
Total household waste collected (tonnes)	2010/11	2012/13	2014/15	2019/20	2022/23	Decrease	DEFRA, 2024, Local Authority Collected Waste Management – Annual Results <sup>4</sup>	2022	Annually
	1,657,000	1,596,000	1,654,000	1,612,000	1,592,000				

<sup>3</sup> Southwark Council, Waste Strategy and policy, Targets and performance: <https://www.southwark.gov.uk/bins-and-recycling/waste-strategy-and-policy/targets-and-performance?displaypref=large>

<sup>4</sup> Defra, Local Authority Collected Waste Management – Annual Results 2022/23 (Table 1a: regular household collection, Table 2a: Recycling and landfill): <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results>



Recycling and composting rate (%)	28.3%	30.4%	30.2%	30%	29%	Increase	DEFRA, 2024, Local Authority Collected Waste Management – Annual Results	2022	Annually
Amount of municipal waste diverted from landfill (recovery rate %)	44.7%	25.5%	20.6%	6.9%	0.1%	Decrease	DEFRA, 2024, Local Authority Collected Waste Management – Annual Results	2022	Annually
<b>National</b>									
Recycling and composting rate (%)	2018/19	2019/20	2020/21	2021/23	2022/23	Decrease	Local authority collected waste management - annual results 2022/23 <sup>5</sup>	2023	Annually
	42.7%	42.8%	41.3%	41.5%	40.7%				
Amount of municipal waste diverted from landfill (recovery rate %)	2022/23: 7.2%					Decrease	Local authority collected waste management - annual results 2022/23	2023	Annually

<sup>5</sup> Local Authority Collected Waste Management – Annual Results 2022/23: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results/local-authority-collected-waste-management-annual-results-202223#:~:text=ln%202022%2C%20total%20'waste%20from,decrease%20of%207.9%20per%20cent.>

## Noise management

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
The rate of complaints about noise	2015/16: 18.7 2020/21: 41.5	Decrease	2015/16: 14.6 2020/21: 40.1	2015/16: 6.3 2020/21: 12	Wider Determinants of Health – Public Health England <a href="https://fingertips.phe.org.uk/wider-determinants#page/3/gid/1938133043/pat/15/pat/E92000001/ati/502/are/E09000028/iid/11401/age/1/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1">https://fingertips.phe.org.uk/wider-determinants#page/3/gid/1938133043/pat/15/pat/E92000001/ati/502/are/E09000028/iid/11401/age/1/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1</a>	2020/21	Annual
The percentage of the population exposed to road, rail and air transport noise of 65dB(A) or more, during the daytime	14.8%	Decrease	12.1%	5.5%	Wider Determinants of Health – Public Health England	2016	Annual
The percentage of the population exposed to road, rail and air transport noise of 55dB(A) or more during the night-time	18.0%	Decrease	15.9%	8.5%	Wider Determinants of Health – Public Health England	2016	Annual

## Play facilities

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of Open spaces with play facilities	78 open spaces that include some form of dedicated children's play provision	Increase	-	-	Open Space Strategy (2013)	2013	As available
Satisfaction level with children's play spaces	80% of respondents consider the quality of children's play space in the borough to be good or very good	Increase	-	-	Open Space Strategy (2013)	2013	As available

## Quality in Design and Conservation of Historic Environment

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of Historic environment assets	Conservation areas: 48	Retain	-	-	Heritage SPD, Southwark Council available at: <a href="https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-guidance/development-plan/spd-by-planning-topic?chapter=2">https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-guidance/development-plan/spd-by-planning-topic?chapter=2</a>	2021	As Available
	Listed buildings and structures: over 3,000						
	The 'local setting' zone or buffer zone of World Heritage Site: 2  1. Tower of London, extends across the River Thames to covers part of north Southwark.  2. The wider setting of the Palace of Westminster World Heritage Site extends to the edges of Bankside and North Walworth.						
	Scheduled monument: 9						
	Archaeological Priority Zones: 6						



Old Kent Road Area Action Plan  
Proposed Submission Version  
October 2024

Integrated Impact Assessment Appendices

**Appendix 10: Options Testing**

<b>Old Kent Road Area Action Plan 2024 Integrated Impact Assessment: Document Locator</b>	
<b>No.</b>	<b>Title</b>
Appendix 1	SEA Directive Requirement
Appendix 2	Relevant Plans, Programmes and Strategies
Appendix 3	Baseline Data – Facts and Figures
Appendix 4	Sustainability Appraisal Framework
Appendix 5	Assessment of the Strategy and Vision
Appendix 6	Assessment of the Strategic and Development Management Policies
Appendix 7	Assessment of the Sub Areas and Site Allocations
Appendix 8	Monitoring Indicators against Sustainability Objectives
Appendix 9	Baseline Indicators Table
<b>Appendix 10</b>	<b>Options Testing</b>
Appendix 11	Scoping Report Consultation Summary and link to OKR AAP Scoping Report
Appendix 12	Reasonable Alternatives Considered
Appendix 13	Mental Well-being Impact Assessment Screening
Appendix 14	OKR AAP References

## Appendix 10: Options Testing

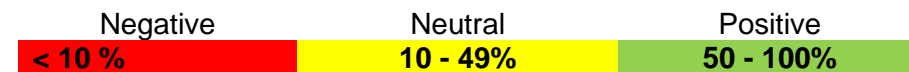
This appendix sets out the sustainability appraisal of the two options considered for the Proposed changes to the Old Kent Road AAP. Each option was appraised against the 17 sustainability objectives, encompassing economic, social and environmental aspects. Each objective is measured on a scoring scale (Key 1), with each grade assigned a numeric value, symbol and colour. Alongside the scoring, a detailed commentary on the objectives is provided.

### Key 1: Individual scoring against each objective

Symbol and colour	Scoring Value (%)	Score	Description
✓✓	100	Major or direct positive	The proposed option/policy contributes significantly to the achievement of the objective.
✓	50	Minor or indirect positive	The proposed option/policy contributes to the achievement of the objective but not significantly or indirectly.
-	0	Neutral	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
x	-50	Minor or indirect negative	The proposed option/policy detracts from the achievement of the objective but not significantly.
xx	-100	Major or direct negative	The proposed option/policy detracts significantly from the achievement of the objective.
?	N/A	Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.

The colour bar below (key 2) divides the overall scoring into three categories from positive, neutral to negative.

### Key 2: Averaged IIA objectives scoring for each policy



The Table1 below sets out the averaged scoring of the 17 objectives to indicate each options overall efficacy in meeting the sustainability objectives.

Table 1: Averaged scoring for the three options considered

	Option A: Business as usual without BLE extension	Timescale			Option B: High growth scenario with two stations under BLE	Timescale		
	Overall	S	M	L	Overall	S	M	L
IIAO 1	✓	-	-	X	✓✓	✓✓	✓✓	✓✓
IIAO 2	?	-	-	X	✓✓	✓	✓	✓✓.
IIAO 3	?	-	X	X	✓✓	✓	✓	✓✓
IIAO 4	-	-	-	X	✓✓	✓	✓	✓✓
IIAO 5	?	✓.	✓.	✓.	✓✓	✓	✓	✓✓
IIAO 6	?	-	-	-	✓✓	✓✓	✓✓	✓✓
IIAO 7	X	-	X	XX	✓✓	✓	✓✓	✓✓
IIAO 8	✓.	✓.	✓.	✓.	✓	✓	✓	✓
IIAO 9	✓	-	-	-	✓	✓	✓	✓
IIAO 10	✓	-	-	X	✓✓	✓.	✓.	✓✓.
IIAO 11	?	-	-	X	✓✓	✓.	✓.	✓✓.
IIAO 12	?	-	✓.	✓.	✓.	✓.	✓.	✓.
IIAO 13	?	-	-	X	✓	-	-	✓.
IIAO 14	?	✓.	✓.	✓.	✓	✓.	✓.	✓.
IIAO 15	?	-	✓.	✓.	✓✓	✓.	✓.	✓✓.
IIAO 16	?	-	X	X	✓	-	-	✓✓.
IIAO 17	?	-	?	?	✓	-	-	✓✓.
Avg.	25%	9%	6%	-16%	79%	47%	50%	85%

	Option A: Business as usual without BLE	S	M	L	Commentary on Results
IIA 1 To tackle poverty and encourage wealth creation	✓	-	-	x	The OA has relatively high levels of deprivation and without significant interventions to existing policies the area is unlikely to be improved significantly through access to housing, jobs and an improved living environment. The area would be unlikely to change significantly in relation to encouraging wealth creation, for example opportunities for new shops, community and leisure facilities would be limited. The decline in demand for industrial land may reduce the appeal and opportunities in the area in the long term which could affect opportunities for young people. However, in the short and medium term there may be retention in the number of industrial sector jobs or a slight loss with general decline. This could also limit the ease of access to facilities for residents with disabilities or pregnant women. It could have an adverse impact on the health of residents due to lack of interventions on the Old Kent Road traffic and industrial uses. The BLE would attract investment to the Opportunity Area as the PTAL rating is increased which means that residential and non-residential development is more viable and incentivised as it is supported by transport infrastructure. Without this, it would be more difficult to tackle poverty and encourage wealth creation.
IIA 2 To improve the education and skill of the population	?	-	-	x	There would be fewer opportunities for training and apprenticeships as a result of new development and the general decline or stagnancy with existing industrial areas. BME groups are strongly represented in the population statistics for the area and lack of access to education or new skills could have an impact on young people in these groups and young people in general.
IIA 3 To improve the health of the population	?	-	x	x	In the OA people in bad health are slightly above the average for London. In this scenario there are fewer opportunities for improving and providing new health facilities, new green spaces and leisure facilities which can help decrease lifestyle risk factors such as smoking, poor diet, substance misuse and lack of exercise. Poor health can be exacerbated by socio-economic challenges such as poor housing and unemployment and in this scenario there are fewer opportunities for significant improvement to the OA.
IIA 4 To reduce the incidence of crime and the fear of crime	-	-	-	x	The relatively high levels of deprivation in the area highlight particular issues in income and crime levels. Young single people aged 18-35 in rented accommodation are more likely to be victims of high rates of crime. Without significant improvements to the public realm across the OA including safety features, it is unlikely crime would be substantially reduced for the benefit of residents.
IIA 5 To promote social inclusion, equality, diversity and community cohesion	?	✓	✓	✓	The OA has a number of existing community networks and a diverse population. There are high numbers of faith premises in the area which benefit many religious groups. The AAP would have the opportunity to promote these networks and improve social cohesion.
IIA 6 To reduce contributions to climate change	?	-	-	-	There would be fewer opportunities to improve green energy in this scenario as redevelopment is less likely to occur and existing buildings are unlikely to be refurbished. Cycling and walking could be encouraged however car use would remain the dominant mode of transport in the OA. This may have a longer term impact on the health of the population through pollutants and harmful emissions from industry, traffic and domestic life. There would be less impact on climate change in the short term as less construction would occur. By not delivering the BLE there are huge disbenefits relating to sustainability and reduction in carbon emissions, by not delivering sustainable transport options like public transport via the tube, it is encouraging people to use private vehicles and increase pollution and congestion This is a major issue that needs to be addressed to ensure that we are addressing the Climate Emergency.
IIA 7 To improve the air quality	x	-	x	xx	The OA corridor has very high levels of air pollution predominantly caused by high levels of traffic and congestion. Without significant improvements to reduce car use and improve modes of public transport this is unlikely to change significantly. Poor air quality has a detrimental effect on the health of the population and particular groups could be more vulnerable such as older people, children, pregnant women, people with a long term illness and the homeless.
IIA 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	✓	✓	✓	The area benefits from the Southwark Integrated Waste Management Facility which recycles and diverts waste away from landfill. This facility benefits the whole of the borough. The AAP could seek to improve waste management in industrial and residential areas, benefiting the cleanliness and sustainability of the area, which would in turn benefit the health of the population.
IIA 9 To encourage sustainable use of water resources	-	-	-	-	The demand for water is likely to slightly increase with some new development, and the AAP can encourage sustainable reuse of water and use of rainwater limiting the impact on surface and groundwater in new development. The sustainable use of water would benefit the health of the population.



IIA 10 To maintain and enhance the quality of land and soils	✓	-	-	x	There will be fewer opportunities to make effective use of land through redevelopment and remediate issues of contamination which may affect many industrial areas around the OA. Soil quality is unlikely to improve with fewer opportunities for green spaces. Exposure to contamination would have an adverse impact on health, particularly on more vulnerable groups.
IIA 11 To protect and enhance quality of landscape and townscape	?	-	-	x	There would be fewer opportunities to enhance the quality of townscape and landscape with the majority of industrial areas remaining in situ and limiting the creation of a network of streets, improved connectivity and new green spaces. This would limit the opportunity to improve health and wellbeing and security, which could affect groups such as the homeless, women, older people and those with physical disabilities.
IIA 12 To conserve and enhance the historic environment and cultural assets	?	-	✓	✓	Historic assets such as listed buildings and conservation areas will remain relatively unaffected by this scenario, and the emphasis in the AAP would be to preserve historic assets. However there would be limited ability to enhance and highlight heritage assets in place-making for the area. There would be fewer opportunities to promote new cultural, leisure and sports facilities which would not enhance the health of the population and provide facilities for children and young adults.
IIA 13 To protect and enhance open spaces, green corridors and biodiversity	?	-	-	x	There would be fewer new green spaces and green infrastructure provided in this scenario, and the OA is not currently well served by green spaces and opportunities to improve biodiversity. The lack of provision of green spaces could impact on the long term health and wellbeing of the population particularly due to proximity to heavy traffic.
IIA 14 To reduce vulnerability to flooding	?	✓	✓	✓	The Southwark Local Flood Risk Management Strategy seeks to manage the effects of pluvial and surface water flooding in the OA. Managing the impact of flood risk improves safety for local people. In this scenario there may be fewer opportunities for the implementation of natural flood risk management such as SUDS.
IIA 15 To provide everyone with the opportunity to live in a decent home	?	-	✓	✓	In this scenario there would be some opportunities for new housing however this would need to be carefully balanced with the proximity to existing industrial areas. Improvements to living conditions and public realm would be provided at a more site specific level. Providing good quality housing benefits the health and wellbeing for many groups including families, children and older people, and people with specialist needs such as those with learning or physical disabilities. By not delivering the BLE it is not unlocking further potential for the delivery of new homes supported by sustainable transport infrastructure.
IIA 16 To promote sustainable transport and minimise the need to travel by car	?	-	x	x	The use of the private vehicle is likely to remain the dominant mode of transport and traffic levels of the Old Kent Road and use of heavy vehicles to service industrial areas is unlikely to change significantly. It would be difficult to promote more walking and cycling without significant interventions to the transport network to improve connectivity. This could have an impact on the health and safety of local people, such as older people and children who are more likely to be involved in road traffic accidents. The area would benefit from improvements to bus networks particularly if bus rapid transit was introduced. The Bakerloo Line Extension not being delivered would bring significant disbenefits because it would not address issues of connectivity and accessibility in and around the Old Kent Road. By not delivering the BLE it is not addressing the issue of the dominance of private vehicles and reliance on unsustainable modes of travel, this causes huge disbenefits in terms of sustainability, access and community cohesion.
IIA 17 To provide the necessary infrastructure to support existing and future development	?	-	?	?	Without the identification of land to provide infrastructure including new education and health facilities and open space and the identification of area-wide improvements the delivery of infrastructure would be less coordinated. This could lead to delays in bringing forward necessary projects and slow down development depending on them. NSP policies would otherwise require development to deliver supporting infrastructure.

	Option B: High growth scenario with two stations under BLE	S	M	L	Commentary on Results
IIA 1 To tackle poverty and encourage wealth creation	✓✓	✓✓	✓✓	✓✓	<p>The area-wide redevelopment will revitalise the neighbourhood with an improved living environment that will encourage inward investment and boost local economy such as retail uses serving the local community. The growing population under the intensification and revitalisation of the existing industrial and residential area will produce economic synergy by creating new job opportunities for local residents and providing enterprise opportunities in the business area.</p> <p>It will diversify the economy and increase the number of higher paid jobs in the area as technical, digital and professional service industries. It will improve local facilities and public transport in the area lowering costs for residents and requiring less need to travel further afield for shopping, community, health and leisure facilities. This would benefit many groups including disabled people, pregnant women and young adults. There may be better provision of facilities for those on low incomes or with specialist needs such as alcohol and drug problems, people who experience domestic violence or people with a long term illness.</p>
IIA 2 To improve the education and skill of the population	✓✓	✓	✓	✓✓	<p>There would be more opportunities for training and apprenticeships as a result of new development and new jobs in mixed use neighbourhoods. Redevelopment of industrial land would bring change in the type of jobs available and improve the floorspace to jobs ratio however it would be important to maintain industries which service central London and contribute to the current function of the OA as an industrial area. BME groups are strongly represented in the population statistics for the area and improved access to education or new skills would have a positive impact on young people in these groups and young people in general as well as the unemployed and those on low incomes.</p>
IIA 3 To improve the health of the population	✓✓	✓	✓	✓✓	<p>In the OA people in bad health are slightly above the average for London. In this scenario there are many more opportunities for improving and providing new health facilities, new green spaces and leisure facilities which can help decrease lifestyle risk factors such as smoking, poor diet, substance misuse and lack of exercise. Poor health can be exacerbated by socio-economic challenges such as poor housing and unemployment and in this scenario there are more opportunities for significant improvements to the OA. Improvements to access to health facilities, better quality housing, employment opportunities, better public transport and new green spaces would improve physical and mental health. Improving connectivity and green routes lessens to the impact of vehicular pollutants and better air quality and would particularly benefit disabled people and pregnant women.</p>
IIA 4 To reduce the incidence of crime and the fear of crime	✓✓	✓	✓	✓✓	<p>The relatively high levels of deprivation in the area highlight particular issues in income and crime levels. Young single people aged 18-35 in rented accommodation are more likely to be victims of high rates of crime. Improvements to public transport accessibility, new and safer routes and safety features would significantly reduce the risk of crime. Introducing residential areas and new streets to existing large scale and quiet industrial areas would improve the amount of footfall and overlooking of public areas improving public realm and safety.</p>
IIA 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓	✓✓	<p>The OA has a number of existing community networks and a diverse population. There are high numbers of faith premises in the area which benefit many religious groups. The AAP would need to ensure the existing community networks are maintained and improved in redevelopment. There would be significantly more opportunities for new community space suited to a range of groups and improving areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, pubs, faith premises and community halls. The redevelopment opportunities will reduce physical barriers and severance improving the layout of the streets and promoting social interaction.</p>
IIA 6 To reduce contributions to climate change	✓✓	✓✓	✓✓	✓✓	<p>With the progressive policies, there would be significantly more opportunities to improve green energy in this scenario through requiring new development to meet high standards of sustainability, renewable energy and efficient use of resources, including connection to district heating network. Two new underground stations and improved surface transport would reduce the reliance on the private car reducing emissions from vehicles. New walking and cycling routes would also be provided improving sustainable modes of transport. This would improve the health of the population by reducing exposure to pollutants and harmful emissions from industry, traffic and domestic life. The densification of under utilised land and improved performance of new development can enable long term carbon savings.</p>

IIA 7 To improve the air quality	✓✓	✓	✓✓	✓✓	The AAP would encourage a reduction in the number of journeys made by car by the introduction of the BLE and two new underground stations, as well as significant improvements to the walking and cycling network and surface transport. This would improve air quality in the area if car journeys are reduced although the Old Kent Road will remain a key vehicular route in and out of London. Improvements to air quality and less exposure to vehicular and industrial emissions will improve the health of the population particularly older people, children, pregnant women, people with a long term illness and the homeless. It will be important to manage the impacts of construction on air quality and the long term sensitivity of intensified development to the existing poor air quality in the area and achieve improvements if possible.
IIA 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	✓	✓	✓	The AAP would need to promote the reduction of waste in construction particularly as large scale change is envisaged. The waste disposal and recycling facilities for commercial and residential development would need to be carefully managed in mixed use schemes. Additional population levels will increase waste from both commercial and domestic developments. It will be important to maximise the reuse and recycling of waste during construction and in new development. For new development in the area services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.  The development in the area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.
IIA 9 To encourage sustainable use of water resources	✓	✓	✓	✓	The demand for water and foul sewage disposal is likely to increase with significant levels of new development, and the AAP would need to encourage sustainable reuse of water and use of rainwater limiting the impact on surface and groundwater in new development. The sustainable use of water would benefit the health of the population.
IIA 10 To maintain and enhance the quality of land and soils	✓	✓.	✓.	✓✓.	There will be many more opportunities to make effective use of land through reuse of previously developed land and remediate issues of contamination which may affect many industrial areas around the OA. Soil quality will improve with more opportunities for new green spaces. Remediation of the effects of contamination would have a positive impact on health, particularly on more vulnerable groups.
IIA 11 To protect and enhance quality of landscape and townscape	✓✓	✓.	✓.	✓✓.	There would be many more opportunities to enhance the quality of townscape and landscape creating a new network of streets, improved connectivity and new green spaces. Sustainable construction techniques would be encouraged. Tall buildings would need to be carefully considered in terms of local and strategic views and ensuring public realm on ground level remains high quality and well used. This would create opportunities to improve health and wellbeing and security, which could affect groups such as the homeless, women, older people and those with physical disabilities.
IIA 12 To conserve and enhance the historic environment and cultural assets	✓.	✓.	✓.	✓.	The AAP would present the opportunity to enhance and highlight heritage assets in place-making for the area. However large scale regeneration would need to carefully consider impact on adjoining conservation areas and listed buildings. There would be many more opportunities to promote new cultural, leisure and sports facilities which would enhance the health of the population and provide facilities for children and young adults.
IIA 13 To protect and enhance open spaces, green corridors and biodiversity	✓	-	-	✓.	There would be improved access to green spaces and new parks and green infrastructure provided in this scenario creating opportunities to improve biodiversity. The provision of green spaces would improve the long term health and wellbeing of the population and may benefit children through provision of new play spaces. It would be vital to balance new high density development with increased population levels with an appropriate level and quality of green spaces that improves the townscape particularly around tall buildings.
IIA 14 To reduce vulnerability to flooding	✓	✓.	✓.	✓.	The effects of pluvial and surface water flooding in the OA would need to be carefully considered to reduce the impact of flood risk and improve safety for local people. In this scenario there may be more opportunities for the implementation of natural flood risk management such as SUDS.
IIA 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓.	✓.	✓✓.	In this scenario there would be major opportunities for new housing significantly improving the supply in Southwark and meeting local housing need as well as providing new affordable homes. New housing would meet appropriate space standards and provide a mix of size and tenures, using good quality materials to provide decent homes for all. High quality design of the public realm in residential schemes will also improve living conditions. There will need to be careful management of mixed uses in this scenario so that other uses such as employment, leisure, retail, education or community uses combined with residential remain compatible and appropriately managed. Providing good quality housing benefits the health and wellbeing for many groups including families, children and older people, and people with specialist needs such as those with learning or physical disabilities.

<p>IIA 16 To promote sustainable transport and minimise the need to travel by car</p>	<p>✓</p>	<p>-</p>	<p>-</p>	<p>✓✓•</p>	<p>There would be significant improvements to public transport and reducing the need to travel by car by the introduction of the BLE and two new underground stations, improved walking and cycling routes and improved surface transport and buses. Improvements to crossing points and pedestrian connectivity along the Old Kent Road as well as better management of surface transport and junctions will reduce road traffic accidents. This would significantly improve the health and safety of local people, such as older people and children who are more likely to be involved in road traffic accidents. Better accessibility will also benefit groups such as people on low income, the unemployed, residents, disabled people and older adults.</p>
<p>IIA 17 To provide the necessary infrastructure to support existing and future development</p>	<p>✓</p>	<p>-</p>	<p>-</p>	<p>✓✓•</p>	<p>Large scale infrastructure improvements to transport, green space and community facilities would be provided to support revitalised neighbourhoods. In this scenario it is likely a review of CIL would take place to help fund large scale infrastructure improvements in the OA. This would benefit all groups and improve accessibility to health and social facilities.</p>



Old Kent Road Area Action Plan  
Proposed Submission Version  
October 2024

Integrated Impact Assessment Appendices

**Appendix 11: Scoping Report Consultation Summary and link to OKR AAP Scoping Report**

Old Kent Road Area Action Plan 2024 Integrated Impact Assessment: Document Locator	
No.	Title
Appendix 1	SEA Directive Requirement
Appendix 2	Relevant Plans, Programmes and Strategies
Appendix 3	Baseline data – Facts and Figures
Appendix 4	Sustainability Appraisal Framework
Appendix 5	Assessment of the Strategy and Vision
Appendix 6	Assessment of the Strategic and Development Management Policies
Appendix 7	Assessment of the Sub Areas and Site Allocations
Appendix 8	Monitoring Indicators against Sustainability Objectives
Appendix 9	Baseline Indicators Table
Appendix 10	Options Testing
Appendix 11	Scoping Report Consultation Summary and link to OKR AAP Scoping Report
Appendix 12	Reasonable Alternatives Considered
Appendix 13	Mental Well-being Impact Assessment Screening
Appendix 14	OKR AAP References

## Consultation on the OKR AAP

CONSULTATION	TIMETABLE
Evidence gathering and refinement of the baseline information, plans , programmes and strategies, key issues, objectives and IIA framework	<b>2015-Spring 2016</b>
Developing and refining options and assessing effects and preparing the Integrated Impact Assessment Report	<b>Spring 2016</b>
Consultation on Integrated Impact Assessment Scoping Report	<b>12 February 2016 - 18 March 2016</b>
Consultation on the draft Old Kent Road Area Action Plan Preferred Option draft AAP policies and Integrated Impact Assessment	<b>June 2016 - November 2016</b>
Consideration of responses and developing the draft Old Kent Road Area Action Plan and Integrated Impact Assessment Report	<b>Autumn 2016</b>
Consultation on the draft Old Kent Road Area Action Plan proposed new and amended AAP policies and Integrated Impact Assessment (this document)	<b>June 2017 - September 2017</b>
Consultation on AAP: Further Preferred Option	<b>December 2017 - March 2018</b>
Consultation on AAP: December 2020 Version	<b>January 2020 - April 2021</b>
Consultation on the submission version Old Kent Road Area Action Plan and Integrated Impact Assessment Report	<b>November 2024 - February 2025</b>
Submission of the draft Old Kent Road Area Action Plan Integrated Impact Assessment Report to the Planning Inspectorate	<b>2025</b>
Examination in Public	<b>2026</b>
Adoption of the Old Kent Road Area Action Plan	<b>2026</b>

Full details of the consultation on the full OKR AAP can be found in Appendix C Consultation Report.

This Consultation Report details the extent of consultation done on the AAP, the consultation events that have been organised and how the council has engaged with the local community, statutory consultees and other stakeholders.

The IIA appraisal has evolved as iterations of the masterplan and as the OKR AAP has been tested and collated. Consultation comments have informed this process.

Consultation comments have also developed the IIA appraisal itself. The consultation response below are made on a previous version of the IIA and the IIA has evolved through different iterations since. The IIA appraisal will continue to be



updated as the OKR AAP evolves through different versions to reflect the changes in the strategy, vision, masterplan and policies.

Consultation on the OKR AAP, Old Kent Road planning application and masterplan iterations is ongoing.

Ongoing consultation with local residents is facilitated in two main ways:

- **231 Old Kent Road**

231 Old Kent Road is a new community space on the Old Kent Road. It is a place where all local residents can get involved with the regeneration in the Old Kent Road.

The idea is to bring the whole community together to help shape the development of Old Kent Road over the next 20 years.

We want 231 to be a place where people who live and work nearby can come and see the latest plans and talk to us about the regeneration programme. But we also want to use the venue for exhibitions and events and to provide space for community groups to hold their own meetings.

231 Old Kent Road officially opened in April 2019 with the Museum of Us, a free exhibition and programme of events. It is open regularly for visitors and residents.

- **Old Kent Road Community Review Panel**

The Community Review Panel is a way for LB Southwark to better understand the needs of the local community in the Old Kent Road.

The panel gives independent advice on planning in the regeneration area. It discusses important issues, including housing, transport, public and green spaces, and the environment. This helps to ensure all new developments are of the highest possible quality and meet the needs of people living and working in the area, both now and in future.

The panel meets once a month to discuss proposals. These discussions are subsequently written up as formal reports to feed into decisions made by the council. All of the panel's recommendations are taken seriously and will be a formal part of the planning process.

The Panel is made up of 12 members who know the local area and the panel is managed by an external group.

### **Report on Consultation on the Old Kent Road Integrated Impact Assessment Scoping Report**

The Old Kent Road Integrated Impact Assessment Scoping Report from 2016 can be found here: [https://www.southwark.gov.uk/assets/attach/1734/2.2.7-DL-OKR\\_AAP\\_Integrated\\_Impact\\_Assessment\\_Scoping\\_Report\\_Feb\\_2016.pdf](https://www.southwark.gov.uk/assets/attach/1734/2.2.7-DL-OKR_AAP_Integrated_Impact_Assessment_Scoping_Report_Feb_2016.pdf)

The scoping report set out the current baseline data and information for the opportunity area including environmental, social and economic matters relevant to the area which are likely to be affected by the Old Kent Road Area Action Plan/Opportunity Area Planning Framework (AAP/OAPF). The report also established a framework for undertaking the IIA and set out the sustainability, health and equalities objectives, decision making criteria and potential indicators that are used to assess the impacts of the AAP/OAPF.

Consultation took place on the scoping report between **12 February 2016** and **18 March 2016** and this document reports on the responses received and how these have been incorporated into the preparation of the Interim IIA for this draft of the OKR AAP.

The following statutory consultees were consulted on the scoping report:

Historic England  
 Environment Agency  
 Natural England (no response received)

The following individuals and organisations provided comments on the scoping report:

Highways England  
 Heiko Steinmann  
 Old Kent Road People  
 Thames Water  
 TFL Taxi and Private Hire  
 TFL Borough Planning  
 Richard Lee  
 Scotia Gas Networks  
 Southwark Studios  
 Cass Cities  
 Jeremy Leach  
 Friends of Burgess Park

### **Summaries of comments and council's response**

The following table summarises responses by relevant sections/topics of the scoping report and provides the council's response. Many of the comments have been considered and incorporated into the IIA, particularly regarding the key environmental, health and equality issues and the role and criteria for the IIA objectives. Respondents have been added to our consultation database where requested.

The Scoping Report outlined the existing baseline information for the area by which future changes can be monitored and assessed. Strong analytical data has been prepared alongside the issues and options informal stages of preparation in the form of evidence base documents. The findings of these documents as they have evolved have been well communicated with local people through community forums and



business consultations. The evidence base has continually evolved to inform the plan progress and will be published alongside the draft AAP.

Representation	Comments received	Council's response
<b>Exploration of options and consultation</b>		
Richard Lee OKR People	Consultation that has been undertaken does not allow enough time for a full exploration of options with local residents and businesses.	The council undertook informal consultation exploring issues and options over approximately one year, discussing options with local residents in the regular community forum meetings with time for feedback and reflection in each meeting.
Richard Lee	The objectives identified in the scoping report are used to identify options but this document was published earlier this year with little time to consider other options with the community.	The objectives in the scoping report were formulated both with reference to the discussions in the community forum on social, environmental and economic issues and by certain requirements set by legislation such as the SEA regulations. As consultation concluded in March the council has adequate time to consider the options that have evolved and whether the objectives are appropriate following consultation on the scoping report when preparing the draft plan for publication in June.
Richard Lee	The council employed Allies and Morrison Urban Practitioners to develop a masterplan where two options were presented to the community forum with little time for appropriate analysis and comments.	The place-making study is a key part of the evidence base but does not represent a masterplan for the area. It guides place-making principles for new development and explore opportunities for cohesion across the whole opportunity area. The results of the 'planning for real' exercise allowed many discussions to take place and smaller groups created different visions across the areas. This was fed back visually and verbally to subsequent forum sessions demonstrating the many various options explored by local people. These sessions were also guided by previous comments and suggestions from the forum on the thematic issues explored in earlier sessions.
Friends of Burgess Park	How does the Allies and Morrison work fit in to the plan making?	

Jeremy Leach	The AAP needs to ensure the voices of under-represented groups are considered in the plan development.	Suggestions for consultation noted. Opportunities for consultation with a wide range of groups will be continued at formal stages of publication.
Richard Lee OKR People	The East Walworth ward should be removed from the opportunity area boundary as it contains many council housing estates which would not be development sites.	The East Walworth ward borders the Old Kent Road itself highlighting importance for road safety and transport infrastructure improvements in particular. It also includes non-residential sites along the road corridor which may be suitable for redevelopment.
Heiko Steinmann	As a resident of the East Walworth Ward along the OKR the envisaged developments and tube stops along the OKR are welcomed. The East Walworth Ward should be included in the whole planning process.	Support noted.
Friends of Burgess Park	People currently living in Council property are worried that they might find their buildings redeveloped as has happened and is happening to the Heygate and the Aylesbury with implications for local communities and affordability. The speed of change across the central area of Southwark is now happening extremely fast and understanding all the implications of all the activity is very difficult.	Noted. The OKR AAP has focused to date on the redevelopment of retail and industrial land. Local communities are encouraged to participate in the plan-making process and it is important consultation reaches a wide range of groups particularly in delivery and monitoring of plan objectives.
<b>Baseline data</b>		
Richard Lee	The baseline data is partial and prejudicial in relation to housing (affordable housing types are not distinguished) and some issues such as education and health are not at an appropriate local scale.	The baseline data for housing, health and education is based on statistics and available information for the area. Affordable housing encompasses a range of types and tenures including social and affordable

CASS Cities	The extent of the baseline information is not adequate for the scope of the area in question and does not have consistent boundaries which can be accurately compared to the Opportunity Area. The use of specific examples is not considered to be fair or representative of the OA.	rented. The needs for the opportunity area in terms of education and health facilities will be carefully considered in the plan.  The Scoping Report acknowledges limitations in data, gaps and encourages continuous review and updates. Different boundaries are a necessary limitation of the available data but the areas referred to from each data source are noted in the scoping report for clarity. Significant planning applications are considered to be relevant to understanding current development trends in the area.
CASS Cities	Has there been any further study into potential population growth after the implementation of the AAP and the extension of the Bakerloo Line to the Old Kent Road?	Population estimates based on the growth options are considered in the IIA and the AAP in terms of meeting future needs.
CASS Cities	Mosaic data does not correlate with the census data and presents a misleading picture of the demographic of the Opportunity Area.	The mosaic household index has been used as a broad indicator of socio-economic conditions in which people live with the limitations recognised and hence a cross-check provided with other indicators in the report.
CASS Cities	Growth in churches and art galleries/studio space are clustered around the north side of the OA, nearer the Central Activity Zone. Will the council commit to expanding civic space in line with population growth?	The provision of cultural space to support a larger population and contribute to place-making in the AAP is an important component of the plan.
Richard Lee	No evidence is provided on the impact and viability of an extension to the Bakerloo Line.	The impacts of the options for transport infrastructure including the BLE are considered in the IIA.

<p>Richard Lee CASS Cities</p>	<p>Evidence on industrial activity does not make use of the GLA/Southwark Employment Study 2015 and it has not been made public. Summary statements seem to show a lack of understanding about the existing economic make-up of the area and do not align with the findings of the GLA report.</p>	<p>The evidence base has been continually prepared throughout the issues and options informal consultation to inform the plan and will be published alongside the draft plan. The early findings of the evidence base has been consistently presented to the community forum/businesses and provided a forum for discussion and evolution of the documents (e.g. Place-making study, characterisation study, employment strategy). The LBS/GLA Employment Study and University studies give a detailed picture of the existing economy and employment uses in the area at the present time and this is reflected in the IIA. Many of the trends in economic change anticipated in the area are outlined in our Employment Land Review and emerging Employment Strategy for the OKR which has been used to inform the plan.</p>
<p>CASS Cities</p>	<p>SME's are a key component of Southwark's economy. Will the Council commit to expanding all types of space required to accommodate SMEs?</p>	<p>The council is developing policies in the New Southwark Plan and the OKR AAP to support the large proportion of SME businesses in the OA. The inclusion of existing businesses in redevelopment in sectors which are currently thriving will be encouraged.</p>
<p>Southwark Studios</p>	<p>Although the importance of workspace providers is noted there are not yet recommendations, protections or suggestions as to how to keep creative workspace providers in the area as redevelopment occurs.</p>	<p>The scoping report identifies the current baseline data for the area. However it will be a key part of the plan to ensure cultural facilities and provision of workspace for small businesses and creative industries can participate in regeneration opportunities.</p>
<p>Historic England</p>	<p>The design and heritage section should briefly and consistently summarise the historic significance of the heritage assets and their sensitivities. There are a number of points within the baseline summary</p>	

<p>Environment Agency</p> <p>Scotia Gas Networks</p>	<p>which need to be further clarified. We would recommend that the development of the scoping should seek to identify the potential for impact on heritage assets over a wider area based on the potential impact for taller development proposed within the area.</p> <p>We consider the Integrated Impact Assessment objectives and indicators appropriate. Southwark SFRA was prepared in 2008; therefore there is need for review to incorporated changes in the national planning policy.</p> <p>The OKR AAP should re-evaluate the existing allocation for the gasworks site.</p>	<p>The AAP includes detailed policies relating to design and heritage, written in conjunction with our design and conservation team recommendations to inform all mitigated and potential impacts. The Characterisation Study part of the evidence base provides extensive detail and analysis of the history and composition of the Old Kent Road OA. The findings of this study and a more comprehensive analysis of the existing heritage baseline is included in the IIA.</p> <p>Southwark is preparing an updated SFRA due to be published shortly (mid 2016). This can be used to review flood risk management in the future development of the AAP. AAP policies will encourage management of flood risk and the incorporation of SUDS.</p> <p>The gasworks site is included in the OA and will be considered in the AAP.</p>
<p><b>Water efficiency and management</b></p>		
<p>Thames Water</p>	<p>Development within the Old Kent Road area could impact on water supply and sewerage infrastructure. An IWMS should be commissioned to highlight the long term infrastructure requirements for water demand and drainage in the AAP area. The water mains referred to in section 3.4.30 provide clean water and are not part of the sewerage network.</p>	<p>Policies in the AAP/OAPF will encourage the efficient use of water resources, sustainable reuse of water and encourage the delivery of SUDS and rainwater harvesting. Southwark is exploring the opportunities for an Integrated Water Management Strategy with Thames Water and the GLA for the opportunity area to manage future demand. Correction noted.</p>
<p><b>Transport</b></p>		
<p>TFL Taxi and private hire</p>	<p>Taxi and private hire vehicles should be included in the consideration for the AAP, particularly in terms of provision of taxi ranks and set down/pick up facilities benefiting disabled and elderly members of the public.</p>	<p>New development will be required to provide appropriate servicing and taxi drop off points particularly for development such as new hotels or large scale retail development. There may be</p>

CASS Cities	The OA is not particularly well served by existing underground stations and PTAL ratings are lower than outlined in the scoping report.	opportunities to incorporate taxi ranks in the development of the underground stations and this can be a part of the detailed considerations for the stations at a later stage of the plan period.
Friends of Burgess Park	What does the council and local people actually want to achieve, what big, key beneficial changes. One proposal would be for the OKR to transferred into a tunnel, it has a major negative impact on the area. Air pollution levels are extremely high should any housing or schools be near the OKR as it currently is?	The scoping report gives a wider analysis of transport connections in the area however it is agreed the Elephant and Castle underground station has limited ability to service the whole of Old Kent Road and the PTAL ratings are lower in some parts of the OA particularly towards the south. This has been updated and reflected in the IIA.
TFL Borough Planning	Support for transport interventions encouraging safer walking and cycling which has positive effects on equalities health and the environment.	Noted. The introduction of the BLE would introduce positive impacts on air pollution and sustainability for the area.
<b>Green space</b>		
CASS Cities	CASS Cities research shows the OKR area to be above the London average for green space rather than under-served as reflected in the scoping report.	Noted.
		The open space baseline information refers to the Southwark Open Space Strategy sub-area rather than ward data, in which the proximity of Burgess Park is recognised. The Cass study area has been drawn to include the park, but excludes other neighbourhoods served by the park so may not be fully representative.

Jeremy Leach	The low provision of green space in the area demonstrated innovative ways need to be found to create useable and accessible open space in the OKR area.	Noted and will be evolved through policies in the AAP.
Friends of Burgess Park	The IIA which seems very comprehensive although it talks about children and young people but does not specifically mention early years provision or access to open air sports or gym facilities. Access to Burgess Park is mentioned plus green routes and linking Burgess Park to Southwark Park. Limited green space in the area is noted as it the need for increasing provision. Shortage of play facilities in the area also noted.	Nurseries and early years education is mentioned at the Community Uses section (page 23). Sports and gym facilities are mentioned under Commercial Leisure Uses (page 33). New and improved provision of these facilities will be encouraged in the AAP.
<b>Comparison of IIA Objectives</b>		
TFL Borough Planning Jeremy Leach	The links between IIA 3 and IIA 16 could be made clearer.	The links between improved transport facilities particularly walking and cycling and improvements to public health have been made clearer throughout the report. The objectives are noted as compatible in the IIA.
Richard Lee	Whether the objectives are compatible with each other will depend upon formulation of policy as well as implementation.	It is appreciated that the interaction of objectives is complex and assumptions made cannot pick up every eventuality of how policies will interact with several objectives. However it is considered good practice to undertake a high level comparison in order to anticipate areas where incompatibility may arise.
<b>Key environmental, health and equality issues (Table 4.1)</b>		
TFL Borough Planning	The links between health and transport should be strengthened as transport choice is an increasingly important factor in health.	The links between healthy lifestyles and active forms of travel have been added to Table 4.1 in the IIA. The strong links between walking and cycling and health benefits are noted in the IIA.



<p>TFL Borough Planning Richard Lee CASS Cities Jeremy Leach Historic England Environment Agency</p>	<p>A number of suggestions for alterations or additions to Table 4.1 have been suggested by respondents.</p>	<p>The additional issues identified are noted and taken into account in the IIA. Many of the additional issues identified are already covered by broader issues identified in Table 4.1 however some points have been further clarified or added.</p>
<p><b>Methodology</b></p>		
<p>CASS Cities</p>	<p>How does the system of symbols employed to represent findings help in the decision making process?</p>	<p>The identification of major and minor impacts is good sustainability appraisal practice and allows reasonable alternatives to be understood and the reasons for choosing a preferred option explained. The findings across objectives are not compared quantitatively. The IIA gives further qualitative analysis of options and policies when measured against the objectives.</p>
<p><b>IIA Objectives (Table 5.1)</b></p>		
<p>TFL Borough Planning Richard Lee CASS Cities Jeremy Leach Historic England Environment Agency Friends of Burgess Park</p> <p>CASS Cities</p>	<p>A broad range of new questions and additional monitoring measures were suggested.</p>	<p>A broad range of new questions and additional monitoring measures have been added to Table 5.1 in the IIA where this is considered appropriate.</p> <p>The questions to consider in Table 5.1 are intended to help those carrying out the assessment and the report reader to interpret the IIA objectives as they apply to the subject matter of the AAP. They are not exhaustive.</p> <p>We can therefore consider the suggested additional questions whilst carrying out the assessment where they relate to the scope of options and policies under consideration and where assumptions can be drawn from the evidence base.</p>

	The IIA objectives thoroughly highlight the issues that face any area challenged with projecting a future for itself, but do not appear to be particularly tailored towards the Old Kent Road.	The objectives do represent issues in common with other areas but the pertinent data in the baseline, emerging studies and consultation are considered in more detail in the IIA to understand local issues.
<b>Additional plans, strategies and programmes</b>		
TFL Borough Planning Friends of Burgess Park Historic England Environment Agency  Richard Lee CASS Cities	The council received suggestions for updates and additions to Appendix 1 of the scoping report.  The work completed by neighbourhood forums and University studies should be included in the baseline.	All suggestions for updates and additional documentation have been taken into account in Appendix 3 of the IIA.  The Appendix also includes an additional neighbourhood tier of documents whereby research and reports prepared by Universities and neighbourhood forums is included and considered in the preparation of the plan and IIA.  The document can be updated as additional plans and projects are published.
<b>Monitoring</b>		
CASS Cities Richard Lee	Monitoring should include a longitudinal study of the impacts of the regeneration on existing residents and businesses. Will the Potential Monitoring Indicators be used in future monitoring?  The IIA could contain more statistical information from the evidence base to minimise the chance of misinterpretation in future monitoring	Monitoring will be longitudinal in nature as it will be carried out continuously over a long time period and through authority annual monitoring reports. The potential indicators in Table 5.1 will pick up impacts to both existing and new residents and businesses.  The IIA considers impacts on social networks as part of the analysis and assessment. Future monitoring indicators are provided.  The suggestion is noted however the evidence base is complex and also incorporates non-statistical analysis which is considered when preparing the IIA and will be an important part of future monitoring.





Old Kent Road Area Action Plan  
Proposed Submission Version

October 2024

Integrated Impact Assessment Appendices

**Appendix 12: Reasonable Alternatives  
Considered**

<b>Old Kent Road Area Action Plan 2024 Integrated Impact Assessment: Document Locator</b>	
<b>No.</b>	<b>Title</b>
Appendix 1	SEA Directive Requirement
Appendix 2	Relevant Plans, Programmes and Strategies
Appendix 3	Baseline Data – Facts and Figures
Appendix 4	Sustainability Appraisal Framework
Appendix 5	Assessment of the Strategy and Vision
Appendix 6	Assessment of the Strategic and Development Management Policies
Appendix 7	Assessment of the Sub Areas and Site Allocations
Appendix 8	Monitoring Indicators against Sustainability Objectives
Appendix 9	Baseline Indicators Table
Appendix 10	Options Testing
Appendix 11	Scoping Report Consultation Summary and link to OKR AAP Scoping Report
<b>Appendix 12</b>	<b>Reasonable Alternatives Considered</b>
Appendix 13	Mental Well-being Impact Assessment Screening
Appendix 14	OKR AAP References

## Appendix 12: Reasonable alternatives considered

This appendix sets out all reasonable alternatives considered for the 18 site allocations within the Old Kent Road Area Action Plan, including the capacity for residential units within the whole opportunity area as identified within the London Plan and also the low, medium and high options considered within the OKR Place Making Study 2016 (Allies and Morrison). It also considers the site allocation capacities within the different iterations of the Old Kent Road Area Action Plan.

