

<b>Meeting Name:</b>	Council Assembly
<b>Date:</b>	20 November 2024
<b>Report title:</b>	Old Kent Road Area Action Plan: 2024 Draft
<b>Cabinet Member:</b>	Councillor Helen Dennis, Cabinet Member for New Homes and Sustainable Development
<b>Ward(s) or groups affected:</b>	All
<b>Classification:</b>	<b>Open</b>
<b>Reason for lateness (if applicable):</b>	Not applicable

## RECOMMENDATIONS

That Council Assembly:

1. Approve the proposed submission documents set out at Appendix A to G (i.e. *the Old Kent Road Area Action Plan: 2024 Draft (Appendix A) for consultation, the Consultation Plan (Appendix B), Consultation Report (Appendix C), Integrated Impact Assessment (Appendix D), Habitats Regulations Assessment (Appendix E), Equality Impact Assessment (Appendix F) and Health Impact Assessment (Appendix G)*) in principle for Regulation 19 statutory public consultation and to authorise officers to proceed to Regulation 22 (i.e. submit to Secretary of State and to notify the public of the submission), subject to no major modifications arising from the Reg 19 statutory public consultation (subject to recommendations 2, 3, 4 and 5 below);
2. Delegate the approval of any minor amendments resulting from its meeting and a final review by officers on the Old Kent Road Area Action Plan: 2024 Draft to the Director of Planning and Growth in consultation with the Cabinet Member for New Homes and Sustainable Development;
3. Approve the final version of the documents specified in recommendation 1;
4. Resolve to publicly consult on the proposed submission documents set out at Appendix A to G to this report;
5. Authorise officers to proceed to Regulation 22 (i.e. submit to Secretary of State and to notify the public of the submission), subject to no major modifications arising from the Reg 19 statutory public consultation of the proposed submission documents;
6. Delegate the approval of any minor amendments resulting from its meeting or consultation on the Old Kent Road Area Action Plan: 2024 Draft to the Director of Planning and Growth in consultation with the Cabinet Member for Cabinet Member for New Homes and Sustainable Development before submission to Secretary of State.

## **REASONS FOR RECOMMENDATIONS**

7. The Council would like to manage growth sustainably and inclusively in the Old Kent Road area, and the Area Action Plan (AAP) is the mechanism to achieve this.

## **ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED**

8. The Council has a Local Development Scheme (LDS) covering the period 2022-2025. The LDS sets out a timetable for the preparation and adoption of various local planning policy and guidance documents, including Area Action Plans (AAPs). The LDS commits the Council to submitting the draft Old Kent Road AAP for Examination in Public before the end of 2024. It expects the Inspector's report to be published in summer 2025, and for the AAP to be adopted shortly thereafter.
9. For this reason, no alternative options to preparing the draft Old Kent Road AAP have been considered. Adopting an up-to-date AAP within the timeframe stipulated by the LDS is essential to ensure an effective set of policies are in place for delivering regeneration outcomes and informing decision making on planning applications.
10. The Integrated Impact Assessment (IIA) explored the likely impact of two different masterplan options for growth in the area, along with 'low', 'medium' and 'high' growth scenarios based on the evolution of evidence base documents and discussions with the local community. The IIA found 'Option B - High Growth' to be the most appropriate option, and as such the other options have been discounted.

## **POST DECISION IMPLEMENTATION**

11. Once agreed for consultation by a meeting of the Full Council, the AAP will be published on the Council website and consulted on in other ways in the run-up to the submission of the draft to the Secretary of State for its Examination in Public. At this consultation stage if significant issues in respect of the soundness of the plan are raised then it may need to be reported back to Cabinet and to Full Council. If minor issues are raised, officers are requesting the delegated authority to make those minor changes in consultation with the Cabinet Member for New Homes and Sustainable Development. Once submitted to the Secretary of State, issues raised by the Inspectors and other stakeholders as part of the Examination in Public may require some of the content of the AAP to be updated. The Inspectors will issue their report after the Examination in Public, and their recommendations will be incorporated into a final draft of the AAP. Once the Inspectors are satisfied with the final draft, the AAP will be adopted at Council Assembly.
12. Following adoption, the AAP will be reviewed and updated on an ongoing basis to take into account any changing circumstances affecting the Old Kent Road area, Southwark or any changes in regional and national policy as required. Such updates to the AAP will be consulted upon before being determined by Cabinet.

<b>Key Activity</b>	<b>Target completion date</b>
<b>Public and stakeholder consultation on the draft</b>	Q3/Q4, FY 2024

<b>Old Kent Road AAP</b>	
<b>Examination in Public of the draft Old Kent Road AAP</b>	Q1, FY 2025
<b>Inspector’s Report and adoption of the draft Old Kent Road AAP</b>	Q2, FY 2025
<b>Ongoing post-decision monitoring and updating</b>	Post Q3, FY 2025

