



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

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 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	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓
Averaged Scoring		76%	26%	76%	76%	79%	32%	79%	79%	79%	32%	79%	79%	79%	32%	79%	79%	65%	35%	65%	65%	65%	35%	65%	65%

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									
I1AO 1	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
I1AO 2	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
I1AO 3	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
I1AO 4	✓	-	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
I1AO 5	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
I1AO 6	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓
I1AO 7	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓
I1AO 8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
I1AO 9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓✓
I1AO 10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
I1AO 11	✓	✓	✓	✓	✓✓	✓	✓	✓	✓✓	✓	✓	✓	✓
I1AO 12	✓	-	✓	✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓
I1AO 13	✓	-	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓
I1AO 14	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
I1AO 15	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
I1AO 16	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓
I1AO 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.
	Average Scoring	✓✓	✓	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓✓	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓	✓✓	✓✓	
IIO 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.
IIO 5	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.
	Average Scoring	✓✓	-	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓✓	✓✓	✓✓	
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.
	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.
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.
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	✓	-	✓	✓	<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>
	Average Scoring	✓✓	-	✓✓	✓✓	
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 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"> - 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. - The redevelopment will also bring forward positive impacts on walkability and connectivity with green pedestrian links, promoting active lifestyle and mental well-being. - 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.

				<ul style="list-style-type: none"> - 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 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 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 - 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. - 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. - 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 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>
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	✓✓	✓✓	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.
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 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.

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	✓	✓	<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>
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 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.
IIAO 14	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"> - 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 - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The site will enable skills to be developed by workers who are employed to carry out the construction - 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.

				<ul style="list-style-type: none"> - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes - Improved permeability across the site will combat severance between communities and encourage community interaction - Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety - 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 - 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 <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	✓✓	✓✓	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 AAP 14'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 will create walkable neighbourhoods, being car free and 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 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>
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 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>
IIAO 14	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"> - 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 - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The site will enable skills to be developed by workers who are employed to carry out the construction - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes - Improved permeability across the site will combat severance between communities and encourage community interaction - Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety - 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 - 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 <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>
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>

			✓✓	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. 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.
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 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.
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 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>
IIAO 13	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.
IIAO 14	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"> - 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 - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The site will enable skills to be developed by workers who are employed to carry out the construction - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public 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 - Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes - Improved permeability across the site will combat severance between communities and encourage community interaction - Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety - 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 - 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 <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"> - All sleeping accommodation has been set above the flood protection level of 2.65mAOD; and - 30% of the ground floor of the site is permeable amenity space. <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"> - 1 in 1 year storm - 3.60 l/s; - 1 in 30 year storm - 9.77 l/s; and - 1 in 100 year storm - 13.55 l/s. <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>
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 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.
IIAO 17	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.
IIAO 12	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>
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>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"> - 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 - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The site will enable skills to be developed by workers who are employed to carry out the construction - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public 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 - Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes - 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 <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.
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 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.
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 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"> - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The site will enable skills to be developed by workers who are employed to carry out the construction - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - Activation of frontages will open up spaces to promote social interaction and the feeling of public safety. - 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 - 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 - 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 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.
--	--	--	---	---

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.
IIO 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.
IIO 14	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"> - 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 - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The site will enable skills to be developed by workers who are employed to carry out the construction. - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - 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 - Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes - Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety. - 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 <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>
IIO 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. 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.
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 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>IIAO 14</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"> - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The site will enable skills to be developed by workers who are employed to carry out the construction - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes - Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety. - The creation of new green links will combat severance between communities and encourage community interaction - 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 - 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 - 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 <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>IIAO 15</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>

<p>IIAO 16</p>	<p>To promote sustainable transport and minimise the need to travel by car</p>	<p>✓✓</p>	<p>✓✓</p>	<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>
<p>IIAO 17</p>	<p>To provide the necessary infrastructure to support existing and future development</p>	<p>✓✓</p>	<p>✓✓</p>	<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>

OKR9: 4/12 Albany Road (NSP64)

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"> - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The site will enable skills to be developed by workers who are employed to carry out the construction - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety. - 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. - Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes - 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 - 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 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.

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 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.
IIAO 17	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			
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%	76%	82%

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.
	Average Scoring	✓✓	✓	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓✓	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓	✓✓	✓✓	
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.
IIAO 5	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.
	Average Scoring	✓✓	-	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓✓	✓✓	✓✓	
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.
	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. 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.
	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 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>
	Average Scoring	✓✓	-	✓✓	✓✓	
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, 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"> - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The provision of new employment and retail uses will allow staff to gain new skills whilst working in these establishments - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - 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 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. - Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes - 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 - 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 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>
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. 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, 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"> - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes - The creation of new green links will combat severance between communities and encourage community interaction - 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 - 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 - 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. - Activation of frontages will open up spaces to promote social interaction and the feeling of public safety. <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>
IIAO 15		✓✓	✓✓	<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.
I1AO 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.
I1AO 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 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"> - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The site will enable skills to be developed by workers who are employed to carry out the construction - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - 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. - Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes - 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 - 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 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>

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.

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	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%	82%	79%	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.
	Average Scoring	✓✓	✓	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓✓	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓	✓✓	✓✓	
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.
IIAO 5	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.
	Average Scoring	✓✓	-	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓✓	✓✓	✓✓	
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 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.
	Average Scoring	✓✓	-	✓✓	✓✓	
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. 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 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	✓	-	✓	✓	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. 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.

						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
	Average Scoring	✓✓	-	✓✓	✓✓	
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"> - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes - The creation of new green links will combat severance between communities and encourage community interaction - 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 - 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 - Activation of frontages will open up spaces to promote social interaction and the feeling of public safety. - 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 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.
--	--	--	--	--

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"> - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - Activation of frontages will open up spaces to promote social interaction and the feeling of public safety. - 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 <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"> - 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 - 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. <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.
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 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"> - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - 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. - Activation of frontages will open up spaces to promote social interaction and the feeling of public safety. - 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 - 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 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.
--	--	--	----	---

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.
	Average Scoring	✓✓	✓	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓✓	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓	✓✓	✓✓	
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.
IIAO 5	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.
	Average Scoring	✓✓	-	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓✓	✓✓	✓✓	
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.
	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 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.
		✓✓	-	✓✓	✓✓	<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>
	Average Scoring	✓✓	-	✓✓	✓✓	
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, 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>

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"> - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes - The creation of new green links will combat severance between communities and encourage community interaction - 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 - Activation of frontages will open up spaces to promote social interaction and the feeling of public safety. - 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 - 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 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>

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 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.
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 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"> - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these - 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. - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - 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 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 - 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 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.

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 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. 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 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.
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"> - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty - The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these - 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.

				<ul style="list-style-type: none"> - New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health - Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes - The creation of new green links will combat severance between communities and encourage community interaction - 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 - Activation of frontages will open up spaces to promote social interaction and the feeling of public safety. - 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 - 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 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.
--	--	--	--	---

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.
	Average Scoring	✓✓	✓	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓✓	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓✓	✓✓	✓✓	
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.
	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	-	-	-	-	<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.
	Average Scoring	✓✓	✓	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓✓	✓✓	✓✓	
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.
	Average Scoring	✓✓	✓✓	✓✓	✓✓	
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>