<b>Old Kent Road sites</b>
OKR1 Bricklayers Arms (NSP56)
OKR2 Crimscott Street and Pages Walk (NSP57)
OKR3 Mandela Way( NSP58)
OKR4 107 Dunton Road (Tesco store and car park) and Southernwood Retail Park (NSP59)
OKR5 Salisbury estate car park (NSP60)
OKR6 96-120 Old Kent Road (Lidl store) (NSP61)
OKR7 Former petrol filling station, 233-247 Old Kent Road (NSP62)
OKR8 Kinglake Street Garages (NSP63)
OKR9 4/12 Albany Road (NSP64)
OKR10 Land bounded by Glengall Road, Latona Road and Old Kent Road (NSP66)
OKR11 Marlborough Grove and St James's Road (NSP67)
OKR12 Former Southern Railway Stables (NSP65)
OKR13 Sandgate Street and Verney Road (NSP68)
OKR14 634 – 636 Old Kent Road (NSP73)
OKR 15 684 – 698 Old Kent Road (Kwik Fit Garage) (NSP72)
OKR 16 Hatcham Road, Penarth Street and Iderton Road (NSP70)
OKR 17 South of Old Kent Road (760, 812 and 840 Old Kent Road,(Former Toys'R'Us) and Aldi Stores) (NSP71)
OKR 18 Devon Street and Sylvan Grove (NSP69)

**Site allocation: OKR1 Bricklayers Arms Roundabout (NSP56)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP53 (OKR1) could potentially come forward in Phase 2 (these are subject to review as we monitor actual delivery rates).

This site has no planning permission or pending applications relating to it and potential masterplanning is in early stages. This site allocation is considered important to redevelopment of the Old Kent Road. TFL have expressed positivity towards the inclusion of the site as an allocation and together with Southwark have submitted a bid to the One Public Estate (OPE) Programme for funding to carry out detailed feasibility and viability testing. Further feasibility testing will test the potential to provide homes, commercial floorspace and open space, including an option to retain the flyover and landscape it as a park. It is expected that this site may come forward for re-development in Phase 2.

The site allocation is now an adopted as part of the Southwark Plan 2022.

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	Dependent on land available	Dependent on BLE option	The residential capacity for the site is under review.

**Site allocation: OKR2 Crimscott Street and Pages Walk (NSP57)**

**Alternatives considered**

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP57 (OKR5) would fall outside of the phasing because a planning application 19/AP/1506 has been approved and this site is located further away from the A2 bus corridor.

The first draft OKR AAP (2016) indicated this site could have a capacity for 760 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP.

Since the AAP was published, numerous planning applications have been submitted and approved on the Phase 1 part of this site. A residential development at Marshall House has already delivered 82 homes. There is a large mixed use scheme currently under construction on the Rich Estate which will deliver 406 homes, expected to be completed in 2025. There is also a mixed use scheme under construction at 18-19 Crimscott Street which will deliver 55 homes. Current approvals are 9 homes and live applications are a further 13 homes, bringing the total to 565 homes. Therefore, there is capacity on this site for an additional 195 homes. These reflect the potential capacity consistent with the high option scenario.

It is currently estimated the site could deliver up to 760 homes consistent with the masterplan and the high option. Any higher options would need to consider existing character, townscape, heritage assets, protected views and the archaeological priority area. A lower option may not optimise the use of the site.

The site allocation is now an adopted as part of the Southwark Plan 2022.

The following constraints were considered for this site:

- The site includes part of Grade II listed buildings 44 and 45 Grange Road.
- The site is within the setting of the Pages Walk and Bermondsey Street Conservation Areas.
- Part of the site lies within the Background Assessment Area of LVMF view 3A.1 from the Kenwood viewing gazebo to St Paul's Cathedral.
- Part of the site falls within the Borough View of St Paul's Cathedral from Nunhead Cemetery.
- The site is in proximity of the Scheduled Ancient Monument the Bermondsey Abbey Buildings.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020
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	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	760 homes	760 homes	760 homes
<b>Site allocation: OKR3 Mandela Way (NSP58)</b>							
Alternatives considered							
<p>The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.</p> <p>The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP55 (OKR3) would fall within Phase 2 as there are currently no planning applications relevant to this site (this is subject to review as we monitor actual delivery rates).</p> <p>The first draft OKR AAP (2016) indicated this site could have a capacity for 2420 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP. It was indicated that the site had the slightly lower capacity for 2200 homes. While the capacity for homes was slightly lower, the amount of industrial space to be provided was substantially increased. In addition, the four principle landowners would jointly contribute to a large park of approximately 1.5ha.</p> <p>Recent masterplanning work for the AAP 2020 shows 1955 homes may be most appropriate. The masterplan has changed to show 25 Mandela Way as a standalone industrial building to provide more industrial uses, with the Tate site coming forward as a horizontal mix, providing a standalone industrial typology alongside residential capacity. The reduction in capacity has been made up for on other sites in the allocation, so residential capacity remains the same as the masterplan for 2020. Industrial buildings have been removed from the boundary of Pages Walk terraced houses back gardens so that residential back gardens would back on to them in the revised masterplan, in response to consultation with residents. The masterplan also shows an option for the relocation of Tesco to the north of OKR4 to accommodate the delivery of the BLE station. The masterplan shows a strategic park delivering 1.45ha of open space. Any higher options would need to consider existing character, townscape, heritage assets, protected views and the archaeological priority area. A lower option may not optimise the use of the site.</p> <p>The site allocation is now an adopted as part of the Southwark Plan 2022.</p> <p>The following constraints were considered when masterplanning for this site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:</p> <ul style="list-style-type: none"> <li>- The site is within the setting of Grade II listed building The White House</li> <li>- The site is partially within the Page’s Walk Conservation Area</li> </ul>							



- Much of the site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster.
- Much of the site falls within the Borough Views of St Paul's Cathedral from Nunhead Cemetery and One Tree Hill.
- The site is in proximity of the Scheduled Ancient Monument the Bermondsey Abbey Buildings.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	2,420 homes	2,200 homes	1,955 homes

**Site allocation: OKR4 107 Dunton Road (Tesco and Car Park) and Southernwood Retail Park (NSP59)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP56 (OKR4) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates).

The first draft OKR AAP (2016) indicated this site could have a capacity for 1,055 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP and this capacity increased to 1,240.

Since the AAP was published, a planning application was submitted and approved subject to s106 agreement on the Phase 1 part of this site (Southernwood Retail Park). Current approvals are 724 homes. There is currently ongoing discussions between the Council and the developer for the Tesco site which indicate that there is a potential for a further 882 homes.

It is currently estimated the site could deliver up to 1,600 homes based on current approvals on the site and masterplanning work undertaken by Maccreanor Lavington. This site is required for one of the stations for the Bakerloo Line Extension. The masterplan the relocation of Tesco elsewhere on

OKR4 to accommodate the delivery of the BLE station. The masterplan shows a new civic space and the site will be a key part of the town centre with the BLE station. Additional parkspace is also incorporated onto the car park site opposite Tesco.

The site allocation is now an adopted as part of the Southwark Plan 2022.

The following constraints were considered when masterplanning for this site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:

- The site is in close proximity of the Grade II listed Former Fire Station.
- The site is in close proximity to the Cobourg Road Conservation Area.
- Part of the site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster.
- Part of the site lies within the Borough View of St Paul's Cathedral from Nunhead Cemetery.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.
- The site is opposite the entrance to Burgess Park.

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	1,055 homes	1,240 homes	1,600 homes

**Site allocation: OKR5 Salisbury Estate Car Park (NSP60)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE).

The first draft OKR AAP (2016) indicated this site could have a capacity for 28 new homes.

Since the AAP was published, an application has come forward and been approved for 26 new homes on the site (19/AP/1506). This reflects a slightly lower but not significant change from the potential capacity consistent with the high option scenario and the tall buildings and density strategy developed in the OKR AAP. As the capacity has been tested by planning applications, this capacity represents the optimum use of the site without having a detrimental impact on heritage assets and protected views. The site is currently under construction.

The site allocation is now an adopted as part of the Southwark Plan 2022.

The following constraints were considered when determining the application:

- The sites is adjacent to Grade II listed Lady Margaret Church.
- The site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster and LVMF view 1A.2 Alexandra Palace viewing terrace to St Paul's Cathedral.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	28 homes	28 homes	26 homes

**Site allocation: OKR6 96-120 Old Kent Road (Lidl store) (NSP61)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP58 (OKR6) is expected to come forward within Phase 1 (these are subject to review as we monitor actual delivery rates).

The first draft OKR AAP (2016) indicated this site could have a capacity for 115 new homes. The site boundary has been expanded in the NSP and AAP and the capacity has now been increased to 180. A 3 storey Victorian building which faces the street is identified as building of architectural and historic merit, will now be retained on the site, the remaining site should be optimised to re-provide the Lidl and residential capacity. There is currently no planning permission or pending applications for this site. Any higher options would need to consider existing character, townscape, heritage assets, protected views and the archaeological priority area. A lower option may not optimise the use of the site.

The site allocation is now an adopted as part of the Southwark Plan 2022.

The following constraints were also considered for this site:

- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.
- The site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster.
- The site falls within the Borough View of St Paul’s Cathedral from One Tree Hill.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	115 homes	140 homes	180 homes

**Site allocation: OKR7 Former petrol filling station, 233-247 Old Kent Road (NSP62)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP59 (OKR7) would fall within Phase 1 as the site is currently under construction.

The first draft OKR AAP (2016) indicated this site could have a capacity for 30 new homes. Since the AAP was published, a planning application, 18/AP/0928, has been submitted and approved on the Phase 1 part of this site. This site has now been built and delivers 24 homes. As the capacity has been tested by planning applications, this capacity represents the optimum use of the site.

The site allocation is now an adopted as part of the Southwark Plan 2022.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	30 homes	24 homes	24 homes

**Site allocation: OKR8 Kinglake Street Garages (NSP63)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we

have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP60 (OKR8) would deliver within Phase 1 as the site is currently under construction.

The first draft OKR AAP (2016) indicated this site could have a capacity for 22 new homes. Since the AAP was published, a planning application has been submitted and approved. This site has now been constructed and delivers 21 homes. As the capacity has been tested by planning applications, this capacity represents the optimum use of the site.

The site allocation is now an adopted as part of the Southwark Plan 2022.

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	22 homes	22 homes	21 homes

<b>Site allocation: OKR9 4/12 Albany Road (NSP64)</b>
Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP61 (OKR9) is expected to come forward in Phase 2 (these are subject to review as we monitor actual delivery rates).

The first draft OKR AAP (2016) indicated this site could have a capacity for 24 new homes. There is currently no planning permission or pending application for this site. Any higher options would need to consider existing character, townscape, heritage assets, protected views and the archaeological priority area. A lower option may not optimise the use of the site.

The site allocation is now an adopted as part of the Southwark Plan 2022.

The following site constraints must be considered by any application for redevelopment of this site:

- The site is in close proximity of the Grade II listed former Fire Station on Shorncliffe Road. The unlisted Thomas A. Beckett Pub adjacent to the site is of architectural and historic interest.
- The site partially lies within the Thomas 'A' Beckett and High Street Conservation Area
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.
- The site lies within the Borough View of St Paul's Cathedral from Nunhead Cemetery.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	24 homes	24 homes	24 homes



**Site allocation: OKR10 Land bounded by Glengall Road, Latona Road and Cantium Retail Park (NSP66)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The first draft OKR AAP (2016) indicated this site could have a capacity for 3,170 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP. The Cantium Retail Park Local Development Study 2018 (Patel Taylor) provided further testing and modelling. This ongoing work informed the capacity in the second draft OKR AAP (2017) which indicated this site could have a capacity for 4,200 homes.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP63 (OKR10) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates).

Since the AAP was published, numerous planning applications have been submitted and approved on the Phase 1 part of this site. Current approvals are 3,368 homes and live applications are a further 71 homes (3,439 total). This leaves a remaining capacity of 1,361 homes on the site. These reflect the potential capacity consistent with the high option scenario and the tall buildings and density strategy developed in the OKR AAP. Multiple sites in the allocation are currently under construction, completed by 2025-2026.

It is currently estimated the site could deliver 4,800 homes consistent with the masterplan and the high option. Non-residential floorspace figures may also be revised however these are likely to be the same or higher than the existing masterplan figures which are summarised in Appendix 1 of the NSP Industrial Background Paper. The masterplan has changed to accommodate a new park at the council owned site at Frensham Street depot, which will be delivered adjacent to the Surrey Canal linear park planned through the site. More open space has been accommodated in pocket parks throughout the site. Two buildings of historic merit will also be retained on the park and transformed into community, youth or café spaces. A stand-alone industrial building is planned for at the Shurgard site which increases industrial capacity. Part of the site to the west of Ossory Road has been designated as LSIS.

The site allocation is now an adopted as part of the Southwark Plan 2022.

The following constraints have been considered when masterplanning for the site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:

- The site includes the Grade II listed mural depicting the history of Old Kent Road and is in proximity of Grade II listed buildings on Glengall Road. The site contains buildings and features of townscape merit and two chimneys of historic interest.
- The site is within the setting of the Glengall Road Conservation Area
- The western part of the site lies within the Borough View of St Paul's Cathedral from One Tree Hill.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.

Options considered summary	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	3,170 homes	4,200 homes	4,800 homes

**Site allocation: OKR11 Marlborough Grove and St James's Road (NSP67)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP64 (OKR11) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates).

The first draft OKR AAP (2016) indicated this site could have a capacity for 1,095 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP.

Since the AAP was published, a planning application has been submitted and approved subject to s106 agreement on the Phase 1 part of this site. Current approvals are equivalent to 100 homes (student housing) and live applications are for a further 15 homes. Further masterplanning for the AAP 2020 shows the site could accommodate up to 1,200 homes. The council has had pre-application discussions with Royal London Mutual Insurance, the owner of the largest site in the allocation, the Six Bridges Estate, and the revised masterplan incorporates a re-provision of circa 11,000sqm of warehousing and distribution space which is a particular priority of RLMI. The masterplan has been adjusted slightly reconfiguring some of the proposed masterplan buildings and retained buildings along St James' Road. The masterplan also shows 0.19ha of open space. This is consistent with the high option. Non-residential floorspace figures may also be revised however these are likely to be the same or higher than the existing masterplan figures which are summarised in Appendix 1 of the NSP Industrial Background Paper.

The site allocation is now an adopted as part of the Southwark Plan 2022.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	1,095 homes	1,012 homes	1,200 homes

**Site allocation: OKR12 Former Southern Railway Stables (NSP65)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP62 (OKR12) is expected to come forward in Phase 1 (these are subject to review as we monitor actual delivery rates).

A feasibility study was undertaken by Makower Architects in 2018 which indicated the site could allocate 103 homes and 765m<sup>2</sup> of workspace suitable for B class employment uses. The site is expected to come forward as one holding for redevelopment. The masterplan for the site has been updated in 2020 however it is still estimated the site could deliver up to 103 homes consistent with the high option. The revised masterplan reconfigures the proposed buildings taking account of consultation with residents at the adjacent Stephenson Crescent as well as retaining part of the historic buildings at the stables and the forge, and making the currently designated but inaccessible public open space (horse paddock and exercise) into an accessible park or allotment space for the community (0.08ha open space).

For the 2024 AAP a revised feasibility study was undertaken by Maccreanor Lavington Architects to inform the capacity for the site. Given the Article 4 direction on the locally listed former railway stables, horse hospital and the forge. Massing has been reduced and setback to preserve and enhance the historic assets. The revised study recommends a reduction of capacity to 60 homes.

The site allocation is now an adopted as part of the Southwark Plan 2022.

The following constraints have been considered when masterplanning for the site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:

- The unlisted former Southern Railway Stables, horse hospital and the forge are identified as buildings of architectural and historic interest and are subject to an Article 4 Direction.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.
- The site includes land designated as other open space but is not currently accessible.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020
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	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	n/a	119 homes	103 homes
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**Site allocation: OKR13 Sandgate Street and Verney Road (NSP68)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP65 (OKR13) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates).

The first draft OKR AAP (2016) indicated this site could have a capacity for 3045 new homes. The site boundary was smaller at OKR13 and larger at the adjacent site OKR18 in 2016. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP. A feasibility study by Stitch Architects in 2018 indicated a capacity of 3754 new homes for the site.

Since the AAP was published, numerous planning applications have been submitted and approved on the Phase 1 part of this site. At 2 Varcoe Road a scheme for 74 homes is under construction and current approvals are 1,863 homes. Live applications indicate a further 146 homes, bringing a total of 2083 currently in planning homes to be delivered in Phase 1 of the site. These reflect the potential capacity consistent with the high option scenario and the tall buildings and density strategy developed in the OKR AAP. Further masterplanning work to support the AAP indicates the site could accommodate up to 5,300 homes. Non-residential floorspace figures may also be revised however these are likely to be the same or higher than the existing masterplan figures which are summarised in Appendix 1 of the NSP Industrial Background Paper. This is consistent with the high option. Revised masterplanning has looked carefully at how this site could be delivered in respect of different land ownerships. It is proposed to move the linear park alignment from the centre of the site to partially close Verney Road ensuring vehicle access to be phased for existing residents and businesses whilst the park is constructed. A new park space has been created to the rear of the Canal Grove cottages which would link with the linear park and the retained mature trees at the rear of the gardens. Regarding the gasworks, the land is part owned by Southwark, National Grid and a developer, Avanton who have acquired the SGN interest, which includes the listed gasholder. All three landowners will contribute land to form a park of 1.37ha. Pre-application discussions have been held with Avanton, who envisage refurbishing the gasholder, potentially incorporating a lido and gifting it to the council alongside a landscaped open space. There is a stand alone industrial building shown on the masterplan in the place of gasholder 10 which was dismantled in 2019. The site is currently let to National Grid, although freeholder SGN anticipate it will become available for development post 2026. To the east of the proposed park, the land is owned by the council and the Rich Group. The mixed use development envisaged on this site reflects a pre-application proposed made by the Rich Group.

A Standalone Industrial building has been granted consent to replace the extant mixed-use development on the site. Capacity has been found elsewhere on the site, so there will be no change to residential capacity.

The site allocation is now an adopted as part of the Southwark Plan 2022.

The following constraints have been considered when masterplanning for the site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:

- The site includes the Grade II listed mural depicting the history of Old Kent Road and is in proximity of Grade II listed buildings on Glengall Road.
- The site contains buildings and features of townscape merit and two chimneys of historic interest.
- The site is within the setting of the Glengall Road Conservation Area.
- The western part of the site lies within the Borough View of St Paul's Cathedral from One Tree Hill.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.
- The site is in proximity to Burgess Park and Surrey Canal (designated Metropolitan Open Land)

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	3,045 homes	3,680 homes	5,300 homes

**Site allocation: OKR14 634 – 636 Old Kent Road (NSP73)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP70 (OKR14) would be delivered within Phase 1.

The first draft OKR AAP (2016) indicated this site could have a capacity for 22 new homes. A planning application, 17/AP/1646, came forward in 2017 indicating a capacity of 42 homes. This has been approved and is currently under construction, due to be completed by 2026. As the capacity has been tested by a planning application, this capacity represents the optimum use of the site.

The site allocation is now an adopted as part of the Southwark Plan 2022.

The following constraints were considered when determining the application:

- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	22 homes	42 homes	42 homes



**Site allocation: OKR15 684-698 Old Kent Road (Kwikfit Garage) (NSP72)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP69 (OKR15) would come forward in Phase 2 (these are subject to review as we monitor actual delivery rates).

The first draft OKR AAP (2016) indicated this site could have a capacity for 70 new homes. The AAP (2017) revised this to 65 homes. There is currently no planning permission or pending applications for this site. Any higher options would need to consider existing character, townscape, heritage assets, protected views and the archaeological priority area. A lower option may not optimise the use of the site.

The site allocation is now an adopted as part of the Southwark Plan 2022.

The following site constraints must be considered by any application for redevelopment of this site:

- The site is adjacent to the Grade II listed Camberwell Public Library and Livesey Museum.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	70 homes	65 homes	65 homes



**Site allocation: OKR16 Hatcham Road, Penarth Street and Ilderton Road (NSP70)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP67 (OKR16) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates).

In the first draft OKR AAP (2016) this site was proposed as two allocations and indicated a combined capacity for 2310 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP. The site was brought forward as a single allocation indicating a capacity of 1460 new homes.

One application has been approved and built delivering 9 homes. Numerous other planning applications have been submitted and approved on the Phase 1 part of this site. There are three schemes which have been approved and are currently under construction which will deliver a total of 178 homes. Current approvals are 701 homes. There is currently one pending application for a mixed use student housing scheme which, if approved, would deliver the equivalent of 141 homes. Several developers and landowners are in discussions with the Council about redevelopment of various parts of the site. Based on masterplanning work, it is expected that the site has the capacity for 2200 new homes. This reflects the potential capacity consistent with the high option scenario and the tall buildings and density strategy developed in the OKR AAP. LSIS has been introduced to the central section of the site. The masterplan identifies the new park, Pat Hickson Gardens and new open space to the north of Ilderton Road and revises the Hatcham Road park space at the centre of the site. The masterplan reflects servicing requirements for industrial mixed-use development along Ilderton Road.

A number of applications have been built or are currently under construction within the site allocation.

The site allocation is now an adopted as part of the Southwark Plan 2022.

The following constraints have been considered when masterplanning for the site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:

- The site contains some buildings of townscape merit and buildings of architectural and historic interest.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads
- The site is in proximity to South Bermondsey Railway Embankments (Borough Open Land) at the north end of the site.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	1,285 and 1,025 homes (2,310)	1,460 homes	2,200 homes

**Site allocation: OKR17 760 and 812 Old Kent Road (Former Toys 'R' Us) and 840 Old Kent Road (Aldi) (NSP71)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP68 (OKR17) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates).

In the first draft OKR AAP (2016) this site was proposed as two allocations and indicated a combined capacity for 740 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP. The site was brought forward as a single allocation indicating a capacity of 1700 new homes.

Since the AAP was published, a planning application has been submitted and approved subject to s106 agreement on the Phase 1 part of this site. Current approvals are 168 homes and live applications are a further 138 homes (Phase 2) (322 total). The site allocation capacity has been revised to a lower capacity of 1,000 units based on further masterplanning work. The capacity is consistent with the high option scenario and the tall buildings and density strategy developed in the OKR AAP.

The Aldi site is currently under construction and provides 170 homes, due to be completed by 2025.

The site allocation is now an adopted as part of the Southwark Plan 2022.

The former Toysrus store site will be required for one of the new Bakerloo Line Extension stations. To help deliver the station the council is in the process of acquiring the site. The masterplan has revised the open space on the site from the rear of the buildings to the eventual location on the Aldi car park (0.09ha). The station entrance will be a generous public square and the masterplan shows the redesigned junction of Asylum Road with Old Kent Road. The following constraints have also been considered for the site:

- The site is within proximity of the Grade II listed Licensed Victuallers Benevolent Institution (Caroline Gardens).
- The site is in close proximity of the Caroline Gardens Conservation Area
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads
- The site is in proximity to Brimington Park (Borough Open Land).

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	590 homes and 150 homes (740)	1,700 homes	1,000 homes

**Site allocation: OKR18 Devon Street and Sylvan Grove (NSP69)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP66 (OKR18) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates).

The first draft OKR AAP (2016) indicated this site could have a capacity for 1,390 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP and indicated the capacity for this site at 740 homes.

Since the AAP was published, numerous planning applications have been submitted on the Phase 1 part of this site. An affordable housing development has been completed delivering 80 homes. Two applications have recently been approved providing a total of 784 homes. Since 2017 the council has acquired 727-733 Old Kent Road and 2-20 Devon Street (known as the Folgate Estate) and undertaken further masterplanning indicating a capacity for around 260 homes and commercial space. The site is also the subject of a Future High Street Fund application to MHCLG to help assemble a larger site and refurbish the frontage building to provide retail and commercial space. A Standalone industrial building is proposed on the food warehouse store, with retail frontage along Old Kent Road. A number of permissions have been given consent for a mix of student and conventional housing within the site allocation. There are no further live applications pending for residential development in the allocation. Based on the current permissions and masterplanning work, including pocket parks, the site has the capacity for 1500 new homes. This reflects the capacity consistent with the high option scenario and the tall buildings and density strategy developed in the OKR AAP.

The site allocation is now an adopted as part of the Southwark Plan 2022.

The following constraints have been considered when masterplanning for the site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:

- The site contains buildings of townscape merit.
- The site partially lies within the Kentish Drovers and Bird in Bush Conservation Area and is in proximity to the Caroline Gardens Conservation Area.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020
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	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	1,390 homes	740 homes	1,500 homes
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## DRAFT OLD KENT ROAD AAP/OAPF Integrated Impact Assessment Appendices

No.	Title
Appendix 1	Scoping report consultation summary
Appendix 2	The SEA Directive Requirements
Appendix 3	Relevant Plans, Strategies and Programmes
Appendix 4	IIA Appraisal of the AAP options
Appendix 5	IIA Appraisal of the AAP policies
Appendix 6	Mental Well-being Impact Assessment Screening



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## MENTAL WELL-BEING IMPACT ASSESSMENT: SCREENING REPORT

The impact of the redevelopment of the Old Kent Road area on the mental well-being of the local people living and working in the area.

**Report by: Tony Coggins and Nina James**

**Screening Meeting held on:** Friday 5<sup>th</sup> February 2016

### **Present:**

Tim Cutts, Southwark Planning and policy Team

Sarah Totterdell, Community Participation team, Southwark Council

Ambrose Omoma, Community Involvement Project worker, Southwark Council

Any Florin, Mental Well-being Specialist, Lambeth and Southwark Public Health Department

### **What is an MWIA Screening?**

The desktop Mental Well-being Impact Assessment (MWIA) screening tool has been designed to help people who are planning or providing policies, services, programmes or projects to begin to find out how they might make a difference to mental well-being. The process is designed to help people decide whether its worth undertaking a more intensive MWIA involving a wide range of people: screening is the *first* stage in MWIA and is a reflection of the view of a small group of invited stakeholders but it can be a valuable stand alone short assessment.

### **Summary of Project/proposal being screened**

Southwark Council is developing a Plan for the Old Kent Road (Old Kent Road Area Action Plan), which will inform its re-development, this will include significant changes to the physical environment including housing, business and transport. The focus of the consultation and evidence gathering to-date has been on the retail and industrial land rather than existing housing land. However, the plan period will cover a 20 year period and because of this will need to be flexible to accommodate and manage change across the opportunity area. Any regeneration of Southwark housing estates would be undertaken in accordance with the principles agreed by Southwark's cabinet in July 2015. The Bakerloo line may be extended from Elephant and Castle to Lewisham along the Old Kent Road creating 2 stations with a completion date of 2030. If this goes ahead it will fundamentally transform the area.

An integrated impact assessment is being undertaken on the plan and the findings from the screening could inform this process.

### **Summary**

A wide range of potential long term and short-term impacts on the determinants of mental well-being have been identified by the screening. These are summarised below.

### **Population groups who may be disproportionately affected:**

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A number of population groups who may be disproportionately affected by the regeneration of the Old Kent Road area have been identified:

### Later Life

The key areas that influence mental health in later life are age discrimination, participation, relationships, physical health and poverty. Fear of crime and lack of transport are also consistent themes with 'daily hassles' contributing more significantly to psychological distress than major life events. Participants felt that potentially the redevelopment will impact positively on older people if it results in the development of more suitable housing (homes for life) and more accessible local shops rather than the large retail parks which currently exist. However the changing identity of the area may be difficult for those who have lived there for a long time and may have a strong sense of connection with the existing Old Kent Road.

- **Socio-economic Position (SEP)**

SEP refers to the position of individuals and families relative to others measured by differences in educational outcomes, income, occupation, housing tenure and wealth. Socio-economic position shapes access to material resources and is a major determinant of health inequalities. There is a high proportion of social housing and poverty in the area. Participants felt that there was a fear that much of the new housing won't be affordable to these groups, potentially increasing inequality as those of a higher SEP move in. Because of this, affordable housing and private rented housing for middle income groups will need to be an important part of the mix of homes to be built.

- **Race and ethnicity**

Race and ethnic differences in the levels of mental well-being and prevalence of mental disorders are due to a complex combination of socio-economic factors, racism, diagnostic bias and cultural and ethnic differences and are reflected in how mental health and distress are presented, perceived and interpreted. Participants thought that there was an increasing presence of Latin American and East African/Middle Eastern businesses, and a large number of African based faith churches in the area who have the potential to be affected both positively and negatively. In the short-term the redevelopment potentially offers a to boost business, given the additional housing and increasing population. However in the long-term (10 – 15 years) there is both the threat that as premise prices rise some of the small cultural business may be displaced but also an opportunity for existing businesses to benefit from a growing customer base. . There is also potential for rising prices to similarly affect the large proportion of faith groups in the area, however there's a real opportunity here to ensure existing community assets are protected and promoted by the redevelopment.

- **Disability**

Life chances (notably education, employment and housing) social inclusion, support, choice, control and opportunities to be independent are key factors influencing the mental health of people with disabilities. Participants felt that improved transport links and accessibility would potentially impact positively on people with disabilities however in the short-term the impact may be negative in the form of disruption to travel routes e.g. temporary closure of foot paths for people who are sight impaired.

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- **Other Population Groups- Travellers**

There are currently three traveller sites in the area. There is a need to think more widely than the opportunity area about how need for such sites can be met and the council is considering the preparation of a separate borough-wide local plan to address these issues.

### **Wider determinants of mental well-being affected**

Mental health and well-being is also affected by the wider determinants of health such as education, housing and employment. The screening identified that the redevelopment had the potential to affect the impact that the following wider determinants of health:

- **Ease of access to high quality services**

Overall, the regeneration programme will be an opportunity to improve and increase the services and facilities in the Old Kent Road area, for example with the addition of schools and green space. The challenge will be ensuring the infrastructure is developed at the same time as the population numbers rise, to avoid any additional burden on existing services such as health and social care and a potential reduction in the quality of service provision.

- **Access to Quality Housing**

With the potential for the development of an additional 20,000 new homes participants felt that the planned regeneration was likely to impact positively on access to quality housing, however if 'affordable' homes are still not affordable to existing residents the impact could be negative.

- **Physical Environment**

Participants identified a key potential positive impact of the plan was its ability to both improve access to existing green space but also create new high quality spaces such as communal gardens, facilities for children's play and food growing. The potential negative was that growth will put additional on existing spaces such as Burgess Park. These will need improvement to help absorb the impact of growth

- **Economic Security**

The redevelopment is likely to increase the number of jobs in the area from 9,000 to 14,000. It is usual for developers to be contractually required to ensure a minimum of 25% of jobs to be allocated to local people. Participants thought that generally this was likely to have a positive impact. However there was a concern that longer-term some SMEs may be displaced due to rising rent costs. The AAP could mitigate this through provision of the right kind of space in new development.

- **Tackling Inequalities**

Tackling inequalities was a recurring theme. Participants felt that the impact could be both positive and negative depending on how much existing residents benefited from better, housing and employment opportunities. The housing stock will be mix tenure, which people thought potentially offers access to non-stigmatising housing.

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- **Transport**

Participants thought that improved transport and transport infrastructure was potentially one of the biggest positive impacts of the redevelopment on people's wellbeing. Currently the area is very difficult to move around. The Bakerloo extension, segregated cycle lanes and improved access through the exiting retail/industrial sites and network of spaces is likely to increase access to services and resources for residents. However people, noted that this was a long-term gain and that in the short-term there was likely to be additional pressure as transport /transport links are disrupted by the physical redevelopment and the local population increases.

### **Protective factors affected**

There are three main protective factors that are considered to promote and protect mental well-being, enhancing control, increasing resilience and community assets and facilitating participation and inclusion. Screening participants thought that plans for the redevelopment of the Old Kent had the potential impact on the following protective factors for local people:

#### **Control**

As discussed above population groups are likely to be affected differently and therefore the sense of control may vary from group to group. The consultation process itself emerged as an important protective factor, giving local people the opportunity to express their views on the regeneration programme and influence the decisions that will affect them. Participants felt that it was important that people believed that it was a genuine and transparent process. The fact the changes are happening incrementally and over a long period of time is also important, as it gives people time to make their own decisions about their future in the area. The redevelopment also provides the opportunity to develop housing targeted at the older generation, supporting their independence in later life. In terms of those groups who might be negatively affected, there is a risk that some businesses will experience a loss of control in the long term if they can no longer afford to stay in the area and residents living in private rented accommodation, if rents rise.

#### **Resilience**

At the individual level there's hope that the regeneration programme will build a sense of optimism amongst local residents, especially as they start to see the work progress. This is countered by a risk that people's sense of belonging and identification with the area will be impacted as the Old Kent Road changes and new people move into the area, especially amongst those who have lived in the area a long time. The regeneration will provide an opportunity to support healthier lifestyles, for example through the creation of green spaces, improved cycle access and walkways, and communal gardens for home food growing. People thought that in the short-term air quality was likely to drop due to additional road traffic and that this was likely to have a negative impact, unless mitigated.

At the community level, opportunities to make the area feel safer and to facilitate the creation of shared public spaces emerged very strongly. The creation of shared spaces e.g. communal gardens and housing developments has the potential to boost social networks

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and relationships, as would the increased provision of 'high street' shops as places for social interaction, however further research would need to be done on the evidence around what works. The faith groups in the area already provide a strong support structure to many, so there is a need to protect and promote these. Finally, there's a need to ensure some of the new jobs are awarded locally – and the same for resources – to support a sustainable local economy.

### **Participation and inclusion**

At the individual level, the consultation itself has provided local residents with an opportunity to participate in local decision-making. People's sense of belonging to the area also emerged as a key factor that could be impacted over the longer term although whether this will be more positive or negative isn't clear yet.

At the community level, there is a danger that the new affordable housing will be out of the price range of local residents – and the cost of participating therefore too high. In terms of ways to get involved, it emerged that there is currently a strong volunteering culture in the area, which the regeneration should protect and promote. Finally, there is an issue around community cohesion and a risk that this could be disrupted in the short-term as people express different opinion as part of the consultation and longer-term as the population grows and changes. Participants thought the area plan with a transparent process could help mediate some of these potential conflicts.

In summary a particular focus on older people, those facing the greatest inequalities, BME communities and people with disabilities identifying how to:

#### a) maximise the **potential positive impacts**:

- Ensure local people are able to access affordable homes created as part of the redevelopment
- Create access to high quality public spaces such as communal gardens and existing green space
- Increased employment and training opportunities for local people provide by the redevelopment
- Opportunities for local businesses to benefit from the regeneration, growing population and new business
- Improved local people's ability to move around the area through transport links, including cycle lanes and walk ways.
- Increase sense of safety through the built environment
- Ensure the consultation process increases people sense control and of being heard
- Consider how the plan creates hope and optimism for the future
- Increase opportunities for people to have social contact through creating and maximising spaces and opportunities for interaction
- Presence of strong faith based communities and churches

And

#### b) mitigate **potential negative impacts**:

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- Potential for unaffordable commercial rents for small local businesses in the longer term. Could use planning policies to safeguard cheaper business space
- Ease potential short-term pressure on transport by working with TFL
- Short-term impact of building on air quality
- Impact of population rising faster than the capacity of local services such as health, education and transport can accommodate the greater numbers
- Changing population increases inequalities
- Local people feeling that they have no say or influence over the area plan and redevelopment

### **Outcome:**

The screening process suggests that there are potential significant short-term and long-term impacts on the mental well-being of people living and working in the Old Kent Road. As such and the programme may benefit from more in-depth work with key stakeholder groups as part of a full MWIA process.

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## Appendix 1

### 1 FINDINGS FROM THE MWIA – SCREENING

#### Initial questions

**Why do you want to look at the impact of the redevelopment of the Old Kent Road area on the mental well-being of the local people living and working in the area?**

**Is there an opportunity to influence or change anything about the ways people are working or supported?**

Yes, the process of consulting the community about the area and the changes that would like to see has been going on for about a year plan. Have most of the information and are starting to work on the plan. The results of the MWIA can feed into this process.

**2 Population groups** Table 1 presents an assessment of impact on mental well-being for different population groups – these are clustered into groups that the evidence suggests are more vulnerable to poorer mental well-being.

30 - 40,000 live and work in the area another 20,000 homes will double that population

**Table 1: MWIA Screening of the Impact of the redevelopment of the Old Kent Road area on the mental well-being of the local people living and working in the area.**

Population group	Likely impact e.g. Positive (+ve) or Negative (-ve)
Early Years	<p><b>+ve:</b></p> <p>Long term there should be opportunities for:</p> <ul style="list-style-type: none"> <li>• New facilities. Potential facilities which might be needed include play space and childcare facilities.</li> <li>• Opportunities to build in accessibility e.g. for buggies.</li> <li>• Development of quality housing with sufficient bedroom space to avoid overcrowding.</li> </ul> <p><b>-ve:</b></p> <p>Possible negative impacts in the short term:</p> <ul style="list-style-type: none"> <li>• Pressure on existing facilities until the new infrastructure is in place, as this potentially won't happen immediately.</li> <li>• Potential impact on formative years of those born during the change i.e. in the case that the infrastructure isn't there.</li> <li>• More pressure on public transport until Bakerloo line extended. Will be especially difficult if you have young children.</li> </ul>

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- Suggested action: Identify needs in the AAP and focus on collaborative approach to ensure that infrastructures can be provided at the right time.

### Adolescence

Scope to work with TfL to run extra bus services in the interim.

#### +ve:

- Potential long-term benefits from development of 1-2 new secondary schools and access to more sophisticated facilities.
- The Old Kent Road itself currently creates a North/South divide. The redevelopment includes a plan to get rid of the barrier, reconnecting communities who've been historically separated – an opportunity to be seen as one community and connect more easily
- Redevelopment aims to make it easier to get around the area e.g. via increased cycle access. Could increase young peoples access to Burgess park
- **-ve:**
- If there are not enough facilities for young people to meet as their numbers increases with population increases □ No negative impacts were identified.

### Later life

#### +ve:

- Older people would like easier access to 'ordinary shops' (high street shops), rather than the large retail parks which currently exist. The redevelopment would provide opportunities for a 'highstreet' offer, and the chance to make the industrial and retail areas more permeable/walkable.
- [Could link to "Age-Friendly borough" work led the Communities team](#) **-ve:**
- There's an issue around the changing perceptions of the area for the older generation, especially for those who have lived there for a long time and feel a strong sense of connection. Will the process of change and the changing identity of the area be difficult?



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### Gender

Gender implications are unclear, although:

- Potential for employment opportunities to benefit local people. Planning policy would require that jobs in construction which may benefit men more. The completed developments are targeted at local people – so it would depend on the nature of the emerging business longer-term.
- Business in the area is currently male dominated, so it is likely that changes would have more of an impact on them. However, most people who work there commute from outside the Old Kent Road area so the impact on local residents could be minimal.
- Could have a positive impact on single parents (most of which are women) if there's a focus to create jobs for them in the area. So there's a potential here to improve income and reduce childhood poverty. **-ve:**
- In the short term, potential that stay at home parents could suffer from construction noise and this may affect more women than men.

### Race and ethnicity

There's an increasing presence of Latin American and East African/Middle Eastern businesses in the area, who have the potential to be affected. There's also a large number of African based faith churches as it's been a low cost

### Socio-economic position (SEP)

area to rent premises in **+ve:**

Short term:

- Redevelopment provides opportunity to boost business, given the additional housing.

Long term:

- Expectation that property prices in the area would rise, so those faith groups who own their own premises would be in an advantageous position.

**-ve:**

Long term:

- Danger faith groups in rented premises could be displaced as prices go up, although expectation is this would be over 10/15 years. Lots of people rely on these groups for support, so thought needs to be given to how redevelopment can support and promote this community asset.
- Businesses who are renting may be priced out by landlords, but again this is likely to be over a longer period 10-15 years rather than immediate.
- Suggested action: Ensure that new public buildings such as schools, as far as possible can be used by the wider community outside core hours.
- Maintain clear channels of communication to ensure that groups are aware of and engaged in the wider process.

### Physical health

### Disability

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	<p><b>People main fear is that new housing will increase inequality rather than decrease it. Affordable housing +ve:</b></p> <p><b>-ve:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> There is a high proportion of social housing and poverty in the area and a fear that much of the new housing won't be affordable to these groups, potentially increasing inequality as those of a higher SEP move in. Local council has limited control over the price of affordable housing, but there are policies they can put in place, such as a requirement to provide social rented housing and council home building programme to mitigate the chance of this happening.</li> </ul> <p><b>+ve:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/></li> </ul> <p><b>-ve:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/></li> </ul> <p><b>+ve:</b></p> <p>Long term:</p> <ul style="list-style-type: none"> <li>• Benefits will include improved transport links and accessibility.</li> </ul> <p><b>-ve:</b></p> <p>Short term</p> <ul style="list-style-type: none"> <li>• Potentially negative impacts in the form of disruption to travel routes e.g. temporary closure of footpaths while development takes place.</li> <li>• Sight impaired people will have to find new routes they're not familiar with.</li> </ul>
<b>Sexuality and transgender</b>	<p>No identified impacts.</p> <p><b>+ve:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/></li> </ul> <p><b>-ve:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/></li> </ul>
<b>Other population groups</b>	<p><b>Travellers</b> – there are currently three sites in the area. They won't be included as part of the redevelopment but there's a separate need to think about how Southwark meets the needs of this group and promotes social cohesion.</p>
<b>Others in settings</b>	

**3 Wider determinants** Table 2 presents the assessment of the impact of **the redevelopment of the Old Kent Road area** on the wider determinants of health

**Table 2: Wider determinants of health**

WIDER DETERMINANTS

(often at a socio-economic/environmental level)

622

Likely impact?

Positive, negative or is it an indirect impact?

**Access to quality Housing** e.g. security, tenure, neighbourhood, social housing, shared ownership, affordable and appropriate

**\*Physical Environment** e.g. access to green space, trees, natural woodland, open space, safe play space, quality of built environment

**Potential for another 20,000 homes**

**+ve:**

- Overall, regeneration should increase access to good quality affordable and social housing.

**-ve:**

- There's a risk that existing residents won't be able to afford the new housing – how affordable is affordable? – so a balance needs to be struck between the amount of housing going to new vs old residents.

**Comment:**

Could tie in with the Housing strategy. There is also a project funded by GSTT charity on engagement with residents in the Old Kent Road Opportunity Area.

**+ve:**

- Central to the plan. Ambition is to create a 'network' of different spaces, both improving access to existing space and creating high quality new space.
- Regeneration will include creation of communal garden space with different facilities for e.g. children's play and food

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**-ve:**

**• DENTIAL** increased pressure on spaces such as Burgess Park which is already very popular and well used.

**+ve:**

- Currently 9,000 jobs in the area, likely to increase to 14,000 as a result of the regeneration
- Will require developers to provide a certain amount of jobs (usually around 25%) and training to local people, both in construction and in the completed development
- Southwark Council has a Volunteering Strategy which a lot of the faith groups in the area are involved in. Opportunity for the redevelopment to support and maintain strong volunteering culture which already exists. There's a hope that more opportunities will arise from additional infrastructure.
- Some developers will want to rent premises out on an interim basis, which could create opportunities for local businesses and voluntary groups **-ve:**
- Long term: Irrespective of the AAP, rents are rising which is impacting on SMEs. The AAP should try to mitigate these impacts.

**Economic security** e.g. access to secure employment (paid and unpaid), access to an adequate income, good working conditions, meaningful work and volunteering opportunities

**Good quality food** e.g. affordable, accessible

**+ve:**

- Longer term there's the potential for community gardens to be developed, which would encourage people to grow their own food. **-ve:**

□

**Leisure opportunities** e.g. participate in arts, creativity, sport, culture

**+ve:**

- There aren't a huge amount of leisure opportunities in the area at the moment, so potential to provide facilities.

**-ve:**

- Short term: regeneration could put pressure on existing services in the borough, until infrastructure is

developed.

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**Tackling inequalities** e.g. addressing relative deprivation and poverty

**+ve:**

- Opportunity to maximise amount of affordable housing provided.
- Improved facilities and accessibility through the area, which should increase access to jobs. Southwark Council can make sure a certain proportion of new jobs are targeted at local people.

**-ve:**

- Danger that local people will be priced out of affordable/social housing, thus increasing inequalities. Mitigation will be required to address this.

**\*Transport access and options** e.g. providing choice, affordability and accessibility

**+ve:**

Long term:

- The area is very difficult to move around and this is an opportunity to make a significant difference to this.
- This should be one of the biggest positive impacts, as a result of e.g. the Bakerloo line extension, segregated cycle lanes, improved access through the existing retail/industrial sites and network of spaces.

**-ve:**

Short term:

- Additional pressure on transport links. Particularly buses which are already crowded.

Action:

- This could be mitigated with help from TfL by e.g. increasing frequency of buses.

**+ve:**

- Community councils already exist (Old Kent Road community forum was mentioned), so important to ensure these continue to be supported.
- Community Infrastructure Levy will raise additional funds (25%) which can be used to support community projects.
- Opportunity to engage people in the consultation and decision making processes resulting from the regeneration.

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<p><b><u>Ease of access to high quality public services</u></b> e.g. housing support, health and social care</p> <p><b><u>*Access to Education</u></b> e.g. schooling, training, adult literacy, hobbies</p> <p><b><u>Challenging discrimination</u></b> e.g. racism, sexism, ageism, homophobia and discrimination related to disability, mental illness or faith</p> <p><b>Other?</b></p>	<p>□ Opportunity to increase transparency e.g. around affordable housing.</p> <p><b>-ve:</b></p> <p>Action: Potential to use the findings from the wellbeing impact assessment to inform decisions around how the community infrastructure levy is allocated.</p> <p><b>+ve:</b></p> <ul style="list-style-type: none"> <li>• Increasing number of GPs, which are attracting people to the area.</li> </ul> <p><b>-ve:</b></p> <ul style="list-style-type: none"> <li>• Potential Increased pressure on existing services in the short term</li> </ul> <p><b>+ve:</b></p> <ul style="list-style-type: none"> <li>• Potential increase in school places through addition of up to 8 primary schools and 2 secondary schools.</li> <li>• Potential increase training available to local people to train them into job that will be created by the development</li> </ul> <p>People have had different experiences of the success of tenure blind housing, so this would need to be investigated further. <b>+ve:</b></p> <p>□ The consultation process itself serves as an opportunity for local people to meet each other, potentially improving social cohesion.</p>
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#### 4 Protective factors

The MWIA toolkit suggests a four-factor framework for identifying and assessing protective factors for mental well-being, adapted from Making it Happen (Department of Health 2001) and incorporates the social determinants that affect mental well-being into four factors that evidence suggests promote and protect mental well-being:

- *Enhancing control*
- *Increasing resilience and community assets*
- *Facilitating participation and promoting inclusion.*

These three factors are made up of a set of 'components' which the evidence base states are important contributory elements that contribute to each factor. Such as Protective Factor: Enhancing Control – component is Maintaining independence e.g. support to live at

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home when severely disabled or frail elderly. The screening asks to assess the potential positive or negative impact that the proposals likely to be having on these factors and components. Tables 3-5 shows the prioritised findings identified through the Screening activity.