## **BACKGROUND INFORMATION**

13. In December 2020, Cabinet resolved to consult on the revised draft Old Kent Road Area Action Plan (AAP), an ambitious growth strategy for the Old Kent Road area, which the Mayor of London designated as an opportunity area in 2015. Over the next 18 years the Opportunity Area will be transformed through:
  - the delivery of two new underground stations as part of the Bakerloo Line Upgrade and Extension (BLUE);
  - 20,000 new homes, of which 7,000 will be affordable (including 5,000 social rented homes); and
  - 10,000 additional jobs.
14. The AAP embeds the Council’s commitment to putting local residents, communities and others at the heart of the regeneration. The AAP is planned to be family friendly, with a commitment to improving the area for families and young people, and integrating older people into community life.
15. The AAP contains a commitment to tackling the Climate Emergency, principally achieved by requiring all new development to achieve net zero carbon.
16. The plan continues to promote a healthier environment and transport improvements including the Bakerloo Upgrade and Extension (BLUE), limitations on car parking, reduced air pollution and sustainability improvements for water, drainage and energy. The Old Kent Road high street itself will be improved with a strategy for healthy streets; this includes safer crossing points, segregated bus lanes, a range of new cycle routes and more tree planting.
17. Extensive consultation has taken place over the last eight years on previous drafts of the AAP and on the Design Codes produced for the AAP.
18. Following Examination in Public in 2021, the Southwark Plan was adopted in early 2022. The vision, policies and site allocations it sets out apply to development in the Old Kent Road Opportunity Area. The AAP builds on the strategy set out in the Southwark Plan 2022, providing additional policies and a masterplan that together prescribe specific land uses and promote an integrated approach to place-making and transport improvements.
19. Once adopted, the AAP will form part of Southwark’s Local Development Framework and be used alongside the Southwark Plan 2022 to determine planning applications and focus investment. It will also be endorsed by the Mayor of London as an Opportunity Area Planning Framework document. As a part of Southwark’s Local Development Framework, it is required to be consistent with the borough-wide Southwark Plan 2022 and must be in general conformity with the London Plan 2021.

20. One of the key drivers for change in the Old Kent Road area is the delivery of the Bakerloo Line Extension (BLE) and improvements to surface transport on the Old Kent Road high street. For the last eight years, the Council has been actively campaigning in coalition with Lewisham Council and more recently with Central London Forward to “Back the Bakerloo”.
21. In 2020, and following two rounds of earlier consultation, TfL launched a consultation for the preferred option location of two stations on the Old Kent Road high street (one at Burgess Park and one at the northern end of Asylum Road). 89% of respondents made positive or supportive comments about the BLE proposals. Work is ongoing by TfL 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.
22. 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.
23. 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. However, it is vital that the government works with TfL to agree a longer term funding package so that the thousands of new homes and jobs which the project is set to bring are not put at risk.

## **KEY ISSUES FOR CONSIDERATION**

24. The draft OKR AAP 2024 is an ambitious plan for the regeneration of the Old Kent Road area. It provides more detail to the Southwark Plan 2022 vision, objectives and policies to manage change over the Plan period.
25. The key elements of the draft OKR AAP 2024 are the Vision, the Strategy and the Policies, all of which have been guided by the series of goals set out in the Southwark 2030 Strategy agreed by Cabinet in July 2024. Before going into detail about the Vision, Strategy and Policies, the bullet points below set out each of the 2030 goals along with some examples of how the AAP will play its role in delivering these:
  - a) Decent homes (people live in safe, well-maintained homes)
    - The AAP seeks to: deliver a total of 20,000 new homes, in a mix of affordable and private tenures; increase the number of genuinely affordable homes in the Old Kent Road OA; and improve the supply of specialist and older people’s housing.
  - b) A good start in life (children and young people have a great childhood that builds on a solid foundation for adult life)

- The AAP seeks to: improve the environment in and around schools; support the expansion of schools where there is demand for extra places; provide a network of outdoor space and youth facilities that will improve outcomes for children who face disadvantage and ensure all young people can participate in positive activities.
- c) A safer Southwark (crime is low and people feel safe)
- The AAP seeks to deliver buildings, streets, parks, other public spaces and a public transport network that through their design reduce opportunities for crime and engender greater confidence about spending time in and moving through the Old Kent Road Area during both the day- and night-time.
- d) A strong and fair economy (ensuring everyone can benefit from Southwark's economic strength and growth)
- The AAP seeks to: deliver 10,000 new jobs, including in higher-paid and emerging sectors; support the existing business ecosystem, including SMEs, in part through the delivery of affordable workspace; and support the town centre to flourish into a hub for recreation, shopping and entertainment.
- e) Staying well (ensuring that people across our whole community can have good health and wellbeing)
- The APP seeks to: create more opportunities for exercise and outdoor recreation through a network of open space and green links; and enhance local health care provision through the delivery of a health hub.
- f) A healthy environment (our environment is clean, green and healthy)
- The APP seeks to: create more green space and biodiversity for our community to enjoy; help people and businesses switch to healthy, clean and green transport; and reduce carbon emission associated with the construction and operation of new buildings and infrastructure, the District Heat Network playing a major role in this goal.

### **Vision of the draft OKR AAP 2024**

26. 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. 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).

