



## Old Kent Road Area Action Plan: Proposed new and amended AAP policies

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Appendix A	Proposed new and amended AAP policies
Appendix B	Proposed changes to the adopted policies map
Appendix C	Integrated impact assessment
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**June 2017**

## FOREWORD

In partnership with the Mayor of London we have consulted with our residents to transform the Old Kent Road with 20,000 new homes, 5,000 new jobs, new community facilities, public spaces and parks to be enabled by the extension of the Bakerloo Line. Our last round of consultation received over 1,000 responses which showed broad support for our plans. This reports details how we will now consult on a small number of amended policies prior to preparing the final version of the Old Kent Road Area Action Plan.

The changes we wish to consult on are the proposed boundary of the Central Activities Zone which will now reflect the core area of the AAP; a new policy on Social Regeneration which puts the council's commitment to improving the lives of our residents at the heart of this plan; bring in greater protections for the retention and reprovision of workspace; reducing the amount of car parking to promote public and sustainable transport and improve air quality; and to include the Mayor of London's and TfL's new Healthy Streets Initiative and guidance for further reducing air pollution.

Cllr Mark Williams

**Cabinet Member for Regeneration and New Homes**

## CONSULTATION DETAILS

We welcome your comments on the Old Kent Road Area Action Plan: Proposed amended Preferred Option Policies. Please send us your responses by 5pm on Wednesday 13 September 2017. Any responses received after this date will not be accepted.

Comments can be provided on line through Southwark's Consultation Hub:

<https://consultations.southwark.gov.uk/>

You can also send your comments by email to [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk) or by letter to:

Old Kent Road AAP, Planning Policy, 5th Floor, Southwark Council, PO Box 64529, London SE1P 5LX

## Introduction

The Old Kent Road Area Action Plan (OKR AAP) which sets out an ambitious growth strategy for Old Kent Road and the surrounding area. Over the next 20 years the opportunity area will be transformed, including the provision of two new underground stations as part of the Bakerloo Line extension, 20,000 new homes, including affordable homes for local people and 5,000 additional jobs.

Once adopted, the OKR AAP will form part of Southwark’s Local Plan and be used alongside the New Southwark Plan to determine planning applications and focus investment. It will also be endorsed by the Mayor of London as an Opportunity Area Planning Framework (OAPF).

Extensive consultation on the plan took place between June and November 2016 and the council received over 1,000 responses.

This document proposes amendments to previously proposed policies. These policies are also ‘preferred option’ stage policies. These policies have been prepared following consultation responses.

The next stage of consultation, scheduled for autumn 2017 will set out the ‘proposed submission’ stage policies.

The table below summarises the proposed changes to a small number of AAP policies and the reasons for these amendments. Full details of each policy amendments are provided for each policy in turn in the remainder of the document.

<b>Current Policy</b>	<b>Proposed new or amended policy</b>	<b>Reasons for amendments</b>
Old Kent Road CAZ extension	Proposed CAZ boundary to proposals map	<ul style="list-style-type: none"> <li>The CAZ boundary has been amended to reflect the core area plus north of Mandela Way</li> </ul>
N/A	New policy: AAP0: Social Regeneration	<ul style="list-style-type: none"> <li>To respond to council’s commitment to social regeneration in the Area Action Plan.</li> </ul>
AAP11: Employment Clusters	Delete policy and add 2x new policies AAP 11a: Workspace and business development AAP 11b: Mixed Use Employment Areas	<ul style="list-style-type: none"> <li>Employment clusters expanded so policy applies to all sites in opportunity area – responds to demand and representations from existing businesses</li> <li>Employment floorspace will be expected to be reprovided on all sites given demand and aspiration for mixed use neighbourhoods as transition from PIL</li> <li>Mixed use design guidance will explain how this is expected to be delivered</li> <li>More information and evidence on sectors in each mixed use employment area</li> <li>Definition required on map for Mixed Use Employment Areas and major town centre</li> </ul>