### **Tables 3-5: Protective factors**



Enhancing Control	Likely impact? 628 Positive, negative or is it an indirect impact?	Comments or recommendations
<b>Individual level</b>		
<p><b><u>A sense of control</u></b> e.g. setting and pursuit of goals and ability to shape our circumstances</p>	<p>Peoples sense of control will be affected differently depending on who they are and how they are affected</p> <p><b>+ve:</b></p> <ul style="list-style-type: none"> <li>• The redevelopment is happening incrementally and over a long period of time. This should increase residents' sense of control as they have time to make their own decision about their future in the area.</li> <li>• There's been extensive consultation, so residents have had the opportunity to be involved in the decision making processes around the redevelopment.</li> </ul> <p><b>-ve:</b></p> <ul style="list-style-type: none"> <li>• Some businesses may have to move. However, steps are already being taken to minimise impact on their sense of control by involving them in consultation.</li> <li>• Where particular residential areas are affected, if people are required to move this may affect their sense of control negatively</li> </ul>	<p>Option of using planning policies to safeguard cheap space, which would help minimise the negative impact on businesses.</p>
<p><b><u>*Belief in own capabilities and self determination</u></b> e.g. sense of purpose and meaning</p>	<p><b>+ve:</b></p> <ul style="list-style-type: none"> <li>□ The consultation process itself can be empowering – even insofar as ensuring people understand the process and are well informed. Consultation also has positive implications for</li> </ul>	

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### Knowledge skills and resources to make healthy choices e.g.

understanding what makes us healthy and being able to make choices

### Maintaining independence e.g.

support to live at home, care for self and family

capacity building and self-efficacy.

- Schools are interested in building awareness of the regeneration process into their curriculum **-ve:**

**+ve:**

- Potential to improve people's opportunities to make healthy choices e.g. by connecting spaces and making it easier to walk/cycle.

**-ve:**

**+ve:**

- Opportunity to think about additional housing for the older generation. Potential for more adaptable housing which people can live in for longer under lifetime homes standards. So people can stay in their homes longer as they become frail.
- Would ask developers to provide quota of housing for people with disabilities.

**-ve:**

Age UK are very active in the area so potential opportunity to collaborate.

### **Community/organisation level**

Self-help provision e.g. information advocacy, groups, advice, support

**+ve**

- Might create interest and need for advocacy **-ve:**
- If there are not resources available to support increased advocacy/advice requirements

**\*Opportunities to influence decisions** e.g. at home, at work or in the community

**+ve**

- The consultation process itself has provided an opportunity for local people to be involved in the decision making process around the redevelopment.

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- As work continues there will be opportunity for more targeted

discussions e.g. older people -ve:

☐ Need to be careful that

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consultation being duplicated – risk of ‘consultation overload’ and people feeling like they’re not being listened to.

+ve

☐ Again, the consultation itself provides an opportunity for this.

-ve:

**\*Opportunities for expressing views and being heard** e.g. tenants groups, public meetings

**\*Workplace job control e.g. participation in decision making**, work-life balance

+ve

-ve:

- Potential the redevelopment might make getting to work harder in the short term due to additional pressure on transport/construction work
- Long term risk SMEs will be displaced as prices go up.

**Collective organisation and action** e.g. social enterprise, community-led action, local involvement, trades unions

+ve

- Regeneration should create opportunities for social enterprise.
- Potential for local people to come together around the plan – offers motivation and a focus -ve:

Resources for financial control and capability e.g. adequate income, access to credit union, welfare rights, debt management

+ve

-ve:

The Action Plan won't directly impact this, however if there's a market you would expect organisations to respond.

**Other?**

+ve

-ve:

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Table 4

Increasing resilience and community assets	Likely impact? Positive, negative or is it an indirect impact?	Comments or recommendations
--	---	-----------------------------

Individual level		
<p><b>*Emotional well-being</b> e.g. self esteem, self worth, <b>confidence</b>, hopefulness, <b>optimism</b>, life satisfaction, <b>enjoyment and having fun</b></p>	<p><b>+ve</b></p> <ul style="list-style-type: none"> <li>• People want change in the area so there's real potential to offer hope. Positive change in one part of the Old Kent Road area could lead to a chain reaction of people wanting the change to reach them.</li> </ul> <p><b>-ve:</b></p> <ul style="list-style-type: none"> <li>• People have to believe the process is genuine and that they're being listened to via the consultation process, if they do not feel this for any reason it could potentially have a negative impact on their sense of hope and confidence</li> </ul>	
<p><b>*Ability to understand, think clearly and function socially</b> e.g. <b>problem solving, decision making, relationships with others, communication skills</b> <b>Have beliefs and values</b> e.g. spirituality, religious beliefs, cultural identity</p>	<p><b>None identified</b></p>	
	<p><b>+ve:</b></p> <ul style="list-style-type: none"> <li>• This could have a positive impact if it fosters better social mixing -</li> </ul> <p><b>-ve:</b></p> <ul style="list-style-type: none"> <li>• People identify with the Old Kent Road area at the moment and its redesign and change could impact this.</li> <li>• As regeneration attracts new people to the area there's a danger people's sense of community and belonging will be disrupted – will the old identify with the new?</li> </ul>	

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### \*Learning and development

e.g. formal and informal education and hobbies

**+ve**

- Development of primary and secondary schools
- Training provided by developers/new employers

**-ve:**

### Healthy lifestyle e.g. taking

**+ve**

steps towards this by healthy eating, regular physical activity and sensible drinking

- The regeneration will see the development of communal gardens, and green spaces will be linked.
- Development of children's play areas, which healthy activities can be designed into the plan.
- Hope the regeneration will improve people's access to wildlife and nature conservation.
- Steps can be taken to ensure new developments support better air quality.

**-ve:**

- Damage to air quality due to additional road traffic

### **Community /Organisation level**

Trust and safety e.g. belief in reliability of others and services, feeling safe where you live or work

**+ve**

- Ambition is to make the Old Kent Road itself and the industrial areas feel safer. This could be via design e.g. increasing number of walkways overlooked by surveillance and other factors e.g. mixed tenure housing to overcome sense of ghettoisation.
- Currently parts of the industrial estate are quite dark and gloomy, this will change as part of the plan
- Will make the roads feel like a safer environment **-ve:**

Potential for mixed

Tenure housing to

Increase social

Capital,

however

people

though

the

Evidence around this

is mixed.

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### **\*Social networks and**

**relationships** e.g. contact with others through family, groups, friendships, neighbours, shared interests, work

**+ve**

- Increased green and open space, walkways and 'highstreet' shops will facilitate opportunities for interaction.
- Opportunity to design flats which facilitate interaction and make it easier to get to know neighbours. E.g smaller

More thought to how you can Facilitate everyday Interactions?

Identify the evidence around What works best?

Emotional support e.g. confiding relationships, provision of counselling support

**Shared public spaces** e.g. community centre, library, faith settings, café, parks, playgrounds, places to stop and chat

**Sustainable local economy** e.g. local skills and businesses being used to

number of front doors of a lift area

- Opportunity to protect and support existing faith groups in the area. Opportunities for places for people to stop and talk, e.g. communal gardens

**+ve**

- Opportunity to protect and promote existing support structures such as Tenant and Resident Associations, and faith groups. There is a chance the places where these groups meet will increase.

**+ve**

- Clear opportunity for the regeneration programme to support the creation of shared public spaces.

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benefit local people, buying locally, using Time Banks

**+ve**

- Improved transport links.
- Increased number of jobs, a certain number of which developers will have to award to local people.

**-ve:**

- Danger small businesses could get displaced.
- Ensuring developers have to award a certain quota of jobs to local residents will help mitigate this.
- Developers will also have to secure a certain amount of their resources from local businesses.

**Arts and creativity** e.g. expression, fun, laughter and play

**+ve**

- Gradually changing use of the business park for creative spaces. This has the potential to increase.

Other?

**+ve**

**-ve:**

**Table 5**

Facilitating participation and promoting inclusion	Likely impact? Positive, negative or is it an indirect impact?	Comments or recommendations
<b>Individual level</b>		



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<p><b>*Having a valued role</b> e.g. volunteer, governor, carer</p>	<p><b>+ve</b></p> <ul style="list-style-type: none"> <li>• The regeneration process itself has generated opportunities for local involvement in decision making via the consultation.</li> <li>• Additional schools will require governors.</li> <li>• Housing developments will lead to increased opportunities for people to take up roles on e.g. Tenants and Residents Associations. <b>-ve:</b></li> <li>• If people don't feel like their views are being taken into account this could make them feel less valued.</li> </ul>	
<p><b>Sense of belonging</b> e.g. connectedness to community, neighbourhood, family group, work team</p>	<p><b>+ve</b></p> <ul style="list-style-type: none"> <li>• Potential to broaden sense of belonging as the North/South divide will be removed.</li> <li>• The change will happen over a long period of time which should minimise the impact. <b>-ve:</b></li> <li>• Could people lose their sense of belonging who really identify with the place at the moment (especially the older generation) – given the change and influx of new people?</li> </ul>	<p>People have very Different perceptions of whether they feel they belong to the area</p>
<p><b>*Feeling involved</b> e.g. in the family, community, at work</p>	<p><b>+ve</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Consultation should help ensure local people feel involved in the process and wider community.</li> </ul>	
<p><b>Community /Organisation</b></p>		
<p><b>level</b></p>		
<p><b>Activities that bring people together</b> e.g. connecting with others through groups, clubs, events, shared interests</p>	<p><b>+ve</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Consultation itself provides opportunity to bring people together.</li> </ul>	<p>Difficult to say whether there will be more activity going on as a result of the redevelopment.</p>

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**Practical support** e.g. childcare, employment, on discharge from services

**+ve**

- Yes - developers will have to offer training opportunities to prospective employees.

**Ways to get involved** e.g. volunteering, Time Banks, advocacy

**+ve**

- Southwark Council already has a Volunteering Strategy. Opportunity to support and promote this during the regeneration.

**Accessible and acceptable services or goods** e.g. easily understood, affordable, user friendly, non-stigmatising, non-humiliating

**+ve:**

- Mixed tenure potentially offers access to nonstigmatising housing **-ve:**

**Cost of participating e.g.** affordable, accessible

**-ve:**

- Danger that 'affordable housing' won't be affordable in reality due to definitions of affordable, which are not determined locally. Policies can put in place to mitigate the chance of this happening.
- Longer-term business may find that new business space is less affordable, also true for faith groups and other community groups

**\*Conflict resolution** e.g. mediation, restorative justice

**+ve:**

- The Action Plan making process serves as mediating function. Has to be considered by an inspector who is independent of the council.

**-ve:**

**Cohesive communities** e.g. mutual respect, bringing communities together

- Potential conflict arising from the different opinions expressed in the consultation, and those who emerge feeling they've been listened to and those who haven't, e.g. its all

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about business not local people.

**+ve**

- There are already a range of community assets to be built on, such as the extensive faith groups in the area.

Is there anything else that will bring people together?

**-ve:**

- Potential threats in the form of affordable housing and work space which might create conflict. The planning team have already been considering this.

**5 Scale of impact and population**

There are two more aspects to consider:

**A) Scale of the impact on mental well-being**

If known (or suspected) at this stage, what is the duration of the likely mental wellbeing impacts of your proposal?

Please tick (this could be more than one period of time)

Brief , Weeks , Months , **years**

**B) Scale of the population whose mental well-being is impacted**

What is the scale of the whole population that your proposal will impact upon?

A small part of the population

**A majority of the population**

The entire population

**6 Having completed the screening assessment process the following sections will help determine what to do next.**

Favouring further appraisal	Question	Not favouring further
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		appraisal
<b>Yes</b>	Does your proposal affect in a negative way any of your population groups in Table 1?	
<b>Yes</b>	Does your proposal affect in a negative way any of the wider determinants and protective factors in Tables 2- 5	
<b>Yes</b>	For some of the wider determinants and protective factors of mental well-being, are some of the impacts of your proposal unknown?	
<b>Yes</b>	Are the impacts likely to be over a long period of time (one year or more)	
<b>Yes</b>	Is there an opportunity to influence the delivery of the proposal you are screening?	

**If there are two or more answers of yes or 'don't know' then it is advisable that there is likely to be value in undergoing further MWIA investigation.**



## Old Kent Road Area Action Plan

### Proposed Submission Version

October 2024

## Integrated Impact Assessment Appendices

### Appendix 14: OKR AAP IIA References

No.	Title
Appendix 1	Strategic Directive Requirement
Appendix 2	Relevant Plans, Programmes and Strategies
Appendix 3	Baseline data – Facts and Figures
Appendix 4	Sustainability Appraisal Framework
Appendix 5	Assessment of the Strategy and Vision
Appendix 6	Assessment of the Development Management Policies
Appendix 7	Assessment of the Sub Areas and Site Allocations
Appendix 8	Monitoring indicators against sustainability objectives
Appendix 9	Baseline Indicators Table
Appendix 10	Options Testing
Appendix 11	Scoping Report Consultation Summary and link to OKR AAP Scoping Report
Appendix 12	Reasonable alternatives considered
Appendix 13	Mental Well-being Impact Assessment Screening
Appendix 14	OKR AAP IIA References

## Introduction

This document references all sources of data and information set out on the Integrated Impact Assessment (IIA) of the Old Kent Road Area Action Plan (OKR AAP) and all supporting appendices.

This references section excludes **Appendix 3: Baseline data – Facts and Figures** and **Appendix 9: Baseline Indicators Table** as they already set out extensive data and referenced sources.

It additionally excludes the appraisal of the OKR AAP policies, sub areas and site allocations (**Appendix 5: Assessment of the Strategy, Vision and Plan Objectives, Appendix 6: Assessment of the Strategic and Development Management Policies** and **Appendix 7: Assessment of the Sub Areas and Site Allocation Policies**) as they have been appraised against the IIA Objectives and Baseline Indicators.

In addition to **Appendix 8** which just visually showcases the overlap of IIAO and Baseline Indicators in a matrix.

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Old Kent Road Area Action Plan  
Proposed Submission Version  
October 2024

**Habitats Regulations Assessment**

Old Kent Road Area Action Plan 2024 appendices: Document Locator	
No.	Title
Appendix A	Old Kent Road AAP December Version 2020
Appendix B	Consultation Plan
Appendix C	Consultation Report
Appendix D	Integrated Impact Assessment
Appendix E	Habitats Regulations Assessment
Appendix F	Equalities Impact Assessment, comprising:
	- EQIA Document 01: Executive Summary
	- EQIA Document 02: Summary of the EQIA
	- EQIA Document 03: Equalities Impact Assessment
	- EQIA Document 04: Supporting Datasets
Appendix G	Health Impact Assessment

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2	The Need for Appropriate Assessment	3
3	Identifying Likely Significant Effects	5
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5	Identification of Relevant Sites	6
6	Appraisal Framework	15
7	Screening analysis of the New Southwark Plan Area: Proposed Submission Version	17
8	Conclusion	19
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## 1. Introduction

- 1.1 This report presents the findings of a screening exercise undertaken to determine whether stages 2 and 3 of the Habitats Regulations Assessment (HRA) process are needed for the Old Kent Road Area Action Plan: September 2024. The council has also undertaken a separate Integrated Impact Assessment incorporating Strategic Environmental Assessment Screening Assessment for the document which outlines the environmental baseline data for the area.
- 1.2 The Old Kent Road Area Action Plan (AAP) is a plan to regenerate the Old Kent Road and surrounding area. It sets out a vision for how the area will change from 2020 to 2040. This includes delivering 20,000 new homes and 10,000 additional jobs. The vision will be delivered by a strategy with policies, designations, site allocation and masterplans over the next 20 years. We will require development as set out in the AAP to make sure that we get the right development needed to support a healthy, safe and prosperous community and a fairer future for all in the Old Kent Road area.
- 1.3 The AAP will be part of our framework of planning documents. It will be a material planning consideration in deciding planning applications in the opportunity area. It will help ensure that we make decisions transparently, providing clarity for members of the public and giving more confidence to developers to invest in the area. It will also be an opportunity area planning framework (OAPF) and will be endorsed by the Mayor of London.
- 1.4 The proposed policies are in general conformity with existing policies in the emerging Southwark Plan (2022). An AA screening exercise was also carried out for other adopted AAP's in Southwark and the Southwark Plan (2022), which found that there was no significant discernible adverse impact on European sites.

## 2. The need for Habitats Regulations Assessment

- 2.1 In October 2005, the European Court of Justice ruled that HRA must be carried out on all planning policy documents in the UK. The purpose of HRA of planning policies is to ensure that the protection and integrity of European sites<sup>1</sup> (also known as the Natura 2000 network) is part of the

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<sup>1</sup> Strictly, 'European sites' are any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a 'Site of Community Importance' (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been identified by the government. However the terms is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4 (4) of Directive 2009/147/EC (the new wild birds directive) are applied; and to possible SACs (pSACs) and listed RAMSAR Sites, to which the provisions of the Habitats Regulations are applied a matter of government policy (NPPF para 118) when considering development proposals that may affect them. The Natura 2000 network is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites.

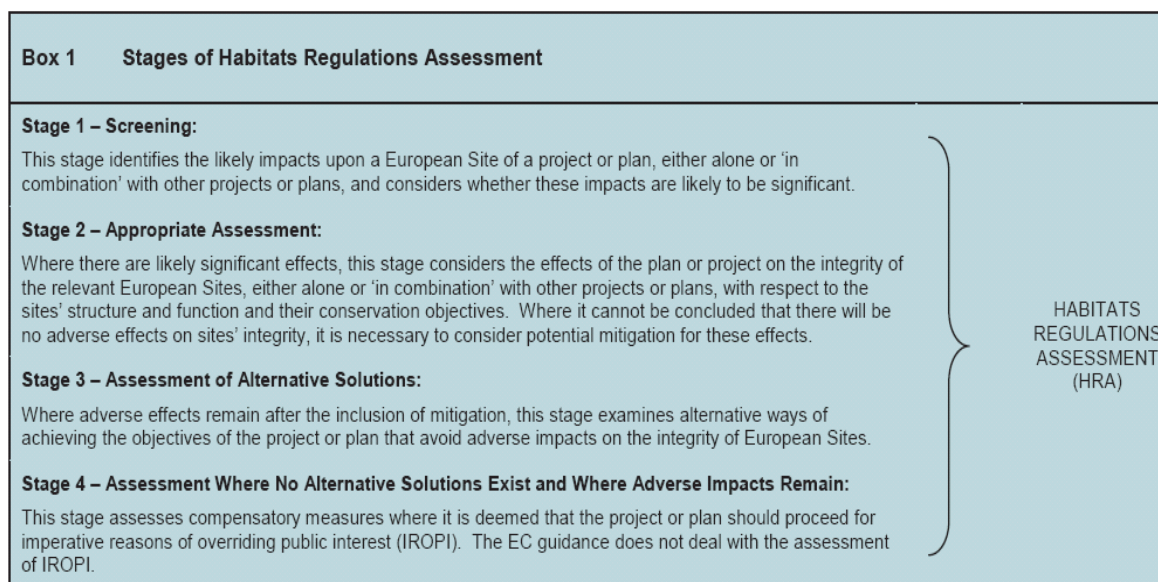
planning process at the regional and local level. It is the responsibility of the Local Planning Authority (LPA) to ensure that the HRA process is carried out in accordance with the Habitat Directive (Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora and Directive 2009/147/EC on the conservation of wild birds) and Regulation 102 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the ‘Habitats Regulations’). This requirement is also supported under paragraph 37 of the Planning Practice Guidance (PPG) on Plan-making which states. “A local plan may ... require a Habitats Regulations Assessment if it is considered likely to have significant effects on habitats, sites or species located in the local planning authority’s area or in its vicinity”.

- 2.2 The Habitats Regulations Assessment will be supported by forthcoming changes made as a result of the Environment Act (2021), such as the Local Nature Recovery Strategy and Local Green Infrastructure Framework which act as a new system of spatial biodiversity strategies across London. European sites will sit within a larger framework of natural landscape land to support biodiversity and green infrastructure as a result of these changes.
- 2.3 The Habitats Regulations requires that authorities assess the effects of land use plans on European sites to determine whether there will be any ‘likely significant effects’ (LSEs) on any Natura 2000 sites as a result of the plan’s implementation (either on its own or in combination with other plans or projects). If there are LSEs there will be a need for the authority to undertake an Appropriate Assessment to determine whether or not there will be any adverse effects on the sites’ integrity.
- 2.4 Guidance from the Department of Communities and Local Government (DCLG) on Appropriate Assessment<sup>2</sup> states that: ‘The purpose of Appropriate Assessment (AA) of land use plans is to ensure that protection of the integrity of ‘European sites’ is a part of the planning process at a regional and local level.
- 2.5 The DCLG guidance summarises the AA process prescribed in Article 6(3) and (4) of the Habitats Directive into three main stages:
1. likely significant effects (AA task 1);
  2. appropriate assessment and ascertaining the effect on site integrity (AA task 2);
  3. mitigation and alternative solutions (AA task 3); and *\*imperative reasons of overriding public interest.*

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<sup>2</sup> Planning for the Protection of European Sites: Appropriate Assessment Guidance For Regional Spatial Strategies and Local Development Documents, DCLG, August 2006

- 2.6 The test to identify whether a plan option is 'likely to have a significant effect' on a European site is also referred to as 'screening'. This determines whether stages 2 and 3 of the HRA are required.
- 2.7 For additional up to date guidance on the methodology of the appropriate assessment, see guidance from Ministry of Housing Communities and Local Government in references section.



### 3. Identifying likely significant effects (LSEs)

- 3.1 The first stage, screening for HRA, will determine if planning policy and guidance documents are likely to have a significant effect on the conservation objectives of the Natura 2000 sites. This will determine whether stages 2 and 3 of the HRA are required. In considering whether the plan policy, guidance or site is likely to have a significant effect on a Natura 2000 site, it should be noted that a site may be located either within or outside the area covered by the plan as significant effects may be incurred in cases where the area of the plan is some distance away.
- 3.2 When considering the LSEs of a policy, it is recognised that some policy 'types' cannot affect any European sites. Different guidance documents suggest various classification and referencing systems to help identify those policies that can be safely screened out to ensure the HRA focuses on the policies with any potential to result in LSEs. Table 2.1 summarises the characteristics of policies that can usually be screened out.

Table 2.1 Policy 'types' that can usually be screened out

Broad Policy Type	Notes
General statements of policy	The European Commission recognises* that plans or plan components that are general statements of policy or political aspirations cannot have significant effects
General design / guidance criteria	A general 'criteria based' policy expresses the tests or expectations of the plan-making body when it comes to consider particular proposals, or relate to design or other qualitative criteria which do not themselves lead to development (e.g. controls on building design).
External plans / projects	Plans or projects that are proposed by other plans and are referred to in the plan being assessed for completeness
Environmental protection policies	Policies designed to protect the natural or built environment will not usually have significant or adverse effects

\* EC, 2000, Managing Natura 2000 sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC April 2000 at 4.3.2

#### 4. Methodology

4.1 The legal requirement to undertake HRAs is set out in the Habitats Directive. However, there is no standardised method for undertaking an HRA. The council has followed the screening method used on the HRA of the London Plan (2021) completed by AECOM and also the methodology used to prepare the HRA for the Southwark Plan (2022).

4.2 The methodology used is based primarily on the guidance by Tydesley and Associates prepared for Natural England - 'The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the Provisions of the Habitats Regulations' (2006).

#### 5. Identification of relevant sites

5.1 Using the Joint Nature Conservation Committee (JNCC) website<sup>3</sup>, and in line with the methodology employed in the draft London Plan Habitats Regulations Assessment (2017) Plan, the council identified those Natura 2000 sites within a 10km zone extending from the boundary of the borough. SACs, SPAs, RAMSARS and OMSs were included. European sites were scoped into the study if they occurred either wholly or partially within this geographical area. The council identified that there are no Natura 2000 sites in Southwark. Four sites are partially within 10km of Southwark and are set out below:

##### Identified conservation sites of EC importance

Sites at least partially in Southwark

None

<sup>3</sup> www.jncc.gov.uk

Sites at least partially within 10km of Southwark

Wimbledon Common (SAC)

Richmond Park (SAC)

Epping Forest (SAC)

Lee Valley (SPA)

5.2 The information for these sites concerning the rationale for EU conservation has had reference to the draft London Plan Habitats Regulation Assessment (2017) completed on behalf of the GLA by Aecom. This includes supplementary information in order to assist in considering the vulnerability of sites to potential adverse impacts. This is presented in the table on the following pages. The screening of likely significant effects for the Old Kent Road Area Action Plan is not considered to deviate from the HRA undertaken to support the examination of the Southwark Plan (2022), and therefore has re-produced the more concise table of LSEs according to; site name and description, qualifying interest (Habitats and Species), current condition and recognised threats.

Site Description table

5.3 This information has been sourced from Natural England 'Designated Sites View' which contains JNCC SAC Data and information on the current condition of European Sites.

- Site name and designation  
Obtained from Natural England 'Natura 2000 Forms' and RAMSAR forms from the JNCC website.
- Qualifying Interest (habitats and species)  
Denotes the habitats and species for which the sites have been awarded EU conservation status. It is these qualifying features which the HRA must safeguard. This information is obtained from 'Natura 2000' and RAMSAR forms. The qualifying features form the basis of Natural England's 'conservation objectives for the European interest on SSSIs', which were drawn upon for pertinent additional information.
- Current condition
- Recognised threats  
Information pertaining to the potential threats. From Natura 2000, RAMSAR, and Conservation Objectives forms.



Site name and designation	Qualifying Interest (Habitats and Species)	Current Condition	Recognised threats
<p>Wimbledon Common SAC (348.31 ha)</p>	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• Northern Atlantic wet heaths with <i>Erica tetralix</i></li> <li>• European dry heaths</li> </ul> <p>Annex II species that are the primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• <i>Lucanus cervus</i> (stag beetle)</li> </ul>		<p>The draft London Plan HRA lists the following pressures to Wimbledon Common SAC:</p> <ul style="list-style-type: none"> <li>• Inappropriate behaviour by some visitors (e.g removal and collection of wood)</li> <li>• Habitat fragmentation</li> <li>• Invasive species (specifically oak processionary moth <i>Thaumetopoea processionea</i>)</li> <li>• Atmospheric pollution (nitrogen deposition)</li> </ul> <p>Recreational pressure: Site is located in an urban area which is likely to have a local core recreational catchment extending to around 5km and as a result experiences intensive recreational pressure which can result in damage to sensitive heathland areas. Most hotspots of recreational usage at Wimbledon Common are areas of grassland which does not host SAC features, however lack of physical disturbance also allow the encroachment of scrub, which footfall can contain.</p> <p>Air quality:</p>

Site name and designation	Qualifying Interest (Habitats and Species)	Current Condition	Recognised threats
			<p>The SAC is within 200m of the A3 and A219 roads, as a result average background nitrogen deposition rates within the SAC exceed the minimum critical load range for heathland. The draft London Plan HRA notes that policies in the London Plan such as the Mayor's Transport Strategy and Transport for London interventions to reduce traffic will aim to improve air quality.</p>

Site name and designation	Qualifying Interest (Habitats and Species)	Current Condition	Recognised threats
Richmond Park SAC (846.68 ha)	<p>Annex II species that are the primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• <i>Lucanus cervus</i> (stag beetle)</li> </ul>	<p>Current condition of Richmond Park SAC is reported here<sup>5</sup> As of August 2024</p> <ul style="list-style-type: none"> <li>• Stag beetle: All units are favourable</li> </ul>	<p>The draft London Plan HRA lists the following pressures to Richmond Park SAC:</p> <ul style="list-style-type: none"> <li>• None specifically identified in the Natural England Site Improvement Plan, although loss of habitat (dead wood) would affect the stag beetle population.</li> </ul> <p>The draft London Plan HRA provides further details relating to the following pressures</p> <p>Recreational pressure: The SAC is located in an urban area and is therefore liable to recreational pressure and urbanisation. The stag beetle population is dependent on good habitat management.</p> <p>Air quality: Nitrogen deposition can negatively impact on woodland features such as ground flora. Development anticipated by the London Plan is unlikely to have a</p>

<sup>5</sup> Richmond Park SAC Data, Natural England:  
<https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK0030246&SiteName=Richmond%20Park%20SAC&countyCode=&responsiblePerson=&SeaArea=&IFCAAarea=>

Site name and designation	Qualifying Interest (Habitats and Species)	Current Condition	Recognised threats
			significant impact upon stag beetle populations.
Epping Forest SAC (1628.86 Ha)	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• Northern Atlantic wet heaths with <i>Erica tetralix</i></li> <li>• European dry heaths</li> <li>• Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>)</li> </ul> <p>Annex II habitats that are a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• <i>Lucanus cervus</i> (stag beetle)</li> <li>• <i>Triturus cristatus</i></li> </ul>	<p>Current condition of Epping Forest SAC is reported here<sup>6</sup> As of August 2024</p> <ul style="list-style-type: none"> <li>• North Atlantic wet heaths: Unfavourable recovering</li> <li>• European dry heaths: One unit unfavourable no change, two units unfavourable recovering</li> <li>• Atlantic acidophilous: 23% favourable, 77% unfavourable recovering</li> <li>• Stag beetle: All units favourable</li> </ul>	<p>The draft London Plan HRA lists the following pressures to Epping Forest SAC:</p> <ul style="list-style-type: none"> <li>• Air pollution</li> <li>• Public disturbance</li> <li>• Inappropriate water levels</li> <li>• Water pollution</li> </ul> <p>Recreational pressure: The SAC receives a high volume of visitors from the surrounding area, with 95% of visitors living within 2km of Epping Forest, with main points of visitor origin being residents of LB Redbridge and LB Waltham Forest.</p> <p>Air quality: The location of the SAC means that key highways accessing settlements within South East Essex and East Hertfordshire, traverse the border of the SAC leading to relatively poor air</p>

<sup>6</sup> Epping Forest SAC Data, Natural England:  
<https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK0012720&SiteName=Epping%20Forest&countyCode=&responsiblePerson=&SeaArea=&IFCAAarea=>

Site name and designation	Qualifying Interest (Habitats and Species)	Current Condition	Recognised threats
			quality. This primarily affects epiphytic lichen communities of the Forest.
Lee Valley SPA / Ramsar (447.87 ha)	<p>Lee Valley qualifies as an SPA for its Annex II species</p> <p>Annex II habitats that are a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• <i>Anas clypeata</i> (Northern Shoveler)</li> <li>• <i>Anas strepera</i> (Gadwall)</li> <li>• <i>Botaurus stellaris</i> (Eurasian bittern)</li> </ul> <p>Triturus cristatus</p>	<p>The current condition of the Lee Valley SPA and Ramsar sites is monitored by Natural England<sup>7</sup></p> <p>There are a number of SSSIs contained within the Lee Valley Ramsar site of which Walthamstow Reservoirs, Waltham Abbey and Turnford and Cheshunt Pits are 100% favourable.</p>	<p>The draft London Plan HRA lists the following pressures to the Lee Valley SPA / Ramsar:</p> <ul style="list-style-type: none"> <li>• Water pollution</li> <li>• Hydrological changes</li> <li>• Recreational disturbance including angling</li> <li>• Atmospheric pollution</li> </ul> <p>The draft London Plan HRA provides further details relating to the following pressures:</p>

<sup>7</sup> Lee Valley SPA and Ramsar Data, Natural England:

<https://designatedsites.naturalengland.org.uk/SiteList.aspx?siteName=Lee%20Valley&countyCode=&responsiblePerson=&DesignationType=All>

Site name and designation	Qualifying Interest (Habitats and Species)	Current Condition	Recognised threats
	<p>Lee Valley qualifies as a Ramsar site under the following criterion:</p> <ul style="list-style-type: none"> <li>• Criterion 2: The site supports the nationally scarce plant species whorled water-milfoil <i>Myriophyllum verticillatum</i> and the rare or vulnerable invertebrate <i>Micronecta minutissima</i> (a water-boatman); and,</li> <li>• Criterion 6: species/populations occurring at levels of international importance.</li> </ul>	<p>Walthamstow Marshes are 36% favourable and 63% unfavourable but recovering</p>	<p>Recreational pressure: Over the past 10 years landowners and managers (RSPB, the local Wildlife Trust, the Regional Park Authority and Thames Water have undertaken initiatives both to facilitate and promote access for the greater public access to the SPA for recreation. It is considered that the relevant competent authorities would not have embarked on these initiatives if there was risk of an adverse effect on the SPA or Ramsar site. For this reason, recreational pressure is not considered to lead to harm to the protected site.</p> <p>Air quality: The only parts of the Lee Valley SPA/Ramsar site in London are Walthamstow Reservoirs. These are sealed reservoirs that are internationally designated for their populations of wintering gadwall and shoveler ducks. no likely significant effects are anticipated since the South West London Waterbodies SPA, like most freshwater environments, is essentially phosphate limited, rather than nitrogen limited, meaning that it is phosphate availability that controls the</p>

Site name and designation	Qualifying Interest (Habitats and Species)	Current Condition	Recognised threats
			<p>growth of macrophytes and algae. The London Plan will not affect phosphate availability within Walthamstow Wetlands.</p> <p>Water resources: Water levels for the reservoirs are controlled by Thames Water and have been largely responsible for creating the circumstances that led to the site being of international importance for species. There are no wastewater treatment works with catchments within the GLA boundary that discharge into the River Lee or its tributaries. Natural England has developed a Site Improvement Plan for the Lee Valley, published in 2014.</p>

## 6. Appraisal Framework

- 6.1 The policies within the Old Kent Road Area Action Plan have been analysed to assess whether they would be likely to result in significant adverse impacts on European sites. The Natural England guidance<sup>8</sup> defines 'likely' as meaning 'probably', not merely a fanciful possibility'. The potentially adverse impacts were screened according to the approach set out in Appendix A and Figure 3 of the guidance. However criteria 2 and 3 were not considered because these are applicable to the assessment of Regional Spatial Strategies (now abolished), not Development Plan Documents.
- 6.2 A precautionary approach was adopted so that the assessment also considered cumulative impacts therefore all potentially significant adverse impacts were assessed.

Coding used for recording effects / impacts on European Sites (from Tydesley and Associates, 2006, Annex 2).

<b>Coding used for recording effects/impacts on European Sites</b>
<b>Reason why policy will have no effect on a European Site</b>
1. The policy will not itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy)
4. Concentration of development in urban areas will not affect European Site and will help to steer development and land use change away from a European Site and associated sensitive areas.
5. The policy will help to steer development away from a European Site and associated sensitive areas, e.g. not developing in areas of flood risk or areas otherwise likely to be affected by climate change.
6. The policy is intended to protect the natural environment, including biodiversity.
7. The policy is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a European Site.
<b>Reason why policy could have a potential effect</b>
8. The DPD steers a quantum or type of development towards, or encourages development in, an area that includes a European Site or an area where development may indirectly affect a European Site.

<sup>8</sup> The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the Provisions of the Habitats Regulations' (2006).



**Reason why policy would be likely to have a significant effect**

9. The policy makes provision for a quantum or kind of development that, in the location(s) proposed, would be likely to have a significant effect on a European Site. The proposal must be subject to appropriate assessment to establish, in light of the site's conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site.

- 6.3 A Habitat Regulations Assessment (HRA) screening (stage 1) has been undertaken to assess the impact of the guidance in the Old Kent Road Area Action Plan. This is set out below. The preparation of the plan is considered likely to have no significant adverse effect on the European sites therefore it is deemed to require no further HRA (stages 2 and 3) to be undertaken.

## 7. Screening Analysis of the Old Kent Road Area Action Plan

7.1 This section screens the Old Kent Road Area Action Plan policies guidance for impacts on Natura 2000 sites. Each policy has been assessed against the criteria provided in section 6 which itself is based on guidance prepared by Tydesley and Associates for Natural England titled, 'The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the Provisions of the Habitats Regulations 2006.'

### Analysis

Old Kent Road AAP objective	Related policy reference	Why policy will have no impact on Natura 2000 sites	Likely to have an impact	Essential recommendations to avoid potential negative effects on European sites
Delivery	<b>AAP1</b> The Masterplan	4	No	None
	<b>AAP2</b> Bakerloo Line Upgrade and Extension	4	No	None
Homes	<b>AAP3</b> Homes for All	4	No	None
	<b>AAP4</b> Student Homes	4	No	None
Strong Local Economy	<b>AAP5</b> Business and Workspace – 'The Bow Tie'	4	No	None
	<b>AAP6</b> Life Sciences	4	No	None
	<b>AAP7</b> Town Centres, Leisure and Entertainment	4	No	None

Movement, Parks and Healthy Streets	<b>AAP8</b> Movement – People, Place, Experience	4	No	None
	<b>AAP9</b> The Greener Belt – Parks & Healthy Streets	4	No	None
Design	<b>AAP10</b> Tall Buildings Strategy – The Stations and the Crossings	4	No	None
	<b>AAP11</b> Character and Heritage	4, 7	No	None
	<b>AAP12</b> Design	4	No	None
Environment	<b>AAP13</b> Climate Emergency	1, 4, 6	No	None
	<b>AAP14</b> Flood Risk, Noise and Air Quality	4, 6	No	None
Great Start in Life	<b>AAP15</b> Great Start in Life	4	No	None
	<b>AAP16</b> Child and Youth Provision	4	No	None

## 8. Conclusion

- 8.1 None of the strategic objectives, delivery policies or development management policies within the Old Kent Road Area Action Plan are likely to have any significant discernible adverse impact on European sites therefore stage 2 (appropriate assessment and ascertaining the effect on site integrity) and stage 3 (mitigation and alternative solutions) of the HRA process are not considered necessary.

## References

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- Draft London Plan Habitats Regulations Assessment (on behalf of the GLA), AECOM, 2017, accessed from: <https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan/eip-library>
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- Planning Practice Guidance, Guidance on plan-making, Ministry of Housing, Communities and Local Government, 2021, accessed from: <https://www.gov.uk/government/collections/planning-practice-guidance>
- The Conservation of Habitats and Species Regulations (England and Wales) Regulations DEFRA 2010, accessed from: <https://www.legislation.gov.uk/uksi/2010/490/contents>
- The Conservation of Habitats and Species Regulations (England and Wales) Regulations, DEFRA, 2017, accessed from: <https://www.legislation.gov.uk/uksi/2017/1012/contents>
- Tyldesley and Associates - prepared for Natural England Guidance - The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the Provisions of the Habitats Regulations 2006.



Old Kent Road Area Action Plan  
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 Equalities Impact Assessment

**EQIA Document 01: Executive Summary**

Old Kent Road Area Action Plan 2024 appendices: Document Locator	
No.	Title
Appendix A	Old Kent Road AAP 2024
Appendix B	Consultation Plan
Appendix C	Consultation Report
Appendix D	Integrated Impact Assessment
Appendix E	Habitats Regulations Assessment
Appendix F	Equalities Impact Assessment, comprising:
	- EQIA Document 01: Executive Summary
	- EQIA Document 02: Summary of the EQIA
	- EQIA Document 03: Equalities Impact Assessment
	- EQIA Document 04: Supporting Datasets
Appendix G	Health Impact Assessment

## Executive Summary

### Introduction

1. This Equalities Impact Assessment (EQIA) considers the equalities impacts of the consolidated version of the Old Kent Road Area Action Plan (AAP). It is a document that will continue to be reviewed by The Council –under its statutory duty– at each stage of the Regulation 19 process, through Examination in Public, and post AAP adoption, to reflect any changes in context.
2. The following paragraphs provide the Executive Summary to the EQIA, covering:
  - the objectives of the proposed Old Kent Road AAP 2024 within the framework set by the Southwark Plan 2022;
  - the Purpose of an Equalities Assessment on Planning Policy;
  - the Approach and Structure of the Equalities Impact Assessment;
  - equalities Issues in Southwark; and
  - how the Council seeks to resolve these issues in planning policy.

### Objectives of the Old Kent Road AAP

3. As set out in the Southwark Plan 2022, the Council will lead the way in London to build more homes of every kind in borough and to use every tool at our disposal to increase the supply of all different kinds of homes. Our target is for 50% of all new homes as social rented and intermediate homes. We will ensure that all new homes in Southwark are of such good quality that you will not know whether you are visiting homes in private, housing association or council ownership. Proposed policies AAP3 and AAP4 of the Old Kent Road AAP build on this Local Plan commitment, setting out how the proposed 20,000 new homes will be delivered at a more geographically-specific scale, often in co-location with non-residential uses, and how this will be supported by commensurate infrastructural investment.
4. As set out in the Southwark Plan 2022, the Council will continue to revitalise our places and neighbourhoods to create new opportunities for residents and local businesses, to promote wellbeing and reduce inequalities so that people have better lives in stronger communities. Exemplary design (in terms of homes, urban design, public spaces, the townscape as a whole and sustainability) are promoted principally in proposed policies AAP10, AAP11 and AAP12 of the Old Kent Road AAP. These aspire to create healthy, safe, attractive and sustainable places that everyone can be proud of.
5. As set out in the Southwark Plan 2022, the Council will give the borough's young people the best start in life in a safe, stable and healthy environment where they have the opportunity to develop, make choices and feel in control of their lives and future. Proposed policies AAP15 and AAP16 of the Old Kent Road AAP build on this; they set out, amongst other things, how schools will be expanded if necessary and how our young people will be able to access social outlets and sports facilities.
6. As set out in the Southwark Plan 2022, the Council will work to make sure that the borough maintains a strong economy where all of our existing and new residents,

businesses and workers benefit. Proposed policies AAP5, AAP6 and AAP7 of the Old Kent Road AAP build on this commitment, setting out how the proposed 10,000 new jobs will be delivered across the Opportunity Area, while putting in place mitigation to ensure the ecosystem of existing SMEs is protected and supported.

7. The Southwark Plan 2022 commits to maintaining and improving the health and wellbeing of our residents, encouraging healthy lives by tackling the causes of ill health and inequalities. Health and wellbeing underlie all of the proposed AAP policies, but is most directly addressed and promoted in AAP8, AAP9, AAP12, AAP13, AAP14
8. The Southwark Plan 2022 sets out to lead the way in providing spaces for people to connect with nature, making people feel safe, create cleaner streets, increasing recycling and reducing landfill waste, and addressing the Climate Emergency. The Old Kent Road AAP build on this framework through a number of its proposed policies, most notably AAP9, AAP13 and AAP14.

### **Purpose of an Equalities Assessment on Planning Policy**

9. The Council is required by UK Law to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics, as set out in the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act 2010). The council carries out Equalities Analysis (EqIA) of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals in accordance with the Equality Act 2010 and on Human Rights that replaces all previous equality legislation into one overarching act.
10. The Town and Country Planning Association sets out in 'Beyond Box-Ticking: A Short Guide to meaningfully assessing Local Plan policy impacts on equality and inclusion' that an equalities assessment should:
  - recognise that planning policies and decisions impact different people differently;
  - have regard to the multiple groups in society who are both under-represented in engagement with planning processes and often at most risk of being negatively affected by planning outcomes
11. Local planning authorities should, therefore, assess the potential impacts of draft policies on different groups at an early stage, and adjust policies accordingly over time.
12. Those who are those subject to the equality duty must, in the exercise of their functions, have due regard to the need to:
  - eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
  - advance equality of opportunity between people who share a protected characteristic and those who do not.
  - foster good relations between people who share a protected characteristic and those who do not.

### **Approach and Structure of the Equalities Impact Assessment**

13. This document sits under the Integrated Impact Assessment (IIA). The IIA is a master document that covers all sustainability assessment works, comprising:
  - the Sustainability Appraisal (SA)
  - the Strategic Environmental Assessment (SEA),
  - the Health Impact Assessment (HIA); and
  - the Equalities Impact Assessment (EQIA).
14. This document is a separate Equalities Analysis (EQIA) that distils and considers the key equalities impact of each of the policies proposed in the Old Kent Road AAP.
15. The equalities impact of the Old Kent Road Area Action Plan has been assessed at every stage of the plan. This is achieved with the Integrated Impact Assessment and Equalities Impact Assessment.
16. This document assesses the proposed submission version of the Old Kent Road Area Action Plan against the protected characteristics highlighting where there is a positive impact, negative impact or neutral impact. Each AAP policy and sub area has been assessed for its equalities impact.
17. This Executive Summary (EQIA Document 01) has been compiled to highlight the key equalities issues in the Old Kent Road Opportunity Area. This document sets out:
  - the Purpose and Context of the Equalities Assessment;
  - key equalities issues in the Old Kent Road; and
  - how Southwark Council is responding to these equalities issues.
18. The 'Summary of the EQIA' (EQIA Document 02) provides a high level summary of equalities impacts arising from AAP policies and sub areas assessed against the three strands of the Public Sector Equalities Duty. It also includes summary tables to set out the data supporting the need in the borough.
19. The 'Equalities Impact Assessment' (EQIA Document 03) holds the more in-depth assessment of each policy and its potential impact on each protected characteristic. It identifies where there is a positive, negative or neutral impact and its impact on health. It also details the indicators in the Integrated Impact Assessment (IIA) that inform the impact of these policies.
20. The 'Supporting Datasets' (EQIA Document 04) highlights national and regional data, as well as the data held by Southwark Council that informs the creation and evolution of these policies.
21. The 2020 draft of the Old Kent Road AAP contained a fifth document as part of its EAI; this was a 'Covid-19 Statement on Equalities'. It outlined the uncertainty of Covid-19 and recognises that there are potential additional impacts on each protected characteristic and those who are more vulnerable of Covid-19. Given that the principal period of the pandemic was over 4 years ago, it is not considered necessary to support the 2024 version of the Old Kent Road AAP EQIA with a Covid-19 Statement.