## Strategy of the draft OKR AAP 2024

27. The Strategy section of the AAP set out how, through a number of plan objectives, the Vision will be achieved. These objectives are:

a) Bakerloo Line Extension

- Extend the Bakerloo Line and deliver two new stations along the Old Kent Road.
- Deliver the 'Bakerloop Bus' which will provide an enhanced service along the Old Kent Road to support growth in advance of the delivery of the BLE.

b) New Homes

- Build 20,000 new homes co-located with new employment space.
- At least 7,000 of these new homes will be affordable including at least 5,000 social rented homes.
- Provide a mix of home sizes with housing suitable for every stage of life.
- Provide a mix of home types, primarily flats but including terraced houses, delivered in high density, mixed use neighbourhoods.
- 50% of new Council homes will be let to local residents.

c) Employment, Jobs and Business

- Double the number of jobs from approximately 10,000 to 20,000.
- Promote the Old Kent Road area as a location for Life Sciences employment space supporting the wider life sciences clusters at Guys and St Thomas's (London Bridge), King's College / Maudsley (Camberwell) and Canada Water.
- Increase the range of jobs by providing different types and sizes of employment space from laptops to forklifts including light industrial, maker spaces, warehousing and distribution, offices, workspaces, retail, leisure and entertainment facilities.
- Provide local jobs and skills training for young people.
- Sustain the business ecosystems which help to make the Old Kent Road area successful.
- Develop the Council's own affordable workspace provision.

d) Town Centre, Leisure and Entertainment

- Create two new district town centres which promote a sense of community and prevent loneliness and social isolation.
- Provide a variety of shops and facilities including local independent shops and large stores such as supermarkets, homeware and hardware available on the high street.
- Deliver exciting new activities in leisure, entertainment, recreation and play in the town centre for local people of all ages to get out and have fun in the day and night time.

e) Movement

- Make the whole of the Old Kent Road high street an exemplary Healthy Street, where people can choose to safely walk, cycle and use public transport by providing sufficient footway widths, and where possible segregating bus

and cycle lanes subject to the final design of the TfL Healthy High Street project.

- Provide efficient, rationalised and sustainable service routes to the new stand-alone and co-located workspace in a way that does not compromise the function of either the residential or workspace uses.
- Implement a Controlled Parking Zone across the whole of the Opportunity Area and create low traffic neighbourhoods around local roads which will also ensure that service routes to employment uses can function efficiently.
- Deliver High Street links to create better pedestrian and cycle connections to the Old Kent Road from its residential and commercial hinterland, helping to secure the economic revival of the high street.
- New residential development will have zero car parking (other than Blue Badge), new commercial development will need to commit to the use of electric vehicles, and TfL will be encouraged to have a low emission bus fleet.

f) Parks and Open Space

- Increase the public open space provision to 30 hectares and deliver more trees on streets and in the new open space.
- Create four new major parks: Mandela Way Park, Livesey Park (at the old gasworks), Surrey Canal Park and Frensham Street Park, which will connect existing and new neighbourhoods and help deliver the Greener Belt.
- Create a network of green links and spaces that connect established residential neighbourhoods with the parks, stations, high streets and community hubs.

g) Energy and Climate Change

- Address the Climate Emergency by working towards the carbon neutrality target.
- Create low carbon jobs and businesses, and support existing individuals and business owners to move towards zero carbon.
- Reduce carbon emissions from vehicles by requiring car free residential development and by reducing the number of commercial trips through the provision of last mile logistics hubs and the use of electric commercial vehicles, cargo and quadricycles.
- Provide infrastructure and work with infrastructure providers of transport, energy and other utilities to enable reduction in carbon.

h) Schools, Community and Youth

- Potential to expand existing primary schools to provide additional pupil numbers as needed, with an option to deliver a new secondary school.
- Promote the co-location of nurseries, primary schools and older people's accommodation for intergenerational wellbeing.
- Ensure every child has a safe and positive experience of growing up in the Old Kent Road area.
- Create a new network of youth facilities including at 231 Old Kent Road, Leyton Square, Frensham Street Park and the Tustin Estate. These will be delivered to ensure access to youth facilities and resources are spread equitably across the plan area.

i) Culture and Heritage

- Strengthen the identity of the Old Kent Road area as a cultural destination, attracting new creative enterprises, a higher education institution and a major cultural attraction.
- Integrate the Old Kent Road area's historic and valued character into new development, celebrating its industrial past and present.
- Protect and enhance listed and non-listed heritage assets and buildings and features of townscape and historic interest, and find new uses for old buildings.

j) Health and Wellbeing

- Reduce air pollution to improve the health and wellbeing of our residents.
- Deliver NHS health services including a co-located health facility at Verney Way.
- Support school streets programmes, reducing vehicular movement outside schools and locating servicing entrances for propose developments are located away from key access points and playgrounds.

28. The 10 categories under which these objectives have been grouped are a refinement of the 13 categories in the Strategy section of the draft AAP 2020. Notwithstanding, the spirit and substance of the objectives remains largely unchanged. The only changes relate to the deletion of some of the more technical requirements (these are now referenced in the applicable policy instead) and the introduction of references to the new life sciences and Bakerloop Bus objectives.

### **Policies of the draft OKR AAP 2024**

29. The Policies section of the AAP sets out the thematic principles that will guide development across the Opportunity Area in order to achieve the Vision and Strategy. The key points of note are:

Policy AAP1: The Masterplan

30. The text content of AAP1 remains largely similar to the corresponding 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.
31. 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.