## **Equalities Issues in Southwark**

22. As set out in the Supporting Datasets, the Old Kent Road Opportunity Area is very diverse in terms of demographic, needs and characteristics. Planning policy must, therefore, respond to a wide range of issues and needs to deliver the best outcomes for all, while also reducing the negative impacts of development on people.
23. Equalities issues in the Old Kent Road Opportunity Area surround a number of key issues.
24. The first of these is community uses, namely the protection and retention of floorspace and ensuring high quality new provision. We need to make sure that the provisions and facilities meet the needs of community groups and are genuinely accessible.
25. We need to safeguard the borough's four existing Gypsy and Traveller sites where there is an identified need for them, as well as making provision for the identification of new sites to meet any identified need for additional Gypsy and Traveller accommodation. This need will continue to be monitored.
26. We need to consider non-conventional housing, namely the delivery of Homes of Multiple Occupation (HMOs), housing for older people, homes for those with specialist needs and supported living. The delivery of larger conventional family homes will also be important to monitor, given the current high levels of demand outstripping supply.
27. The delivery of affordable rooms within student housing developments will also need to be monitored, balancing this against the borough's pipeline of affordable conventional housing, the latter being something student housing schemes can also contribute to.
28. In terms of employment, there are equalities issues surrounding the delivery of affordable workspace, protection and support for Small and Medium Enterprises (SMEs) and small shops, and the delivery of accessible education and training.
29. In terms of the environment, there are equalities issues in relation to equality of access to good quality green space for all and the prevalence of poor air quality in certain areas of the borough, and the health and wellbeing implications.
30. This highlights key tensions in the delivery of interventions to meet these requirements, namely around the negotiation of additional requirements to meet specialist needs, as these are not as feasible or viable in some cases.

## **How is Southwark Council responding to resolve these issues in planning policy?**

31. The Old Kent Road AAP has been assessed at each stage against the protected characteristics. Amendments have been made accordingly to ensure the delivery of affordable housing, greater provision of affordable workspace, protection of green and open space and improvement of air quality.

32. These key issues are targeted more widely by Southwark Council as a whole through the delivery of 'Regeneration that Works for all'. This ensures that a Social Regeneration Charter is created for each area in Southwark. These aim to deliver improved social aspects, pride of place and cohesion with a system-wide approach to improving life opportunities, good health and wellbeing for all. It also invests in communities, in employment and community resources aims to increase inclusivity and accessibility, and community collaboration. This Council-wide agenda also aims to reduce inequalities to tackle a wide range of factors that impact on equality with a targeted approach to ensure the regeneration benefits are for all and to make more welcome neighbourhoods.
33. Consultation is addressed more widely in the Statement of Community Involvement and Developers Charter. This aims to create a more transparent and more easily understandable and accessible plan-making and decision-taking process for members of the public to be involved in. It also requires larger planning applications to provide a consultation plan demonstrating that the developer has properly consulted on their development.
34. The plan-making and decision-making process and how the OKRAAP is engaged with is set out in the Statement of Community Involvement.



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**EQIA Document 02: Summary of the EQIA**

Old Kent Road Area Action Plan 2024 appendices: Document Locator	
No.	Title
Appendix A	Old Kent Road AAP 2024
Appendix B	Consultation Plan
Appendix C	Consultation Report
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## Summary of the EQIA

### Introduction

1. The need to conduct an equalities analysis is mandatory for Councils to carry out their Public Sector Equality Duty. Through adopting a new local plan we deem it crucial to address the needs of our residents, mitigate against potential negative impacts and also foster good relations with established communities in our borough. We recognise that any scale of change on people, such as minor to large scale development, can have a significant impact on people. This is why we have drafted the Area Action Plan (AAP) for the Old Kent Road Opportunity Area.
2. A summary based on the initial analysis is set out below. This summary section concisely conveys the positive/negative impacts identified for all of the Old Kent Road Area Action Plan's policy objectives. It also sets out how each have also addressed the three strands of the Public Sector Equality Duty.

### Vision and Strategy

#### Negative impacts:

3. In relation to the plan objectives for Vision and Strategy, no negative impacts have been identified.

#### Protected characteristic(s) impacted negatively:

4. None.

#### Positive impacts:

5. The Vision and Strategy sections of the AAP set out to deliver a masterplan which achieves the strategic objectives of:
  - delivering homes, employment, green space, community facilities, play space and youth facilities;
  - addressing climate change;
  - making movement easier, more appealing and more sustainable;
  - promoting high quality design.
6. This has positive impacts for all because it considers the need and character of the local area with respect to the design of its spaces, building and land uses. The delivery of the Old Kent Road AAP masterplan creates greater cohesion between existing and new residents through the delivery of a series of open and green spaces to encourage more active travel modes and encounter, but also through the delivery of affordable homes, employment and community facilities that are accessible for all.

#### Protected characteristic(s) impacted positively:

7. All protected characteristics and those with socio-economic disadvantage shall benefit.

Mitigation:

8. Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our policies (both in the Southwark Plan and the AAP) and IIA indicators, in addition to the AMR. This to ensure we are up to date with all groups who will be impacted by development.

**Delivery**

9. The 'Delivery' objectives encompass:
- AAP1 'The Masterplan'; and
  - AAP2 'Bakerloo Line Upgrade and Extension'.

Negative impacts:

10. In relation to the plan objectives for the delivery of the Masterplan and the Bakerloo Line Extension, no negative impacts have been identified.

Protected characteristic(s) impacted negatively:

11. None.

Positive impacts:

12. The objectives for the 'Delivery' policies are very much focussed on bringing forward new development supported by public transport improvements, the Bakerloo Line Extension (and its precursor, the Bakerloop bus, as part of Phase 1) being the critical element of this. The delivery of this tube line extension will deliver improved public transport accessibility to the Old Kent Road Opportunity Area. This delivers development with higher capacity for housing, employment and other services. This also delivers benefits to local residents who can have improved access to transport, affordable housing, employment and other services for all.

Protected characteristic(s) impacted positively:

13. All protected characteristics and those with socio-economic disadvantage shall benefit.

Mitigation:

14. Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our policies (both in the Southwark Plan and the AAP) and IIA indicators, in addition to the AMR. This to ensure we are up to date with all groups who will be impacted by development.

Addressed three strands of the Public Sector Equality Duty:

15. The 'Delivery' policies address the three strands of the PSED by bringing forward new jobs and homes in the Old Kent Road Opportunity Area, while also ensures infrastructural investment is delivered in tandem to support this growth. This will

bring socioeconomic improvements for all protected characteristics, in so doing ensuring that all residents have access housing, employment, public transport and other services. This means that discrimination is mitigated against in terms of growth, infrastructural investment, and access to services.

## **Housing**

The 'Housing' objectives are encompassed by the following policies:

- AAP3 'Homes for All; and
- AAP4 'Student Housing'.

### Negative impacts:

In relation to the plan objectives for the delivery of the Housing policies, no negative impacts have been identified.

### Protected characteristic(s) impacted negatively:

16. None.

### Positive impacts:

17. The objectives for the 'Housing' policies sets out a strategy for the delivery of 20,000 new homes across the opportunity area, including a wide range of homes sizes and home types to meet the needs of local residents. This improves accessibility to quality affordable homes for all, which provides a greater sense of security and inclusion for residents. The 'Housing' policies also recognise the need for, and economic benefits brought by, Purpose Built Student Accommodation; this will deliver high quality managed accommodation for the area's student population, while also ensuring that such developments are designed to help foster mixed and inclusive communities.

### Protected characteristic(s) impacted positively:

18. All protected characteristics and those with socio-economic disadvantage shall benefit.

### Mitigation:

19. Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our policies (both in the Soutwark Plan and the AAP) and IIA indicators, in addition to the AMR. This to ensure we are up to date with all groups who will be impacted by development.

### Addressed three strands of the Public Sector Equality Duty:

20. The 'Housing' polices address the three strands of the PSED by delivery affordable housing that is available to those with protected characteristics, in so doing ensuring that all residents have access to safe and good quality housing. This means that discrimination is mitigated against in terms of housing.

### **Strong Local Economy**

21. The 'Strong Local Economy' objectives are encompassed by the following policies:
- AAP5 'Businesses and Workspace - The Bow Tie';
  - AAP6 'Life Sciences; and
  - AAP7 'Town Centre, Leisure and Entertainment'.

#### Negative impacts:

22. In relation to the plan objectives for a Strong Local Economy, no negative impacts have been identified.

#### Protected characteristic(s) impacted negatively:

23. None.

#### Positive impacts:

24. The objectives for a 'Strong Local Economy' sets out a strategy to deliver more vibrant town centres with greater employment opportunities for local residents, while leveraging the Old Kent Road Opportunity Area's location at heart of the South Central London Life Sciences district to bring more employers and businesses within this sector to the area.

#### Protected characteristic(s) impacted positively:

25. All protected characteristics and those with socio-economic disadvantage shall benefit.

#### Mitigation:

26. Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our policies (both in the Southwark Plan and the AAP) and IIA indicators, in addition to the AMR. This to ensure we are up to date with all groups who will be impacted by development.

#### Addressed three strands of the Public Sector Equality Duty:

27. The 'Strong Local Economy' policies address the three strands of the PSED by providing more vibrant town centres with greater employment opportunities (including in the emerging Life Sciences sector) that are available to those with protected characteristics. The policies ensure that all residents can participate in, and benefit from, a strong local economy. This means that discrimination is mitigated against in terms of employment and economics.

### **Movement, Parks and Healthy Streets**

28. The 'Movement, Parks and Healthy Streets' objectives are encompassed by the following policies:

- AAP8 'Movement – People, Place, Experience'; and
- AAP9 'The Greener Belt – Parks and Healthy Streets'.

Negative impacts:

29. In relation to the plan objectives for Movement, Parks and Healthy Streets, no negative impacts have been identified.

Protected characteristic(s) impacted negatively:

30. None.

Positive impacts:

31. The objectives for Movement, Parks and Healthy Streets sets out a strategy for the prioritising of walking and cycling and the delivery of inclusive and accessible streets and public realm. This will be complemented by enhancements to, and delivery of brand new, parks; some of these new open spaces will link together, creating a green spine east-to-west through the Opportunity Area, providing quieter and safer routes for active travel.
32. Policy AAP8 promotes car free development with the exception of disabled car parking spaces. It also sets out a servicing strategy that places preference on off-street servicing, consolidation and promotion of deliveries by cargo bikes and quadricycles – all of which will create cleaner, greener and more welcoming spaces to travel through for all sections of society.

Protected characteristic(s) impacted positively:

33. All protected characteristics and those with socio-economic disadvantage shall benefit.

Mitigation:

34. Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our policies (both in the Southwark Plan and the AAP) and IIA indicators, in addition to the AMR. This to ensure we are up to date with all groups who will be impacted by development.

Addressed three strands of the Public Sector Equality Duty:

35. The 'Movement, Parks and Healthy Streets' policies address the three strands of the PSED by providing greater access to public open space and sustainable modes of public transport, while reducing the amount of motorised traffic (and the dominance this has on the local environment) . These greener and cleaner spaces, as well as the major new public transport infrastructure, will be fully available to those with protected characteristics. This means that discrimination is mitigated against in terms of movement and access to open space.

**Design**



36. The 'Design' objectives are encompassed by the following policies:
- AAP10 'Tall Buildings - The Stations and the Crossings';
  - AAP11 'Character and Heritage'; and
  - AAP12 'Design'.

Negative impacts:

37. In relation to the plan objectives for Design, no negative impacts have been identified.

Protected characteristic(s) impacted negatively:

38. None.

Positive impacts:

39. The objectives for Design sets out a strategy for the delivery of inclusive and accessible buildings that also delivers proper amenity and communal open spaces. These buildings are to be high quality and form part of coherent town- and street-scapes, aiding wayfinding and legibility for all.

Protected characteristic(s) impacted positively:

40. All protected characteristics and those with socio-economic disadvantage shall benefit.

Mitigation:

41. Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our policies (both in the Southwark Plan and the AAP) and IIA indicators, in addition to the AMR. This to ensure we are up to date with all groups who will be impacted by development. These policies are also designed to respond to the local character and landmarks in the Old Kent Road Opportunity Area to promote a sense of place for all.

Addressed three strands of the Public Sector Equality Duty:

42. The 'Design' policies address the three strands of the PSED by delivering inclusive and accessible buildings that achieve a high quality of design and form part of coherent town- and street-scape. This high quality design will be enjoyed by those with protected characteristics. This means that discrimination is mitigated against in terms of design.

### **Climate and Environmental Quality**

43. The 'Climate and Environmental Quality' objectives are encompassed by the following policies:
- AAP13 'Climate Emergency'; and
  - AAP14 'Water Management, Air and Noise Quality'.

Negative impacts:

44. In relation to the plan objectives for Climate and Environmental Quality, no negative impacts have been identified.

Protected characteristic(s) impacted negatively:

45. None.

Positive impacts:

46. The objectives for Climate and Environmental Quality sets out a strategy for the delivery of green spaces to address the deficiency of open and green space currently in the Old Kent Road Opportunity Area, along with a strategy for tackling the Climate Emergency. This delivers spaces for recreation and exercise that are accessible to all, while ensuring new development plays its part in minimising emissions and creating an environment that mitigates against --and is adapted to-- climate change and global warming

Protected characteristic(s) impacted positively:

47. All protected characteristics and those with socio-economic disadvantage shall benefit.

Mitigation:

48. Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our policies (both in the Southwark Plan and the AAP) and IIA indicators, in addition to the AMR. This to ensure we are up to date with all groups who will be impacted by development.

Addressed three strands of the Public Sector Equality Duty:

49. The 'Climate and Environmental Quality' policies address the three strands of the PSED by delivering inclusive and accessible buildings that achieve a high quality of design and form part of coherent town- and street-scape. This high quality design will be enjoyed by those with protected characteristics. This means that discrimination is mitigated against in terms of climate and environment.

**Great Start in Life**

50. The 'Great Start in Life objectives are encompassed by the following policies:
- AAP15 'Great Start in Life'; and
  - AAP16 'Child and Youth Provision'.

Negative impacts:

51. In relation to the plan objectives for Best start in life no negative impacts have been identified.

Protected characteristic impacted negatively:

52. None.

Positive impacts:

53. The plan objectives for Great Start in Life sets out a strategy for the delivery of community facilities, play space and education for children and youth in the Old Kent Road opportunity Area. This addresses the need to provide safe spaces for young people and to improve recreation and education opportunities. By improving these facilities for young people, other residents also benefit from improved facilities and accessible space.

Protected characteristic impacted positively:

54. All protected characteristics and those with socio-economic disadvantage shall benefit.

Mitigation:

55. Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our policies (both in the Southwark Plan and the AAP) and IIA indicators, in addition to the AMR. This to ensure we are up to date with all groups who will be impacted by development.

Addressed three strands of the Public Sector Equality Duty:

56. The 'Great Start in Life' policies address the three strands of the PSED by delivering inclusive and accessible community facilities, play space and education for children and youth available to those with protected characteristics. This means that discrimination is mitigated against in education, recreation and community engagement.

**Sub areas and site allocations**Sub Areas 1-5:

57. All Sub Areas were acknowledged to have a positive impact across all protected characteristic groups, as these all broadly aim to:

- deliver housing where appropriate to meet local need;
- improve walking and cycling connectivity; and
- preserve and enhance character.

58. These aims help to achieve regeneration for all, ensuring that neighbourhoods are improved for everyone to feel pride in their communities.

59. The masterplans for each sub area aim to promote wellbeing and reduce inequalities so that everyone is able to benefit from regeneration..

Negative impacts:

60. In relation to Sub Areas 1, 2, 3, 4 and 5 no negative impacts have been identified for any of the protected characteristics.

Protected characteristic(s) impacted negatively:

61. None.

Positive impacts:

62. By producing a masterplan for each sub area and site allocation, the Old Kent Road AAP can respond to the needs in the local area. The masterplan is delivering a number of affordable homes, jobs, education and community facilities that are accessible to local residents. Connectivity is also a crucial element that has been considered alongside movement, to encourage safer and more active travel modes. Recognition of the current green and open space deficiency in the Opportunity Area has also informed the sub areas and site allocations – the benefits of this (a range of enhanced and new parks, the Trim Trail, the potential lido etc.) will be available to all with protected characteristics.

Protected characteristic(s) impacted positively:

63. All protected characteristics and those with socio-economic disadvantage shall benefit.

Mitigation:

64. Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our policies (both in the Southwark Plan and the AAP) and IIA indicators, in addition to the AMR. This to ensure we are up to date with all groups who will be impacted by development.

Addressed three strands of the Public Sector Equality Duty:

65. The sub areas and site allocations address the three strands of the PSED by setting how a number of affordable homes, jobs, education and community facilities will be delivered across the OA, ensuring that they are accessible to those with protected characteristics. This means that discrimination is mitigated against in across all the plan objectives.

**Conclusion on how the AAP addresses the Public Sector Equality Duty**

66. In conclusion, all the policies and sub-areas within the AAP cumulatively address the three strands of the PSED.
67. With regard to the first strand, the policies have due regard to eliminating unlawful discrimination in housing, employment and the public realm by delivering a range of affordable and accessible homes, workspace and employment.

68. With regard to the second strand, the policies have due regard to advance equality of opportunity between people who share a protected characteristic and those who do not. This is achieved through the delivery of education, training and community facilities that are accessible for all. This ensures greater opportunity for all to access improved amenities and services. By supporting the local economy to grow and provide more diverse employment opportunities for local people, it also promotes equality of opportunity for local residents.
69. With regard to the third strand, the policies have due regard to foster or encourage good relations between people who share a protected characteristic and those who don't. This is achieved through improving mobility and connectivity for all residents, along with new community and town centre facilities designed to foster integration and community cohesion.



Old Kent Road Area Action Plan  
Proposed Submission Version  
October 2024  
Equalities Impact Assessment

**EQIA Document 03: Equalities Impact Assessment**

Old Kent Road Area Action Plan 2024 appendices: Document Locator	
No.	Title
Appendix A	Old Kent Road AAP 2024
Appendix B	Consultation Plan
Appendix C	Consultation Report
Appendix D	Integrated Impact Assessment
Appendix E	Habitats Regulations Assessment
Appendix F	Equalities Impact Assessment, comprising:
	- EQIA Document 01: Executive Summary
	- EQIA Document 02: Summary of the EQIA
	- EQIA Document 03: Equalities Impact Assessment
	- EQIA Document 04: Supporting Datasets
Appendix G	Health Impact Assessment

## Guidance notes

### Things to remember:

1. Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the effect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:
  - Decision-makers are aware of the general equality duty's requirements;
  - The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken;
  - We consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process;
  - We have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty;
  - We review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty;
  - We take responsibility for complying with the general equality duty in relation to all their relevant functions - responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf; and
  - We consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.
  
2. Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:
  - Consider all the protected characteristics and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies);
  - Use equality analysis to inform policy as it develops to avoid unnecessary additional activity;
  - Focus on understanding the effects of a policy on equality and any actions needed as a result, not the production of a document;
  - Consider how the time and effort involved should relate to the importance of the policy to equality;
  - Think about steps to advance equality and good relations as well as eliminate discrimination;
  - Use good evidence (where it isn't available, take steps to gather it, where practical and proportionate);
  - Use insights from engagement with employees, service users and others who can help provide evidence for equality analysis;
  - Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision

might affect different communities in Southwark and to consider any implications for equality and diversity.

3. The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present within divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme.
4. Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments. Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and [www.southwarkadvice.org.uk](http://www.southwarkadvice.org.uk)).
5. Whilst the equality analysis is being considered, Southwark Council recommends considering health and wellbeing implications, as health and health inequalities are strongly influenced by the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce health inequalities and this is reflected in its values and aims. For this reason, the council recommends considering health and wellbeing impacts in all equality analyses, not forgetting to include identified potential mitigating actions.



## Section 1: Equality analysis details and contents

<b>Proposed policy/decision/business plan to which this equality analysis relates</b>			Old Kent Road Area Action Plan		
<b>Equality analysis author</b>			Patrick Cronin		
<b>Strategic Director</b>			Stephen Platts		
<b>Department</b>			Finance	<b>Division</b>	Planning
<b>Date of analysis</b>			April to August 2024		
<b>Sign-off</b>	Colin Wilson	<b>Position</b>	Head, Strategic Applications and Old Kent Road Planning and Growth	<b>Date</b>	TBC

## Section 2: Brief description of policy/decision/business plan

### The Old Kent Road Area Action Plan

6. The Old Kent Road Area Action Plan (AAP) will, once adopted, form part of the Development Plan for the borough of Southwark. It will sit alongside the Local Plan, Area Action Plans, Adopted Policies Map, Adopted Neighbourhood Plans and the London Plan.
7. This site specific policy document aims to manage the growth and development of the Old Kent Road Opportunity Area (OA) to nurture and develop the thriving businesses, arts and cultural communities. It aims to be innovative and guide new development to provide urgently needed housing and jobs. The plan proposes co-locating residential uses with industrial and commercial uses, applying innovative architectural and environmental design to ensure new and existing businesses can co-exist with new homes.
8. By virtue of the location, connections and existing uses, evolving character and development potential, the Old Kent Road OA is well placed to absorb growth. This is recognised by the London Plan, which identifies the Old Kent Road OA in two major growth areas: Central London and the Bakerloo Line Extension (BLE) Growth Corridor.
9. The efficient delivery of quality development in the Old Kent Road OA will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions towards the cost of the BLE.
10. The Old Kent Road AAP and the Southwark Plan must be in conformity with the London Plan and the National Planning Policy Framework (NPPF). The Old Kent Road AAP is also an Opportunity Area Planning Framework which may be endorsed by the Mayor of London.

### The Equalities Analysis

11. This Equalities Assessment will assess the following policies:
  - Vision
  - Strategy
  - AAP1: The Masterplan
  - AAP2: Bakerloo Line Upgrade and Extension
  - AAP3: Homes for All
  - AAP4: Student Homes
  - AAP5: Businesses and Workspace - The Bow Tie
  - AAP6: Life Sciences
  - AAP7: Town Centres, Leisure and Entertainment
  - AAP8: Movement - People, Place, Experience
  - AAP9: The Greener Belt - Parks and Healthy Streets
  - AAP10: Tall Buildings - The Stations and the Crossings
  - AAP11: Character and Heritage

- AAP12: Design
- AAP13: Climate Emergency
- AAP14: Water management, air and noise quality
- AAP15: Great Start in Life
- AAP16: Child and Youth Provision
- Sub Area 1
- Sub Area 2
- Sub Area 3
- Sub Area 4
- Sub Area 5

### **Summary of overall assessment**

12. The Old Kent Road AAP aims to co-ordinate development in the Old Kent Road OA to ensure it delivers direct benefits to local people, specifically regarding the provision of affordable housing and jobs for all.
13. In terms of socioeconomic background, the Old Kent Road AAP aims to improve the quantity and quality of affordable housing and employment to help those who are disadvantaged.
14. In terms of youth provision and community uses, the Old Kent Road AAP aims to deliver more spaces for community uses and improve the provision of educational facilities.
15. These interventions have positive impacts for all protected characteristics and cumulatively reduce inequality.

### Section 3: Service users and stakeholders

Service users and stakeholders	
<p><b>Key users of the department or service</b></p>	<ul style="list-style-type: none"> <li>• Members of the public;</li> <li>• Councillors;</li> <li>• Developers;</li> <li>• Local Authorities;</li> <li>• Housing Associations;</li> <li>• Greater London Authority;</li> <li>• Transport for London;</li> <li>• Thames Water;</li> <li>• Metropolitan Police;</li> <li>• LBS Chief Executive's Department;</li> <li>• LBS Children's and Adult's Services Department;</li> <li>• LBS Environment and Leisure Department;</li> <li>• LBS Finance and Governance Department;</li> <li>• LBS Flood and Drainage Department;</li> <li>• LBS Housing and Modernisation Department;</li> <li>• LBS Public Health.</li> </ul>
<p><b>Key stakeholders were/are involved in this policy/decision/business plan</b></p>	<ul style="list-style-type: none"> <li>• Members of the public;</li> <li>• Councillors;</li> <li>• Developers;</li> <li>• Local Authorities;</li> <li>• Housing Associations;</li> <li>• Greater London Authority;</li> <li>• Transport for London;</li> <li>• Thames Water;</li> <li>• Metropolitan Police;</li> <li>• LBS Chief Executive's Department;</li> <li>• LBS Children's and Adult's Services Department;</li> <li>• LBS Environment and Leisure Department;</li> <li>• LBS Finance and Governance Department;</li> <li>• LBS Flood and Drainage Department;</li> <li>• LBS Housing and Modernisation Department;</li> <li>• LBS Public Health.</li> </ul>

## Section 4: Pre-implementation equality analysis

16. This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken.
17. The first column on the left is for societal and economic issues (discrimination, higher poverty levels) and the second column on the right for health issues, physical and mental. As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that health is given special consideration, as it is the Council's declared intention to reduce health inequalities in the borough.

<b><u>AGE</u></b>	
Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).	
<b>Societal and economic issues</b>	<b>Health issues</b>
Potential impacts (positive and negative) of proposed policy	Potential impacts (positive and negative) of proposed policy
<b>Vision</b>	<b>Vision</b>
<p>The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel enhancements (for Phase 1) and the BLE (Phase 2).</p> <p>Furthermore the Vision recognises the need for more innovative approaches to supporting the positive growth of communities by encouraging integration of different age groups. One example is the benefits of co-location of nurseries and older person's accommodation to reduce social isolation.</p>	<p>Three key components of the Vision are:</p> <ul style="list-style-type: none"> <li>• delivering the Greener Belt;</li> <li>• delivering the Bakerloo Line Extension; and</li> <li>• revitalising and diversifying the Old Kent Road into a thriving Healthy High Street;</li> </ul> <p>all of which seek to promote sustainable transport behaviours amongst all age groups within the local population. This will have direct positive health impacts.</p> <p>The Greener Belt strategy, in providing a network of generous open spaces and walking and cycling routes, seeks to promote health and wellbeing for all age groups. This will be particularly beneficial for younger people amongst whom there are higher than average levels of obesity in the Old Kent Road OA.</p>

	<p>The Vision also recognises how good design and co-location of certain uses can provide wider societal benefits for mental health and wellbeing, especially for the elderly.</p> <p>More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.</p>
<p><b>Strategy</b></p> <p>The Strategy demonstrates positive social impacts through these key objectives:</p> <ul style="list-style-type: none"> <li>• the co-location of nurseries, primary schools and older people’s accommodation;</li> <li>• the provision of older people’s specialist housing (such as the over-55s housing at the Tustin Estate); and</li> <li>• a new network of youth facilities (including supporting the existing facilities at 231 Old Kent Road and Leyton Square).</li> </ul> <p>These will all promote intergenerational wellbeing and foster good relations. The network of youth facilities will provide social spaces that encourage young people from all backgrounds to mix.</p>	<p><b>Strategy</b></p> <p>The Strategy aims to enhance the environment and encourage physical activity to improve wellbeing for all, regardless of age. This demonstrates positive health impacts.</p> <p>The 20,000 new homes, 10,000 new jobs and other major infrastructure that the Strategy seeks to deliver will produce carbon emissions and generate environmental conditions (noise, dust etc.) that could present negative health impacts for people of all ages. The age groups most vulnerable to these impacts are the young and the elderly<sup>1</sup>. However, when the full range of mitigation secured across the various policies (examples being construction environmental management plans, emission minimisation through sustainable design, delivering biodiversity net gain, and achieving air quality neutrality) is taken account of, there would be an overall positive impact.</p>
<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for</p>	<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and</p>

<sup>1</sup> ‘United Nations Environment Programme - Young and old, air pollution affects the most vulnerable’, accessible from <https://www.unep.org/news-and-stories/blogpost/young-and-old-air-pollution-affects-most-vulnerable>

<p>housing, employment, infrastructure and community uses. This ensures greater access to housing, jobs and local services for all age groups.</p>	<p>improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all age groups.</p>
<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p> <p>AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. These upgrades will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. This ensures equality of access to opportunity, amenities and services for all age groups.</p>	<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p> <p>New and improved public transport infrastructure will reduce reliance on private motor vehicles, in turn improving air quality and health outcomes for all age groups.</p>
<p><b>AAP3: Homes for all</b></p> <p>AAP3 demonstrates positive impacts by building 10% of new homes as accessible and helping vulnerable people find the right housing to meet their needs so they can live independently. In the latter respect, the policy expressly references the need to deliver dedicated over-55s housing within the OA. This improves the provision/availability of specialist fit-for-purpose modern housing for mature citizens. This is particularly relevant to the Old Kent Road OA, where of all seven indices of deprivation, the 2019 IMD found “quality of living environment” to be the poorest performing metric in this location</p>	<p><b>AAP3: Homes for all</b></p> <p>AAP3, by seeking to deliver high quality housing for those of all ages, including specialist (sometime managed) forms of housing for mature citizens, will provide comfortable living environments where residents feel a greater sense of security in their home. This has positive benefits for mental wellbeing, and improves quality of life.</p>
<p><b>AAP4: Student homes</b></p> <p>AAP4 demonstrates positive economic impacts by encouraging investment from higher education providers, who make a significant contribution to the</p>	<p><b>AAP4: Student homes</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP4.</p>

<p>borough's economy and labour market. PBSA can also bring indirect benefits by increasing spend in local businesses. This benefits those of working age.</p> <p>The policy also positively impacts young adults by ensuring high quality housing options are available to the borough's student population.</p> <p>AAP4 places a strong focus on ensuring the student demographic is integrated with the existing and future residential communities. This will help promote good neighbourhood relations between, for example, children in their mid-teens and university-age young people. Many developments consented and built in the OA incorporate co-working space for the students that is also available for a charge to remote-working professionals; this hybrid customer base brings people of working age into contact with the student demographic. This brings a positive age-related social impact.</p>	<p>There are more general mental and physical health benefits in widening access to high quality (safe, comfortable, professionally managed, community-oriented etc.) housing for the borough's student population.</p>
<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>AAP5 demonstrates positive socioeconomic impacts for people of working age by making provisions for current business occupiers of the Old Kent Road OA. The policy ensures that current and future businesses are considered in the regeneration of Old Kent Road OA.</p>	<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP5.</p>
<p><b>AAP6: Life sciences</b></p> <p>The aim of AAP6 is for the Old Kent Road OA to play a key role in establishing south central London as a world-recognised district for life sciences expertise and innovation. This will have positive impacts for those of working age because it will complement and support existing business in the life sciences and related sectors, while also bringing new life sciences business to</p>	<p><b>AAP6: Life sciences</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP6.</p>



<p>the area, expanding and diversifying the local jobs market. Importantly, these new employment opportunities for local working-age people will be in a higher skilled and paid sector.</p>	
<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>AAP7 aims to transform town centres. This illustrates positive impacts for those of all ages because it aims to deliver a range of shops and amenities to meet daily needs, clustered in two key locations benefiting from high public transport accessibility and high quality and inclusive public realm. By locating essential amenities together it improves accessibility for all ages.</p> <p>The policy promotes the provision of increased seating to provide resting points for people of all ages and abilities, making it easier for people to get out and engage in town centre social life without necessarily needing to spend money. The policy also seeks to deliver a greater provision of leisure facilities through the night- and well as the day-time, thereby better meeting the wide-ranging needs of all age groups.</p> <p>The town centre strategy seeks to retain/re-provide the various large supermarkets that line the Old Kent Road high street. In part, this is to safeguard the continued operation of free-to-access public toilets within these large retail premises (something that Policy P35 of the Southwark Plan also requires for main town centre uses that are 1,000 sq.m or more GIA). The provision of public toilets makes for a more comfortable and dignified town centre experience for all, in particular older citizens. This has positive social impacts.</p>	<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>AAP7 seeks to deliver a new NHS health hub to serve the area's growing population. This will bring major benefits for all age groups, providing integrated primary health, community health and social care support. In promoting a shift towards co-ordinated and holistic care in this way, AAP7 responds to the increase in the number of people in the borough with multiple long-term conditions, in part a consequence of the ageing population.</p>
<p><b>AAP8: Movement - People, Place and Experience</b></p>	<p><b>AAP8: Movement - People, Place and Experience</b></p>

<p>AAP8 demonstrates positive societal impacts for all, but especially young people in its aim to deliver cycle routes where unaccompanied 12 year olds can confidently cycle, such as the Trim Trail in Sub-Area 3, which will improve their sense of independence.</p> <p>Improved access to sustainable forms of public transport will also positively impact older residents; this is because it will make it easier for them get out into, and play a more active socioeconomic role in, the local community.</p>	<p>AAP8 demonstrates positive impacts for health because it encourages a change in travel habits to more active modes of travel, which will promote healthier lifestyles for all age groups. By delivering dedicated cycle lanes and more crossing points in the OA, the policy will also improve cyclist and pedestrian safety across all age groups.</p> <p>Furthermore, a reduction in vehicle dependence and supporting a shift to electric vehicles will improve air quality (because it involves less combustion), which in turn will reduce the risk of respiratory related illness, especially in the more vulnerable age groups (i.e. the young and the elderly).</p>
<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>AAP9 aims to illustrate positive impacts by delivering new play spaces in the Old Kent Road OA, as part of the Council's promise to have a top quality playground in every neighbourhood<sup>2</sup>. This encourages children to play and be active in a safe environment.</p> <p>More generally, the provision of new and improved parks and open spaces across the OA will have social benefits for all age groups by reducing social isolation and fostering interaction.</p>	<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>AAP9 delivers positive health benefits for all because it creates greens spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing for people of all ages. This should have positive impacts for young people in particular, amongst whom there are higher levels of obesity.</p>
<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>AAP10 illustrates positive impacts for all by ensuring tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.</p>	<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP10.</p>

<sup>2</sup> 'Southwark Council's Delivery Plan 2022-2026', accessible from <https://modern.gov.southwark.gov.uk/documents/s108711/Appendix%201%20Council%20Delivery%20Plan.pdf>

<p><b>AAP11: Character and heritage</b></p> <p>AAP11 illustrates positive impacts, as it conserves key landmarks and valuable historical buildings. This ensures that areas remain legible and easily navigable, and that the area as a whole remains familiar, which is particularly important for the elderly. Legible and easy-to-navigate urban environments are also beneficial for young people to gain independence and familiarity with the place they live in, which again brings positive social impacts.</p>	<p><b>AAP11: Character and heritage</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP11.</p>
<p><b>AAP12: Design</b></p> <p>AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road OA but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all ages. This ensures greater accessibility for all.</p> <p>The focus the policy gives to increased permeability and enhanced frontages will make non-vehicular movement through the Old Kent Road OA easier. The policy also aims to create places that are less hostile and more appealing with a greater sense of safety, which will be socially beneficial for all age groups.</p>	<p><b>AAP12: Design</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP12.</p> <p>More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all age groups lead healthier lifestyles.</p>
<p><b>AAP13: Climate Emergency</b></p> <p>AAP13 demonstrates positive impacts for all by ensuring new development responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:</p> <ul style="list-style-type: none"> <li>• improving air quality;</li> <li>• creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and</li> </ul>	<p><b>AAP13: Climate Emergency</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP13. There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing for people of all ages.</p>

<ul style="list-style-type: none"> <li>• reducing global warming.</li> </ul> <p>All of the aforementioned have beneficial impacts for local residents of all ages.</p>	
<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 illustrates positive impacts for all ages by ensuring development has met high environmental standards and promotes more active, public and sustainable travel modes to reduce pollution. Young children and the elderly are more susceptible to the effects of poor air quality and low environmental quality.</p> <p>This policy aims to improve the conditions across the OA to ensure a cleaner, greener, and safer environment for all ages.</p>	<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.</p> <p>It also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely.</p> <p>The policy also reinforces high standards of residential design to ensure that homes, including homes co-located with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.</p> <p>Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all age groups within the local population.</p>
<p><b>AAP15: Great start in life</b></p> <p>AAP15 demonstrates positive impacts for all by providing accessible and affordable access to youth facilities. The aim of this policy is to support the freedom of children and young people to occupy and move around the public realm independently. This encourages greater community cohesion and supports children and young people's</p>	<p><b>AAP15: Great start in life</b></p> <p>AAP15 demonstrates positive health impacts for children and young people by improving school grounds and outdoor areas where they can play, exercise and engage with habitats and food growing. Locating places of education away from main roads helps to reduce the risk of developing respiratory illness or difficulties later in life.</p>

<p>independence improving their development, teaching and learning.</p>	
<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive impacts by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm where children and young people can congregate and exercise, which promotes social cohesion within and between age groups.</p>	<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive health impacts by providing new and improved existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle —attendant with which are mental and physical benefits— amongst young people.</p>
<p><b>Sub area and site allocations</b></p> <p>Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have positive impacts for all.</p>	<p><b>Sub area and site allocations</b></p> <p>There are no specific identifiable impacts on health for Sub Areas.</p> <p>More generally, the proposed enhancements to —and delivery of new— green and open spaces within the sub areas will have positive health impacts for all.</p>
<p><b>Sub Area 1</b></p> <p>Sub Area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. In particular, this will have positive economic impacts for those of working age. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.</p> <p>The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian</p>	<p><b>Sub Area 1</b></p> <p>There are no specific identifiable impacts on health for Sub Area 1.</p> <p>More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all ages groups, not least children who will benefit from safer and healthier environments for play and recreation. This has positive mental and physical health effects.</p>

<p>friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts on all ages.</p> <p>The community facility at 231 Old Kent Road, which has now been operational for over five years, will have particular positive social impacts for young people.</p>	
<p><b>Sub Area 2</b></p> <p>In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities –which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and OKR11– will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts inter- and intra- all age groups.</p> <p>The proposed partial closure of Marlborough Grove (outside Phoenix Primary School) to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for those who have a disability (as well as their carers and families). Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life.</p>	<p><b>Sub Area 2</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 2.</p> <p>More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.</p>
<p><b>Sub Area 3</b></p> <p>Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be</p>	<p><b>Sub Area 3</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 3.</p>

<p>delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.</p> <p>Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by co-location.</p> <p>ORK13 is the site allocation identified for a potential new school; however, this is very much a fall-back option, the preferred option (as set out in AAP16) being to expand existing schools as necessary to meet demand. After years on ongoing dialogue between the Council and local schools, the 'Great Start in Life' policy in its 2024 iteration seeks to avoid school place overprovision arising. Overprovision would result in under-admission, which could cause school closure and pupil displacement. This would be disruptive to family life and run counter to the community cohesion aspirations that run through the AAP as a whole. In this regard, Sub-Area 3 demonstrates positive impacts on the school-age population.</p>	<p>More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.</p>
<p><b>Sub Area 4</b></p> <p>Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been</p>	<p><b>Sub Area 4</b></p> <p>An example of how this Sub-Area seeks to generate positive health impacts for different groups includes the new high quality over-55s housing at the Tustin Estate.</p>

<p>undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.</p>	
<p><b>Sub Area 5</b></p> <p>Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated; this has positive impacts in particular for the working age population.</p>	<p><b>Sub Area 5</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 5.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Health data on which above analysis is based</b></p>
<p>The above analysis is based on equality information and health data sets as set out in:</p> <ul style="list-style-type: none"> <li>• Appendix 3 '<i>Baseline data – Facts and Figures</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission; and</li> <li>• Appendix 9 '<i>Baseline Indicators Table</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.</li> </ul> <p>Where references are made in the above analysis to any equality information and health data not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).</p> <p>It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of age, are listed alongside each indicator:</p> <ul style="list-style-type: none"> <li>• IIA01: AAP3, AAP4, AAP5, AAP6, AAP7</li> <li>• IIA02: AAP15, AAP16</li> <li>• IIA03: AAP8, AAP9</li> <li>• IIA04: AAP12</li> <li>• IIA05: AAP4, AAP9, AAP15, AAP16</li> </ul>	



- IIA06: AAP8, AAP12, AAP13, AAP14
- IIA07: AAP8, AAP13, AAP14
- IIA08: AAP12, AAP13, AAP14
- IIA09: AAP12, AAP14
- IIA010: AAP14
- IIA011: AAP10, AAP11, AAP12, AAP14
- IIA012: AAP10, AAP11, AAP12,
- IIA013: AAP9, AAP14
- IIA014: AAP14
- IIA015: AAP3, AAP4
- IIA016: AAP8, AAP13
- IIA017: AAP1, AAP2

### **Mitigating actions to be taken**

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

## **DISABILITY**

A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

### **Societal and economic issues**

Potential impacts (positive and negative) of proposed policy

### **Health issues**

Potential impacts (positive and negative) of proposed policy

### **Vision**

The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel enhancements (for Phase 1) and the BLE (Phase 2).

Furthermore, the Connecting Communities strand of the Vision

### **Vision**

Three key components of the Vision are:

- delivering the Greener Belt;
- delivering the Bakerloo Line Extension; and
- revitalising and diversifying the Old Kent Road into a thriving Healthy High Street;

all of which seek to promote sustainable transport behaviours amongst all groups within the local population. This will have direct positive health impacts.