Policy AAP2: Bakerloo Line Upgrade and Extension

32. The policy now includes definitions of various terms relating to the Bakerloo Line Upgrade and Extension (BLUE). Two of the key ones are:
- the Bakerloo Line Extension (BLE) acronym, which describes the southwards extension of the Bakerloo Line in two stages from Elephant and Castle to Hayes, the initial stage being from Elephant and Castle to Lewisham involving the construction of two new underground stations, and the second stage from Lewisham to Hayes; and
  - the Bakerloo Line Upgrade (BLU) acronym, which describes the provision of new rolling stock together and modernisation of signalling equipment, enabling



faster line speeds, increased train frequencies, and improved safety and reliability on the existing Bakerloo Line.

33. The policy also explains why the BLU is needed as a precursor to the BLE.
34. The policy provides an update on the timeframes for delivery of the BLE, explaining that the letting of the construction contract and start of works is expected in 2030, with construction set to complete in 2038.
35. The policy brings the timescales of 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.
36. References to investment in schools, health and leisure facilities have been removed from the policy and placed in the other applicable policies.
37. With regard to the monitoring of which schemes are in Phase 1 and Phase 2 delivery, 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. If schemes in Phase 1 are not implemented they may be moved into Phase 2 and Phase 2 schemes which are more likely to be implemented moved to Phase 1. In this way our aim is to maximise delivery of housing in advance of the BLE being confirmed.
38. In support of the policy, we have recently launched the Moving London Forward report, which identifies and quantifies the social and economic benefits the BLUE will unlock. We will also complete in the coming weeks the BLE Funding Considerations Study. Both of these studies have been prepared in collaboration with London Borough of Lewisham, TfL and Central London Forward.

#### Policy AAP3: Homes for All

39. Under the draft 2020 OKR AAP, this policy required at least 35% of new homes to be affordable and for development proposals to deliver a specific mix of housing. Although these requirements have now been adopted in the Southwark Plan 2022, AAP3 still mentions them to ensure readers remain aware of the policy requirement.
40. 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. The policy also includes reference to Key Worker Housing to ensure consistency with the CIL and S106 SPD, adoption of which is targeted for early-to-mid 2025.
41. The Old Kent Road Opportunity Area overall is achieving the highest average % delivery of affordable housing in London, with 3,333 homes being delivered, of which 51.2% are affordable. The 'Reasons' section of the policy refers to these up-to-date statistics as a way of demonstrating delivery.

#### Policy AAP4: Student Homes

42. The draft OKR AAP 2024 includes a student housing policy, AAP4, that sets out how consistency with the London Plan Purpose Built Student Accommodation policy (Policy H15) requirement to create mixed and inclusive communities will be achieved in the Old Kent Road Opportunity Area.
43. In the 'Development Must' section, the policy requires proposed student housing developments to demonstrate how, through their design and location, they will help create mixed and inclusive neighbourhoods. It explains that, when assessing whether a planning proposal would achieve this aim, the following matters will be taken into consideration:
  - proximity to other student housing schemes; and
  - the availability of other sites for other types of homes, including affordable and family homes; and
  - whether the proposal will deliver other plan priorities (including affordable housing, affordable workspace, open space and the high street).
44. The words "mixed and inclusive neighbourhoods" have been used to ensure consistency with the policies of the London Plan 2021.
45. Across the Opportunity Area we have been requiring all student housing developments, not just conventional housing proposals, to make a contribution towards public open space. Where a proposal cannot deliver the required amount of public open space on-site, a payment-in-lieu has been applied using a conversion rate of every 2.5 student bedspaces being equivalent to 1 conventional home. This is as per the approach endorsed in the London Plan. A tariff is applied for each 5 square metres of public open space shortfall; this financial contribution is then secured through the s106 agreement. To provide clarity to readers, this requirement has been included in the 'Development Must' section of AAP4. The payment-in-lieu mechanism is also reflected in the draft S106 and CIL SPD 2024.
46. Policy P5 of the Southwark Plan 2022 sets out affordable housing requirements for student housing proposals depending on the operation of the accommodation (e.g. direct let or nominations) and the provision of student rooms at affordable rates. Policy P5 also stipulates wheelchair accommodation requirements for student housing proposals. To avoid duplication of a pre-existing policy, AAP4 makes no mention of these matters.

#### Policy AAP5: Businesses and Workspace – The Bow Tie

47. Requirements for new developments to provide affordable workspace and relocation options for displaced businesses have been removed from this policy because these became policy requirements when the Southwark Plan 2022 was adopted. These have now been moved into a 'Commitments' section so that readers are aware that the requirements exist and are part of the Southwark Plan, with the rationale expanded upon in the 'Reasons' section.
48. The policy is strongly underpinned by the themes of co-location of residential and commercial uses and industrial intensification, explaining that these are critical to making the most efficient use of land in order to deliver homes and jobs whilst strengthening the special character of the Old Kent Road Opportunity Area as a creative and productive part of London.