<p>recognises the need for more innovative approaches to supporting the positive growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population. Other forms of co-location particularly relevant to those with a disability include co-locating nurseries and older person's accommodation to help reduce social isolation amongst the elderly.</p>	<p>The Greener Belt vision, in linking together the area's green spaces and creating new cycle- and pedestrian-friendly links across the OA, will provide opportunities for disabled people to make sustainable journeys more easily and comfortably, which has positive physical and mental health impacts.</p> <p>The Vision also recognises how high quality and community-oriented design, as well as the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for the most vulnerable and those demographic groups that experience higher levels of social isolation.</p> <p>More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.</p>
<p><b>Strategy</b></p> <p>Rates of unemployment and poverty are higher amongst disabled people while rates of private home ownership are lower. Thus, the strategy of providing at least 5,000 social rented homes in the period to 2042, of which a proportion will be wheelchair user homes, will have positive impacts for this particular demographic.</p> <p>Town centres are particularly important for disabled people in terms of local participation and social integration<sup>3</sup>. The Strategy, in seeking to creating two revitalised district town centres along the course of the Old Kent Road high street, will mean all disabled residents of the OA are within a short journey time</p>	<p><b>Strategy</b></p> <p>The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-- promotes a greater sense of security, comfort and confidence when using the public realm. This improves mental wellbeing for all.</p> <p>In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and 'head room', allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for those with a disability living in the Old Kent Road OA.</p>

<sup>3</sup> 'Mayor of London's High Street Adaptive Strategies', accessible from: [https://www.london.gov.uk/sites/default/files/ggbd\\_high\\_streets\\_adaptive\\_strategies\\_web\\_compressed\\_0.pdf](https://www.london.gov.uk/sites/default/files/ggbd_high_streets_adaptive_strategies_web_compressed_0.pdf)

<p>of a local shopping, leisure and recreational hub. This will have positive social impacts.</p>	<p>The 20,000 new homes, 10,000 new jobs and other major infrastructure that the Strategy seeks to deliver will produce carbon emissions and generate environmental conditions (noise, dust etc.) that could present negative health impacts for people with disabilities and other pre-existing medical conditions. However, when the full range of mitigation secured across the various policies (examples being construction environmental management plans, emission minimisation through sustainable design, delivering biodiversity net gain, and achieving air quality neutrality) is taken account of, there would be an overall positive impact.</p>
<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure, services and community uses.</p> <p>AAP1 gives focus to the co-location approach and the revitalisation of the high street to provide two town centre hubs (the latter seeking to cluster services, shopping and leisure/recreation outlets). Both of these masterplan elements are particularly important for the disabled, who are more likely to encounter difficulty accessing services in person compared with non-disabled people, with travel (both in terms of time and ease) being a contributing factor<sup>4</sup>.</p>	<p><b>AAP1: The Masterplan</b></p> <p>The Greener Belt strategy --which seeks to provide a network of enhanced and new outdoor spaces and routes across the OA that are well-designed and accessible-- will enable those who use a wheelchair or are less ambulant due to disability to move around as freely and easily as cyclists and those on foot. It will also bring those with disabilities into greater contact with nature, which has proven mental health benefits<sup>5</sup>.</p>
<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p>	<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p>

<sup>4</sup> 'Disabled people's access to products and services, Great Britain: February to March 2022', accessible from:

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/disabledpeoplesaccesstoproductsandservicesgreatbritain/februarytomarch2022#main-points>

<sup>5</sup> 'Nature: How connecting with nature benefits our mental health', accessible from:

<https://www.mentalhealth.org.uk/sites/default/files/2022-06/MHAW21-Nature-research-report.pdf>

<p>AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure.</p> <p>Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure, fully accessible to all irrespective of physical or mental impairment, which will provide reduced travel times into central London and beyond. This ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.</p> <p>The pre-BLE public transport intervention of the 'Bakerloop Bus' will improve public transport accessibility for all, including those with a disability. This is particularly important in the Old Kent Road OA, as it suffers from some of the lowest Public Transport Accessibility Level ratings in the borough.</p>	<p>The provision of step-free tube stations, platforms and rolling stock as part of the BLE will make taking public transport a more comfortable and dignified experience for disabled people. The 'Bakerloop Bus' will also be disabled friendly. In seeking to provide modern and inclusive public transport infrastructure, AAP2 has positive mental health impacts for this particular protected group.</p>
<p><b>AAP3: Homes for all</b></p> <p>Overarching policies regarding housing for those with disabilities in the Southwark Plan 2022 apply.</p> <p>AAP3 demonstrates positive impacts by reiterating the Southwark Plan policy to build 10% of new homes as accessible and adaptable homes for wheelchair users and homes for people with physical and mental health needs. This improves the provision/availability of specialist housing for those with a disability. This is particularly relevant to the Old Kent Road OA, where of all seven indices of deprivation, the 2019 IMD found "quality of living environment" to be the poorest performing metric in this location.</p>	<p><b>AAP3: Homes for all</b></p> <p>AAP3, by ensuring specific provision is made for those with disability, contributes to a greater sense of security and independence in the home, which has positive benefits for mental wellbeing. The policy (and the corresponding Southwark Plan policy) requires homes to be distributed amongst non-wheelchair dwellings within new developments, in part to encourage resident interaction. This helps foster community and reduce sense of isolation. This is particularly important with regards to those who have a disability, for whom levels of</p>

<p>More generally, AAP3 seeks to deliver positive social impacts for disabled people by ensuring new homes provide high quality living environment through things like:</p> <ul style="list-style-type: none"> <li>• generous room sizes (for ease of movement);</li> <li>• appropriate fit-out specifications (for the practicality of day-to-day life); and</li> <li>• pleasant spatial qualities such as high ceilings, good levels of acoustic insulation and large windows (all of which can aid mental health).</li> </ul>	<p>chronic loneliness are higher than the rest of the population<sup>6</sup>.</p>
<p><b>AAP4: Student homes</b></p> <p>AAP4 demonstrates positive impacts by requiring new PBSA developments to provide at least 5% of the homes as wheelchair accessible and adaptable. Furthermore, in encouraging PBSA developments to provide communal and community-facing facilities, the policy promotes good relations between disabled people and the wider community.</p>	<p><b>AAP4: Student homes</b></p> <p>In placing emphasis on high quality design, AAP4 seeks to ensure PBSA provides comfortable, practical, restful and uplifting living environments for all. Additionally, the policy promotes where possible the provision of outdoor amenity space for PBSA occupiers. All of these measures help support mental wellbeing and physical activity amongst disabled students.</p>
<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>AAP seeks to deliver 10,000 new jobs across the OA, bringing greater employment opportunities for local adults, including those with a disability. This would be a positive economic impact on this demographic group.</p>	<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP5 for disabled people.</p>
<p><b>AAP6: Life sciences</b></p> <p>AAP6 may have positive impacts for disabled people by bringing new life sciences businesses to the area,</p>	<p><b>AAP6: Life sciences</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP6 for disabled people.</p>

<sup>6</sup> 'Fear of mental health crisis as loneliness rises dramatically amongst disabled people', accessible from <https://www.sense.org.uk/media/latest-press-releases/loneliness-rises-dramatically-among-disabled-people/>; 'Outcomes for disabled people in the UK: 2021', accessible from: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcomesfordisabledpeopleintheuk/2021>

expanding and diversifying the local jobs market.	
<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>AAP7 demonstrates positive impacts for all because it aims to transform the high street into a new destination which connects neighbourhoods on both sides of the Old Kent Road high street. These improvements in connectivity will enhance legibility and, along with the intention to deliver more seating within the town centre, will make the Old Kent Road area more sociable and easier to navigate. This will bring positive social benefits.</p>	<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation, levels of which are higher amongst the disabled than the non-disabled. It will, therefore, have positive mental health benefits.</p>
<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>With regard to disability, AAP8 demonstrates positive impacts by requiring new development to deliver blue badge parking for residents and visitors. This ensures greater accessibility and mobility for those who are wheelchair users as well as their carers and families.</p> <p>The policy, in seeking to enhance public transport availability and accessibility through initiatives such as the Bakerloop Bus and the BLE, as well as improving public realm more generally, would help close the transport accessibility gap. Research has found that this brings fiscal benefit by helping to move disabled people off benefits and into work, which is particularly important in the Old Kent Road where unemployment levels are higher than the borough average<sup>7</sup>.</p>	<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>One of the key components of AAP8 is promoting a change in travel habits to more active modes of transport. It seeks to do this by, amongst other things, promoting a shift to electric vehicles, delivering more attractive options for cycling and walking, and implementing a CPZ across the entire OA. The policy also seeks to reduce and consolidate commercial deliveries. In these ways, AAP8 will promote healthier lifestyles and (by reducing combustion) tackle air and noise pollution</p> <p>All of the above will be especially advantageous for disabled people for whom health outcomes are poorer and the risk of developing health conditions (such as depression, asthma and other respiratory illness, diabetes, stroke or obesity) is twice as high as non-disabled people<sup>8</sup>.</p>

<sup>7</sup> 'The Transport Accessibility Gap', accessible from [https://www.motabilityfoundation.org.uk/media/iwaidhvk/motability\\_transport-accessibility-gap-report\\_march-2022\\_final.pdf](https://www.motabilityfoundation.org.uk/media/iwaidhvk/motability_transport-accessibility-gap-report_march-2022_final.pdf)

<sup>8</sup> 'World Health Organisation – Disability statistics', accessible from <https://www.who.int/news-room/fact-sheets/detail/disability-and-health>

<p>The focus AAP9 gives to creating new and improved connections that better link the high street with existing and proposed residential communities will help reduce some of the barriers to social interaction faced by disabled people.</p>	
<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>AAP9 demonstrates positive impacts by prioritising the wellbeing of existing and future residents. By creating a network of green and open spaces, the policy increases accessibility to open space for all to ensure equality of access and opportunity.</p>	<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>AAP9 delivers positive health benefits for all because it creates green spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing for all groups, including the disabled.</p>
<p><b>AAP10: Tall buildings strategy: The Stations and the Crossings</b></p> <p>AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.</p>	<p><b>AAP10: Tall buildings strategy: The Stations and the Crossings</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP10.</p>
<p><b>AAP11: Character and heritage</b></p> <p>AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all.</p>	<p><b>AAP11: Character and heritage</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP11.</p>
<p><b>AAP12: Design</b></p> <p>AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road OA but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for people with disabilities, with thought given to wayfinding and hazard reduction (tactile</p>	<p><b>AAP12: Design</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP12.</p> <p>More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all to lead healthier lifestyles.</p>

<p>paving, detectable kerbs, clutter-free pavements). Using the latest technology and materials to achieve these goals is promoted. This ensures greater accessibility for all. The focus the policy gives to increased permeability and enhanced frontages will produce less hostile and more appealing places with a greater sense of safety, which will be socially beneficial for those with a disability.</p>	
<p><b>AAP13: Climate emergency</b></p> <p>AAP13 demonstrates positive impacts for all by ensuring new development reduces carbon emissions by holistically thinking about design, construction, building operation, whole life cycle and transport. This has secondary impacts by:</p> <ul style="list-style-type: none"> <li>• improving air quality;</li> <li>• creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and</li> <li>• reducing global warming.</li> </ul> <p>All of the aforementioned have beneficial impacts for all local residents, including those with disabilities for whom rates of poverty and poorer health outcomes are higher than the non-disabled.</p>	<p><b>AAP13: Climate emergency</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP13.</p> <p>There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing.</p>
<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 illustrates positive impacts for all by ensuring development has met high environmental standards and promotes more active, public and sustainable travel modes to reduce pollution. Those with a disability are more susceptible to the effects of poor air quality and environments that are unsafe and/or not fully accessible. This policy aims to improve these conditions to ensure a cleaner, greener, safer environment for all.</p>	<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.</p> <p>The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely.</p>



	<p>Furthermore, it reinforces high standards of residential design to ensure that homes, including homes co-located with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.</p> <p>Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population, including the disabled.</p>
<p><b>AAP15: Great start in life</b></p> <p>AAP15 illustrates positive impacts for all because it provides learning and education facilities for the young, for the mature, and for continuous adult learning. This ensures equality of opportunity for all, by improving access to education. This then ensures a higher skilled workforce and boosts employability, while also reducing unemployment and providing new opportunities for all.</p>	<p><b>AAP15: Great start in life</b></p> <p>AAP15 demonstrates positive health impacts for children and young people, including those with disabilities, by improving school grounds and outdoor areas where they can play, exercise and engage with habitats and food growing. Locating places of education away from main roads helps to reduce the risk of developing respiratory illness or difficulties later in life.</p>
<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background and irrespective of any disability. This creates safe indoor and outdoor spaces in the public realm, for children and young people to congregate and exercise for all, which promotes social cohesion. It also supports young people's independence improving their development, teaching and learning.</p> <p>The policy also places emphasis on these facilities being distributed across neighbourhoods, rather than consolidated in a single location. This</p>	<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive health impacts by providing new and improved existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle —attendant with which are mental and physical benefits— irrespective of any disability.</p>

<p>makes accessing such facilities easier for those who are less mobile. It also encourages greater community cohesion, which has positive social impacts.</p>	
<p><b>Sub area and site allocations</b></p> <p>Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have positive impacts for all.</p>	<p><b>Sub area and site allocations</b></p> <p>There are no specific identifiable impacts on health for Sub Areas.</p> <p>More generally, the proposed enhancements to –and delivery of new– green and open spaces within the sub areas will have positive health impacts for all.</p>
<p><b>Sub Area 1</b></p> <p>Sub Area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.</p>	<p><b>Sub Area 1</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 1.</p> <p>More generally, the investment in new parks and various street reconfigurations will make people of all ages, but in particular those with disabilities, feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.</p>
<p><b>Sub Area 2</b></p> <p>Sub Area 2 demonstrates positive impacts through the delivery of new uses accessible for all that provide opportunities for education (e.g. those required by site allocation OKR10) and leisure (e.g. LEX, and those within site allocation OKR11). These facilities will promote community cohesion by creating community spaces for residents to meet, congregate and exercise. This has positive impacts for all by creating accessible community spaces.</p>	<p><b>Sub Area 2</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 2.</p> <p>More generally, the investment in new parks and various street reconfigurations (all of which will be designed to be fully accessible) will make disabled people feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.</p>

<p>The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for those who have a disability (as well as their carers and families). Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement amongst disabled people in social and community life.</p>	
<p><b>Sub Area 3</b></p> <p>Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.</p> <p>Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by co-location.</p>	<p><b>Sub Area 3</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 3.</p> <p>More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.</p>
<p><b>Sub Area 4</b></p> <p>Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing</p>	<p><b>Sub Area 4</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 4.</p> <p>More generally, the investment in new parks and various street reconfigurations (all of which will be designed to be fully accessible) will make disabled people feel more confident about (a) spending their</p>

businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.	recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.
<p><b>Sub Area 5</b></p> <p>Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.</p>	<p><b>Sub Area 5</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 5.</p> <p>More generally, the focus on enhancing permeability and linking into the Low Line (all of which will be designed to be fully accessible) will make disabled people feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Health data on which above analysis is based</b></p>
<p>The above analysis is based on equality information and health data sets as set out in:</p> <ul style="list-style-type: none"> <li>• Appendix 3 '<i>Baseline data – Facts and Figures</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission; and</li> <li>• Appendix 9 '<i>Baseline Indicators Table</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.</li> </ul> <p>Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).</p> <p>It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of disability, are listed alongside each indicator:</p> <ul style="list-style-type: none"> <li>• IIA01: AAP3, AAP4, AAP5, AAP6, AAP7</li> <li>• IIA02: AAP15, AAP16</li> <li>• IIA03: AAP8, AAP9</li> <li>• IIA04: AAP12</li> <li>• IIA05: AAP4, AAP9, AAP15, AAP16</li> </ul>	

- IIA06: AAP8, AAP12, AAP13, AAP14
- IIA07: AAP8, AAP13, AAP14
- IIA08: AAP12, AAP13, AAP14
- IIA09: AAP12, AAP14
- IIA010: AAP14
- IIA011: AAP10, AAP11, AAP12, AAP14
- IIA012: AAP10, AAP11, AAP12,
- IIA013: AAP9, AAP14
- IIA014: AAP14
- IIA015: AAP3, AAP4
- IIA016: AAP8, AAP13
- IIA017: AAP1, AAP2

### **Mitigating actions to be taken**

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

### **GENDER REASSIGNMENT**

The process of transitioning from one gender to another.

#### **Societal and economic issues**

Potential impacts (positive and negative) of proposed policy

#### **Vision**

The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel enhancements (for Phase 1) and the BLE (Phase 2).

Furthermore, the Connecting Communities strand of the Vision recognises the need for more innovative approaches to supporting the positive

#### **Health issues**

Potential impacts (positive and negative) of proposed policy

#### **Vision**

The Vision, in seeking seek to promote sustainable transport behaviours amongst all groups within the local population, demonstrates positive health impacts

It also recognises how high quality and community-oriented design, as well as the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for the most vulnerable and those

<p>growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population.</p>	<p>demographic groups that experience higher levels of social isolation<sup>9</sup>.</p> <p>The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making open spaces more attractive and easily accessible to all.</p> <p>More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.</p>
<p><b>Strategy</b></p> <p>The Strategy demonstrates positive social impacts by aiming to shield people from negative experiences such as feeling unsafe. One example is by creating multifunctional neighbourhoods featuring amongst other things youth facilities, shops, services and leisure opportunities; these places will help to promote feelings of security for all.</p>	<p><b>Strategy</b></p> <p>The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-- fosters a greater sense of security, comfort and confidence when using the public realm. This improves mental wellbeing for all.</p> <p>In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and 'head room', allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for all, regardless of gender identity.</p>
<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.</p>	<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA</p>

<sup>9</sup> 'Loneliness and Social Isolation among Transgender and Gender Diverse People', accessible from <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10217806/>

	more generally, which will impact positively on all.
<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p> <p>AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure fully accessible to all, which will provide reduced travel times into central London and beyond. This ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.</p>	<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP2.</p>
<p><b>AAP3: Homes for all</b></p> <p>AAP3 demonstrates positive impacts for all because it ensures that high quality housing standards will be maintained for all. This means residents can take pride in and feel responsible for their own homes.</p>	<p><b>AAP3: Homes for all</b></p> <p>AAP3 makes this provision to contribute to a greater sense of security in the home, which has positive benefits for mental wellbeing, and improves quality of life<sup>10</sup>.</p>
<p><b>AAP4: Student homes</b></p> <p>In encouraging PBSA developments to provide communal and community-facing facilities, AAP4 promotes good relations between those undergoing gender reassignment and the wider community. This has positive social impacts.</p>	<p><b>AAP4: Student homes</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP4.</p>
<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>AAP seeks to deliver 10,000 new jobs across the OA, bringing greater</p>	<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p>

<sup>10</sup> 'Loneliness and Social Isolation among Transgender and Gender Diverse People', accessible from: <https://www.mdpi.com/2227-9032/11/10/1517>

<p>employment opportunities for local adults, including those undergoing gender reassignment. This would be a positive economic impact on this demographic group.</p>	<p>There are no specific identifiable positive or negative impacts on health arising from AAP5.</p>
<p><b>AAP6: Life sciences</b></p> <p>AAP6 may have positive impacts for those undergoing gender reassignment by bringing new life sciences business to the area, expanding and diversifying the local jobs market.</p>	<p><b>AAP6: Life sciences</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP6 for people undergoing gender reassignment.</p>
<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>AAP6 demonstrates positive impacts for all because it aims to create activity throughout the Old Kent Road OA in both the north and south town centres. This will improve the experience of pedestrians and create a vibrant and lively town centre, with expanded social opportunities for all.</p>	<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation, levels of which are higher amongst those undergoing gender reassignment. It will, therefore, have positive mental health benefits.</p>
<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible, both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). This improves accessibility and mobility for all, which potentially impacts positively in terms of socioeconomic participation and opportunities.</p>	<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>AAP8 demonstrates positive impacts for health because it encourages a change in travel habits to more active modes of travel which will encourage healthier lifestyles for all. Furthermore, vehicle reduction will improve air quality as there is less combustion, which is reduce the risk of respiratory related illness, especially in those who are more vulnerable.</p>
<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>AAP9 delivers a new network of green links and streets across the Old Kent</p>	<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>There are no specific health impacts arising from AAP9. However, more</p>



<p>Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. By creating a network of green and open spaces, some of which are enhanced and some of which are entirely new, the policy increases accessibility to open space for all to ensure equality of access and opportunity.</p>	<p>generally, AAP9 delivers positive health benefits by creating green spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing.</p>
<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.</p>	<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP10.</p>
<p><b>AAP11: Character and heritage</b></p> <p>AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all.</p>	<p><b>AAP11: Character and heritage</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP11.</p>
<p><b>AAP12: Design</b></p> <p>AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road OA but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all.</p> <p>The policy also aims to create places that are less hostile and more appealing with a greater sense of safety, which will be socially beneficial for all, including those undergoing gender reassignment.</p>	<p><b>AAP12: Design</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP12.</p> <p>More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all to lead healthier lifestyles.</p>
<p><b>AAP13: Climate Emergency</b></p> <p>AAP13 demonstrates positive impacts for all by ensuring new development</p>	<p><b>AAP13: Climate Emergency</b></p>

<p>responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:</p> <ul style="list-style-type: none"> <li>• improving air quality;</li> <li>• creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and</li> <li>• reducing global warming.</li> </ul> <p>All of the aforementioned have beneficial impacts for all, including those undergoing gender reassignment.</p>	<p>There are no specific identifiable positive or negative impacts on health arising from AAP13.</p> <p>There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing.</p>
<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 demonstrates positive impacts for all because it sets out an ambitious environmental strategy to create opportunities for using environmental technology to create a place with environmental excellence.</p>	<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.</p> <p>The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely. Furthermore, it reinforces high standards of residential design to ensure that homes, including homes colocated with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.</p> <p>Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population, including those undergoing gender reassignment.</p>
<p><b>AAP15: Great start in life</b></p>	<p><b>AAP15: Great start in life</b></p>

<p>AAP15 illustrates positive impacts for all because it provides learning and education facilities for the young, for the mature, and for continuous adult learning. This ensures equality of opportunity for all, by improving access to education. This then ensures a higher skilled workforce and boosts employability, while also reducing unemployment and providing new opportunities for all.</p>	<p>AAP15 demonstrates positive health impacts for children and young people by improving air pollution both internally (e.g. through building design) and externally (e.g. through maximising distance to roads) to reduce the risk of developing respiratory illness or difficulties later in life. It also encourages greater contact with nature, which has proven mental health benefits.</p>
<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm, for children and young people to congregate and exercise for all, which promotes social cohesion. It also supports young people's independence improving their development, teaching and learning.</p> <p>The policy also places emphasis on these facilities being distributed across neighbourhoods, rather than consolidated in a single location. This encourages greater community cohesion, which has positive social impacts.</p>	<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive health impacts by providing new and improved existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle —attendant with which are mental and physical benefits— irrespective of gender identity.</p>
<p><b>Sub area and site allocations</b></p> <p>Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.</p>	<p><b>Sub area and site allocations</b></p> <p>There are no specific identifiable impacts on health for Sub Areas.</p> <p>More generally, the proposed enhancements to —and delivery of new— green and open spaces within the sub areas will have positive health impacts for all.</p>
<p><b>Sub Area 1</b></p>	<p><b>Sub Area 1</b></p>

<p>Sub Area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.</p> <p>The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts for all.</p>	<p>There are no specific identifiable positive or negative impacts on health for Sub Area 1.</p> <p>More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all, who will benefit from safer and healthier environments for recreation. This has positive mental and physical health effects.</p>
<p><b>Sub Area 2</b></p> <p>In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities –which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and OKR11– will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion.</p> <p>The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all. Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will</p>	<p><b>Sub Area 2</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 2.</p> <p>More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.</p>

<p>foster greater engagement in social and community life.</p>	
<p><b>Sub Area 3</b></p> <p>Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.</p> <p>Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by co-location.</p>	<p><b>Sub Area 3</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 3.</p> <p>More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.</p>
<p><b>Sub Area 4</b></p> <p>Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.</p>	<p><b>Sub Area 4</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 4.</p>
<p><b>Sub Area 5</b></p> <p>Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience,</p>	<p><b>Sub Area 5</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 5</p>

<p>making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.</p>	
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Health data on which above analysis is based</b></p>
<p>The above analysis is based on equality information and health data sets as set out in:</p> <ul style="list-style-type: none"> <li>• Appendix 3 '<i>Baseline data – Facts and Figures</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission; and</li> <li>• Appendix 9 '<i>Baseline Indicators Table</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.</li> </ul> <p>Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).</p> <p>It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of gender reassignment, are listed alongside each indicator:</p> <ul style="list-style-type: none"> <li>• IIA01: AAP3, AAP4, AAP5, AAP6, AAP7</li> <li>• IIA02: AAP15, AAP16</li> <li>• IIA03: AAP8, AAP9</li> <li>• IIA04: AAP12</li> <li>• IIA05: AAP4, AAP9, AAP15, AAP16</li> <li>• IIA06: AAP8, AAP12, AAP13, AAP14</li> <li>• IIA07: AAP8, AAP13, AAP14</li> <li>• IIA08: AAP12, AAP13, AAP14</li> <li>• IIA09: AAP12, AAP14</li> <li>• IIA010: AAP14</li> <li>• IIA011: AAP10, AAP11, AAP12, AAP14</li> <li>• IIA012: AAP10, AAP11, AAP12,</li> <li>• IIA013: AAP9, AAP14</li> <li>• IIA014: AAP14</li> <li>• IIA015: AAP3, AAP4</li> <li>• IIA016: AAP8, AAP13</li> <li>• IIA017: AAP1, AAP2</li> </ul>	
<p><b>Mitigating actions to be taken</b></p>	

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

### **PREGNANCY AND MATERNITY**

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

#### **Societal and economic issues**

Potential impacts (positive and negative) of proposed policy

#### **Health issues**

Potential impacts (positive and negative) of proposed policy

#### **Vision**

The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel enhancements (for Phase 1) and the BLE (Phase 2).

The Vision places great emphasis on the AAP delivering a family friendly environment with housing, youth facilities, schools, parks, leisure and health centers. This emphasis is a direct response to the findings of the baseline data, which show the Old Kent Road area to, amongst other things, perform corporately poorly for childhood obesity and living environment. The Vision will have positive impacts particularly for those who are pregnant or on maternity, as it will not only provide immediate day-to-day socioeconomic facilities and opportunities, but it will also engender

#### **Vision**

The vision recognises how high quality and community-oriented design, as well as the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for the most vulnerable and those demographic groups that experience higher levels of social isolation.

The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making the area's existing open spaces more attractive and easily accessible to all, while also delivering brand new parks alongside new active travel routes. These positive benefits will be experienced by those who pregnant or on maternity / raising families.

More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact

<p>long-term confidence about the OA being somewhere positive to raise a family.</p> <p>Furthermore, the Connecting Communities strand of the Vision recognises the need for more innovative approaches to supporting the positive growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population.</p>	<p>that it has, when well-designed and welcoming, on mental wellbeing.</p>
<p><b>Strategy</b></p> <p>The Strategy seeks to deliver positive impacts for those who are pregnant or on maternity in its aim to deliver a range of housing types to suit need, all designed to a high standard.</p> <p>It also seeks to deliver a new NHS health hub to serve the area's growing population. This will bring major benefits for all, providing integrated primary health, community health and social care support. This will directly positively benefit those who are pregnant or on maternity.</p>	<p><b>Strategy</b></p> <p>The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-- fosters a greater sense of security, comfort and confidence when using the public realm. This improves mental wellbeing for all.</p> <p>In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and 'head room', allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for all.</p>
<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.</p>	<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all.</p>
<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p>	<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p>



<p>AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure fully accessible to all, which will provide reduced travel times into central London and beyond. This ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.</p>	<p>There are no specific identifiable positive or negative impacts on health arising from AAP2.</p>
<p><b>AAP3: Homes for all</b></p> <p>AAP3 demonstrates positive impacts by aiming to build at least 4,000 new family homes, and ensuring that vulnerable residents are helped to find the right housing so they can live as independently as possible.</p>	<p><b>AAP3: Homes for all</b></p> <p>The policy aims to meet family housing need with a range of housing types. AAP3, by making this provision for those who are pregnant and have families, contributes to a greater sense of security in the home. This has positive benefits for mental wellbeing and improves quality of life.</p>
<p><b>AAP4: Student homes</b></p> <p>In encouraging PBSA developments to provide communal and community-facing facilities, the policy promotes good relations between any pregnant or maternity-taking residents and the wider community.</p>	<p><b>AAP4: Student homes</b></p> <p>In placing emphasis on high quality design, AAP4 seeks to ensure PBSA provides comfortable, practical, restful and uplifting living environments for all. Additionally, the policy promotes where possible the provision of outdoor amenity space for PBSA occupiers. All of these measures help support mental wellbeing amongst any pregnant or maternity-taking residents.</p>
<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>AAP5 seeks to deliver 10,000 new jobs across the OA, bringing greater employment opportunities for local adults, including those who are pregnant. This would be a positive</p>	<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP5 for those who are pregnant or on maternity.</p>

<p>economic impact on this demographic group.</p>	
<p><b>AAP6: Life sciences</b></p> <p>AAP6 may have positive impacts for those who are pregnant by bringing new life sciences business to the area, expanding and diversifying the local jobs market.</p>	<p><b>AAP6: Life sciences</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP6 for those who are pregnant or taking maternity</p>
<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>AAP7 demonstrates positive impacts for all because it aims to transform the high street into a new destination which connects neighbourhoods on both sides of the Old Kent Road high street. These improvements in connectivity will enhance legibility and, along with the intention to deliver more seating within the town centre, will make the Old Kent Road area more sociable and easier to navigate. This will bring positive social benefits.</p>	<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation. It will, therefore, have positive mental health benefits.</p>
<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible, both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). This improves accessibility and mobility for all, including for example those who are less mobile because of pregnancy or those using pushchairs. There are potentially knock-on positive impacts in terms of socioeconomic participation and opportunities.</p>	<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>One of the key components of AAP8 is promoting a change in travel habits to more active modes of transport. It seeks to do this by, amongst other things, promoting a shift to electric vehicles, delivering more attractive options for cycling and walking, and implementing a CPZ across the entire OA. The policy also seeks to reduce and consolidate commercial deliveries. In these ways, AAP8 will promote healthier lifestyles and (by reducing combustion) tackle air and noise pollution</p> <p>All of the above will be especially advantageous for parents and unborn/newborn children, the latter being more susceptible to developing health conditions (such as asthma and</p>

	other respiratory illness) from air quality <sup>11</sup> .
<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>AAP9 delivers a new network of green links and streets across the Old Kent Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. By creating a network of green and open spaces, some of which are enhanced and some of which are entirely new, the policy increases accessibility to open space for all to ensure equality of access and opportunity.</p> <p>On example of this is AAP9's aims to make the Old Kent Road a healthier street; this includes improving the pedestrian experience for all, and ensuring pavement widths are suitable for buggies and wheelchair users, and people walking with young children.</p>	<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>There are no specific health impacts arising from AAP9. However, more generally, AAP9 delivers positive health benefits by creating green spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing.</p>
<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.</p>	<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP10.</p>
<p><b>AAP11: Character and heritage</b></p> <p>AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all.</p>	<p><b>AAP11: Character and heritage</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP11.</p>
<b>AAP12: Design</b>	<b>AAP12: Design</b>

<sup>11</sup> 'Air pollution during pregnancy and lung development in the child', accessible from <https://www.sciencedirect.com/science/article/abs/pii/S1526054216300823#:~:text=Exposure%20to%20air%20pollution%20during%20pregnancy%20has%20also%20been%20linked,the%20development%20of%20childhood%20asthma>

<p>AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all.</p>	<p>There are no specific identifiable positive or negative impacts on health arising from AAP12.</p> <p>More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all to lead healthier lifestyles.</p>
<p><b>AAP13: Climate Emergency</b></p> <p>AAP13 demonstrates positive impacts for all by ensuring new development responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:</p> <ul style="list-style-type: none"> <li>• improving air quality;</li> <li>• creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and</li> <li>• reducing global warming.</li> </ul> <p>All of the aforementioned have beneficial impacts for all, including those who are pregnant or on maternity</p>	<p><b>AAP13: Climate Emergency</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP13.</p> <p>There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing.</p>
<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 aims to illustrate positive impacts by ensuring development has met high environmental standards and promoting more active, public and sustainable travel modes to reduce pollution. Pregnant women are more susceptible to the effects of poor air quality and low environmental quality. This policy aims to improve these conditions to ensure a cleaner and greener environment.</p>	<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.</p> <p>The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely. Furthermore, it reinforces high standards of residential design to ensure that homes, including homes</p>

	<p>colocated with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.</p> <p>Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population, including those who are pregnant or on maternity.</p>
<p><b>AAP15: Great start In life</b></p> <p>AAP15 illustrates positive impacts for all because it provides learning and education facilities for the young, for the mature, and for continuous adult learning. This ensures equality of opportunity for all, by improving access to education. This then ensures a higher skilled workforce and boosts employability, while also reducing unemployment and providing new opportunities for all.</p>	<p><b>AAP15: Great start In life</b></p> <p>AAP15 demonstrates positive health impacts for children and young people by improving air pollution both internally (e.g. through building design) and externally (e.g. through maximising distance to roads) to reduce the risk of developing respiratory illness or difficulties later in life. It also encourages greater contact with nature, which has proven mental health benefits.</p>
<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm, for children and young people to congregate and exercise for all, which promotes social cohesion. It also supports young people's independence improving their development, teaching and learning.</p> <p>The policy also places emphasis on these facilities being distributed across neighbourhoods, rather than consolidated in a single location. This encourages greater community</p>	<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive health impacts by providing new and improving existing indoor and outdoor youth and sports facilities. This promotes a healthy, active lifestyle for all, and also promotes improved mental and physical wellbeing.</p>

<p>cohesion, which has positive social impacts.</p>	
<p><b>Sub area and site allocations</b></p> <p>Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.</p>	<p><b>Sub area and site allocations</b></p> <p>There are no specific identifiable impacts on health for Sub Areas.</p> <p>More generally, the proposed enhancements to –and delivery of new– green and open spaces within the sub areas will have positive health impacts for all.</p>
<p><b>Sub Area 1</b></p> <p>Sub area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.</p> <p>The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts for all.</p>	<p><b>Sub Area 1</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 1.</p> <p>More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all, who will benefit from safer and healthier environments for recreation. This has positive mental and physical health effects.</p>
<p><b>Sub Area 2</b></p> <p>In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities –which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and</p>	<p><b>Sub Area 2</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 2.</p> <p>More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending</p>

<p>OKR11– will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts for all.</p> <p>The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all. Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life.</p>	<p>their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.</p>
<p><b>Sub Area 3</b></p> <p>Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.</p> <p>Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by co-location.</p>	<p><b>Sub Area 3</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 3.</p> <p>More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way. This is all part of the overarching Vision to make the Old Kent Road area family friendly.</p>
<p><b>Sub Area 4</b></p> <p>Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly</p>	<p><b>Sub Area 4</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 4.</p>

<p>accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.</p>	
<p><b>Sub Area 5</b></p> <p>Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.</p>	<p><b>Sub Area 5</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 5.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Health data on which above analysis is based</b></p>
<p>The above analysis is based on equality information and health data sets as set out in:</p> <ul style="list-style-type: none"> <li>• Appendix 3 '<i>Baseline data – Facts and Figures</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission; and</li> <li>• Appendix 9 '<i>Baseline Indicators Table</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.</li> </ul> <p>Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).</p> <p>It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of pregnancy and maternity, are listed alongside each indicator:</p> <ul style="list-style-type: none"> <li>• IIA01: AAP3, AAP4, AAP5, AAP6, AAP7</li> <li>• IIA02: AAP15, AAP16</li> <li>• IIA03: AAP8, AAP9</li> </ul>	



- IIA04: AAP12
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### Mitigating actions to be taken

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

### RACE

Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, nationality (including citizenship), ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others

#### **Societal and economic issues**

Potential impacts (positive and negative) of proposed policy

#### **Health issues**

Potential impacts (positive and negative) of proposed policy

#### **Vision**

The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel enhancements (for Phase 1) and the BLE (Phase 2).

#### **Vision**

The Vision, in seeking seek to promote sustainable transport behaviours amongst all groups within the local population, demonstrates positive health impacts

It also recognises how high quality and community-oriented design, as well as the co-location of certain uses, can provide wider societal benefits for

<p>Furthermore, the Connecting Communities strand of the Vision recognises the need for more innovative approaches to supporting the positive growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population.</p>	<p>mental health and wellbeing, especially for the most vulnerable.</p> <p>The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making open spaces more attractive and easily accessible to all.</p> <p>More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.</p>
<p><b>Strategy</b></p> <p>This demonstrates positive impacts because it recognises regeneration may sometimes be criticised as gentrification or social cleansing. The Strategy aims to create delivery of direct benefits to the existing communities regardless of race. Examples include:</p> <ul style="list-style-type: none"> <li>• the delivery a range of housing types to suit need –including over 4,000 larger homes that better respond to the needs of larger intergenerational families – all designed to a high standard and in mixed-tenure developments;</li> <li>• revitalised town centres, offering services and leisure/recreational outlets;</li> <li>• a network of youth facilities providing social spaces that encourage young people from all backgrounds to mix</li> </ul> <p>all of which will promote inter-racial and intra-racial good relations, while also expanding socioeconomic opportunities for residents, workers and visitors of the OA irrespective of race.</p>	<p><b>Strategy</b></p> <p>The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-- fosters a greater sense of security, comfort and confidence when using the public realm. This improves mental wellbeing for all.</p> <p>In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and ‘head room’, allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for all.</p>
<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for</p>	<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and</p>

<p>housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.</p>	<p>improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all. It will also ensure those who currently live in the area (approximately 65% of whom are non-white) see benefits commensurate with the scale of change the AAP will bring.</p>
<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p> <p>AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure fully accessible to all, which will provide reduced travel times into central London and beyond. This ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.</p>	<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP2.</p>
<p><b>AAP3: Homes for all</b></p> <p>AAP3 demonstrates positive impacts for all by ensuring a diversity of types and tenures of homes to meet needs of those across the community. This ensures that residents can remain close to their families and communities.</p>	<p><b>AAP3: Homes for all</b></p> <p>AAP3 makes this provision to contribute to a greater sense of security in the home, which has positive benefits for mental wellbeing, and improves quality of life.</p>
<p><b>AAP4: Student homes</b></p> <p>In encouraging PBSA developments to provide communal and community-facing facilities, the policy promotes good relations between all, irrespective of race.</p>	<p><b>AAP4: Student homes</b></p> <p>In placing emphasis on high quality design, AAP4 seeks to ensure PBSA provides comfortable, practical, restful and uplifting living environments for all. Additionally, the policy promotes where possible the provision of outdoor</p>

	amenity space for PBSA occupiers. All of these measures help support mental wellbeing amongst residents.
<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>AAP5 demonstrates positive impacts for all ages by making provisions for current business occupiers of Old Kent Road. This ensures that current and future businesses are considered in the regeneration of Old Kent Road, which is particularly important with respect of the protected characteristic of race given the higher than average number of BME business owners and employees in the OA.</p> <p>New development has the potential to displace existing businesses, with small-to-medium enterprises being the most at risk; this could result in negative impacts, particularly those from BME backgrounds given that over 65% of those living in the Old Kent Road ward are non-white. Mitigation is secured within the AAP (and the Southwark Plan 2022) through business relocation and affordable workspace policies.</p>	<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP5.</p>
<p><b>AAP6: Life sciences</b></p> <p>AAP6 may have positive impacts for all by bringing new life sciences business to the area, expanding and diversifying the local jobs market.</p>	<p><b>AAP6: Life sciences</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP6.</p>
<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>AAP7 illustrates positive impacts for all by making provisions for smaller local shops and community facilities in two town centres, making these hubs easily accessible by non-vehicular forms of transport from all neighbourhoods within the OA. This ensures greater</p>	<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation. It will, therefore, have positive mental health benefits.</p>

accessibility for all to a range of shops, services and recreational/leisure outlets.	
<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible, both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). This improves accessibility and mobility for all, which potentially impacts positively in terms of socioeconomic participation and opportunities.</p>	<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>One of the key components of AAP8 is promoting a change in travel habits to more active modes of transport. It seeks to do this by, amongst other things, promoting a shift to electric vehicles, delivering more attractive options for cycling and walking, and implementing a CPZ across the entire OA. The policy also seeks to reduce and consolidate commercial deliveries. In these ways, AAP8 will promote healthier lifestyles and (by reducing combustion) tackle air and noise pollution. This has positive impacts for all.</p>
<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>AAP9 delivers a new network of green links and streets across the Old Kent Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. By creating a network of green and open spaces, some of which are enhanced and some of which are entirely new, the policy increases accessibility to open space for all to ensure equality of access and opportunity.</p>	<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>There are no specific health impacts arising from AAP9. However, more generally, AAP9 delivers positive health benefits by creating green spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing.</p>
<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.</p>	<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP10.</p>
<p><b>AAP11: Character and heritage</b></p>	<p><b>AAP11: Character and heritage</b></p>

<p>AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all. In turn, this guards against perceptions among the OA's existing communities that their neighbourhoods and places of cultural value are being eroded by regeneration.</p>	<p>There are no specific identifiable positive or negative impacts on health arising from AAP11.</p>
<p><b>AAP12: Design</b></p> <p>AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all.</p>	<p><b>AAP12: Design</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP12.</p> <p>More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all to lead healthier lifestyles.</p>
<p><b>AAP13: Climate Emergency</b></p> <p>AAP13 demonstrates positive impacts for all by ensuring new development responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:</p> <ul style="list-style-type: none"> <li>• improving air quality;</li> <li>• creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and</li> <li>• reducing global warming.</li> </ul> <p>All of the aforementioned have beneficial impacts for all.</p>	<p><b>AAP13: Climate Emergency</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP13.</p> <p>There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing.</p>
<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 aims to illustrate positive impacts by ensuring development has met high environmental standards and promoting more active, public and sustainable travel modes to reduce</p>	<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.</p>

<p>pollution. This policy aims to improve these conditions to ensure a cleaner and greener environment.</p> <p>The focus AAP14 gives to the 'Agent of Change' principle ensures that SMEs, of which there are a large number in the Old Kent Road OA operated by BME individuals, are not prejudiced by new development. This ensures sufficient mitigation is in place to guard against the negative economic impacts that might otherwise arise.</p>	<p>The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely. Furthermore, it reinforces high standards of residential design to ensure that homes, including homes co-located with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.</p> <p>Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population.</p>
<p><b>AAP15: Great start in life</b></p> <p>AAP15 illustrates positive impacts for all because it provides learning and education facilities for the young, for the mature, and for continuous adult learning. This ensures equality of opportunity for all, by improving access to education. This then ensures a higher skilled workforce and boosts employability, while also reducing unemployment and providing new opportunities for all.</p>	<p><b>AAP15: Great start in life</b></p> <p>AAP15 demonstrates positive health impacts for children and young people by improving air pollution both internally (e.g. through building design) and externally (e.g. through maximising distance to roads) to reduce the risk of developing respiratory illness or difficulties later in life. This has particular positive impacts in relation to race, given that approximately half of hospital admissions for asthma in London occur in children from black, Asian and minority ethnic backgrounds, compared to 28% of white children<sup>12</sup>.</p> <p>The policy also encourages greater contact with nature, which has proven mental health benefits.</p>
<p><b>AAP16: Child and youth provision</b></p>	<p><b>AAP16: Child and youth provision</b></p>

<sup>12</sup> 'Shocking inequality in children with asthma admitted to hospital in London', accessible from <https://www.london.gov.uk/increaseinasthmaadmissions>

<p>AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm, for children and young people to congregate and exercise for all, which promotes social cohesion. It also supports young people's independence improving their development, teaching and learning.</p> <p>The policy also places emphasis on these facilities being distributed across neighbourhoods, rather than consolidated in a single location. This encourages greater community cohesion, which has positive social impacts.</p>	<p>AAP16 demonstrates positive health impacts by providing new and improving existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle—attendant with which are mental and physical benefits—irrespective of race.</p> <p>This has particular positive impacts in relation to race, given that children from black, Asian and minority ethnic backgrounds are more likely to be overweight or be living with obesity by the age of 4/5 and 10/11 years old, compared to white children<sup>13</sup>.</p>
<p><b>Sub area and site allocations</b></p> <p>Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.</p>	<p><b>Sub area and site allocations</b></p> <p>There are no specific identifiable impacts on health for Sub Areas.</p> <p>More generally, the proposed enhancements to –and delivery of new– green and open spaces within the sub areas will have positive health impacts for all.</p>
<p><b>Sub Area 1</b></p> <p>Sub Area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.</p>	<p><b>Sub Area 1</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 1.</p> <p>More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all, who will benefit from safer and healthier environments for recreation. This has positive mental and physical health effects.</p>

<sup>13</sup> 'Overweight children', accessible from <https://www.ethnicity-facts-figures.service.gov.uk/health/diet-and-exercise/overweight-children/latest/>



<p>The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts for all.</p>	
<p><b>Sub Area 2</b></p> <p>In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities –which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and OKR11– will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts for all.</p> <p>The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all. Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life.</p>	<p><b>Sub Area 2</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 2.</p> <p>More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.</p>
<p><b>Sub Area 3</b></p> <p>Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces</p>	<p><b>Sub Area 3</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 3.</p> <p>More generally, however, examples of how this sub area seeks to generate positive health impacts for different</p>

<p>where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.</p> <p>Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by co-location.</p>	<p>groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way. In particular, these interventions may help tackle the higher than average rates of childhood obesity experienced by the youth population of the Old Kent Road area.</p>
<p><b>Sub Area 4</b></p> <p>Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all.</p> <p>Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible. This is especially relevant to 'Race', given the high number of BME employees and business owners in the Sub Area.</p>	<p><b>Sub Area 4</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 4.</p>
<p><b>Sub Area 5</b></p> <p>Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.</p>	<p><b>Sub Area 5</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 5.</p>

<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>
<p>The above analysis is based on equality information and health data sets as set out in:</p> <ul style="list-style-type: none"> <li>• Appendix 3 '<i>Baseline data – Facts and Figures</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission; and</li> <li>• Appendix 9 '<i>Baseline Indicators Table</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.</li> </ul> <p>Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).</p> <p>It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of race, are listed alongside each indicator:</p> <ul style="list-style-type: none"> <li>• IIA01: AAP3, AAP4, AAP5, AAP6, AAP7</li> <li>• IIA02: AAP15, AAP16</li> <li>• IIA03: AAP8, AAP9</li> <li>• IIA04: AAP12</li> <li>• IIA05: AAP4, AAP9, AAP15, AAP16</li> <li>• IIA06: AAP8, AAP12, AAP13, AAP14</li> <li>• IIA07: AAP8, AAP13, AAP14</li> <li>• IIA08: AAP12, AAP13, AAP14</li> <li>• IIA09: AAP12, AAP14</li> <li>• IIA010: AAP14</li> <li>• IIA011: AAP10, AAP11, AAP12, AAP14</li> <li>• IIA012: AAP10, AAP11, AAP12,</li> <li>• IIA013: AAP9, AAP14</li> <li>• IIA014: AAP14</li> <li>• IIA015: AAP3, AAP4</li> <li>• IIA016: AAP8, AAP13</li> <li>• IIA017: AAP1, AAP2</li> </ul>	
<b>Mitigating actions to be taken</b>	
<p>Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).</p> <p>We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.</p>	

<b>RELIGION AND BELIEF</b>	
<p>Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.</p>	
<b>Societal and economic issues</b>	<b>Health issues</b>
Potential impacts (positive and negative) of proposed policy	Potential health impacts (positive and negative) of proposed policy
<b>Vision</b>	<b>Vision</b>
<p>The Connecting Communities strand of the Vision recognises the need for more innovative approaches to supporting the positive growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population. Particularly relevant to religion and belief include re-providing existing faith premises as part of mixed-use redevelopments (applying the Agent of Change principle).</p> <p>Indirectly, the uplift in land values associated with the regeneration brought by the AAP has the potential to displace places of worship, as these are particularly vulnerable due to often occupying low-rent premises on short-term leases. The OA has a particularly large number of faith premises per head of the population, relative to the rest of the borough. Many of these serve non-white communities. While such displacement would have negative impacts, the Southwark Plan and AAP require relocation strategies to be prepared by developers setting out how the affected faith group(s) will be accommodated elsewhere in adequate premises.</p>	<p>The Vision, in seeking seek to promote sustainable transport behaviours amongst all groups within the local population, demonstrates positive health impacts</p> <p>It also recognises how high quality and community-oriented design, as well as the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for the most vulnerable.</p> <p>The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making open spaces more attractive and easily accessible to all.</p> <p>More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.</p>
<b>Strategy</b>	<b>Strategy</b>

<p>This demonstrates positive impacts because it recognises regeneration may sometimes be criticised as gentrification or social cleansing. The Strategy aims to create delivery of direct benefits to the existing communities regardless of religion or belief. Examples include:</p> <ul style="list-style-type: none"> <li>• the delivery a range of housing types to suit need –including over 4,000 larger homes that better respond to the needs of larger intergenerational families– all designed to a high standard and in mixed-tenure developments;</li> <li>• revitalised town centres, where places of worship form part of the mix of facilities;</li> <li>• a network of youth facilities providing social spaces that encourage young people from all backgrounds to mix</li> </ul> <p>all of which will promote inter-faith and intra-faith good relations, while also expanding socioeconomic opportunities for residents, workers and visitors of the OA irrespective of religion or belief.</p>	<p>The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-- fosters a greater sense of security, comfort and confidence when using the public realm. This improves mental wellbeing for all.</p> <p>In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and 'head room', allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for all.</p> <p>The recognition of existing communities and delivering benefits direct to them ensures the sense of place in the OA is preserved and this will contribute to a greater sense of security and community. This will improve wellbeing for all.</p>
<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.</p>	<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all.</p>
<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p> <p>AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure</p>	<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP2.</p>

<p>such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure fully accessible to all, which will provide reduced travel times into central London and beyond. This ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.</p>	
<p><b>AAP3: Homes for all</b></p> <p>AAP3 demonstrates positive impacts for all by ensuring a diversity of types and tenures of homes to meet needs of those across the community. This ensures that residents can remain close to their families and communities.</p>	<p><b>AAP3: Homes for all</b></p> <p>AAP3 makes this provision to contribute to a greater sense of security in the home, which has positive benefits for mental wellbeing, and improves quality of life.</p>
<p><b>AAP4: Student homes</b></p> <p>In encouraging PBSA developments to provide communal and community-facing facilities, the policy promotes good relations between all, irrespective of religion or belief.</p>	<p><b>AAP4: Student homes</b></p> <p>In placing emphasis on high quality design, AAP4 seeks to ensure PBSA provides comfortable, practical, restful and uplifting living environments for all. Additionally, the policy promotes where possible the provision of dedicated communal internal facilities for PBSA occupiers, which could include prayer/reflection rooms or other places that promote inter-faith and intra-faith dialogue. This would support mental wellbeing amongst residents.</p>
<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>AAP5 demonstrates positive impacts for all ages by making provisions for current business occupiers of Old Kent Road. This ensures that current and future businesses are considered in the regeneration of Old Kent Road.</p>	<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>There are no specific identifiable positive or negative impacts on health for AA5.</p>
<p><b>AAP6: Life sciences</b></p> <p>AAP6 may have positive impacts for all by bringing new life sciences business</p>	<p><b>AAP6: Life sciences</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP6.</p>

<p>to the area, expanding and diversifying the local jobs market.</p>	
<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>AAP7 illustrates positive impacts for all by making provisions for smaller local shops and community facilities in two town centres, making these hubs easily accessible by non-vehicular forms of transport from all neighbourhoods within the OA. This ensures greater accessibility for all to a range of shops, services and recreational/leisure outlets.</p>	<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation. It will, therefore, have positive mental health benefits.</p>
<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible, both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). This improves accessibility and mobility for all, which potentially impacts positively in terms of socioeconomic participation and opportunities.</p>	<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>One of the key components of AAP8 is promoting a change in travel habits to more active modes of transport. It seeks to do this by, amongst other things, promoting a shift to electric vehicles, delivering more attractive options for cycling and walking, and implementing a CPZ across the entire OA. The policy also seeks to reduce and consolidate commercial deliveries. In these ways, AAP8 will promote healthier lifestyles and (by reducing combustion) tackle air and noise pollution. This has positive impacts for all.</p>
<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>AAP9 delivers a new network of green links and streets across the Old Kent Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. By creating a network of green and open spaces, some of which are enhanced and some of which are entirely new, the policy increases accessibility to open space for all to ensure equality of access and opportunity.</p>	<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>There are no specific health impacts arising from AAP9. However, more generally, AAP9 delivers positive health benefits by creating green spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing.</p>

<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.</p>	<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP10.</p>
<p><b>AAP11: Character and heritage</b></p> <p>AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all. In turn, this guards against perceptions among the OA's existing communities that their neighbourhoods and places of cultural value are being eroded by regeneration.</p>	<p><b>AAP11: Character and heritage</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP11.</p>
<p><b>AAP12: Design</b></p> <p>AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all.</p>	<p><b>AAP12: Design</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP12.</p> <p>More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all to lead healthier lifestyles.</p>
<p><b>AAP13: Climate Emergency</b></p> <p>AAP13 demonstrates positive impacts for all by ensuring new development responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:</p> <ul style="list-style-type: none"> <li>• improving air quality;</li> <li>• creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and</li> <li>• reducing global warming.</li> </ul>	<p><b>AAP13: Climate Emergency</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP13.</p> <p>There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing.</p>



<p>All of the aforementioned have beneficial impacts for all.</p>	
<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 aims to illustrate positive impacts by ensuring development has met high environmental standards and promoting more active, public and sustainable travel modes to reduce pollution. This policy aims to improve these conditions to ensure a cleaner and greener environment.</p>	<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.</p> <p>The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely. Furthermore, it reinforces high standards of residential design to ensure that homes, including homes co-located with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.</p> <p>Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population.</p>
<p><b>AAP15: Great start in life</b></p> <p>AAP15 illustrates positive impacts for all because it provides learning and education facilities for the young, for the mature, and for continuous adult learning. This ensures equality of opportunity for all, by improving access to education. This then ensures a higher skilled workforce and boosts employability, while also reducing unemployment and providing new opportunities for all.</p>	<p><b>AAP15: Great start in life</b></p> <p>AAP15 demonstrates positive health impacts for children and young people irrespective of religion/belief by improving air pollution both internally (e.g. through building design) and externally (e.g. through maximising distance to roads) to reduce the risk of developing respiratory illness or difficulties later in life. It also encourages greater contact with nature, which has proven mental health benefits.</p>

<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm, for children and young people to congregate and exercise for all, which promotes social cohesion. It also supports young people's independence improving their development, teaching and learning.</p> <p>The policy also places emphasis on these facilities being distributed across neighbourhoods, rather than consolidated in a single location. This encourages greater community cohesion, which has positive social impacts.</p>	<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive health impacts by providing new and improving existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle —attendant with which are mental and physical benefits— irrespective of religion or belief.</p>
<p><b>Sub area and site allocations</b></p> <p>Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.</p>	<p><b>Sub area and site allocations</b></p> <p>There are no specific identifiable impacts on health for Sub Areas.</p> <p>More generally, the proposed enhancements to —and delivery of new— green and open spaces within the sub areas will have positive health impacts for all.</p>
<p><b>Sub Area 1</b></p> <p>Sub Area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.</p>	<p><b>Sub Area 1</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 1.</p> <p>More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all, who will benefit from safer and healthier environments for recreation. This has positive mental and physical health effects.</p>

<p>The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts for all.</p> <p>In accordance with the Connecting Communities section of the AAP, existing places of worship within and on the cusp of the sub-area will be protected. Examples include Haddon Hall Baptist Church, Bermondsey Hall Methodist Church, the church that operates from Site Allocation OKR6 and the Old Kent Road Mosque and Islamic Cultural Centre.</p>	
<p><b>Sub Area 2</b></p> <p>In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities –which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and OKR11– will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts for all.</p> <p>The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all. Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life.</p>	<p><b>Sub Area 2</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 2.</p> <p>More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.</p>

<p><b>Sub Area 3</b></p> <p>Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park, various pocket parks and a potential new lido. This delivers urban greening and green spaces for residents, to exercise, rest and play, which is safe and attractive. This encourages a healthy active, lifestyle for all.</p> <p>Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by co-location.</p> <p>The support given by the Sub-Area 3 site allocations to retaining/reproviding places of worship will reduce the risk of displacement as a result of uplift in land values. This demonstrates positive social impacts.</p>	<p><b>Sub Area 3</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 3.</p> <p>More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.</p>
<p><b>Sub Area 4</b></p> <p>Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.</p>	<p><b>Sub Area 4</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 4.</p>
<p><b>Sub Area 5</b></p> <p>Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience,</p>	<p><b>Sub Area 5</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 5.</p>

<p>making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.</p>	
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Health data on which above analysis is based</b></p>
<p>The above analysis is based on equality information and health data sets as set out in:</p> <ul style="list-style-type: none"> <li>• Appendix 3 '<i>Baseline data – Facts and Figures</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission; and</li> <li>• Appendix 9 '<i>Baseline Indicators Table</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.</li> </ul> <p>Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).</p> <p>It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of religion and belief, are listed alongside each indicator:</p> <ul style="list-style-type: none"> <li>• IIA01: AAP3, AAP4, AAP5, AAP6, AAP7</li> <li>• IIA02: AAP15, AAP16</li> <li>• IIA03: AAP8, AAP9</li> <li>• IIA04: AAP12</li> <li>• IIA05: AAP4, AAP9, AAP15, AAP16</li> <li>• IIA06: AAP8, AAP12, AAP13, AAP14</li> <li>• IIA07: AAP8, AAP13, AAP14</li> <li>• IIA08: AAP12, AAP13, AAP14</li> <li>• IIA09: AAP12, AAP14</li> <li>• IIA010: AAP14</li> <li>• IIA011: AAP10, AAP11, AAP12, AAP14</li> <li>• IIA012: AAP10, AAP11, AAP12,</li> <li>• IIA013: AAP9, AAP14</li> <li>• IIA014: AAP14</li> <li>• IIA015: AAP3, AAP4</li> <li>• IIA016: AAP8, AAP13</li> <li>• IIA017: AAP1, AAP2</li> </ul>	
<p><b>Mitigating actions to be taken</b></p>	

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

### SEX

A man or a woman.

#### **Societal and economic issues**

Potential impacts (positive and negative) of proposed policy

#### **Vision**

The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel enhancements (for Phase 1) and the BLE (Phase 2).

Furthermore, the Connecting Communities strand of the Vision recognises the need for more innovative approaches to supporting the positive growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population.

One of the key themes of the Vision is co-location, involving the introduction of residential uses to locations that were formerly exclusively or predominantly industrial. This will make these neighbourhoods much safer places for all, but particularly women, during the day- and night-time (for example, through the presence of more active uses, the presence of increased

#### **Health issues**

Potential health impacts (positive and negative) of proposed policy

#### **Vision**

The Vision, in seeking seek to promote sustainable transport behaviours amongst all groups within the local population, demonstrates positive health impacts

It also recognises how high quality and community-oriented design, as well as the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for the most vulnerable.

The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making open spaces more attractive and easily accessible to all.

More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.

<p>numbers of individuals in the public realm, and improved levels of natural surveillance).</p>	
<p><b>Strategy</b></p> <p>The Strategy aims to create delivery of direct benefits to the existing communities regardless of sex. It demonstrates positive social impacts by aiming to shield people from negative experiences such as feeling unsafe. One example is by creating multifunctional neighbourhoods featuring amongst other things youth facilities, shops, services and leisure opportunities linked by pleasant and well naturally-surveilled public spaces and routes; these places will help to promote feelings of security for all, but especially women.</p>	<p><b>Strategy</b></p> <p>The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-- fosters a greater sense of security, comfort and confidence when using the public realm. It will encourage in particular women to use public realm (for exercise, leisure etc.) in the day- and night-time by reducing opportunities for crime and reducing a perception of danger and hostility within external public space. This improves mental and physical wellbeing for all.</p> <p>In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and 'head room', allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for all.</p>
<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.</p>	<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all.</p>
<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p> <p>AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and</p>	<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP2.</p>

<p>physical infrastructure. Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure fully accessible to all, which will provide reduced travel times into central London and beyond. The two BLE stations will provide toilets, making journeys more dignified and comfortable for all, but in particular women.</p> <p>All of the above ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.</p>	
<p><b>AAP3: Homes for all</b></p> <p>AAP3 demonstrates positive impacts for all by ensuring a diversity of types and tenures of homes to meet needs of those across the community. This ensures that residents can remain close to their families and communities.</p> <p>AAP3 also extends to Purpose Built Shared Living developments (also known as co-living), which provide private and shared spaces for single occupiers, male and female, to live as part of a community. This type of housing is an example of how, through the 'Homes for All' policy, the AAP will have positive benefits for inter- and intra-sex relations.</p>	<p><b>AAP3: Homes for all</b></p> <p>AAP3 makes this provision to contribute to a greater sense of security in the home, which has positive benefits for mental wellbeing, and improves quality of life.</p>
<p><b>AAP4: Student homes</b></p> <p>In encouraging PBSA developments to provide communal and community-facing facilities, the policy promotes good relations between all, irrespective of sex.</p> <p>Although not expressly stated, the policy enables PBSA operators to provide --if there is demand and if it is considered</p>	<p><b>AAP4: Student homes</b></p> <p>In placing emphasis on high quality design, AAP4 seeks to ensure PBSA developments provide comfortable, practical, restful and uplifting living environments for all. Additionally, the policy promotes where possible the provision of outdoor amenity space for PBSA occupiers. All of these measures</p>



<p>necessary to provide safety reassurances-- female-only floors or spaces bookable for female-only activities. Such provisions can be secured in Student Management Plans.</p>	<p>help support mental wellbeing amongst residents.</p>
<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>AAP5 demonstrates positive impacts for all ages by making provisions for current business occupiers of Old Kent Road. This ensures that current and future businesses are considered in the regeneration of Old Kent Road.</p>	<p><b>AAP5: Businesses and workspace – The Bow Tie</b></p> <p>There are no specific identifiable positive or negative impacts on health for AAP5.</p>
<p><b>AAP6: Life sciences</b></p> <p>AAP6 may have positive impacts for all by bringing new life sciences business to the area, expanding and diversifying the local jobs market.</p>	<p><b>AAP6: Life sciences</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP6.</p>
<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>The town centre strategy seeks to retain/re-provide the various large supermarkets that line the Old Kent Road high street. In part, this is to safeguard the continued operation of free-to-access public toilets within these large retail premises (something that Policy P35 of the Southwark Plan also requires for main town centre uses that are 1,000 sq.m or more GIA). The provision of public toilets makes for a more comfortable and dignified town centre experience for all, in particular women. This has positive social impacts.</p>	<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation. It will, therefore, have positive mental health benefits for both men and women, the rates of chronic loneliness for whom are 6.3% and 7.7% respectively<sup>14</sup>.</p> <p>In aiming to transform the high street into a new destination which:</p> <ul style="list-style-type: none"> <li>• connects neighbourhoods on both sides of the Old Kent Road high street; and</li> <li>• is much more directly connected to the surrounding neighbourhoods via the various Town Centre Links;</li> </ul> <p>journeys on foot/bike to the town centre will become more appealing with a</p>

<sup>14</sup> 'The State of Loneliness 2023: ONS data on loneliness in Britain June 2023', accessible from: <https://www.campaigntoendloneliness.org/wp-content/uploads/The-State-of-Loneliness-2023-ONS-data-on-loneliness-in-Britain.pdf>

	<p>greater perception of safety. This will have positive physical health benefits for all, but importantly women, by making them feel more confident to walk or cycle to the high street.</p>
<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible, both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). This improves accessibility and mobility for all, which potentially impacts positively in terms of socioeconomic participation and opportunities.</p>	<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>One of the key components of AAP8 is promoting a change in travel habits to more active modes of transport. It seeks to do this by, amongst other things, promoting a shift to electric vehicles, delivering more attractive options for cycling and walking, and implementing a CPZ across the entire OA. The policy also seeks to reduce and consolidate commercial deliveries. In these ways, AAP8 will promote healthier lifestyles and (by reducing combustion) tackle air and noise pollution for all.</p>
<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>AAP9 delivers a new network of green links and streets across the Old Kent Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. By creating a network of green and open spaces, some of which are enhanced and some of which are entirely new, the policy increases accessibility to open space for all to ensure equality of access and opportunity.</p> <p>The policy includes 'Principles' sections that advise developers on the types of facilities that would make for high-quality, engaging and appealing playspace. Implicitly, this includes thinking about how playspace can be designed to appeal to girls as much as boys. This has positive social benefits.</p>	<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>There are no specific health impacts arising from AAP9.</p> <p>However, more generally, AAP9 delivers positive health benefits by creating green spaces for safe and accessible exercise and leisure for all. Public toilets are also planned for Frensham Street Park, making time spent in green/open public space a more dignified and comfortable experience for all, especially women. This promotes greater physical and mental health and wellbeing.</p>

<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.</p>	<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP10.</p>
<p><b>AAP11: Character and heritage</b></p> <p>AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all.</p>	<p><b>AAP11: Character and heritage</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP11.</p>
<p><b>AAP12: Design</b></p> <p>AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all. This includes ensuring places (internal and external) are well-lit and naturally-surveilled, with opportunities for crime designed-out, which has positive social impacts for all but particularly women.</p>	<p><b>AAP12: Design</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP12.</p> <p>More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all to lead healthier lifestyles.</p>
<p><b>AAP13: Climate Emergency</b></p> <p>AAP13 demonstrates positive impacts for all by ensuring new development responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:</p> <ul style="list-style-type: none"> <li>• improving air quality;</li> <li>• creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and</li> <li>• reducing global warming.</li> </ul>	<p><b>AAP13: Climate Emergency</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP13.</p> <p>There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing.</p>

<p>All of the aforementioned have beneficial impacts for all.</p>	
<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 illustrates positive impacts by ensuring development has met high environmental standards and promoting more active, public and sustainable travel modes to reduce pollution. This policy aims to improve these conditions to ensure a cleaner and greener environment.</p>	<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.</p> <p>The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely. Furthermore, it reinforces high standards of residential design to ensure that homes, including homes colocated with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.</p> <p>Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population.</p>
<p><b>AAP15: Great start in life</b></p> <p>AAP15 illustrates positive impacts for all because it provides learning and education facilities for the young, for the mature, and for continuous adult learning. This ensures equality of opportunity for all, by improving access to education. This then ensures a higher skilled workforce and boosts employability, while also reducing unemployment and providing new opportunities for all.</p>	<p><b>AAP15: Great start in life</b></p> <p>AAP15 demonstrates positive health impacts for children and young people by improving air pollution both internally (e.g. through building design) and externally (e.g. through maximising distance to roads) to reduce the risk of developing respiratory illness or difficulties later in life. It also encourages greater contact with nature, which has proven mental health benefits.</p>
<p><b>AAP16: Child and youth provision</b></p>	<p><b>AAP16: Child and youth provision</b></p>

<p>AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm, for children and young people to congregate and exercise for all, which promotes social cohesion. It also supports young people's independence improving their development, teaching and learning.</p> <p>Implicitly, the policy encourages thinking about how youth facilities can be designed to appeal to girls as much as boys.</p> <p>The policy also places emphasis on these facilities being affordable distributed across neighbourhoods, rather than consolidated in a single location. This encourages greater community cohesion, which has positive social impacts.</p>	<p>AAP16 demonstrates positive health impacts by providing new and improving existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle —attendant with which are mental and physical benefits— irrespective of sex.</p>
<p><b>Sub area and site allocations</b></p> <p>Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.</p>	<p><b>Sub area and site allocations</b></p> <p>There are no specific identifiable impacts on health for Sub Areas.</p> <p>More generally, the proposed enhancements to –and delivery of new– green and open spaces within the sub areas will have positive health impacts for all.</p>
<p><b>Sub Area 1</b></p> <p>Sub area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the</p>	<p><b>Sub Area 1</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 1.</p> <p>More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all, who will benefit from safer and healthier environments</p>

<p>existing land uses, businesses and character. This will help foster good relationships for all.</p> <p>The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts for all.</p>	<p>for recreation. This has positive mental and physical health effects.</p>
<p><b>Sub Area 2</b></p> <p>In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities –which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and OKR11– will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts for all.</p> <p>The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all. Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life.</p>	<p><b>Sub Area 2</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 2.</p> <p>More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.</p>
<p><b>Sub Area 3</b></p> <p>Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be</p>	<p><b>Sub Area 3</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 3.</p>

<p>delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.</p> <p>Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by co-location.</p>	<p>More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.</p>
<p><b>Sub Area 4</b></p> <p>Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.</p>	<p><b>Sub Area 4</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 4.</p>
<p><b>Sub Area 5</b></p> <p>Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.</p>	<p><b>Sub Area 5</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 5.</p>

Equality information on which above analysis is based	Health data on which above analysis is based
<p>The above analysis is based on equality information and health data sets as set out in:</p> <ul style="list-style-type: none"> <li>• Appendix 3 '<i>Baseline data – Facts and Figures</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission; and</li> <li>• Appendix 9 '<i>Baseline Indicators Table</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.</li> </ul> <p>Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).</p> <p>It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of sex, are listed alongside each indicator:</p> <ul style="list-style-type: none"> <li>• IIA01: AAP3, AAP4, AAP5, AAP6, AAP7</li> <li>• IIA02: AAP15, AAP16</li> <li>• IIA03: AAP8, AAP9</li> <li>• IIA04: AAP12</li> <li>• IIA05: AAP4, AAP9, AAP15, AAP16</li> <li>• IIA06: AAP8, AAP12, AAP13, AAP14</li> <li>• IIA07: AAP8, AAP13, AAP14</li> <li>• IIA08: AAP12, AAP13, AAP14</li> <li>• IIA09: AAP12, AAP14</li> <li>• IIA010: AAP14</li> <li>• IIA011: AAP10, AAP11, AAP12, AAP14</li> <li>• IIA012: AAP10, AAP11, AAP12,</li> <li>• IIA013: AAP9, AAP14</li> <li>• IIA014: AAP14</li> <li>• IIA015: AAP3, AAP4</li> <li>• IIA016: AAP8, AAP13</li> <li>• IIA017: AAP1, AAP2</li> </ul>	
<p><b>Mitigating actions to be taken</b></p>	
<p>Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).</p> <p>We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.</p>	



<b><u>SEXUAL ORIENTATION</u></b>	
Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.	
<b>Societal and economic issues</b>	<b>Health issues</b>
Potential impacts (positive and negative) of proposed policy	Potential impacts (positive and negative) of proposed policy
<b>Vision</b>	<b>Vision</b>
<p>The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel enhancements (for Phase 1) and the BLE (Phase 2).</p> <p>Furthermore, the Connecting Communities strand of the Vision recognises the need for more innovative approaches to supporting the positive growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population.</p>	<p>The Vision, in seeking seek to promote sustainable transport behaviours amongst all groups within the local population, demonstrates positive health impacts</p> <p>It also recognises how high quality and community-oriented design, as well as the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for the most vulnerable.</p> <p>The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making open spaces more attractive and easily accessible to all.</p> <p>More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.</p>
<b>Strategy</b>	<b>Strategy</b>
The Strategy aims to create delivery of direct benefits to the existing communities regardless of sexual orientation. It demonstrates positive social impacts by aiming to shield people from negative experiences such as feeling unsafe. One example is by creating multifunctional neighbourhoods featuring amongst other things youth facilities, shops, services and leisure	The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-- fosters a greater sense of security, comfort and confidence when using the public realm. It will encourage in particular women to use public realm (for exercise, leisure etc.) in the day- and night-time by reducing opportunities

<p>opportunities linked by pleasant and well naturally-surveilled public spaces and routes; these places will help to promote feelings of security for all.</p>	<p>for crime and reducing a perception of danger and hostility within external public space. This improves mental and physical wellbeing for all.</p> <p>In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and ‘head room’, allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for all.</p>
<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.</p>	<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all.</p>
<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p> <p>AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure fully accessible to all, which will provide reduced travel times into central London and beyond.</p> <p>All of the above ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.</p>	<p><b>AAP2: Bakerloo Line Upgrade and Extension</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP2.</p>

<p><b>AAP3: Homes for all</b></p> <p>AAP3 demonstrates positive impacts for all by ensuring a diversity of types and tenures of homes to meet needs of those across the community. This ensures that residents can remain close to their families and communities.</p>	<p><b>AAP3: Homes for all</b></p> <p>AAP3 makes this provision to contribute to a greater sense of security in the home, which has positive benefits for mental wellbeing, and improves quality of life.</p>
<p><b>AAP4: Student homes</b></p> <p>In encouraging PBSA developments to provide communal and community-facing facilities, the policy promotes good relations between all, irrespective of sexual orientation.</p>	<p><b>AAP4: Student homes</b></p> <p>In placing emphasis on high quality design, AAP4 seeks to ensure PBSA developments provide comfortable, practical, restful and uplifting living environments for all. Additionally, the policy promotes where possible the provision of outdoor amenity space for PBSA occupiers. All of these measures help support mental wellbeing amongst residents.</p>
<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>AAP5 demonstrates positive impacts for all ages by making provisions for current business occupiers of Old Kent Road. This ensures that current and future businesses are considered in the regeneration of Old Kent Road.</p>	<p><b>AAP5: Businesses and workspace – The Bow Tie</b></p> <p>There are no specific identifiable positive or negative impacts on health for AAP5.</p>
<p><b>AAP6: Life sciences</b></p> <p>AAP6 may have positive impacts for all by bringing new life sciences business to the area, expanding and diversifying the local jobs market.</p>	<p><b>AAP6: Life sciences</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP6.</p>
<p><b>AAP6: Town centres, leisure and entertainment</b></p> <p>AAP6 illustrates positive impacts for all because it provides more spaces for social interaction in a pleasant environment, with more neighbourhood events and cultural activities.</p>	<p><b>AAP6: Town centres, leisure and entertainment</b></p> <p>There are no specific identifiable positive or negative impacts on health for AAP6.</p>
<p><b>AAP7: Town centre, leisure and entertainment</b></p>	<p><b>AAP7: Town centre, leisure and entertainment</b></p>

<p>AAP7 aims to transform town centres. This illustrates positive impacts for those of all ages because it aims to deliver a range of shops and amenities to meet daily needs, clustered in two key locations benefiting from high public transport accessibility and high quality and inclusive public realm. By locating essential amenities together it improves accessibility for all.</p>	<p>In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation. It will, therefore, have positive mental health benefits.</p>
<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible, both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). This improves accessibility and mobility for all, which potentially impacts positively in terms of socioeconomic participation and opportunities.</p>	<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>One of the key components of AAP8 is promoting a change in travel habits to more active modes of transport. It seeks to do this by, amongst other things, promoting a shift to electric vehicles, delivering more attractive options for cycling and walking, and implementing a CPZ across the entire OA. The policy also seeks to reduce and consolidate commercial deliveries. In these ways, AAP8 will promote healthier lifestyles and (by reducing combustion) tackle air and noise pollution for all.</p>
<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>AAP9 delivers a new network of green links and streets across the Old Kent Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. The policy also increases accessibility to open space for all.</p>	<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>There are no specific health impacts arising from AAP9.</p> <p>However, more generally, AAP9 delivers positive health benefits by creating green spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing.</p>
<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to</p>	<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP10.</p>

benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.	
<p><b>AAP11: Character and heritage</b></p> <p>AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all.</p>	<p><b>AAP11: Character and heritage</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP11.</p>
<p><b>AAP12: Design</b></p> <p>AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all.</p>	<p><b>AAP12: Design</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP12.</p> <p>More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all to lead healthier lifestyles.</p>
<p><b>AAP13: Climate Emergency</b></p> <p>AAP13 demonstrates positive impacts for all by ensuring new development responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:</p> <ul style="list-style-type: none"> <li>• improving air quality;</li> <li>• creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and</li> <li>• reducing global warming.</li> </ul> <p>All of the aforementioned have beneficial impacts for all.</p>	<p><b>AAP13: Climate Emergency</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP13.</p> <p>There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing.</p>
<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 aims to illustrate positive impacts by ensuring development has</p>	<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 illustrates positive health benefits for all because it works to</p>

<p>met high environmental standards and promoting more active, public and sustainable travel modes to reduce pollution. This policy aims to improve these conditions to ensure a cleaner and greener environment.</p>	<p>improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.</p> <p>The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely. Furthermore, it reinforces high standards of residential design to ensure that homes, including homes colocated with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.</p> <p>Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population.</p>
<p><b>AAP15: Great start in life</b></p> <p>AAP15 demonstrates positive impacts for all by providing accessible and affordable access to youth facilities. The aim of this policy is to support the freedom of children and young people to occupy and move around the public realm independently. This encourages greater community cohesion and supports children and young people's independence improving their development, teaching and learning.</p>	<p><b>AAP15: Great start in life</b></p> <p>AAP15 demonstrates positive health impacts for children and young people by improving air pollution both internally and externally to reduce the risk of developing respiratory illness or difficulties later in life.</p>
<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm, for children and young people to</p>	<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive health impacts by providing new and improving existing indoor and outdoor youth and sports facilities. This promotes a healthy, active lifestyle for all, and also promotes improved mental and physical wellbeing.</p>

<p>congregate and exercise for all, which promotes social cohesion.</p>	
<p><b>Sub area and site allocations</b></p> <p>Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.</p>	<p><b>Sub area and site allocations</b></p> <p>There are no specific identifiable impacts on health for Sub Areas.</p> <p>More generally, the proposed enhancements to –and delivery of new– green and open spaces within the sub areas will have positive health impacts for all.</p>
<p><b>Sub Area 1</b></p> <p>Sub Area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.</p> <p>The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts for all.</p>	<p><b>Sub Area 1</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 1.</p> <p>More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all, who will benefit from safer and healthier environments for recreation. This has positive mental and physical health effects.</p>
<p><b>Sub Area 2</b></p> <p>In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities –which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and</p>	<p><b>Sub Area 2</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 2.</p> <p>More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending</p>

<p>OKR11– will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts for all.</p> <p>The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all. Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life.</p>	<p>their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.</p>
<p><b>Sub Area 3</b></p> <p>Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.</p> <p>Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by co-location.</p>	<p><b>Sub Area 3</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 3.</p> <p>More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.</p>
<p><b>Sub Area 4</b></p> <p>Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly</p>	<p><b>Sub Area 4</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 4.</p>



<p>accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.</p>	
<p><b>Sub Area 5</b></p> <p>Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.</p>	<p><b>Sub Area 5</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 5.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Health data on which above analysis is based</b></p>
<p>The above analysis is based on equality information and health data sets as set out in:</p> <ul style="list-style-type: none"> <li>• Appendix 3 '<i>Baseline data – Facts and Figures</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission; and</li> <li>• Appendix 9 '<i>Baseline Indicators Table</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.</li> </ul> <p>Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).</p> <p>It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of sexual orientation, are listed alongside each indicator:</p> <ul style="list-style-type: none"> <li>• IIA01: AAP3, AAP4, AAP5, AAP6, AAP7</li> <li>• IIA02: AAP15, AAP16</li> <li>• IIA03: AAP8, AAP9</li> </ul>	

- IIA04: AAP12
- IIA05: AAP4, AAP9, AAP15, AAP16
- IIA06: AAP8, AAP12, AAP13, AAP14
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- IIA014: AAP14
- IIA015: AAP3, AAP4
- IIA016: AAP8, AAP13
- IIA017: AAP1, AAP2

#### **Mitigating actions to be taken**

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

### **SOCIOECONOMIC DISADVANTAGE**

Although the Equality Act 2010 does not include socioeconomic status as one of the protected characteristics, Southwark Council recognises that this continues to be a major cause of inequality in the borough. Socioeconomic status is the measure of an area's, an individual's or families economic and social position in relation to others, based on income, education, health, living conditions and occupation.

#### **Societal and economic issues**

Potential impacts (positive and negative) of proposed policy

#### **Vision**

The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel

#### **Societal and economic issues**

Potential health impacts (positive and negative) of proposed policy

#### **Vision**

The Vision, in seeking seek to promote sustainable transport behaviours amongst all groups within the local population, demonstrates positive health impacts

It also recognises how high quality and community-oriented design, as well as

<p>enhancements (for Phase 1) and the BLE (Phase 2). As the Vision expressly states, it aims to deliver positive benefits through “delivering enviable economic and cultural capital opportunity for all and not just privileged few”, in so doing fighting socioeconomic disadvantage.</p> <p>Furthermore, the Connecting Communities strand of the Vision recognises the need for more innovative approaches to supporting the positive growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population.</p>	<p>the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for those who suffer from socioeconomic disadvantage.</p> <p>The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making open spaces more attractive and easily accessible to all, irrespective of socioeconomic status.</p> <p>More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.</p>
<p><b>Strategy</b></p> <p>The AAP delivers positive impacts by recognising the need for affordable homes. The Strategy sets out a 35% requirement for affordable new homes, with an aim to deliver 7,000 affordable homes in total. This will have direct positive impacts for lower-income households in the OA.</p> <p>The AAP, in seeking to create 10,000 new jobs (including training/employment opportunities in higher paid sectors), will deliver positive economic impacts for the resident population. This will help tackle socioeconomic disadvantage.</p> <p>The delivery of the BLE, with its two proposed stations (‘Old Kent Road’ and ‘Burgess Park’) will bring major inward investment during and post-completion, as identified in the Hatch Study entitled “Moving London Forward Bakerloo Line Upgrade and Extension”, produced and published in 2024. For those who live within reach of the existing Bakerloo Line (47% of whom are within the top 30% most deprived communities in</p>	<p><b>Strategy</b></p> <p>The positive health impacts of addressing the issue of affordability in housing arise from a greater sense of security that will encourage improved mental health and wellbeing.</p> <p>The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-- fosters a greater sense of security, comfort and confidence when using the public realm. This improves mental wellbeing for all.</p> <p>In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and ‘head room’, allowing residents to think, rest and enjoy their leisure time. This is particularly important in the Old Kent Road OA, where living environment quality scores poorly in the IMD; the socioeconomically disadvantaged are likely to be particularly affected by this. The environmental improvements will,</p>

<p>England) this would have positive socioeconomic impacts on a transformative scale<sup>15</sup>.</p>	<p>therefore, improve mental health and wellbeing for all.</p>
<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.</p> <p>Although regeneration causes land and property values to rise, attendant with which is usually an increase in rent rates charged by private sector landlords, the masterplan provides mitigation against this negative impact by delivering 7,000 affordable homes. These homes will be available to those in greatest need and suffering most from housing insecurity.</p>	<p><b>AAP1: The Masterplan</b></p> <p>AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all groups.</p>
<p><b>AAP2: Bakerloo Line Extension and Infrastructure</b></p> <p>AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. These upgrades will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. This ensures equality of access to opportunity, amenities and services for all.</p>	<p><b>AAP2: Bakerloo Line Extension and Infrastructure</b></p> <p>New and improved public transport infrastructure will reduce reliance on private motor vehicles, in turn improving air quality and health outcomes for all.</p>
<p><b>AAP3: Homes for all</b></p> <p>AAP3 demonstrates positive commitments because it aims to deliver more affordable housing across a</p>	<p><b>AAP3: Homes for all</b></p> <p>AAP3, by seeking to deliver high quality housing for those of all ages, including specialist (sometime managed) forms of</p>

<sup>15</sup> 'Moving London Forward Bakerloo Line Upgrade and Extension', accessible from [https://centrallondonforward.gov.uk/wp-content/uploads/2024/02/Page-Numbers-revised-H372051\\_REP\\_001F\\_Bakerloo-Extension-Revised\\_Digital.pdf](https://centrallondonforward.gov.uk/wp-content/uploads/2024/02/Page-Numbers-revised-H372051_REP_001F_Bakerloo-Extension-Revised_Digital.pdf)

<p>broader range of tenures to meet individuals' and families' needs regardless of socioeconomic background. Furthermore these homes will be high quality and the tenures will be undetectable. This is particularly relevant to the Old Kent Road OA, where of all seven indices of deprivation, the 2019 IMD found "quality of living environment" to be the poorest performing metric in this location</p>	<p>housing for mature citizens, will provide comfortable living environments where residents feel a greater sense of security in their home. This has positive benefits for mental wellbeing, and improves quality of life.</p>
<p><b>AAP4: Student homes</b></p> <p>AAP4 demonstrates positive economic impacts by encouraging investment from higher education providers, who make a significant contribution to the borough's economy and labour market.</p>	<p><b>AAP4: Student homes</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP4.</p>
<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>AAP5 demonstrates positive socioeconomic impacts for people of working age by making provisions for current business occupiers of the Old Kent Road OA. The policy ensures that current and future businesses are considered in the regeneration of Old Kent Road OA. The 10,00 new jobs brought by the AAP will have direct economic impacts, by providing local people with a greater number of employment opportunities within close reach of their home.</p>	<p><b>AAP5: Businesses and workspace - The Bow Tie</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP5.</p>
<p><b>AAP6: Life sciences</b></p> <p>AAP6 will have positive impacts for those of working age because it will complement and support existing business in the life sciences and related sectors, while also bringing new life sciences business to the area, expanding and diversifying the local jobs market. Importantly, these new employment opportunities for local people will be in a higher skilled and paid sector.</p>	<p><b>AAP6: Life sciences</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP6.</p>

<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>AAP7 illustrates positive impacts for all by making provisions for smaller local shops and community facilities in two town centres, making these hubs easily accessible by non-vehicular forms of transport from all neighbourhoods within the OA. This ensures greater accessibility for all to a range of shops, services and recreational/leisure outlets.</p>	<p><b>AAP7: Town centres, leisure and entertainment</b></p> <p>In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation. It will, therefore, have positive mental health benefits.</p> <p>AAP7 seeks to deliver a new NHS health hub to serve the area's growing population. This will bring major benefits for all, providing integrated primary health, community health and social care support. In promoting a shift towards co-ordinated and holistic care in this way, AAP7 responds to the increase in the number of people in the borough with multiple long-term conditions.</p>
<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible, both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). By improving accessibility and mobility for all in this way, increased socioeconomic participation and opportunities are made possible.</p>	<p><b>AAP8: Movement - People, Place and Experience</b></p> <p>There are no specific identifiable positive or negative impacts on health for AAP8.</p>
<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>AAP9 delivers a new network of green links and streets across the Old Kent Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. The</p>	<p><b>AAP9: The Greener Belt - Parks and healthy streets</b></p> <p>AAP9 delivers positive health benefits for all because it creates greens spaces for safe and accessible exercise and leisure for all. This promotes greater</p>

<p>policy also increases accessibility to open space for all.</p> <p>There is a correlation between poverty and lower quality living environment. Furthermore, socioeconomic disadvantage can have a bearing on access to good quality and safe green spaces. AAP9 seeks to tackle this adverse relationship by improving the quality and number of green and open spaces, in so doing broadening and enhancing accessibility for residents of all background, but in particular for the most socioeconomically disadvantaged.</p>	<p>physical and mental health and wellbeing for people of all ages.</p>
<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>AAP10 illustrates positive impacts for all by ensuring tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.</p>	<p><b>AAP10: Tall buildings strategy - The Stations and the Crossings</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP10.</p>
<p><b>AAP11: Character and heritage</b></p> <p>AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all.</p>	<p><b>AAP11: Character and heritage</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP11.</p>
<p><b>AAP12: Design</b></p> <p>AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road OA but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all.</p> <p>It also reiterates the Southwark Plan and London Plan in stressing the importance on designing-out crime. This is particularly important in the OKR OA, where the IMD show incidence of crime</p>	<p><b>AAP12: Design</b></p> <p>There are no specific identifiable positive or negative impacts on health for AAP10.</p> <p>More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping everyone lead healthier lifestyles irrespective of socioeconomic status.</p>

<p>to be one of the metrics against which the area performs poorly. By actively seeking to tackle this inequality, AAP12 demonstrates positive socioeconomic impacts.</p>	
<p><b>AAP13: Climate Emergency</b></p> <p>AAP13 demonstrates positive impacts for all by ensuring new development responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:</p> <ul style="list-style-type: none"> <li>• improving air quality;</li> <li>• creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and</li> <li>• reducing global warming.</li> </ul> <p>All of the aforementioned have beneficial impacts for local residents of all socioeconomic backgrounds.</p>	<p><b>AAP13: Climate Emergency</b></p> <p>There are no specific identifiable positive or negative impacts on health arising from AAP13. There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing for people of all socioeconomic backgrounds</p>
<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 aims to illustrate positive impacts for all ages by ensuring development has meet high environmental standards and promote more active, public and sustainable travel modes to reduce pollution. Those from lower socioeconomic backgrounds could live in areas with poorer environmental quality and are therefore more susceptible to the effects of poor air quality and low environmental quality. This policy aims to improve these conditions to ensure a cleaner, greener and safer environment for all.</p> <p>People living in poverty are more financially susceptible to the effects of flooding, which the policy aims to address with its flooding minimisation and drainage requirements.</p>	<p><b>AAP14: Water management, air and noise quality</b></p> <p>AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.</p> <p>It sets out requirements to ensure future development meets high standards to ensure long term environmental sustainability that all residents can benefit from.</p> <p>Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all socioeconomic groups within the local population.</p>



<p><b>AAP15: Great start in life</b></p> <p>AAP15 demonstrates positive impacts for all by providing accessible and affordable access to youth facilities. The aim of this policy is to support the freedom of children and young people to occupy and move around the public realm independently. This encourages greater community cohesion and supports children and young people's independence improving their development, teaching and learning.</p>	<p><b>AAP15: Great start in life</b></p> <p>AAP15 demonstrates positive health impacts for children and young people by improving school grounds and outdoor areas where they can play, exercise and engage with habitats and food growing. Locating places of education away from main roads helps to reduce the risk of developing respiratory illness or difficulties later in life.</p>
<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive impacts by ensuring all young people have access to social and physical infrastructure regardless of their socioeconomic background. This creates safe indoor and outdoor spaces in the public realm where children and young people can congregate and exercise, which promotes social cohesion.</p>	<p><b>AAP16: Child and youth provision</b></p> <p>AAP16 demonstrates positive health impacts by providing new and improved existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle —attendant with which are mental and physical benefits— for everyone irrespective of socioeconomic background.</p>
<p><b>Sub area and Site allocations</b></p> <p>Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.</p>	<p><b>Sub area and Site allocations</b></p> <p>There are no specific identifiable impacts on health for Sub Areas.</p> <p>More generally, the proposed enhancements to –and delivery of new– green and open spaces within the sub areas will have positive health impacts for all.</p>
<p><b>Sub Area 1</b></p> <p>Sub area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the</p>	<p><b>Sub Area 1</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 1.</p>

<p>existing land uses, businesses and character. This will help foster good relationships for all.</p>	
<p><b>Sub Area 2</b></p> <p>In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities –which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and OKR11– will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts for all.</p> <p>The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all. Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life, helping to tackle socioeconomic disadvantage.</p>	<p><b>Sub Area 2</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 2.</p> <p>More generally, the investment in new parks and various street reconfigurations (all of which will be designed to be fully accessible) will make disabled people feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.</p>
<p><b>Sub Area 3</b></p> <p>Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle</p>	<p><b>Sub Area 3</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 3.</p> <p>More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.</p>

<p>for all, but will also promote social and community cohesion.</p> <p>Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by co-location.</p>	
<p><b>Sub Area 4</b></p> <p>Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.</p>	<p><b>Sub Area 4</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 4.</p>
<p><b>Sub Area 5</b></p> <p>Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.</p>	<p><b>Sub Area 5</b></p> <p>There are no specific identifiable positive or negative impacts on health for Sub Area 5.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Health data on which above analysis is based</b></p>
<p>The above analysis is based on equality information and health data sets as set out in:</p> <ul style="list-style-type: none"> <li>• Appendix 3 '<i>Baseline data – Facts and Figures</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission; and</li> </ul>	

- Appendix 9 '*Baseline Indicators Table*' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.

Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).

It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of socioeconomic disadvantage, are listed alongside each indicator:

- IIA01: AAP3, AAP4, AAP5, AAP6, AAP7
- IIA02: AAP15, AAP16
- IIA03: AAP8, AAP9
- IIA04: AAP12
- IIA05: AAP4, AAP9, AAP15, AAP16
- IIA06: AAP8, AAP12, AAP13, AAP14
- IIA07: AAP8, AAP13, AAP14
- IIA08: AAP12, AAP13, AAP14
- IIA09: AAP12, AAP14
- IIA010: AAP14
- IIA011: AAP10, AAP11, AAP12, AAP14
- IIA012: AAP10, AAP11, AAP12,
- IIA013: AAP9, AAP14
- IIA014: AAP14
- IIA015: AAP3, AAP4
- IIA016: AAP8, AAP13
- IIA017: AAP1, AAP2

#### **Mitigating actions to be taken**

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

#### **HUMAN RIGHTS**

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

<b>Potential impacts (positive and negative) of proposed policy</b>
<p>The Old Kent Road AAP is anticipated to have a range of positive impacts on people living and working in the Old Kent Road Opportunity Area. The proposed masterplan and development management policies do not threaten the human rights of anyone living or working in the area.</p>
<b>Information on which above analysis is based</b>
<p>The above analysis is based on equality information and health data sets as set out in:</p> <ul style="list-style-type: none"> <li>• Appendix 3 '<i>Baseline data – Facts and Figures</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission; and</li> <li>• Appendix 9 '<i>Baseline Indicators Table</i>' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.</li> </ul> <p>These indicators broadly apply to the Old Kent Road AAP a whole, and also applies more specifically to each policy, these indicators are:</p> <ul style="list-style-type: none"> <li>• IIA01: AAP4, AAP5, AAP6</li> <li>• IIA02: AAP13, AAP14</li> <li>• IIA03: AAP10, AAP11</li> <li>• IIA04: AAP10</li> <li>• IIA05: AAP10, AAP13, AAP14, AAP15</li> <li>• IIA06: AAP3, AAP7, AAP12</li> <li>• IIA07: AAP3, AAP7, AAP12</li> <li>• IIA08: AAP3, AAP7, AAP10, AAP12</li> <li>• IIA09: AAP10, AAP12</li> <li>• IIA010: AAP10, AAP12</li> <li>• IIA011: AAP5, AAP6, AAP8</li> <li>• IIA012: AAP9, AAP10</li> <li>• IIA013: AAP13</li> <li>• IIA014: AAP12</li> <li>• IIA015: AAP4</li> <li>• IIA016: AAP3, AAP7</li> <li>• IIA017: AAP1, AAP2</li> </ul>
<b>Mitigating actions to be taken</b>
<p>Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).</p> <p>We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.</p>



# Old Kent Road Area Action Plan

Proposed Submission Version

October 2024

Equalities Impact Assessment

## EQIA Document 04: Supporting Datasets

Old Kent Road Area Action Plan 2024 appendices: Document Locator	
No.	Title
Appendix A	Old Kent Road AAP 2024
Appendix B	Consultation Plan
Appendix C	Consultation Report
Appendix D	Integrated Impact Assessment
Appendix E	Habitats Regulations Assessment
Appendix F	Equalities Impact Assessment, comprising:

	- EQIA Document 01: Executive Summary
	- EQIA Document 02: Summary of the EQIA
	- EQIA Document 03: Equalities Impact Assessment
	- EQIA Document 04: Supporting Datasets
Appendix G	Health Impact Assessment

## Supporting Datasets

### Introduction

The data below sets out the need at the Opportunity Area level and (where relevant) borough level, and identifies the number/proportion of people with these protected characteristics. It provides the key pieces of most relevant data for who is impacted by the policies in the Old Kent Road Area Action Plan. The evidence is taken from:

- a range of borough, regional and national sources of data; and
- the Integrated Impact Assessment baseline data and indicators (the full comprehensive catalogue of which can be found by referring to Appendices 3 and 9 of the Integrated Impact Assessment).

The table identifies where we:

- do have data; and
- would want to have more specific equalities data, but either the data is unavailable and difficult to locate or it is unobtainable due to the nature of the protected characteristic and process of obtaining that data.

This table will be updated alongside the Integrated Impact Assessment IIA to reflect the changing need and context in the borough.

The data and indicators that support each policy are set out in the Integrated Impact Assessment Appendix Baseline Indicators. These are referred to in the Full Equalities Impact Assessment (EQIA Document 03).

Please note:

- where a source of data relates to multiple AAP objectives, it has been captured within the first section of the table (the dataset for the 'Delivery' objectives, as these overarch all the other objectives within the plan) - this avoids repetition;
- matters of crime are captured within the dataset for the 'Great Start in Life' objectives.

## Datasets

Dataset for the 'Delivery' objectives	
<b>Policies:</b> <ul style="list-style-type: none"><li>• AAP1 'The Masterplan'</li><li>• AAP2 'Bakerloo Line Upgrade and Extension'</li></ul>	
<b>Age</b>	<b>Breakdown of resident population, by age group</b> <ul style="list-style-type: none"><li>• <u>Southwark:</u> As of the date of the 2021 Census, the borough population spans the three key age groups as follows<sup>1</sup>:<ul style="list-style-type: none"><li>- Aged 15 years and under: <b>16.7%</b></li><li>- Aged 16-64: <b>74.9%</b></li><li>- Aged 65 and over: <b>8.3%</b></li></ul></li><li>• <u>Old Kent Road OA:</u> As of the date of the 2021 Census, the Old Kent Road ward population spans the three key age groups as follows<sup>2</sup>:<ul style="list-style-type: none"><li>- Aged 15 years and under: <b>19.5%</b> (which is higher than the borough rate)</li><li>- Aged 16-64: <b>72.6%</b> (which is lower than the borough rate)</li></ul></li></ul>

<sup>1</sup> <https://www.ons.gov.uk/census/maps/choropleth/population/age/resident-age-3a/aged-15-years-and-under>

<sup>2</sup> <https://www.ons.gov.uk/datasets/TS007/editions/2021/versions/2/filter-outputs/bd0ded88-5f66-42e9-871a-3a94e3d33a3b>, then go to 'Age by Single Year' dataset



- Aged 65 and over: **7.9%** (which is lower than the borough rate)

#### Breakdown of resident population, by median age

- Southwark:  
As of the date of the 2021 Census, the median age in the borough is 32.4 years. This is more than two years younger than London (34.9), and almost seven years younger than England (39.4)<sup>3</sup>.
- Old Kent Road OA:  
There are no 'median age' statistics at this more granular geographic scale.