49. AAP5 also explains the broad spatial strategy for where certain employment uses will be located. Guided by the overarching “Bow Tie” employment strategy, it expects office or “lap top” uses to be focused in the town centre nearer to the new BLE stations and heavier “forklift” industrial uses to be located in the Opportunity Area Core, Locally Significant Industrial Sites (LSIS) and Strategic Protected Industrial Locations (SPIL).
50. The policy refocuses attention on the importance of designing mixed use developments so that servicing arrangements enable residential and commercial uses to coexist with each other.
51. 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.

#### Policy AAP6: Life Sciences

52. ‘Life Sciences’ is the second of two new policies proposed for inclusion in the draft OKR AAP 2024. It has been positioned immediately after AAP5 because of the common thread of seeking to diversify and strengthen the Opportunity Area’s economy and business environment.
53. With proximity to the emerging life sciences cluster at Bankside and London Bridge, as well as Guys and St Thomas’ and Kings College hospitals, the Old Kent Road area holds significant potential to provide “wet labs” and other facilities associated with medical and life sciences sectors including “back of office” support space. The policy seeks to capitalise on the Old Kent Road area being the geographic centrepiece between Southwark’s clusters and a number of other clusters in neighbouring boroughs.
54. AAP6 encourages meanwhile life sciences use of development sites in advance of the delivery of the BLE.
55. 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 expertise and innovation.
56. AAP6 is fully aligned with the National Planning Policy Framework draft, the London Plan and the Southwark Plan in supporting the growth of the life sciences sector.

#### Policy AAP7: Town Centres, Leisure and Entertainment

57. The ‘Strategy’ section of the policy now clarifies that there are two District Town Centres in the Old Kent Road area. It introduces a requirement for new leisure and town centre links to be delivered; these will provide increased connectivity from existing and proposed residential and business communities to the high street to support the town centre economy.
58. The NHS strategy for Southwark aspires to deliver three health hubs: one in the Old Kent Road area, one at Elephant and Castle, and one at Canada Water. The

'Strategy' section of this policy continues to refer to an Old Kent Road health hub. The policy also includes a map identifying sites where the health hub could be located.

59. 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 grant funding.

#### Policy AAP8: Movement – People Place, Experience

60. The Strategy section of this policy has been updated to include the following strengthened and new ambitions:
- deliver the Bakerloop Bus to support Phase 1 growth;
  - design commercial servicing intelligently to ensure the mixed use agenda is successfully delivered;
  - deliver town centre links to improve the walking and cycling experience across the Opportunity Area and better integrate Old Kent's Road neighbourhoods with each other and with the high street; and
  - convert the roads at the front of John Keats and Phoenix Primary Schools into parks;
  - make the Old Kent Road high street an exemplary Healthy High Street and deliver TfL's Healthy High Streets project;
61. Another of the strategies which has been carried-forward into the 2024 draft of the AAP from the 2020 draft is the implementation of an area-wide Controlled Parking Zone. Since the date of the 2020 draft AAP, the entire Old Kent Road AAP area has been designated a Controlled Parking Zone. The Council's Highways division intend to complete all remaining works by winter 2024 / spring 2025, subject to all statutory consultation processes.
62. The 'Development Must' section of this policy has been updated to place stronger emphasis on the need for proposals to provide coordinated commercial servicing, appropriate electric vehicle infrastructure and adequately-sized footways. This section of the policy also provides greater clarity about the s106 financial contributions that will be sought from new developments in the Opportunity Area
63. With regard specifically to the matter of commercial servicing, the major changes to the policy since 2020 are:
- it introduces the concept of primary commercial service routes (more location-specific detail about which is provided in the sub-areas); and
  - it recognises the importance of providing appropriate infrastructure for sustainable emerging forms of delivery vehicle (electric vehicles, cargo bikes, quadricycles etc.).
64. The 'Reasons' section of the policy has been updated to reflect the changes, but the key message of needing to provide healthier and better connected neighborhoods through cleaner and greener infrastructure remains dominant. The 'Reasons' section also rationalises the demolition/construction management guidance for developers.

#### Policy AAP9: The Greener Belt Strategy – Parks and Healthy Streets

65. This policy, 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.
66. AAP9 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.
67. 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.
68. There has been some rationalisation and elaboration of the 'Reasons' section of the policy.
69. With regard to capital funding, this would come from a combination of s106 financial contributions and CIL monies. Most running costs will be covered by developers where they retain freeholds (such as Mandela Park and Ruby Triangle) through their service charge regimes. Where parks are shared across freeholds (such as Surrey Canal Park) we have developed s106 mechanisms to ensure they are managed as a single space. In some instances, s106 and CIL payments are going to fund capital works improvements to our parks and we will continue to manage those park spaces (such as Brimington Park and Leyton Square). There will be some new open spaces that the Council owns, for which revenue funding would be required (Frensham Street and Livesey Park are two examples). Bramcote Park is an example of a park we own part of the freehold of; we are in the process of establishing whether it would be best to fund the maintenance regime via the Council's Housing Team or the Council's Park Team.