#### Breakdown of resident population, by life expectancy

- Southwark:  
In the period in 2020 to 2022, life expectancy was **78.2 years for males** and **83.3 years for females**<sup>4</sup>. Both the male and female life expectancy is lower than the London rate (79.1 years and 83.6 years respectively)<sup>5</sup>.

<sup>3</sup> <https://www.southwark.gov.uk/assets/attach/206524/JSNA-Annual-Report-2023.pdf>

<sup>4</sup> <https://moderngov.southwark.gov.uk/documents/s115562/Apendix%201%20-%20JSNA%20Annual%20Report%202023%20Southwarks%20Joint%20Strategic%20Needs%20Assessment.pdf>

<sup>5</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/bulletins/lifeexpectancyforlocalareasoftheuk/between2001to2003and2020to2022>

	<ul style="list-style-type: none"> <li>• <u>Old Kent Road OA:</u> In the period in 2020 to 2022, in the East Central Southwark MWA life expectancy was <b>77.8 for males</b> and <b>82.7 years for females</b><sup>6</sup>. For both sexes, this is lower than the borough, regional and national levels.</li> </ul>
<b>Disability</b>	<p><b>Breakdown of resident population, by disability</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of the date of the 2021 Census, <b>42,022</b> Southwark residents (14.4% of the borough’s total population) are recorded as Disabled under the Equality Act (of which 17,361 had activities ‘limited a lot’, and 24,661 had activities ‘limited a little’). 14% is a similar proportion to London but slightly less than the national average of 17.3%<sup>7 8</sup>.</li> <li>• <u>Old Kent Road OA:</u> As of the date of the 2021 Census, <b>2,740</b> residents in the Old Kent Road ward are recorded as Disabled under the Equality Act (of which 1,237 had activities ‘limited a lot’, and 1,503 had activities “limited a little”)<sup>9</sup>. As such, 6.5% of Southwark’s disabled residents reside in the Old Kent Road ward.</li> </ul>
	<p><b>Breakdown of resident population, by households with at least one disabled occupant</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u></li> </ul>

6 <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/lifeexpectancies/bulletins/nationallifetablesunitedkingdom/2020to2022#:~:text=Life%20expectancy%20at%20birth%20in%202020%20to%202022%20was%20estimated,and%2082.8%20years%20for%20females>

7 <https://www.ons.gov.uk/datasets/TS038/editions/2021/versions/1>, then go to ‘Disability’ dataset

8 <https://www.ons.gov.uk/visualisations/customprofiles/build/#E05011109>

9 <https://www.ons.gov.uk/datasets/TS038/editions/2021/versions/1/filter-outputs/f0791cee-fded-4feb-b724-aecadef73ab>

	<p>As of the date of the 2021 Census, <b>33,775</b> households (25.8% of the total households in the borough (130,818)) had at least one resident with a disability<sup>10</sup>. This is broadly consistent with the national rate, which is 25.4% of households (6.0 million in total)<sup>11</sup>. It is also broadly consistent with the London rate, which is 26.6% of households (3,423,890 in total)<sup>12</sup></p> <ul style="list-style-type: none"> <li>• <u>Old Kent Road OA:</u> As of the date of the 2021 Census, <b>2,191</b> households in the Old Kent Road ward (29.8% of the total households in the ward (7,349)) had at least one resident with a disability<sup>13</sup>. This is higher than the borough, regional and national rates.</li> </ul>
<p><b>Gender Reassignment</b></p>	<p><b>Breakdown of resident population, by gender identity</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of the date of the 2021 Census, there were <b>3,200</b> residents (1% of the borough’s total population) reporting a gender identity different from their sex registered at birth. This is higher than the London rate (0.91%) and the national rate (0.55%)<sup>14</sup>. The 1% rate in Southwark broadly correlates with the national estimate (from the Gender Identity Research and Education Society) that 1% of the population may experience gender dysphoria<sup>15</sup>.</li> </ul>

<sup>10</sup> <https://www.ons.gov.uk/datasets/TS040/editions/2021/versions/1>, then go to ‘Number of disabled people in the household’ dataset, filtered by local authority

<sup>11</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/disabilityenglandandwales/census2021>

<sup>12</sup> <https://www.ons.gov.uk/datasets/TS040/editions/2021/versions/3/filter-outputs/9016b6fc-0731-4c2b-8880-8566309094f6#get-data>

<sup>13</sup> <https://www.ons.gov.uk/datasets/TS040/editions/2021/versions/1>, then go to ‘Number of disabled people in the household’ dataset, filtered by ward

<sup>14</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/disabilityenglandandwales/census2021>

<sup>15</sup> <https://www.bma.org.uk/advice-and-support/gp-practices/gp-service-provision/managing-patients-with-gender-dysphoria#:~:text=The%20Gender%20Identity%20Research%20and,where%20necessary%2C%20treatment%20is%20available.>

	<p>Southwark ranked 5th highest in England for trans/non-binary identity<sup>16</sup>.</p> <ul style="list-style-type: none"> <li>• <u>Old Kent Road OA:</u> There are no statistics at this more granular geographic scale; however, as the ward population equates to roughly 6.2% of the borough<sup>17</sup>, this may equate to around <b>192</b> people with a gender identity different from their sex registered at birth living in the Old Kent Road ward.</li> </ul>
<b>Pregnancy and Maternity</b>	<p><b>Breakdown of resident population, by general fertility rate</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of the date of the 2021 Census, the general fertility rate in the borough was <b>42.5 births per 1,000 women</b><sup>18</sup>: This is lower than the national rate, which is 54.1 births per 1,000 women<sup>19</sup>.</li> <li>• <u>Old Kent Road OA:</u> As of the date of the 2021 Census, the general fertility rate in the Old Kent Road ward was <b>36.1 births per 1,000 women</b><sup>20</sup>, while in the East Central MWA it was <b>38.6 births per 1,000 women</b>. These are both lower rates than at borough and national levels.</li> </ul>
<b>Marriage and Civil Partnership</b>	<b>Assessment not required.</b>

<sup>16</sup> <https://www.southwark.gov.uk/assets/attach/177190/Census-2021-Profile-Gender-Identity-Sexual-Orientation.pdf>

<sup>17</sup> Based on the 2021 Census, the population of Southwark is 307,637 and the population of Old Kent Road ward is 19,037.

<sup>18</sup> <https://www.ons.gov.uk/visualisations/censusareachanges/E09000028>

<sup>19</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/birthsummarytablesenglandandwales/2021#:~:text=As%20discussed%20in%20our%202020,2021%2C%20from%2055.1%20in%202020.>

<sup>20</sup> <https://www.ons.gov.uk/visualisations/censusareachanges/E09000028>

<b>Race</b>	<p><b>Breakdown of resident population, by ethnic group</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of the date of the 2021 Census, the ethnic composition of the borough is as follows<sup>21</sup>: <ul style="list-style-type: none"> <li>- White: <b>51%</b></li> <li>- Black, Black British, Caribbean or African: <b>25%</b></li> <li>- Asian or Asian British: <b>10%</b></li> <li>- Mixed or Multiple Ethnic Groups: <b>7%</b></li> <li>- Chinese/Other: <b>6%</b></li> </ul> </li> <li>• <u>Old Kent Road OA:</u> As of the date of the 2021 Census, the ethnic composition of the Old Kent Road ward is as follows<sup>22</sup>: <ul style="list-style-type: none"> <li>- White: <b>35%</b></li> <li>- Black, Black British, Caribbean or African: <b>38%</b></li> <li>- Asian or Asian British: <b>9%</b></li> <li>- Mixed or Multiple Ethnic Groups: <b>7%</b></li> <li>- Chinese/Other: <b>11%</b></li> </ul> </li> </ul>
	<p><b>Breakdown of resident population, by country of birth</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of the date of the 2021 Census, <b>40%</b> of the population of the borough was born in a country that was not part of the UK, Ireland or Channel Islands<sup>23</sup>. In 2021, the top country of birth outside the UK and Ireland was Nigeria. Residents born in Italy, Jamaica, Spain and Ghana also made up a notable proportion of Southwark's population.</li> <li>• <u>Old Kent Road OA:</u></li> </ul>

<sup>21</sup> <https://www.ons.gov.uk/visualisations/censusareachanges/E09000028>

<sup>22</sup> <https://www.southwark.gov.uk/assets/attach/206524/JSNA-Annual-Report-2023.pdf>

<sup>23</sup> <https://www.southwark.gov.uk/assets/attach/169610/Census-2021-Profile-Demography-and-Migration.pdf>

	As of the date of the 2021 Census, <b>48.1%</b> of the population of the Old Kent Road ward was born in a country that was not part of the UK, Ireland or Channel Islands <sup>24</sup> . This is higher than the rates at borough, regional (40.6% <sup>25</sup> ) and national (16.8% <sup>26</sup> ) levels.
<b>Religion and Belief</b>	<p><b>Breakdown of resident population, by religion/belief</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> The majority of residents in Southwark who stated their religion in the 2021 Census were of <b>Christian faith (43.3%)</b>, with the second highest category being <b>'No religion' (36.4%)</b><sup>27</sup>.</li> <li>• <u>Old Kent Road OA:</u> The majority of residents in the Old Kent Road ward who stated their religion in the 2021 Census were of <b>Christian faith (51.1%)</b>, with the second highest category being <b>'No religion' (27.5%)</b><sup>28</sup>.</li> </ul>
<b>Sex</b>	<p><b>Breakdown of resident population, by sex</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of the date of the 2021 Census, the population of the borough comprises<sup>29</sup>: <ul style="list-style-type: none"> <li>- Female: <b>51.6%</b></li> <li>- Male: <b>48.4%</b></li> </ul> </li> <li>• <u>Old Kent Road OA:</u></li> </ul>

<sup>24</sup> <https://www.ons.gov.uk/visualisations/customprofiles/build/#E05011109>

<sup>25</sup> <https://www.ons.gov.uk/news/news/census2021demographyandinternationalmigrationstatistics/#:~:text=In%202021%2C%20more%20than%204,Residents%20born%20outside%20the%20UK>

<sup>26</sup> <https://www.ons.gov.uk/news/news/census2021demographyandinternationalmigrationstatistics/#:~:text=In%202021%2C%20more%20than%204,Residents%20born%20outside%20the%20UK>

<sup>27</sup> <https://www.southwark.gov.uk/assets/attach/169632/Census-2021-Profile-Ethnicity-Identity-Language-and-Religion-1-.pdf>

<sup>28</sup> <https://www.ons.gov.uk/datasets/TS030/editions/2021/versions/2/filter-outputs/a762c99c-1698-40b2-a1df-5680424eeadb#get-data>

<sup>29</sup> <https://www.ons.gov.uk/datasets/TS008/editions/2021/versions/4>

	<p>As of the date of the 2021 Census, the population of the Old Kent Road ward comprises<sup>30</sup>:</p> <ul style="list-style-type: none"> <li>- Female: <b>51.9%</b></li> <li>- Male: <b>48.1%</b></li> </ul>
<p><b>Sexual Orientation</b></p>	<p><b>Breakdown of resident population, by sexual orientation</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of the date of the 2021 Census, <b>17.29%</b> of Southwark’s residents identify as something other than straight or heterosexual. 8.07% of Southwark’s resident population identify as gay/lesbian, bisexual, pansexual, asexual and/or queer (which indicates the differential of 9.22% did not state their sexuality). The 17.29% rate is higher than the London (13.81%) and national (10.63%) rates<sup>31</sup>.</li> <li>• <u>Old Kent Road OA:</u> There are no ‘sexual orientation’ statistics at this more granular geographic scale.</li> </ul>
	<p><b>Experience of place and society, by sexual orientation</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> The Southwark LGBTQ+ Community Consultation 2018-2019 report sets out the findings of a survey designed to assess the experience of LGBTQ+ people in the borough of health and wellbeing, socialising and community safety. It makes recommendations for health and social care providers, Southwark police and voluntary organisations to improve this experience<sup>32 33</sup>. The key findings in terms of experience of place are: <ul style="list-style-type: none"> <li>- 64% of respondents felt safe in their local area; and</li> </ul> </li> </ul>

<sup>30</sup> <https://www.ons.gov.uk/datasets/TS008/editions/2021/versions/4>

<sup>31</sup> [https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualorientationenglandandwales/census2021#:~:text=Source%3A%20Office%20for%20National%20Statistics%20%E2%80%93%20Census%202021&text=43.4%20million%20people%20\(89.4%25%20of,%25\)%20selected%20%E2%80%9COther%20sexual%20orientation%E2%80%9D](https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualorientationenglandandwales/census2021#:~:text=Source%3A%20Office%20for%20National%20Statistics%20%E2%80%93%20Census%202021&text=43.4%20million%20people%20(89.4%25%20of,%25)%20selected%20%E2%80%9COther%20sexual%20orientation%E2%80%9D)

<sup>32</sup> [https://communitysouthwark.org/sites/default/files/images/Southwark%20LGBTQ%2B%20Community%20Consultation%202018-19\\_Final.pdf](https://communitysouthwark.org/sites/default/files/images/Southwark%20LGBTQ%2B%20Community%20Consultation%202018-19_Final.pdf)

<sup>33</sup> [https://southwarklgbtnetwork.com/wp-content/uploads/2019/06/southwark-lgbtq-community-consultation-2018-19\\_final.pdf](https://southwarklgbtnetwork.com/wp-content/uploads/2019/06/southwark-lgbtq-community-consultation-2018-19_final.pdf);

	<ul style="list-style-type: none"> <li>- 51% of respondents felt safe in the borough as a whole.</li> <li>• <u>Old Kent Road OA:</u> The Southwark LGBTQ+ Community Consultation 2018-2019 report<sup>34 35</sup> identifies personal experiences specific to the Old Kent Road OA as: <ul style="list-style-type: none"> <li>- Being considered an unsafe neighbourhood (by some participants in the study);</li> <li>- Encountering physical abuse and uncomfortable interactions with faith groups;</li> <li>- Encountering verbal abuse.</li> </ul> </li> </ul>
<b>Socioeconomic Disadvantage</b>	<b>Indices of deprivation ranking</b> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> Southwark as a whole has an ID score of <b>25.8</b>, and is one of the most deprived boroughs in England, ranked 43rd out of 326 local authorities<sup>36</sup>.</li> <li>• <u>Old Kent Road OA:</u> The average ID score across the six MSOAs falling within the OKR OA is <b>34.7</b>, which indicates higher levels of deprivation than Southwark as a whole<sup>37</sup>.</li> </ul>
	<b>Breakdown of households disadvantaged in one or more dimensions (as a proportion of all households)</b> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> <b>51.5%</b> of households are disadvantaged in two or more dimensions in the borough. This is very similar to the national rate, which is 51.4%.</li> <li>• <u>Old Kent Road OA:</u></li> </ul>

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[https://communitysouthwark.org/sites/default/files/images/Southwark%20LGBTQ%2B%20Community%20Consultation%202018-19\\_Final.pdf](https://communitysouthwark.org/sites/default/files/images/Southwark%20LGBTQ%2B%20Community%20Consultation%202018-19_Final.pdf)

35 [https://southwarklgbtnetwork.com/wp-content/uploads/2019/06/southwark-lgbtq-community-consultation-2018-19\\_final.pdf](https://southwarklgbtnetwork.com/wp-content/uploads/2019/06/southwark-lgbtq-community-consultation-2018-19_final.pdf);

36 [https://assets.publishing.service.gov.uk/media/5d8b3cfbe5274a08be69aa91/File\\_10](https://assets.publishing.service.gov.uk/media/5d8b3cfbe5274a08be69aa91/File_10)

37 [https://research.mysociety.org/sites/imd2019/media/data/imd2019\\_msoa\\_level\\_data.csv](https://research.mysociety.org/sites/imd2019/media/data/imd2019_msoa_level_data.csv)



	<b>63.9%</b> of households are disadvantaged in two or more dimensions in the Old Kent Road ward. This is higher than the borough and national rates.
<b>Dataset for the 'Homes' objectives</b>	
Policies: <ul style="list-style-type: none"> <li>• AAP3 'Homes for All'</li> <li>• AAP4 'Student Homes'</li> </ul>	
<b>Age</b>	<b>Breakdown of specialist housing need, by age:</b> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of 2019, it was found that the following would be required in the borough to meet need by 2029<sup>38</sup>: <ul style="list-style-type: none"> <li>- an additional 780 units of specialist elderly accommodation, of which 559 (72%) should be sheltered and 116 (14%) should be extra care; and</li> <li>- an additional or improved 867 dementia care beds.</li> </ul> </li> <li>• <u>Old Kent Road OA:</u> There are no 'specialist elderly accommodation' statistics available at this more granular geographic scale.</li> </ul>
<b>Disability</b>	<b>Breakdown of specialist housing need, by disability:</b> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of 2019, in the borough<sup>39</sup>: <ul style="list-style-type: none"> <li>- 613 households have unmet wheelchair accessible accommodation requirements; and</li> <li>- 108 households are on the Disability Housing Waiting List</li> </ul> </li> <li>• <u>Old Kent Road OA:</u> There are no 'wheelchair homes and adaptable room' statistics available at this more granular geographic scale.</li> </ul>

<sup>38</sup> <https://www.southwark.gov.uk/assets/attach/11208/SP107-Southwark-Strategic-Housing-Market-Assessment-2019-.pdf>

<sup>39</sup> <https://www.southwark.gov.uk/assets/attach/11208/SP107-Southwark-Strategic-Housing-Market-Assessment-2019-.pdf>

<b>Gender Reassignment</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Pregnancy and Maternity</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Marriage and Civil Partnership</b>	<b>Assessment not required.</b>
<b>Race</b>	<p><b>Breakdown of specialist housing need, by race:</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> There is a need for pitches in Southwark for the three 3 categories of Travellers (as identified and assessed in relation to the government’s Planning Policy for Traveller Sites) as follows<sup>40</sup>: <ul style="list-style-type: none"> <li>- <b>No pitches</b> in Southwark over the period to 2034 for Gypsy and Traveller households that meet the PPTS planning definition;</li> <li>- <b>Zero to one pitch</b> for undetermined Gypsy and Traveller households that may meet the PPTS planning definition; and</li> <li>- <b>42 pitches</b> for Gypsy and Traveller households who did not meet the PPTS planning definition.</li> </ul> </li> <li>• <u>Old Kent Road OA:</u> There is no need for pitches established at the Old Kent Road OA level. However, in regards to supply, currently in the Old Kent Road OA there are Authorised Pitches or Plots for Gypsy and Traveller households as follows<sup>41</sup>: <ul style="list-style-type: none"> <li>- <b>16 pitches</b> at Brideale Close; and</li> <li>- <b>16 pitches</b> at Ilderton Road.</li> </ul> </li> </ul>

<sup>40</sup> <https://www.southwark.gov.uk/assets/attach/12565/EIP22-Gypsy-and-Traveller-Accommodation-Assessment-Report-May-2020-.pdf>

<sup>41</sup> <https://www.southwark.gov.uk/assets/attach/12565/EIP22-Gypsy-and-Traveller-Accommodation-Assessment-Report-May-2020-.pdf>

	<p><b>Breakdown of homelessness, by race:</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of the year 2021/22, of the 322 rough sleepers identified in Southwark, the split between ethnicity was<sup>42</sup>: <ul style="list-style-type: none"> <li>- <b>59%</b> white (including 36% White-British);</li> <li>- <b>23%</b> black; and</li> <li>- <b>18%</b> other ethnicity / unrecorded.</li> </ul> </li> <li>• <u>Old Kent Road OA:</u> There are no 'homelessness by race' statistics at this more granular geographic scale.</li> </ul>
<b>Religion and Belief</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Sex</b>	<p><b>Breakdown of homelessness, by sex:</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of the year 2021/22, of the 322 rough sleepers identified in Southwark, the split between the sexes was<sup>43</sup>: <ul style="list-style-type: none"> <li>- 87% male</li> <li>- 13% female</li> </ul> </li> <li>• <u>Old Kent Road OA:</u> There are no 'homelessness by sex' statistics at this more granular geographic scale.</li> </ul>
<b>Sexual Orientation</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>

<sup>42</sup> <https://moderngov.southwark.gov.uk/documents/s115562/Apendix%201%20-%20JSNA%20Annual%20Report%202023%20Southwarks%20Joint%20Strategic%20Needs%20Assessment.pdf>

<sup>43</sup> <https://moderngov.southwark.gov.uk/documents/s115562/Apendix%201%20-%20JSNA%20Annual%20Report%202023%20Southwarks%20Joint%20Strategic%20Needs%20Assessment.pdf>

<b>Socioeconomic Disadvantage</b>	<p><b>Breakdown of resident population, by tenure of home</b></p> <ul style="list-style-type: none"> <li> <b>Southwark:</b>            As of the date of the 2021 Census, residents reported their home tenure status as follows<sup>44</sup>:           <ul style="list-style-type: none"> <li>- Owns outright: <b>10.6%</b> (which is lower than the national rate of 32.5%)</li> <li>- Owns with a mortgage or loan or shared ownership: <b>20.7%</b> (which is lower than the national rate of 29.8%)</li> <li>- Social rented: <b>39.7%</b> (which is higher than the national rate of 17.1%)</li> <li>- Private rented or lives rent free: <b>29.0%</b> (which is higher than the national rate of 20.6%).</li> </ul> <p>The ‘social rented’ rate is much higher than rate of council/TMO management across London (23%) and nationally (17%).</p> </li> <li> <b>Old Kent Road OA:</b>            As of the date of the 2021 Census, residents of the Old Kent Road ward reported their home tenure status as follows<sup>45</sup>:           <ul style="list-style-type: none"> <li>- Owns outright: <b>5.4%</b> (which is lower than both the borough and national rate)</li> <li>- Owns with a mortgage or loan or shared ownership: <b>15.2%</b> (which is lower than both the borough and national rate)</li> <li>- Social rented: <b>58.1%</b> (which is higher than both the borough and national rate)</li> <li>- Private rented or lives rent free: <b>21.4%</b> (which is higher than both the borough and national rate).</li> </ul> <p>Looking at the slightly less granular scale of the East Central Southwark MWA, 48% of housing is managed by Southwark Council or a TMO<sup>46</sup>.</p> <p>The ‘social rented’ rate for both the ward and the MWA is much higher than rate of council/TMO management across the borough as a whole, London (23%) and nationally (17%).</p> </li> </ul>
	<p><b>Breakdown of specialist housing need, by socioeconomic disadvantage</b></p>

<sup>44</sup> <https://www.ons.gov.uk/visualisations/customprofiles/build/> and then filter by relevant category

<sup>45</sup> <https://www.ons.gov.uk/visualisations/customprofiles/build/#E05011109> and then filter by relevant category

<sup>46</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

	<ul style="list-style-type: none"> <li>• <u>Southwark:</u> The annualised additional affordable housing need (above the supply pipeline) by tenure and size in the borough is, as of 2019<sup>47</sup>: <ul style="list-style-type: none"> <li>- <b>x458</b> Social rent and sub-social rent, comprising: x200 one-beds; x235 two-beds; 51 three-beds; x373 four-beds</li> <li>- <b>x1,619</b> Intermediate, comprising: x198 one-beds; x359 two-beds; x353 three-beds; x309 four beds</li> </ul> </li> <li>• <u>Old Kent Road OA:</u> There are no 'specialist housing need by socioeconomic disadvantage' statistics at this more granular geographic scale.</li> </ul>
	<p><b>House price to residence-based earnings ratio</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> The average house price in Southwark was £470,000 in 2024<sup>48</sup>. As of 2022, Southwark residents have to spend around <b>13.38 times their annual earnings</b> on purchasing a home<sup>49</sup></li> <li>• <u>Old Kent Road OA:</u> There are no 'house price to residence-based earning ratio' statistics at this more granular geographic scale.</li> </ul>
	<p><b>Breakdown of resident population, by central heating in the home:</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> 3.1% of households in the borough do not have access to central heating. This is higher than the national rate of 1.5% of households.</li> </ul>

<sup>47</sup> <https://www.southwark.gov.uk/assets/attach/11208/SP107-Southwark-Strategic-Housing-Market-Assessment-2019-.pdf>

<sup>48</sup> <https://landregistry.data.gov.uk/app/ukhpi/browse?from=2023-07-01&location=http%3A%2F%2Flandregistry.data.gov.uk%2Fid%2Fregion%2FUnited-kingdom&to=2024-07-01&lang=en>

<sup>49</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian>

	<ul style="list-style-type: none"> <li>• <u>Old Kent Road OA:</u> 3.6% of households in the Old Kent Road ward do not have access to central heating. This is higher than the borough and national (1.5%) rate.</li> </ul>
<p><b>Dataset for the ‘Strong Local Economy’ objectives</b></p> <p>Policies:</p> <ul style="list-style-type: none"> <li>• AAP5 ‘Businesses and Workspace – The Bow Tie’</li> <li>• AAP6 ‘Life Sciences’</li> <li>• AAP7 ‘Town Centres, Leisure and Entertainment’</li> </ul>	
<p><b>Age</b></p>	<p><b>Breakdown of resident child population, by rate of those growing up in poverty:</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> The average child poverty rate in the borough is <b>36.2%</b><sup>50</sup>. This is higher than the London rate of 33%.</li> <li>• <u>Old Kent Road OA:</u> The average child poverty rate across the two parliamentary consistencies in which the OKR OA is located is <b>35.6%</b><sup>51</sup>. This is slightly lower than Southwark as a whole.</li> </ul>
	<p><b>Number of NEETS (not in education, employment or training or whose activity is not known)</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of 2022, of the 16-17 year olds in the borough, <b>2.6%</b><sup>52</sup> are a NEET. This is lower than the London rate of 3.4% and national rate of 5.2%..</li> <li>• <u>Old Kent Road OA:</u> There are no ‘NEET’ statistics at this more granular geographic scale.</li> </ul>

<sup>50</sup> [https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Child-Poverty-AHC-estimates-2015-2022\\_final.xlsx](https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Child-Poverty-AHC-estimates-2015-2022_final.xlsx)

<sup>51</sup> [https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Child-Poverty-AHC-estimates-2015-2022\\_final.xlsx](https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Child-Poverty-AHC-estimates-2015-2022_final.xlsx)

<sup>52</sup> <https://www.gov.uk/government/publications/neet-and-participation-local-authority-figures>

<b>Disability</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Gender Reassignment</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Pregnancy and Maternity</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Marriage and Civil Partnership</b>	<b>Assessment not required.</b>
<b>Race</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Religion and Belief</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Sex</b>	<p><b>Breakdown of economic activity, by sex:</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of the 2023/2024 financial year, the resident population who are economically active is as follows, by sex<sup>53</sup>: <ul style="list-style-type: none"> <li>- Males: <b>82.1%</b> (66.6% of which are employees, and 15.5% of which are self-employed)</li> <li>- Females: <b>74.4%</b> (62.6% of which are employees, and 11.8% of which are self-employed)</li> </ul> </li> </ul> <p>This is higher for both sexes than the London male (79.0%) and female (70.0%) rates of economic activity<sup>54</sup>.</p>

<sup>53</sup> <https://www.nomisweb.co.uk/reports/lmp/la/1946157256/report.aspx#tabempunemp>

<sup>54</sup> <https://www.nomisweb.co.uk/reports/lmp/la/1946157256/report.aspx#tabempunemp>

	<ul style="list-style-type: none"> <li>• <u>Old Kent Road OA:</u> There are no 'economy activity by sex' statistics at this more granular geographic scale.</li> </ul>
<b>Sexual Orientation</b>	<b><i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i></b>
<b>Socioeconomic Disadvantage</b>	<b>Breakdown of resident population, by unemployment</b> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> The borough has an average unemployment level of 5.6%<sup>55</sup>.</li> <li>• <u>Old Kent Road OA:</u> The average unemployment level across the six MSOAs falling within the OKR OA is <b>6.82%</b><sup>56</sup>. This is higher than Southwark as a whole.</li> </ul>
	<b>Breakdown of resident population, by proportion of benefit claimants aged 16-64</b> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of 2022, 6.9% of borough residents aged 16-64 are claiming benefits. This is higher than the London rate (6.3%) and the national rate (5.0%)<sup>57</sup>.</li> <li>• <u>Old Kent Road OA:</u> As of 2022, 9.7% of the residents aged 16-64 living in the Old Kent Road ward are claiming benefits. At the wider scale of the East Central MWA, the rate is 8.6%<sup>58</sup>. In both cases, the rate is higher than the borough, London and national rate.</li> </ul>

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<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/economicactivitystatusenglandandwales/census2021#economically-active-unemployed>

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<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/economicactivitystatusenglandandwales/census2021#economically-active-unemployed>

<sup>57</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>58</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>



	<p><b>Median gross household income</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark:</u> As of 2022, the median household income in the borough is <b>44,000</b><sup>59</sup>.</li> <li>• <u>Old Kent Road OA:</u> As of 2022, the median household income in the Old Kent Road ward is <b>£33,000</b><sup>60</sup>, which is the lowest of all 23 wards in the borough. It is significantly lower than the median income for the borough. This is higher than Southwark as a whole.</li> </ul>
<p><b>Dataset for the ‘Movement, Parks and Healthy Streets’ objectives</b></p> <p>Policies:</p> <ul style="list-style-type: none"> <li>• AAP8 ‘Movement – People, Place, Experience’</li> <li>• AAP9 ‘The Greener Belt – Parks and Healthy Streets’</li> </ul>	
<b>Age</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Disability</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Gender Reassignment</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>

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<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/economicactivitystatusenglandandwales/census2021#economically-active-unemployed>

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<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/economicactivitystatusenglandandwales/census2021#economically-active-unemployed>

<b>Pregnancy and Maternity</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Marriage and Civil Partnership</b>	<b>Assessment not required.</b>
<b>Race</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Religion and Belief</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Sex</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Sexual Orientation</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Socioeconomic Disadvantage</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Dataset for the 'Design' objectives</b>	
Policies: <ul style="list-style-type: none"> <li>• AAP10 'Tall Buildings – The Stations and The Crossings'</li> <li>• AAP11 'Character and Heritage'</li> <li>• AAP12 'Design'</li> </ul>	
<b>Age</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Disability</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>

Gender Reassignment	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
Pregnancy and Maternity	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
Marriage and Civil Partnership	<b>Assessment not required.</b>
Race	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
Religion and Belief	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
Sex	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
Sexual Orientation	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
Socioeconomic Disadvantage	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Dataset for the 'Healthy Environment' objectives</b>	
Policies: <ul style="list-style-type: none"> <li>• AAP13 'Climate Emergency'</li> <li>• AAP14 'Water Management, Air and Noise Quality'</li> </ul>	
Age	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>

Disability	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
Gender Reassignment	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
Pregnancy and Maternity	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
Marriage and Civil Partnership	<b>Assessment not required.</b>
Race	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
Religion and Belief	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
Sex	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
Sexual Orientation	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
Socioeconomic Disadvantage	<p><b>Breakdown of resident population, by rates of Type 2 diabetes</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark</u> As of 2023, the borough rate is <b>54 per 1,000 residents</b><sup>61</sup>. There are no statistics at the London or national levels to draw comparisons with.</li> <li>• <u>Old Kent Road OA</u></li> </ul>

<sup>61</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

	<p>As of 2023, the Old Kent Road ward rate is <b>82 per 1,000 residents</b> while the East Central MWA rate is <b>69 per 1,000 residents</b><sup>62</sup>. Both are higher than the borough rate.</p>
	<p><b>Breakdown of resident population, by rates of asthma</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark</u> As of 2023, the borough rate is <b>43 per 1,000 residents</b><sup>63</sup>. There are no statistics at the London or national levels to draw comparisons with.</li> <li>• <u>Old Kent Road OA</u> As of 2023, the Old Kent Road ward rate is <b>45 per 1,000 residents</b> while the East Central MWA rate is <b>49 per 1,000 residents</b><sup>64</sup>. Both are higher than the borough rate.</li> </ul>
	<p><b>Breakdown of resident population, by rates of COPD</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark</u> As of 2023, the borough rate is <b>23 per 1,000 residents</b><sup>65</sup>. There are no statistics at the London or national levels to draw comparisons with.</li> <li>• <u>Old Kent Road OA</u> As of 2023, the Old Kent Road ward rate is <b>16 per 1,000 residents</b> while the East Central MWA rate is <b>13 per 1,000 residents</b><sup>66</sup>. Both are higher than the borough rate.</li> </ul>
	<p><b>Breakdown of resident population, by rates of hypertension</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark</u></li> </ul>

<sup>62</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>63</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>64</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>65</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>66</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

	<p>As of 2023, the borough rate is <b>105 per 1,000 residents</b><sup>67</sup>. There are no statistics at the London or national levels to draw comparisons with.</p> <ul style="list-style-type: none"> <li>• <u>Old Kent Road OA</u> As of 2023, the Old Kent Road ward rate is <b>140 per 1,000 residents</b> while the East Central MWA rate is <b>125 per 1,000 residents</b><sup>68</sup>. Both are higher than the borough rate.</li> </ul>
	<p><b>Breakdown of resident population, by Standardised Mortality Ratio (SMR) from all causes rates</b></p> <ul style="list-style-type: none"> <li>• <u>Southwark</u> Over the period 2016-2020, the borough rate is <b>94 per 1,000 residents</b><sup>69</sup>. This is lower than the national rate (which is 100 per 1,000 residents)</li> <li>• <u>Old Kent Road OA</u> Over the period 2016-2020, the Old Kent Road ward rate is <b>100 per 1,000 residents</b> while the East Central MWA rate is <b>106 per 1,000 residents</b><sup>70</sup>. This is slightly higher than the borough rate but broadly consistent with the national rate.</li> </ul>
<p><b>Dataset for the ‘Great Start in Life’ objectives</b></p> <p>Policies:</p> <ul style="list-style-type: none"> <li>• AAP15 ‘Great Start in Life’</li> <li>• AAP16 ‘Child and Youth provision’</li> </ul>	
<p><b>Age</b></p>	<p><b>Crime rate, by age:</b> First time entrants to the youth justice system (2018) <a href="https://fingertips.phe.org.uk/profile/child-health-profiles/data#page/0/qid/1938133228/pat/6/par/E12000007/ati/102/are/E09000028/iid/90819/age/-1/sex/4">https://fingertips.phe.org.uk/profile/child-health-profiles/data#page/0/qid/1938133228/pat/6/par/E12000007/ati/102/are/E09000028/iid/90819/age/-1/sex/4</a></p>

<sup>67</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>68</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>69</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>70</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

	<p><b>Level of intellectual and physical development, by age:</b></p> <p>69.9% of children achieved a good level of development at the end of Reception 2022/2023<sup>71</sup></p> <p>For attainment in English and maths at grade 9 to 4, 67.4% of pupils in Southwark achieved this measure compared to 63.5% nationally and 67.3% for London<sup>72</sup>.</p> <p>The quality of schools in Southwark is increasing, but there is scope for further improvement in attainment.</p>
<p><b>Disability</b></p>	<p><b>Rate of disability across all age groups:</b> Approximately just over 15,000 residents in Southwark are considered to have a disability.<sup>73</sup></p> <p><b>Rate of disability at Higher Education level:</b> 13% of students at higher education providers in England have a known disability<sup>74</sup>.</p> <p><b>Crime rate per protected characteristic:</b> Disability hate crime <a href="https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/">https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/</a></p> <p><b>Special needs school provision:</b> There are six mainstream schools with special units or resource bases in Southwark. There are three Southwark maintained special primary schools. There are four secondary community special schools<sup>75</sup>. There are 7 special schools and 1 special academy<sup>76</sup>.</p>

<sup>71</sup> <https://explore-education-statistics.service.gov.uk/find-statistics/early-years-foundation-stage-profile-results/2022-23>

<sup>72</sup> <https://fingertips.phe.org.uk/profile/child-health-profiles/data#page/7/qid/1938133228/pat/6/par/E12000007/ati/102/are/E09000028/iid/93203/age/174/sex/4>

<sup>73</sup> data set DWP- 2019 PIP & DLA figures

<sup>74</sup> <https://www.hesa.ac.uk/data-and-analysis/sb252/figure-4>

<sup>75</sup> <https://localoffer.southwark.gov.uk/education/specialist-school/special-schools-resource-bases-and-units-in-southwark/>

<sup>76</sup> <http://modern.gov.southwark.gov.uk/documents/s72803/Appendix%201%20Best%20start%20in%20life%20Southwark%20school%20standards%20report%202017.pdf>

<b>Gender Reassignment</b>	<p><b>Crime rate per protected characteristic:</b> Transgender hate <a href="https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/">https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/</a></p>
<b>Pregnancy and Maternity</b>	<p><b>Crime rate per protected characteristic:</b> Domestic abuse <a href="https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/">https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/</a></p> <p><b>Number of community uses accessed by pregnant women or women who have infant children:</b> Currently there is no specific data held on the community groups that pregnant women access. However it is acknowledged that the total number of babies born in Southwark has been decreasing year on year since 2010. There were just under 4,400 live births in 2017, down from over 5,100 in 2010. The decline in the fertility rate in Southwark is seen across all age groups, but particularly among younger women. The average age of mothers having their first child in Southwark is 32.8 years, compared to 30.5 years in England.</p> <p><b>Teenage mothers (2017/18):</b> <a href="https://fingertips.phe.org.uk/profile/child-health-profiles/data#page/0/qid/1938133228/pat/6/par/E12000007/ati/102/are/E09000028/iid/90819/age/-1/sex/4">https://fingertips.phe.org.uk/profile/child-health-profiles/data#page/0/qid/1938133228/pat/6/par/E12000007/ati/102/are/E09000028/iid/90819/age/-1/sex/4</a></p> <p><b>Obesity in pregnancy:</b> Local data suggests that obesity in pregnancy varies considerably in different ethnic groups (around three-fold), and reviews of all child deaths show that about 26% are preventable, higher than the national rate (20%)<sup>77</sup>.</p>
<b>Marriage and Civil Partnership</b>	<b>Assessment not required.</b>
<b>Race</b>	<p><b>Crime rate per protected characteristic:</b> Racist and religion hate crime <a href="https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/">https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/</a></p>

<sup>77</sup> <http://moderngov.southwark.gov.uk/documents/s52272/Southwark%20Public%20Health%20Annual>



<b>Religion and Belief</b>	<i>No data is available, or all relevant data has already been referred to in earlier sections of this Dataset table.</i>
<b>Sex</b>	<p><b>Sex-specific crime rate in the borough:</b> Domestic abuse <a href="https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/">https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/</a></p> <p><b>Sex-specific educational provision in the borough:</b> In Southwark, there are 13 mixed secondary schools, 6 girls' secondary schools and 3 boys' secondary schools<sup>78</sup>.</p>
<b>Sexual Orientation</b>	<p><b>Crime rate per protected characteristic:</b> Homophobic hate crime <a href="https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/">https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/</a></p>
<b>Socioeconomic Disadvantage</b>	<p><b>Crime rate:</b> 111.1 crimes per 1000 residents in the East Central Southwark MWA. Within the Old Kent Road Ward, the rate is 132.3 per 1000.<sup>79</sup></p> <p><b>Number of stop and searches:</b> <a href="https://www.met.police.uk/sd/stats-and-data/met/stop-and-search-dashboard/">https://www.met.police.uk/sd/stats-and-data/met/stop-and-search-dashboard/</a></p> <p><b>Single parent households:</b> There are 11,945 lone parents with dependent children<sup>80</sup>.</p>

<sup>78</sup> <https://www.southwark.gov.uk/schools-and-education/schools-in-southwark/list-of-schools-in-southwark>

<sup>79</sup> <https://www.southwark.gov.uk/assets/attach/250837/2023-multi-ward-area-profiles-east-central-feb24-.pdf>

<sup>80</sup> <http://moderngov.southwark.gov.uk/documents/s72803/Appendix%201%20Best%20start%20in%20life%20Southwark%20school%20standards%20report%202017.pdf>

	At the end of KS2 73% of disadvantaged pupils are meeting the expected standard in English, Maths and writing <sup>81</sup>
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<sup>81</sup> [https://www.compare-school-performance.service.gov.uk/schools-by-type?step=default&table=schools&region=210&la-name=southwark&geographic=la&for=primary&basedon=Overall+performance&show=Disadvantaged+pupils&orderby=ks2.0.PTR.WM\\_EXP\\_FSM6CLA1A&orderdir=asc](https://www.compare-school-performance.service.gov.uk/schools-by-type?step=default&table=schools&region=210&la-name=southwark&geographic=la&for=primary&basedon=Overall+performance&show=Disadvantaged+pupils&orderby=ks2.0.PTR.WM_EXP_FSM6CLA1A&orderdir=asc)



Old Kent Road Area Action Plan  
Proposed Submission Version  
October 2024

**Health Impact Assessment**

<b>Old Kent Road Area Action Plan 2024 appendices: Document Locator</b>	
<b>No.</b>	<b>Title</b>
Appendix A	Old Kent Road AAP 2024
Appendix B	Consultation Plan
Appendix C	Consultation Report
Appendix D	Integrated Impact Assessment
Appendix E	Habitats Regulations Assessment
Appendix F	Equalities Impact Assessment, comprising:
	- EQIA Document 01: Executive Summary
	- EQIA Document 02: Summary of the EQIA
	- EQIA Document 03: Equalities Impact Assessment
	- EQIA Document 04: Supporting Datasets
Appendix G	Health Impact Assessment

**Health Impact Assessment (HIA)**

**Name of organisation:** Southwark Council

**Name of project/plan/proposal):** Old Kent Road Area Action Plan (OKR AAP) 2024

**Planning reference (if applicable):** N/A

**Location of project/plan/proposal:** Old Kent Road, Southwark

**Date of assessment:**

First version	July-November 2020
Second version	September 2024

**Prepared by:** Old Kent Road Planning and Growth Team

**Contributors:** Public Health Team

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6.0 Health Impact Assessment Matrix.....	9

## **1.0 Introduction**

- 1.1 The Old Kent Road Area Action Plan (Old Kent Road AAP) has a range of health impacts on local people, and these vary based on protected characteristics and geographical location in the borough. This variance is addressed in the Equalities Impact Assessment (EQIA).
- 1.2 This Health Impact Assessment (HIA) has been collated to identify the impacts of planning issues on health in the borough. This assessment of the potential health and wellbeing impacts of the Old Kent Road Area Action Plan policies is guided by the principles of the Healthy Urban Design Unit (HUDU) Rapid Health Impact Assessment tool and the Healthy Urban Planning Checklist. The checklist aims to promote healthy urban planning by ensuring that the health and wellbeing implications of Area Action Planning documents are consistently taken into account.
- 1.3 This document was written by the planning policy team as a supporting document for the Old Kent Road AAP, with support and input from the Public Health team at LB Southwark.
- 1.4 The HIA is integrated into the Integrated Impact Assessment (IIA). The IIA in its assessment of the policies and their impact has taken into consideration the potential health impacts of the policy. The IIA also makes reference to a Mental Well-being Impact Assessment Screening which assesses the impacts of the policies on Mental Health.
- 1.5 The HIA was first prepared in July-November 2020 during the COVID 19 pandemic. This assessment has subsequently been updated in preparation for the Regulation 19 consultation of the Old Kent Road AAP to reflect the iterations of the policies and subsequent potential impacts on health and wellbeing of residents in Southwark. The HIA will continue to be updated as the plan progress finally into adoption.
- 1.6 This HIA is a desktop based assessment.

## **2.0 Overview of the Area Action Plan**

- 2.1 The aim of the Old Kent Road AAP is to set out the policies and plans that will help us deliver wider improvements for the Old Kent Road Opportunity Area for years to come.
- 2.2 This policy document sets out Southwark's vision for the Old Kent Road Opportunity Area and in a greater level of detail how Area Vision 13 and Site Allocations NSP 56 to 62 of the Southwark Plan will be implemented.
- 2.3 The Vision focuses on re-establishing the Old Kent Road as one of London's most important arteries, connecting the city to the rest of Europe. The three prongs of the Vision are:
  - the 'Greener Belt', an ambitious plan to create a green corridor through the Opportunity Area by linking together enhanced existing open spaces,

new green pedestrian and cycle routes and new parks (with the potential to extend into other parts of the borough and our neighbouring boroughs of Lambeth and Lewisham);

- ‘Connecting Communities’, a strategy to deliver for all existing and future residents a range of high quality housing, youth facilities, schools leisure, health centres, parks and a wide variety of jobs; and
- The “Bow Tie” employment strategy, which seeks to capitalise on the area’s geographic location and leverage the benefits of the BLE to integrate the Old Kent Road Area into the cluster of business and economic centres north and south of the Thames (the City of London, the West End, Waterloo, Bankside, Vauxhall, Nine Elms, Canada Water and New Bermondsey).

2.4 The Strategy section of the AAP sets out how, through a number of objectives, the Vision will be achieved. The objectives relate to the following 10 aspects:

- Bakerloo Line Extension;
- new homes;
- employment, jobs and business;
- town centre, leisure and entertainment;
- movement;
- parks and open space;
- culture and heritage;
- energy and climate change;
- schools, community and youth; and
- health and wellbeing.

2.5 The Old Kent Road AAP also set out the thematic policies order to achieve the Vision and Strategy.

2.6 Once the Old Kent Road AAP is formally adopted by the council, planning decisions must be made in accordance with the policies set out in the development plan unless other material considerations indicate otherwise.