#### Policy AAP10: Tall Buildings – The Stations and the Crossings

70. The 'Strategy' section sets out where tall buildings will be located in the Old Kent Road Opportunity Area and what height they will be. Additions have been made to the design requirements of tall buildings, including consideration of townscape, relationship to heritage assets, to local and strategic views, 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.
71. Consequently the 'Development Must' section of the policy has been simplified, essentially requiring that development must implement the three tier tall building strategy.
72. There have been some deletions from the wording in the draft OKR AAP 2020 that repeats the tall building policy of the Southwark Plan 2007, the latter having been rescinded upon the adoption of the Southwark Plan 2022.

#### Policy AAP11: Character and Heritage

73. 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. The 'Definitions' section of the policy defines each of these classifications. They are reflected on an accompanying map.
74. Since the date of the draft OKR AAP 2020, there have been five new conservation areas adopted in the Old Kent Road area. Furthermore, the historic industrial chimney and part of the original factory building at Glengall Road has been retained and integrated as part of a co-located residential/workspace redevelopment. These developments have been referenced in the 'Reasons' section of the policy.
75. 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.

#### Policy AAP12: Design

76. The 'Strategy' section of this policy now makes an express requirement for new development to be well-designed and constructed in high quality durable materials that will withstand the test of time.
77. A 'Targets' section has been introduced to match the presentation style of other policies. It communicates the continued focus on quality-driven and contextually-responsive new development.
78. The 'Development Must' section of the counterpart policy in the draft OKR AAP 2020 included dedicated topic-based design guidance covering matters such as design of streets, parks and buildings. In the draft OKR AAP 2024, some of this 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-area sections. The latter has been informed by the design code commissions. This aligns with the approach promoted by the NPPF 2023. Where appropriate, design codes will be commissioned for the remaining sub areas.
79. Some sections of the guidance have been removed because they would otherwise repeat content from the Southwark Plan 2022 and/or other policies within the draft AAP.
80. With the dedicated area-based design guidance having been moved into the sub-areas, the 'Development Must' section of this policy now gives focus to three key topics:
  - Materials;
  - Building Typologies; and
  - Connecting Communities.

81. The 'Reasons' section remains unchanged compared to the AAP 2020 version, except that it mentions the successful delivery of schemes to date and some of the lessons learnt.

#### Policy AAP13: Climate Emergency

82. This policy of the draft AAP gives increased focus to the District Heat Network (DHN), as this is a major low carbon energy project particular to the Old Kent Road area. We are working with partners to deliver the DHN and, following the adoption of the Local Development Order in 2023 that enables the network's rollout, we have already begun laying some of the pipework infrastructure. This aligns with the Council's Climate Change Action Plan 2021, which promotes the creation of a DHN.
83. AAP13 now includes detailed design requirements that development proposals must accord with in order to facilitate future connection to the DHN.
84. 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.

#### Policy AAP14: Water Management, Air and Noise Quality

85. Previously called 'Cleaner, Green, Safer', AAP14 has been renamed to better reflect the thrust of the policy.
86. 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.

#### Policy AAP15: Great Start in Life – Child and Youth Provision

87. This policy brings together two separate policies from the draft OKR AAP 2020, 'Best Start in Life' and 'Child and Youth Provision'. It has been named to align with the Great Start in Life policy of the Southwark Plan 2022, SP3.
88. The current situation with school under-subscriptions in the Old Kent Road area is such that the wording of AAP15 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.
89. The policy includes 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.

90. These projects' capital costs have mostly been funded by a mix of s106 and CIL funding, with some funding for the capital costs of indoor/outdoor sports facilities (for projects such as Brimington Park) primarily covered by the Council's Parks and Leisure Department and supplemented by s106 payments. These projects' running costs would be mainly from the Council's Parks and Leisure Department. The one exception to this is the 231 Old Kent Road facility, where developer contributions have been secured to cover running costs.

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

91. The 'Sub-area and Site Allocations' 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.

### **Community, equalities (including socio-economic) and health impacts**

#### Community impact statement

92. The draft AAP has the aims of:
- promoting regeneration that benefits existing communities in Southwark;
  - providing new and improved facilities for residents and businesses; and
  - accommodating much needed growth in housing and transport infrastructure.
93. In preparing the draft OKR AAP 2024 the Council has completed an integrated impact assessment. This assessment found that the AAP has strong objectives for improving the quality of the environment in the Opportunity Area including fostering community cohesion, improving health and equal opportunities for all. Policies reflect the aim of achieving revitalised neighbourhoods with new community facilities, healthcare, education, cultural, business, leisure and arts space. The AAP provides many opportunities to replace, enhance and expand community, business 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 Opportunity Area, encouraging sites to consider wider considerations to achieve the aspirations of the Plan, including new green spaces, improved transport infrastructure, connecting routes and high quality new buildings.

#### Equalities (including socio-economic) impact statement

94. The Equalities Impact Assessment that supports the AAP identifies the protected characteristics and needs of Southwark's diverse communities. It concludes that there are no negative impacts arising from the AAP that cannot be adequately mitigated.

#### Health impact statement

95. The draft OKR AAP 2024 has a key role to play in supporting the Council to ensure new development across the Opportunity Area improves and addresses health inequalities.



96. The positive health impacts from high quality new housing, business diversification and the associated employment opportunities, sustainable modes of transport, enhanced town centres, and investment in open space are well documented. This correlation is expressed in the IIA and other policy documents referenced above.
97. The draft AAP includes mitigation for negative impacts from development on the health of local communities, such as provision of social, health and community infrastructure where there is a need, as well as improvements to air quality. It will also have an impact on factors that have an indirect beneficial impact on health, including improvements to sustainable transport infrastructure that can allow for active travel.

### **Climate change implications**

98. Following Council assembly on 14 July 2021, the Council has committed to considering the climate change implications of any decisions. The Council's climate change strategy is available [here](#).
99. Climate change considerations are threaded through and strongly represented within the objectives, policies and visions of the draft OKR AAP 2024, as explained in detail in the earlier paragraphs of this Cabinet Report. Examples of this include encouraging sustainable travel and reducing car use, enhancing and creating new green spaces, creating new green jobs and businesses, and rolling out a District Heat Network and promoting other forms sustainable energy generation.
100. The overarching planning policy framework within which the AAP will sit sets ambitious carbon savings targets for new development proposals.

### **Resource implications**

#### Budget implications

101. There are no immediate budget implications arising from the proposed consultation on the draft OKR AAP 2024. Any potential budget issues from any specific proposals emerging from the preparation and adoption of the plan or any queries thereof will be submitted as separate reports for consideration in line with the appropriate protocols.

#### Staffing implications

102. There are no immediate staffing implications arising from the proposed consultation on the draft OKR AAP 2024. Any potential staffing implications from any specific proposals emerging from the preparation and adoption of the plan or any queries thereof will be submitted as separate reports for consideration in line with the appropriate protocols.

### **Legal/Financial implications**

103. There are no immediate financial implications arising from the proposed consultation on the draft OKR AAP 2024. Any potential additional costs from any specific proposals emerging from the preparation and adoption of the Plan or any

queries thereof will be submitted as separate reports for consideration in line with the appropriate protocols.

104. There are no immediate legal implications arising from the proposed consultation on the draft OKR AAP 2024. Relevant legal matters are addressed in a subsequent part of this report entitled Supplementary Advice From Other Officers.

### Consultation

105. Over the course of the past eleven years of AAP preparation, the Council has conducted extensive community consultation. This took the form of five phases:

Phase	Time period	Consultation
1	July 2013 to October 2015	Early informal consultation
2	June to September 2016	Consultation on the <b>Old Kent Road Area Action Plan (June 2016 draft) Preferred Option</b>
3	June to September 2017	Consultation on the <b>New and Amended Policies Preferred Option (June 2017)</b>
4	December 2017 to March 2018	Consultation on the <b>Further Preferred Option version (December 2017)</b>
5	January 2021 to May 2021	Consultation on the <b>Old Kent Road Area Action Plan (December 2020 draft)</b>

106. Phase 2 of the consultation comprised 48 formal events and elicited over 1,200 responses.

107. Phase 3 of the consultation comprised 35 formal events and elicited over 750 responses.

108. We produced a Consultation Summary covering Phases 2 and 3. This was presented in a 'You Said, We Did' style, explaining the actions taken in response to the recurring/predominant themes raised by the public.

109. Phase 4 of the consultation comprised 33 formal events and elicited over 180 responses.

110. Phase 5 of the consultation has comprised workshops for the three proposed design codes (Sub-Areas 1, 3 and 4), intended to be more locally specific and targeted at the relevant stakeholders. There were a number of one-to-one events with businesses and local residents as well as public consultation events held within the sub areas, which were well attended. In addition to this, a number of consultations on public realm projects within the Old Kent Road area took place throughout this phase to make gradual steps towards implementing the strategic vision of the AAP.

111. An extensive summary of Phases 4 and 5 is set out in the Consultation Report. Comments from statutory consultees, individuals, community groups, businesses and developers/landowners received during the 2021 consultation can be found within the Consultation Report.
112. The draft OKR AAP 2024 and all supporting documents will be available to view on the Council website from November 2024 to early 2025, which will include a Consultation Plan. A mini AAP, which will summarise the vision and strategy for the Opportunity Area without going into the detail of the policy and site allocations, will be used during this period as part of additional consultation in the period running up to the Examination in Public.

## **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

### **Strategic Director, Resources**

113. This report is requesting that Cabinet to agree the Old Kent Road Area Action Plan: 2024 Draft for consultation and note the supporting documents – namely the Consultation Plan, Consultation Report, Integrated Impact Assessment, Habitats Regulations Assessment, Equalities Impact Assessment and Health Impact Assessment.
114. The Strategic Director of Resources notes that there are no immediate financial implications arising from this report and any costs from specific proposals emerging from the adopted plan would be subject to separate report for formal approval.
115. Staffing and any other costs connected with this report to be contained within existing departmental revenue budgets.