### **3.0 Health Determinants**

3.1 To assess the health impact of the Old Kent Road AAP, it is necessary to identify the factors with the greatest influence on health (determinants of health). Health determinants are the social, economic, and environmental factors that indirectly influence health and wellbeing. Each policy will be assessed against these determinants of health. It is recognised that not all health determinants can be influenced by the policies in the AAP. Considering the health and wellbeing profile of Southwark ensures that the correct determinants are used in the assessment and that the AAP addresses issues relevant to our population.

### **4.0 Southwark Profile**

4.1 A summary of the population profile for Southwark can be found in the IIA Appendix 3: Baseline Data - Facts and Figures. This provides a broad overview of health and wellbeing in Southwark. It includes the following sections:

- Demographics
- Socio-economic status
- Housing need
- Education, skills and training
- Environment

## 5.0 Health Impact Indicators

### HUDU Rapid Health Impact Assessment Tool

5.1 The HUDU Rapid Health Impact Assessment Tool was developed as a tool to assess the likely health impacts of development plans, and a broad range of major applications. The assessment identifies those determinants of health which are likely to be influenced by the Old Kent Road Area Action Plan. It is not intended to identify all the issues relating to health and wellbeing. The assessment is intended to focus on the issues directly or indirectly impacted by the Area Action Plan.

5.2 For a policy document, the guidance sets out that it is appropriate to assess the health impacts using an Integrated Impact Assessment (IIA), full Health Impact Assessment (HIA) or incorporate health impacts into Sustainability Appraisal.

5.3 This document is an HIA that sits beneath an IIA that assesses the sustainability of the Old Kent Road Area Action Plan. The EQIA also identifies the potential health impacts of each policy in the OKRAAP. These documents form the Sustainability Appraisal of the Old Kent Road Area Action Plan.

5.4 This rapid HIA tool provides an assessment matrix in Section 1 based on eleven topics or broad determinants:

1. Housing design and affordability
2. Access to health and social care services and other social infrastructure
3. Access to open space and nature
4. Air quality, noise and neighbourhood amenity
5. Accessibility and active travel
6. Crime reduction and community safety
7. Access to healthy food
8. Access to work and training
9. Social cohesion and inclusive design
10. Minimising the use of resources
11. Climate change

### HUDU Planning Contributions Model and Healthy Urban Planning Checklist



- 5.5 The HUDU Planning Contributions Model was developed for the purpose of assessing the impacts of urban planning on health. It is a comprehensive tool to assess the health service requirements and cost impacts of new residential developments.
- 5.6 The Healthy Urban Planning Checklist (2014) is designed to go further and explicitly recognise the role of planning in public health and using health issues as a way to promote and deliver good planning and design and raise standards. This is emulated in the adopted London Plan policy GG3 Creating a healthy city which aims to promote healthy lifestyles and reduce health inequalities.
- 5.7 Informed by the HUDU Planning Contributions Model, this assessment considers the positive, neutral, or negative impact of the policies according to the four key themes as detailed in the HUDU model and Healthy Urban Planning Checklist. These themes are: Housing design and affordability; Accessibility and active travel; Healthy environment; and Vibrant neighbourhoods.
- 5.8 This Health Impact Assessment is based on planning issues set out in the Urban Planning Health Checklist according to its four themes:
- Housing Design and affordability
    1. Housing design
    2. Accessible housing
    3. Healthy living
    4. Housing mix and affordability
  - Accessibility and active travel
    1. Promoting cycling and walking
    2. Safety
    3. Connectivity
    4. Minimising car use
  - Healthy environment
    1. Construction
    2. Air quality
    3. Noise
    4. Contaminated land
    5. Open space
    6. Play space
    7. Biodiversity
    8. Local food growing
    9. Flood risk
    10. Overheating
  - Vibrant neighbourhoods

1. Healthcare services
2. Education
3. Access to social infrastructure
4. Local employment and healthy
5. Access to local food shops
6. Public buildings and spaces

5.9 These planning issues are attributed to health issues that the policies are addressing. The above issues are indicators that are reflected in the IIA Appendix 9: Baseline Indicators.

5.10 This Health Impact Assessment is informed by both the HUDU Rapid Health Impact Assessment Tool and HUDU Planning Contributions Model and Healthy Urban Planning Checklist. This HIA has taken a desktop based assessment.

#### Assessment Methodology

5.11 This Health Impact Assessment highlights the policy related to each planning and health related issue, and assesses its impact on health. These are:

- Positive - the policy has a likely positive impact on health impacts for local residents;
- Neutral - the policy has neither likely positive or negative health impacts for local residents;
- Negative - the policy has a negative impact on health and a mitigation will be provided.

5.12 Where there is not a specific policy in the OKRAAP which addresses the issue, details have been provided as to how Southwark Council resolves these issues collectively as a council.

## 6.0 Health Impact Assessment Matrix

### Theme 1: Housing design and affordability

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	<i>Question</i>	Yes No N/A	<i>Policy that meets this requirement</i>	<i>Positive Negative Neutral Uncertain</i>	<i>Mitigation or enhancement identified?</i>	<i>Aims to solve health and wellbeing issues such as....</i>
Housing design	Does the plan seek to meet Building Regulation requirement M4 (2)?	Yes	Policy AAP3 'Homes For All' sets out that accessible homes will be delivered for both older and vulnerable residents and ensure they are helped to find the right housing for them to live as independently possible.	Positive	<p>This standard is set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P8 Wheelchair accessible and adaptable housing sets out that the build major residential development must meet Building Regulation M4(3) standard in at least 10% of homes as measured habitable rooms. This policy applies to across the Old Kent Road Opportunity Area.</p>	The provision of accessible homes promotes improved quality of life for residents with disabilities and ensures they are able to live as independently as possible, and that has positive impacts for residents mental and physical health and wellbeing.

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	Does the plan contain homes that are highly energy efficient?	Yes	Policy AAP13 'Climate Emergency' sets out that all buildings should be energy efficient to reduce carbon emissions in response to the climate emergency.	Neutral	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P69 'Sustainability Standards' sets out the required standards for energy efficient design which all to all development.</p>	By creating energy efficient homes it ensures that residents are able to regulate the temperatures in their homes in an affordable way to reduce the impact of excess hot and cold on their health and wellbeing.
			Policy AAP3 'Homes For All' sets out that homes should be of high quality.			

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	Does the plan meet all the health and wellbeing credits contained in the Code for Sustainable Homes for daylighting, sound insulation, private space and Lifetime Homes?	Yes partly. Whilst Code for Sustainable Homes standards are no longer applicable to planning decisions. The aims of achieving good quality of daylighting , sound insulation and private space are still relevant.	<p>Policy AAP 9 ‘The Greener Belt Strategy – Parks and Healthy Streets’ re-iterates the requirements for private and communal amenity space.</p> <p>Policy AAP 14 ‘Water Management, Air and Noise Quality’ sets out requirements for considerations of sound.</p>	Neutral	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P69 ‘Sustainability Standards’ sets out the required standards for energy efficient design which all to all development.</p> <p>Policy P66 ‘Reducing noise pollution and enhancing soundscapes’ sets out the requirements for sound insulation which applies across the Old Kent Road Opportunity Area.</p>	<p>The policy will ensure an adequate supply of affordable housing and that it meets space standards reducing risk of overcrowding. The effect this will have is the potential to improve physical and mental wellbeing and safety.</p> <p>Providing mixed developments that conform with local needs will strengthen the community.</p> <p>The policy seeks to tackle noise pollution. The effect this will have is the potential to improve mental wellbeing.</p>

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
Accessible housing	Does the plan provide accessible homes for older or disabled people?	Yes	AAP3 'Homes For All' sets out that homes must be accessible and affordable.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P8 'Wheelchair accessible and adaptable housing' sets out that the build major residential development must meet Building Regulation M4(3) standard in at least 10% of homes as measured habitable rooms. This policy applies to across the Old Kent Road Opportunity Area.</p>	Providing adaptable homes allows residents to remain in their home despite changing accommodation requirements. In this context, adaptable housing more easily permits care to be provided in the community.
	Does the plan address the housing needs of older people, i.e. extra care housing, sheltered housing, lifetime homes and	Yes	AAP3 'Homes For All' sets out a strategy to ensure vulnerable residents are helped to find the right housing to live as independently as possible.	Neutral	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P8 'Wheelchair</p>	Providing adaptable homes allows residents to remain in their home despite changing accommodation requirements. In this context, adaptable housing more easily

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	wheelchair accessible homes?				<p>accessible and adaptable housing' sets out that the build major residential development must meet Building Regulation M4(3) standard in at least 10% of homes as measured habitable rooms. This policy applies to across the Old Kent Road Opportunity Area.</p> <p>Policy P7 'Housing for Older People' sets out that development should provide new specialist housing for older people where appropriate.</p>	permits care to be provided in the community.
	Does the plan include homes that can be adapted to support independent living for older and disabled people?	Yes	AAP3 'Homes For All' sets out a strategy to ensure vulnerable residents are helped to find the right housing to live as independently as possible.	Neutral	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P7 'Housing for Older People' sets out that development should provide new specialist housing for older</p>	Providing adaptable homes allows residents to remain in their home despite changing accommodation requirements. In this context, adaptable housing more easily permits care to be provided in the community.

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
					people where appropriate.	
Healthy living	Does the plan ensure that every non-ground floor dwelling is accessible by a lift which can accommodate an ambulance trolley?	Yes	AAP3 'Homes For All' sets out a strategy to ensure vulnerable residents are helped to find the right housing to live as independently as possible.	Neutral	This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.  Strategic Policy SP1 'Quality affordable homes' sets out requirements to deliver housing to suit a range of housing needs and types of accommodation.	Providing adaptable homes allows residents to remain in their home despite changing accommodation requirements. In this context, adaptable housing more easily permits care to be provided in the community.
			Policy AAP12 'Design' sets out that development must be of inclusive design and be accessible for people of all ages and disabilities.			



<b>Planning Issue</b>	<b>Assessment Criteria</b>	<b>Relevant?</b>	<b>Details/evidence (policy requirements and standards)</b>	<b>Potential health impact?</b>	<b>Recommended mitigation or enhancement actions</b>	<b>Health issue policy aims to address</b>
Housing mix and affordability	Does the plan provide dwellings with adequate internal space, including sufficient storage and separate kitchen and living spaces? Does the plan promote good design through layout and orientation, meeting internal space standards?	Yes	AAP3 'Homes For All' sets out a strategy to deliver good quality housing.	Neutral	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P8 'Wheelchair accessible and adaptable housing' sets out space standards for development meeting Building Regulation M4(3) standard.</p> <p>Policies in the Southwark Plan 2022 set out amenity provision for different types of specialist housing.</p>	The policy will ensure a supply of housing that meets space standards. The effect this will have is the potential to improve mental health and wellbeing.
	Does the plan encourage the use of stairs by ensuring that they are well located, attractive and welcoming?	Yes	Policy AAP 12 'Design' sets out principles of good design for the OKR Opportunity Area.	Neutral	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p>	Tackles physical inactivity and associated health issues

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
					<p>Policy P14 'Design' quality sets out design standards and requirements to ensure good quality design in all buildings.</p> <p>The use of stairs is promoted at Council offices for those able, and is an initiative promoted by the Public Health team.</p>	
	Does the plan include a range of housing types and sizes, including affordable housing responding to local housing needs?	Yes	Policy AAP3 'Homes For All' sets out the need for a range of housing types and sizes to meet a range of housing needs in the Old Kent Road Opportunity Area.	Neutral	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Strategic Policy SP1 'Quality affordable homes' sets out requirements to deliver housing to suit a range of housing needs and types of accommodation.</p>	The policy will ensure a supply of housing that meets the local need. The effect this will have is the potential to improve mental health and wellbeing.

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
Social cohesion and inclusive design	Does the plan connect with existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?	Yes	Policy AAP12 'Design' sets out that design should be accessible and inclusive. It also sets out that design must foster a positive relationship for residents and existing communities to interact and improve connectivity for all.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P13 'Design of places' sets out that development must provide accessible and inclusive design for all ages and people with disabilities. It also sets out that spaces should provide seating for residents and visitors and deliver a high quality public realm to enable positive social interaction.</p>	Better legibility will improve walking and cycling options can help people achieve recommended daily physical activity levels. Providing safe and well-lit walking and cycling routes can improve safety and perception of safety. The removal of physical barriers can help achieve this.
			AAP10 'Tall Buildings Strategy – The Stations and The Crossings' sets out a strategy for tall buildings that creates landmarks to improve legibility and enhance the character of the Old Kent Road area.			
			AAP 8 'Movement – People, Place, and Experience' focuses on encouraging active travel especially safer			

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
			<p>walking and cycling including quiet routes and safer pedestrian crossing points.</p> <p>AAP 9 'The Greener Belt Strategy – Parks and Healthy Streets' and the OKR AAP masterplan are designed to facilitate social interaction and improve public spaces for all.</p>			
	Does the plan include a mix of uses and a range of community facilities?	Yes	Policy AAP 5 'Businesses and Workspace – The Bow Tie' promotes mixed use development to create vibrant communities. The OKR AAP masterplan sets out locations for new community and sports facilities.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P35 'Town and local centres' sets out that development must provide main</p>	By co-locating a mix of uses and community uses more activity in the public domain will be created, which can improve safety and security. In turn, this will encourage more people to walk and use public spaces

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
			Policy AAP 7 'Town Centres, Leisure and Entertainment' sets out a strategy for retaining retail floor space and introducing new uses to create a lively major town centre with new community uses.		town centre uses including markets, community, civic, leisure and cultural uses.	which is beneficial to their physical and mental wellbeing.

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	Does the plan provide opportunities for the voluntary and community sectors?	Yes	Policy AAP 7 'Town Centres, Leisure and Entertainment' aims to deliver an inclusive network of independently and institutional arts and cultural spaces and facilities for the local community, as well as dedicated community spaces in the Old Kent Road Opportunity Area.	Positive	The Sustainable Growth team is working with local community groups to deliver projects for local people.	This contributes to a greater sense of place and community, which improves mental wellbeing for local residents.
	Does the plan take into account issues and principles of inclusive and age-friendly	Yes	Policy AAP12 'Design' sets out that design must be accessible and inclusive.		This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy	By ensuring that everyone can benefit from regeneration it promotes inclusion which has positive impacts on mental

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	design?		Policy AAP 15 'Great Start in Life' sets out a strategy for delivering spaces that are friendly for younger people that are safe and offer leisure and recreation activities.		document.  Policy P13 'Design of places' sets out that development must provide accessible and inclusive design for all ages and people with disabilities.	health and wellbeing.
<b>Crime reduction and community safety</b>	Does the plan incorporate elements to help design out crime?	Yes	Policy AAP12 'Design' recognises the need for good design to reduce opportunities for crime.	Positive	This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.  Policy P16 'Designing out crime' sets out that development must be designed with secured by design principles. This is important to promote a sense of security and inclusion.	Ensures everyone can access benefits of regeneration to improve feeling of inclusion and therefore improve mental health and wellbeing

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	Does the plan include attractive, multi-use public spaces and buildings?	Yes	Policy AAP 7 'Town Centres, Leisure and Entertainment' promotes mixed use development and multi-use public spaces and buildings especially for community uses.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P51 'Walking' sets out that improving the walking experience is crucial to bring public spaces closer to residents to encourage a healthy and active lifestyle.</p>	Ensures everyone can access benefits of regeneration to improve feeling of inclusion and therefore improve mental health and wellbeing
			Policy AAP 9 'The Greener Belt Strategy – Parks and Healthy Streets' sets out that spaces should be accessible for all and create a healthier environment for pedestrians and cyclists.			



Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	Does the plan consider health inequalities by addressing local needs through community engagement?	Yes	The OKR AAP has an equalities impact assessment (EQIA), which can be found at Appendix F. It reflects issues of public health for each of the protected characteristics for each policy.	Neutral	The Development Consultation Charter sets out detailed aims for reducing social, economic and health inequalities and explains how we will monitor our progress towards achieving a number of promises which the Council has made to the community.	This promotes good working relationships and inclusion, which can contribute to positive impacts on mental health and wellbeing.
	Has engagement and consultation been carried out with the local community and voluntary sector?	Yes	AAP 15 'Great Start in Life' sets out, amongst other things, that: space will be provided for young people to hold events and activities at 231 Old Kent Road community hub; young people will be engaged through council run community events (both at 231 Old Kent Road and other facilities, if appropriate, in the area).	Positive	<p>Further details of consultation with local residents and community groups is set out in the "You said, we did" document and the Consultation Plan.</p> <p>A dedicated website has been set up to communicate any latest news about the Old Kent Road Opportunity Area, including any consultations.</p> <p>A Community Review Panel has been set up for residents to assess applications and decisions made in the Old Kent Road Opportunity Area.</p>	This promotes good working relationships and inclusion, which can contribute to positive impacts on mental health and wellbeing.

Planning Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	Does the plan incorporate design techniques to help people feel secure and avoid creating 'gated communities'?	Yes	Policy AAP12 'Design' promotes accessible and inclusive design to ensure that people feel secure. It sets out that development must follow the secured by design principles that aim to design out crime.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P16 'Designing out crime' sets out that development must be designed with secured by design principles. This is important to promote a sense of security and inclusion.</p>	By creating inclusive and secure design and public realm, it promotes a stronger sense of security which can have positive impacts on mental health and wellbeing of local residents.

Theme 2: Accessibility and active travel

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	<i>Question</i>	Yes No N/A	<i>Policy that meets this requirement</i>	<i>Positive Negative Neutral Uncertain</i>	<i>Mitigation or enhancement identified?</i>	<i>Aims to solve health and wellbeing issues such as....</i>
Promoting walking and cycling	Does the plan prioritise and encourage walking, for example through the use of shared spaces?	Yes	Policy AAP8 'Movement – People, Place and Experience' sets out a strategy to improve the experience for pedestrians and promoting walking as a viable alternative to reliance on a private vehicle.	Positive	This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.  Policy P50 'Walking' sets out the need to improve the experience of walkability in the borough to promote a healthy active lifestyle.	Improving walking and cycling options can help people achieve recommended daily physical activity levels. Promoting active travel reduces the risk of ill health by having a positive impact on air quality.
	Does the plan promote cycling and walking through measures in a travel plan, including adequate cycle parking and cycle	Yes	Policy AAP8 'Movement – People, Place and Experience' sets out a strategy to improve the experience for pedestrians and promoting walking and cycling as a viable	Positive	This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.  Policy P50 'Walking' sets out the	Improving walking and cycling options can help people achieve recommended daily physical activity levels. Promoting active travel reduces the risk of ill

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	storage?		alternative to reliance on a private vehicle.		<p>need to improve the experience of walkability in the borough to promote a healthy active lifestyle.</p> <p>Policy P51 'Cycling' promotes cycling storage provision and the creation of safer routes to encourage cycling.</p>	health by having a positive impact on air quality.
	Does the plan address the ten Healthy Streets indicators?	Yes	<p>The ten TfL Healthy Streets indicators are:</p> <ul style="list-style-type: none"> <li>- Clean air</li> <li>- People feel relaxed</li> <li>- Things to do and see</li> <li>- People feel safe</li> <li>- Pedestrians from all walks of life</li> <li>- People choose to walk, cycle and use public transport</li> <li>- Easy to cross</li> <li>- Shade and shelter</li> <li>- Places to stop and rest</li> <li>- Not too noisy</li> </ul>	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy SP6 'Climate Emergency' addresses these issues in the Southwark Plan 2022.</p>	By improving the pedestrian and cyclist experience, it encourages people to use active travel modes, and be more active which has benefits for mental and physical health and wellbeing.

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
			<p>Policy AAP9 'The Greener Belt Strategy – Parks and Healthy Streets' aims to: re-landscape wider pavements to improve biodiversity; provide more crossing points; deliver a range of green links that inter-connect the area's existing and proposed public open spaces; and create a healthier street environment.</p>			
Safety	Does the plan include traffic management and calming measures and safe and well lit pedestrian and cycle crossings and routes?	Yes	<p>Policy AAP8 'Movement – People, Place and Experience' sets out a strategy to improve safety for pedestrians and cyclists.</p>	Positive	<p>The transport policy team and highways team are responsible for traffic management measures. The adopted Movement Plan (2019) addresses these issues of pedestrian and cycling safety.</p>	<p>Improving walking and cycling options can help people achieve recommended daily physical activity levels. Providing safe and well-lit walking and cycling routes can improve safety and perception of safety.</p>

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
Connectivity	Does the plan connect public realm and internal routes to local and strategic cycle and walking networks and public transport?	Yes	Policy AAP8 'Movement – People, Place and Experience' sets out a strategy to expand and improve the area's walking and cycling network, doing so with consideration to improving safety for pedestrians and cyclists.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P53 'Cycling' sets out how the number of people who cycle and the number of trips made by bicycle should be increased, and also sets out how we will ensure our streets support easy and safe cycling.</p> <p>Policy P52 'Low Line routes' sets out how railway arches can be used to improve pedestrian experience and safety by creating new safer walking routes and improving the public realm.</p>	Providing greater connectivity will encourage physical activity and promote active travel through the creation of safer pedestrian routes.
	Does the plan prioritise and encourage cycling, for	Yes	Policy AAP8 'Movement – People, Place and Experience' sets out a strategy to	Positive	This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and	Improving walking and cycling options can help people achieve

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	example by providing secure cycle parking, showers and cycle lanes?		improve safety for pedestrians and cyclists.		<p>the OKR AAP must comply with this overarching policy document.</p> <p>Policy P53 'Cycling' sets out how the number of people who cycle and the number of trips made by bicycle should be increased, and also sets out how we will ensure our streets support easy and safe cycling.</p> <p>Policy P52 'Low Line routes' sets out how railway arches can be used to improve pedestrian experience and safety by creating new safer walking routes and improving the public realm. The Southwark Spine Cycling Route also sets out improved and safer routes for cyclists.</p>	recommended daily physical activity levels. Promoting active travel reduces the risk of ill health by having a positive impact on air quality.
	Is the plan well connected to public transport, local services and facilities?	Yes	Policy AAP8 'Movement – People, Place and Experience' sets out a strategy to improve connectivity and accessibility to	Positive	This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy	By improving connectivity and accessibility, it promotes inclusion which encourages positive mental

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
			<p>walking, cycling and public transport.</p> <p>Policy AAP1 'Bakerloo Line Upgrade and Extension' sets out a strategy to deliver the Bakerloo Line Extension along the route of the Old Kent Road high street, to include the construction of two underground stations, to improve accessibility to the tube network.</p>		<p>document.</p> <p>Policy P49 'Public Transport' sets out that development must demonstrate that the public transport network has sufficient capacity to support new development.</p>	<p>wellbeing.</p>
	<p>Does the plan connect public realm and internal routes to local and strategic cycle and walking networks?</p>	<p>Yes</p>	<p>Policy AAP8 'Movement – People, Place and Experience' promotes walking and cycling as key modes of travel in the OKR Opportunity Area.</p>	<p>Positive</p>	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P13 'Design Of Places' sets out a strategy for development to follow to set out how the public realm can be</p>	<p>Improving walking and cycling options can help people achieve recommended daily physical activity levels. Promoting active travel reduces the risk of ill health by having a positive impact on air quality.</p>



Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
					<p>utilised to create safer and more attractive cycling and walking network.</p> <p>The adopted Movement Plan (2019) sets out a vision for walking and cycling priority and new routes.</p>	
	Does the plan allow people with mobility problems or a disability to access buildings	Yes	Policy AAP12 'Design' sets out that design should be accessible and inclusive.	Positive	This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with	By creating spaces for people to rest and making accessibility to spaces easier, it

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	and places?		Policy AAP8 'Movement – People, Place and Experience' sets out requirements for wheelchair accessible parking to improve access to places for with disabilities.		<p>this overarching policy document.</p> <p>Policy P8 'Wheelchair accessible and adaptable housing' sets out the strategy for the delivery of accessible housing.</p> <p>Policy P13 'Design of Places' promotes accessible and inclusive design of places.</p> <p>Policy P54 'Parking standards for disabled people and mobility impaired people' sets out requirement to deliver accessible parking.</p>	enables safer active travel and activity for all, which contributes to improved mental and physical health and wellbeing.
Minimise car use	Does the plan seek to minimise car use by reducing car parking provision, controlled parking zones, car free development and car clubs?	Yes	Policy AAP8 'Movement – People, Place and Experience' promotes car free development and prioritises walking, cycling and public transport.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P54 'Car Parking' sets out the strategy for delivering</p>	<p>Reducing car journeys and removing cars from roads will encourage more walking and cycling and improve air quality.</p> <p>Reducing car travel</p>

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
					<p>car-free development (except Blue Badge parking) and controlled parking zones (CPZs).</p> <p>The Movement Plan (2019) sets out a vision for vehicle reduction and traffic calming measures.</p>	<p>will also contribute to a reduction in the emission of greenhouse gases and thus contribute to the mitigation of climate change.</p>
	<p>Does the plan include traffic management and calming measures to help reduce and minimise road injuries?</p>	<p>Yes</p>	<p>Policy AAP8 'Movement – People, Place and Experience' sets out where there are Low Emission neighbourhoods to improve road safety. The policy also aims to deliver safer pedestrian crossings and quieter walking and cycling routes.</p>	<p>Positive</p>	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P12 'Design Of Places' sets out that development must ensure a high quality public realm that encourages walking and cycling is safe, legible and attractive.</p> <p>The Movement Plan (2019) sets out a vision for vehicle reduction and traffic calming measures.</p>	<p>By introducing safety measures to roads, it creates safer streets for all reducing casualties on the roads and making active travel safer, encouraging more active lifestyles, which has benefits for physical and mental health and wellbeing.</p>

Theme 3: Healthy Environment

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	<i>Question</i>	Yes No N/A	<i>Policy that meets this requirement</i>	<i>Positive Negative Neutral Uncertain</i>	<i>Mitigation or enhancement identified?</i>	<i>Aims to solve health and wellbeing issues such as....</i>
Construction	Does the plan minimise construction impacts such as dust, noise, vibration and odours?	Yes	Policy AAP14 'Water Management, Air and Noise Quality' sets out that development must be designed with the Agent of Change principle in mind to ensure that established noise and other nuisance generating uses may continue to successfully operate.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P66 'Reducing noise pollution and enhancing soundscapes' sets out that measures should be taken to mitigate against noise.</p>	<p>The policy seeks to reduce the negative impacts of health caused by construction and development activity.</p> <p>The policy seeks to reduce the risk of ill health by ensuring minimum standards of air quality and that potential impacts are minimised and mitigated.</p> <p>This will reduce the levels of greenhouse gases produced in the borough, which will contribute to the mitigation of climate</p>

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
						change.
Air quality	Does the plan minimise air pollution caused by traffic and energy facilities?	Yes	Policy AAP13 'Climate Emergency' and Policy AAP8 'Movement – People, Place and Experience' sets out how a modal shift towards cycling and walking can improve air quality.	Positive	<p>LB Southwark monitors air quality to ensure that measures are taken to mitigate against the issue of air quality.</p> <p>The School Superzones Initiative aims to improve air quality outside of schools. The Old Kent Road Opportunity Area is a designated School Superzone.</p>	<p>The policy seeks to reduce the risk of ill health by ensuring minimum standards of air quality and that potential impacts are minimised and mitigated.</p> <p>This will reduce the levels of greenhouse gases produced in the borough, which will contribute to the mitigation of climate change.</p>

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
Noise	Does the plan minimise the impact of noise caused by traffic and commercial uses through insulation, site layout and landscaping?	Yes	Policy AAP14 'Water Management, Air and Noise Quality' sets out that development must be designed with the Agent of Change principle in mind to ensure that established noise and other nuisance generating uses may continue to successfully operate.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P66 'Reducing noise pollution and enhancing soundscapes' sets out that measures should be taken to mitigate against noise.</p>	This policy seeks to reduce the risk of ill health by ensuring potential impacts of noise pollution are minimised and mitigated.
Contaminated land	Does the plan set out how contaminated land will be dealt with?	No	This is not set out in the Old Kent Road Area Action Plan but in the Southwark Plan 2022. As such, there is overarching policy to address this.	Neutral	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P64 'Contaminated land and hazardous substances' of the Southwark Plan 2022 sets out that development that</p>	This policy seeks to ensure that residents' health and wellbeing will not be put at risk by preventing development on contaminated land or mitigating impacts from such land.

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
					has an adverse impact on the environment will not be permitted and development must mitigate against contaminated land.	

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
Open space	Does the plan retain or replace existing open space and in areas of deficiency, provide new open or natural space, or improve access to existing spaces?	Yes	<p>Policy AAP9 'The Greener Belt Strategy - Parks and Healthy Streets' sets out the strategy to deliver green space in the OKR Opportunity Area and acknowledges the open space deficiency in the area.</p> <p>For each of the five Sub Areas there is a section on parks and recreation which sets out where there are new or improvements to existing green and open spaces. This is to address the green space deficiency in the Old Kent Road Opportunity Area.</p>	Positive	This is supported by the Council's Parks and Leisure department.	This policy seeks to protect the availability of open spaces and undeveloped land. This may have a positive impact on residents' health and wellbeing, including promoting physical activity and may reduce the demand on physical and mental health facilities through people having more active lifestyles.



Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	Does the plan set out how new open space will be managed and maintained?	No	This is agreed through the planning process.	Positive	This is supported by the Council's Parks and Leisure department.	This policy seeks to protect the availability of open spaces and undeveloped land. This may have a positive impact on residents' health and wellbeing, including promoting physical activity and may reduce the demand on physical and mental health facilities through people having more active lifestyles.

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
Play space	Does the plan provide a range of play spaces for children and young people?	Yes	Together, Policy AAP9 'The Greener Belt - Parks and Healthy Streets' and Policy AAP16 'Child and Youth Provision' set out that development must provide (or contribute towards) a range of play and social spaces that are inclusive and accessible for all, and for a range of ages too.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P15 'Residential design' of the Southwark Plan 2022 sets out a need for development to provide communal amenity space and play space and to provide a financial contribution in circumstances where this is not possible.</p>	This policy seeks to ensure provision of sufficient and appropriate physical and green infrastructure and amenity space. This may have a positive impact on residents' health and wellbeing by encouraging physical activity and may lead to a reduction in demand for health and social care services.
Biodiversity	Does the plan contribute to nature conservation and biodiversity?	Yes	Together, Policy AAP9 'The Greener Belt - Parks and Healthy Streets' and Policy AAP14 'Water Management, Air and Noise Quality' sets out that green infrastructure should be utilised for biodiversity.	Positive	This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.	The policy seeks to protect and enhance the natural environment. This may have a positive impact on mental health and wellbeing and promote increased physical activity.

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
					Policy P60 'Biodiversity' of the Southwark Plan 2022 sets out that development must contribute to net gains in biodiversity.	
Local food growing	Does the plan provide opportunities for food growing, for example by providing allotments, private and community gardens and green roofs?	Yes	Policy AAP9 'The Greener Belt - Parks and Healthy Streets' sets out that development should provide opportunities for communal recreation and food growing.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P59 'Green Infrastructure' of the Southwark Plan 2022 sets out that development should provide opportunities for food growing and recreation.</p>	Positive health effects will arise from the requirement for major developments to provide appropriate open space and green infrastructure. This may lead to opportunities for residents to grow food and help foster a sense of community. This may help tackle food poverty and improve residents' mental health.
Flood risk	Does the plan reduce surface water flood risk through sustainable urban drainage	Yes	Policy AAP14 'Water Management, Air and Noise Quality' sets out the specific greenfield run off rates required in the Old Kent Road and the	Positive	This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this	Positive health impacts may be derived from requiring minimisation of flood risk when locating and designing new developments.

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	techniques, including storing rainwater, use of permeable surfaces and green roofs?		drainage hierarchy to ensure that water and sewage capacity is not exceeded to protect people and their livelihoods. Green roofs are encouraged alongside biodiversity and urban greening to create permeable surfaces to absorb rainwater rain off in urban areas.		overarching policy document.  Policy P68 'Reducing Flood Risk' of the Southwark Plan 2022 sets out that development should not reduce flood risk onsite by utilising water sensitive design and following the drainage hierarchy. The NSP also sets out the need for tree planting to achieve this too.	This may have an indirect positive impact on health through reduction of anxiety and increased ability to secure home insurance. Improvements in mental health arising from alleviation of potential flood risk issues may reduce demand on health services.
Overheating	Does the design of buildings and spaces avoid internal and external overheating, through use of passive cooling techniques and urban greening? Does the plan ensure that buildings and public spaces	Yes	Policy AAP12 'Design' sets out a need for sustainable design to reduce the risk of overheating and the need to integrate urban greening into the design of new development.	Positive	This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.  Policy P68 'Reducing Flood Risk' of the Southwark Plan 2022 sets out that development must follow the cooling hierarchy to achieve	This policy seeks to minimise the risk to health caused by overheating.

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	are designed to respond to winter and summer temperatures, for example ventilation, shading and landscaping?				proper ventilation to reduce the risk of overheating.	
Air quality, noise and neighbourhood amenity	Does the plan minimise air pollution caused by traffic and energy facilities?	Yes	Policy AAP13 'Climate Emergency' sets out a shift towards more active modes of travel to minimise combustion and improve air quality.	Positive	<p>Air quality in the Old Kent Road is monitored by LB Southwark.</p> <p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P65 'Improving air quality' of the Southwark Plan 2022 sets out that air quality should be addressed to reduce impact on building occupiers and users of the</p>	This policy seeks to reduce the negative impacts of health caused by construction and development activity.

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
					public realm.	
Climate change	Does the plan incorporate renewable energy?	Yes	LB Southwark has declared a Climate Emergency. Policy AAP13 'Climate Emergency' directly responds to this. This policy sets out that development should connect to the DHN and SELCHP which is considered to be a renewable source of heat.	Positive	Policy 70 'Energy' of the Southwark Plan 2022 includes the encouragement of onsite generation of renewable energy where possible. PV is assumed to be a renewable source of energy for all major development to ensure greater carbon reductions onsite.	This policy seeks to reduce the negative impacts of health caused by non-renewable energy sources and combustion.
Minimising the use of resources	Does the plan make best use of existing land?	Yes	Policy AAP12 'Design' promotes a design-led approach to density in accordance with the London Plan. The Subareas and site allocations set out what the appropriate uses, typologies and densities are for each sub area to make best use of land.	Positive	The OKR AAP is a masterplan delivered with council and private partners to deliver a masterplan that makes best use of land to meet the needs of residents in the Old Kent Road Opportunity Area.	This policy seeks to reduce the negative impacts of health caused by incompatible land uses.

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	Does the plan encourage recycling, including building materials?	Yes	Policy AAP12 'Design' sets out that to meet sustainable design all new buildings should be designed so that materials can be re-used in future buildings.	Neutral	Policy 70 'Energy' of the Southwark Plan 2022 addresses how to properly recycle materials and use these in building materials. This policy will apply to development in the OKR Opportunity Area.	This policy seeks to reduce the negative impacts of health caused by climate change and poor air quality.

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	Does the plan incorporate sustainable design and construction techniques?	Yes	Policy AAP12 'Design' sets out that development must be of sustainable design and development must meet a net zero carbon target; this is achieved through an efficient use of materials and high performing building fabric.	Positive	Development is assessed against the BREEAM standard for sustainable design and construction, it must reach at minimum 'Very Good' but we are encouraging development to meet the 'Excellent' standard.	This policy seeks to reduce the negative impacts of health caused by climate change and poor air quality.



Theme 4: Vibrant Neighbourhoods

<b>Issue</b>	<b>Assessment Criteria</b>	<b>Relevant?</b>	<b>Details/evidence (policy requirements and standards)</b>	<b>Potential health impact?</b>	<b>Recommended mitigation or enhancement actions</b>	<b>Health issue policy aims to address</b>
	<i>Question</i>	<i>Yes No N/A</i>	<i>Policy that meets this requirement</i>	<i>Positive Negative Neutral Uncertain</i>	<i>Mitigation or enhancement identified?</i>	<i>Aims to solve health and wellbeing issues such as....</i>
Health services	Has the impact on healthcare services been addressed?	Yes	The OKR AAP masterplan currently proposes one new healthcare facility.	Positive	This is the responsibility of the wider council.	This policy may have a positive impact on health and wellbeing and may reduce health inequalities in the borough by providing greater access to health and care facilities.

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
Education	Has the impact on primary, secondary and post-19 education been addressed? Does the plan assess the capacity, location and accessibility of other social infrastructure (e.g. primary, secondary and post 19 education needs and community facilities)?	Yes	Policy AAP16: 'Child and Youth Provision' ensures that there is education, training and employment provision to ensure training and local opportunities for local people.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy SP3 'A Great Start in Life' of the Southwark Plan 2022 sets out how development can deliver opportunities for education training.</p>	This policy seeks to improve provision of education facilities in the borough. This may have a positive impact on residents' health and wellbeing indirectly by supporting young people to grow and develop and improve educational attainment.
Access to social infrastructure	Does the plan contribute to new social infrastructure provision that is accessible, affordable and timely?	Yes	Policy AAP7 'Town Centres, Leisure and Entertainment' sets that development must improve connections to social infrastructure beyond the main Old Kent Road frontage.	Positive	The council is delivering a number of schemes in the Old Kent Road area to deliver social and community facilities.	This policy seeks to ensure that there is adequate provision of social infrastructure. This may have a positive impact on mental health and wellbeing by fostering a sense

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	Does the plan assess the impact on health and social care services and has local NHS organisations been contacted regarding existing and planned healthcare capacity?	Yes	The OKR AAP masterplan currently proposes one new healthcare facility.	Neutral	This is the responsibility of the wider council.	of community.
	Have opportunities for multi-use and the co-location of services been explored?	Yes	<p>The designated industrial land in the OKR will be intensified for mixed use development and industrial co-location.</p> <p>The OKR AAP also encourages co-location of nursery schools and primary schools as well as facilities for older people to improve community cohesion.</p>	Positive	This designation is also in the Southwark Plan 2022.	

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
Local employment and healthy workspaces	Does the design of the public realm maximise opportunities for social interaction and connect the plan with neighbouring communities?	Yes	Policy AAP12 'Design' encourages the use of design to promote connected communities. Design should be used to facilitate social interaction and connect with neighbouring communities.	Positive	<p>The Movement Plan (2019) encourages greater social interaction through a modal shift towards more walking and cycling to facilitate encounter.</p> <p>Policy 32 'Small Shops' of the Southwark Plan 2022 will help to improve the health of communities by creating employment opportunities through the promotion of small local retailers as well as the integration of small shops in new developments.</p>	This may have an indirect positive impact on health by reducing levels of deprivation, reducing risk of unemployment and associated mental health issues.
Access to affordable healthy food	Does the plan facilitate the supply of local	Yes	Policy AAP12: Design encourages the use of design to promote	Positive	Food growing opportunities is something that the Public Health Team are continuing to	Positive health impacts may be derived from

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
and Access to local food shops	food, for example allotments, community farms and farmers' markets?		connected communities which includes the delivery of food growing areas.		<p>explore at LB Southwark.</p> <p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policies SP5 'Thriving neighbourhoods and tackling health inequalities' and SP6 'Climate Emergency' of the Southwark Plan 2022 promote food growing as part of a wider objective to encourage healthy lifestyles.</p> <p>Policy P48 'Hot Food Takeaways' of the Southwark Plan 2022 seeks to mitigate the impact of hot food takeaways and regulate their availability on Southwark high streets or proximity to secondary schools (in line with Southwark's Healthy Weight Strategy),</p>	<p>improved public realm design including promoting physical activity and social interaction and may reduce the demand on physical and mental health facilities through people having more active lifestyles.</p> <p>The policy seeks to mitigate the impact of hot food takeaways and regulate their availability on Southwark high streets or proximity to secondary schools (in line with Southwark's Healthy Weight Strategy), resulting in health benefits (e.g. encouraging healthy weight).</p>

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	Yes	Policy AAP5 'Businesses and workspace – The Bow Tie' sets out a requirement for the delivery of affordable workspace to accommodate a range of employment types.	Positive	There are overarching aims set out in the Southwark Plan 2022 to address and deliver affordable workspace provision, principally in Policy P31 'Affordable Workspace'. Where this not feasible a financial contribution will be made to support training in certain circumstances.	Positive health impacts are demonstrated as it benefits mental health and wellbeing by creating greater economic stability.
	Does the plan avoid contributing towards an over-concentration of hot food takeaways in the local area?	Yes	The OKR AAP makes reference to the School Superzones initiatives which targets childhood obesity, a review of food offer is part of this work.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P48 'Hot Food Takeaways' of the Southwark Plan 2022 seeks to mitigate the impact of hot food takeaways and regulate their availability on Southwark high streets or proximity to secondary schools (in line with Southwark's Healthy Weight Strategy), resulting in health benefits (e.g.</p>	Positive health impacts may be derived from improved public realm design including promoting physical activity and social interaction and may reduce the demand on physical and mental health facilities through people having more active lifestyles. The policy seeks to mitigate the impact of hot food takeaways and

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
					encouraging healthy weight).	regulate their availability on Southwark high streets or proximity to secondary schools (in line with Southwark's Healthy Weight Strategy), resulting in health benefits, e.g. encouraging healthy weight.
Public realm	Does the plan allow people with mobility problems or a disability to access buildings and places?	Yes	Policy AAP12 'Design' sets out that design should be inclusive and accessible, this applies to residential development and mixed use development with public facing aspects.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P12 'Design of Places' in the Southwark Plan 2022 sets out that development must provide accessible and inclusive design for all ages and people with disabilities.</p>	Poor environment leading to physical inactivity through isolation, lack of social contact and fear of crime

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
Access to work and training	Does the plan provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	Yes	<p>Policy AAP16 'Child and Youth Provision' sets out that major development should contribute to the delivery of local training opportunities for local people, especially local youth.</p> <p>The regeneration of the Old Kent Road Opportunity Area and the delivery of the masterplan is supported by local projects run by the council to offer training and opportunities for local people.</p>	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy SP3 'A Great Start in Life' of the Southwark Plan 2022 sets out how development can contribute to improving education and training facilities and delivering training.</p>	Mental illness and poor self-esteem associated with unemployment and poverty
	Does the plan provide childcare facilities?	Yes	Policy AAP15 'Great Start in Life' sets out that development must contribute to the provision of new childcare places including nurseries.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKRAAP, and the OKRAAP must comply with this overarching policy document.</p> <p>Policy SP3 of the Southwark Plan 2022 sets out the need to</p>	Mental illness and poor self-esteem associated with unemployment and poverty



Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
					deliver more childcare facilities.	
	Does the plan include managed and affordable workspace for local businesses?	Yes	By joining the Old Kent Road Business Network, businesses can be informed about opportunities to relocate into new developments and is one way of securing affordable workspace. Affordable workspace sites will be delivered throughout the opportunity area.	Positive	There are overarching aims set out in the Southwark Plan 2022 to address and deliver affordable workspace provision, principally in Policy P31 'Affordable Workspace'. Where this not feasible a financial contribution will be made to support training in certain circumstances.	Mental illness and poor self-esteem associated with unemployment and poverty
	Does the plan include opportunities for work for local people via local procurement arrangements?	No	The OKR AAP is supported by wider regeneration to deliver economic benefits and support to local people.	Positive	The regeneration team in partnership with other departments in the council work with residents in the Old Kent Road Opportunity Area to support education and training and deliver new employment opportunities.  This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply	Mental illness and poor self-esteem associated with unemployment and poverty

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
					<p>with this overarching policy document.</p> <p>There are overarching aims to bring forward opportunities for local employment and procurement set out in Policy P28 'Access to employment and training' of the Southwark Plan 2022.</p>	
Access to open space and nature	<p>In areas of deficiency, does the plan provide new open or natural space, or improve access to existing spaces? Does the plan retain and enhance existing open and natural spaces?</p>	Yes	Policy AAP9 'The Greener Belt Strategy – Parks and Healthy Streets' addresses the deficiency of open and green space in the Old Kent Road. Each sub area sets out the new and existing green and open spaces.	Positive	<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P57 'Open Space' of the Southwark Plan 2022 protects open land from development except in exceptional circumstances to preserve open space.</p>	Poor environment leading to physical inactivity through isolation, lack of social contact and fear of crime
	Does the plan provide links between open	Yes	Policy AAP9 'The Greener Belt Strategy – Parks and Healthy	Positive	This is further set out in the Southwark Plan 2022. This is the local plan for Southwark	Poor environment leading to physical inactivity through

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
	and natural spaces and the public realm?		Streets' sets out a Parks and Recreation Strategy and the Greener Belt vision. The latter connects green and public open spaces from Lewisham throughout the Old Kent Road and Lambeth.		and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.  Policy P57 'Open Space' of the Southwark Plan 2022 protects open land from development except in exceptional circumstances to preserve open space.	isolation, lack of social contact and fear of crime
	Does the plan set out how new open space will be managed and maintained?	Yes	The OKR AAP masterplan sets out where the new and existing green spaces are. Some of these are managed privately by landowners and some are managed by the council.	Neutral	This is agreed during the construction process.	Poor environment leading to physical inactivity through isolation, lack of social contact and fear of crime
	Are the open and natural spaces welcoming and safe and accessible for all?	Yes	Policy AAP9 'The Greener Belt Strategy – Parks and Healthy Streets' sets out that new green and open space delivered should be publically accessible.	Positive	This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.	Poor environment leading to physical inactivity through isolation, lack of social contact and fear of crime

Issue	Assessment Criteria	Relevant?	Details/evidence (policy requirements and standards)	Potential health impact?	Recommended mitigation or enhancement actions	Health issue policy aims to address
					<p>Policy P14 'Residential Design' of the Southwark Plan 2022 sets out that in the Old Kent Road opportunity area 5sqm of public space must be delivered per dwelling.</p>	
	<p>Does the plan provide a range of play spaces for children and young people?</p>	<p>Yes</p>	<p>AAP9 'The Greener Belt Strategy – Parks and Healthy Streets' sets out the need for child play space in the area, and for it to be safe, accessible and to suit a range of ages.</p> <p>AAP16 'Child and Youth Provision' sets out that major development must contribute to new or improved youth facilities including physical space or land for the use of local youth.</p>		<p>This is further set out in the Southwark Plan 2022. This is the local plan for Southwark and sits above the OKR AAP, and the OKR AAP must comply with this overarching policy document.</p> <p>Policy P15 'Residential Design' of the Southwark Plan 2022 sets out that in the Old Kent Road opportunity area 5sqm of public space must be delivered per dwelling and should consider providing communal play areas for children.</p>	<p>Poor environment leading to physical inactivity through isolation, lack of social contact and fear of crime</p>



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