### **Assistant Chief Executive (Governance & Assurance) – NST300924**

116. This report requests that Members give approval in principle for Regulation 19 statutory public consultation on the draft Old Kent Road Area Action Plan ('OKR AAP') and accompanying submission documents, subject to any further changes needed arising from Council Assembly and a final review by officers. Once adopted, the OKR AAP will be a development plan document.
117. Under Part 3A, paragraph 10 of the constitution, the decision to agree development plan documents (which form part of the development plan framework) is reserved to Council Assembly.
118. Under Part 3D, paragraph 21 the Cabinet Member for New Homes and Sustainable Development may agree draft local development framework documents for consultation but, given the significance of the OKR AAP, the decision to make the recommendations set out in this report is being brought to Council Assembly for decision.
119. The ORK AAP is an optional development plan document. The OKR AAP provides specific planning policy and guidance for the Old Kent Road area. Once adopted, the OKR AAP will be local development document that will have development plan

status. Once it is adopted by the Council, development control decisions must be made in accordance with the OKR AAP, unless material considerations indicate otherwise.

120. The Planning and Compulsory Purchase 2004 (as amended) (“the 2004 Act”) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (“the 2012 Regulations”) set out the requirements and the statutory procedure for the preparation of a development plan document.
121. Regulation 19 of the 2012 Regulations provides that before submitting a local development plan document to the Secretary of State under section 20 of the Act, the local planning authority must (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).
122. Officers have considered the council’s PSED under section 149 of the 2010 Act at paragraph 94 of this report. A detailed equality impact needs analysis is set out in Appendix F. Officers have concluded there are no adverse impacts on persons with protected characteristics.
123. The Human Rights Act 1998 imposes a duty on the council as a public authority to apply the European Convention on Human Rights; as a result the Council must not act in a way which is incompatible with these rights. The relevant rights for planning purposes are Article 8 (respect for homes) and Article 1 of the First Protocol (peaceful enjoyment of property). The OKR AAP is not anticipated to engage or breach the provisions of the Human Rights Act 1998.
124. Council Assembly on 14 July 2021 approved a change to the Council’s Constitution to confirm that all decisions made by the council will consider the climate and equality (including socio-economic disadvantage and health inequality) consequences of taking that decision. This has been considered at paragraphs 95 to 100 above.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
London Plan 2021	Southwark Council 5 <sup>th</sup> Floor Hub 2 160 Tooley Street London SE1 2QH	<a href="mailto:planningpolicy@southwark.gov.uk">planningpolicy@southwark.gov.uk</a>
<b>Web link (please copy and paste into browser):</b> <a href="https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf">https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf</a>		
Southwark Statement of	Southwark Council	<a href="mailto:planningpolicy@southwark.gov.uk">planningpolicy@southwark.gov.uk</a>

<b>Background Papers</b>	<b>Held At</b>	<b>Contact</b>
Community Involvement 2022	5 <sup>th</sup> Floor Hub 2 160 Tooley Street London SE1 2QH	<a href="mailto:ark.gov.uk">ark.gov.uk</a>
<b>Web link (please copy and paste into browser):</b> <a href="https://www.southwark.gov.uk/assets/attach/211294/Statement-of-Community-Involvement-Dec-2022.pdf">https://www.southwark.gov.uk/assets/attach/211294/Statement-of-Community-Involvement-Dec-2022.pdf</a>		
Saved Southwark Plan 2022	Southwark Council 5 <sup>th</sup> Floor Hub 2 160 Tooley Street London SE1 2QH	<a href="mailto:planningpolicy@southwark.gov.uk">planningpolicy@southwark.gov.uk</a>
<b>Web link (please copy and paste into browser):</b> <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>		
National Planning Policy Framework 2023	Southwark Council 5 <sup>th</sup> Floor Hub 2 160 Tooley Street London SE1 2QH	planningpolicy@southwark.gov.uk
<b>Web link (please copy and paste into browser):</b> <a href="https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf">https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf</a>		
Old Kent Road draft AAP 2020	Southwark Council 5 <sup>th</sup> Floor Hub 2 160 Tooley Street London SE1 2QH	planningpolicy@southwark.gov.uk
<b>Web link (please copy and paste into browser):</b> <a href="https://www.southwark.gov.uk/assets/attach/31641/Old-Kent-Road-AAP-December-2020-Draft.pdf">https://www.southwark.gov.uk/assets/attach/31641/Old-Kent-Road-AAP-December-2020-Draft.pdf</a>		
<b>Old Kent Road Area Action Plan Viability Study (authored by BNP Paribas)</b>		

## APPENDICES

<b>No.</b>	<b>Title</b>
Appendix A	Proposed Vision, Strategy and Policies (plain text) of the Draft Old Kent Road AAP 2024
Appendix B	Consultation Plan
Appendix C	Consultation Report
Appendix D	Integrated Impact Assessment
Appendix E	Habitats Impacts Assessment
Appendix F	Equalities Impact Assessment
Appendix G	Health Impact Assessment

## AUDIT TRAIL

<b>Cabinet Member</b>	Councillor Helen Dennis, Cabinet Member for New Homes and Sustainable Development	
<b>Lead Officer</b>	Clive Palfreyman, Strategic Director of Resources	
<b>Report Author</b>	Colin Wilson, Head of Strategic Development	
<b>Version</b>	Final	
<b>Dated</b>	07 November 2024	
<b>Key Decision?</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments Included</b>
Assistant Chief Executive, Governance and Assurance	Yes	Yes
Strategic Director, Resources	Yes	Yes
<b>Cabinet Member</b>	Yes	Yes
<b>Date final report sent to Constitutional Team</b>		08 November 2024