AAP12: High streets	Amend policy to AAP 12: Town Centre and include reference to major town centre status and the relationship of primary and secondary retail	<ul style="list-style-type: none"> <li>Promote the Old Kent Road as a major town centre</li> <li>Clarify the retail strategy for the Old Kent Road as a primary high street with a network of secondary retail on streets and squares connecting to the main road.</li> </ul>
AAP21: Car parking	Amend policy to require 0.1 car parking spaces per unit in lower PTAL areas and requirement for electric vehicle charging points.	<ul style="list-style-type: none"> <li>To continue to promote car free development in high PTAL areas and reduce the amount of car parking required in less accessible areas.</li> <li>To improve air quality and promote sustainable development.</li> </ul>
AAP22: Green infrastructure	Key new amendment to include 5sqm of open space per dwelling	<ul style="list-style-type: none"> <li>Given the high density of development proposed in the opportunity area it is important to ensure that sufficient public green/open space is delivered across the area to create high quality places that feel comfortable to spend time in.</li> </ul>
AAP23: Flood risk and sustainable urban drainage systems	Key amendment relating to S106 payment if greenfield runoff rates cannot be achieved	<ul style="list-style-type: none"> <li>Minimising surface water runoff from new developments in the opportunity area is critical to reduce surface water and sewer flood risk and avoid the need for expensive and disruptive upgrades to the combined sewer network.</li> </ul>
AAP25: Air quality	Key amendment regarding Healthy Streets initiative and guidance for reducing air pollution	<ul style="list-style-type: none"> <li>Poor air quality in London is leading to nearly 9,500 premature deaths per year. Air quality on the Old Kent Road is particularly bad and given the scale of development anticipated there is potential for the situation to get worse without a strong policy on managing air quality.</li> </ul>
Site allocations	The change in policy approach to employment re-provision will affect a number of site allocations which will be updated in the submission version.	<ul style="list-style-type: none"> <li>To remain consistent with emerging policies</li> </ul>
Site allocations OKR11 and OKR 13	Change of Galleywall Trading Estate site allocation to identify it as an employment site only (rather than for mixed use residential, employment, community, retail development). To specify both sites as retained SIL.	<ul style="list-style-type: none"> <li>To ensure more industrial land is maintained in the Old Kent Road area as industrial/employment uses only</li> </ul>
Site allocation OKR18	Policy to reflect longevity of waste management site and	<ul style="list-style-type: none"> <li>To reflect the future phasing of development and existing functions</li> </ul>

	electricity substation as retained SIL.	of SIL.
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## Appendices

Appendices to this document show proposed updates to the proposals map to align with the policy changes highlighted above. The appendices include:

Map 1: Amended CAZ boundary

Map 2: Old Kent Road Major Town Centre Boundary

Appendix 1: **Guidance on Business and Relocation Strategy**

## Proposed policy changes

### **AAP 0: Social regeneration**

We will ensure that regeneration and development provide the best outcomes and opportunities for all our residents in the opportunity area. We will ensure physical change goes hand in hand with positive social change through using the strategy and policies set out in the Old Kent Road Area Action Plan. All development should contribute towards social regeneration by enhancing the health and wellbeing of our existing residents. This will be achieved through:

- Strengthening and supporting cohesive and empowered local communities;
- Building new and improving existing community facilities for our residents, including schools, health centres and community centres;
- Supporting our residents to take advantage of the employment and education opportunities that new development brings; both in construction and in completed developments;
- Ensuring the Old Kent Road is a vibrant and exciting place to live by improving accessibility so residents can easily travel safely, and actively if they choose, to new and improved facilities for leisure, sport, arts, learning and other cultural activities;
- Ensuring new development contributes towards maintaining inclusive environments that encourage healthy behaviours for all, including promoting more physical activity, healthy eating, connection with green spaces and social interaction;
- Ensuring new development reduces avoidable harm to residents, such as air pollution, noise, traffic accidents and crime;
- Ensuring new development provides environments that can adapt to changing life stages, including homes that can change as people age and public realm that is easy to use by all residents.

### **Reasons**

The council is committed to delivering 'good growth' that improves the quality of life for its residents, communities and businesses and promoting fairness. There are significant opportunities for development in the Old Kent Road that will revitalise the area and provide new facilities for existing residents including healthcare, education, jobs, business space, healthier streets and new green spaces. Policies will require the highest possible standards of design, creating attractive, healthy and distinctive buildings and places. New development will help to ensure these improvements can be delivered and will help to improve the health and social wellbeing of the borough's residents.

## **Strong local economy**

The Old Kent Road core area will become part of London's Central Activities Zone (CAZ). The CAZ represents the centre of London, a world city and competitive business location driving the UK economy. The Old Kent Road will provide a rich mix of land uses that responds positively to the expansion of central London and supports social regeneration. The Old Kent Road will also become a new major town centre, with a focus on revitalising the high street as the main location for new retail development. Beyond the Old Kent Road, mixed use employment areas will be created which draw on strengths of the existing business community and offer innovative design solutions for mixing residential uses with light industrial, creative and managed workspaces.

The Old Kent Road has distinctive characteristics as an industrial and creative area with a thriving existing business community. We recognise that the needs of businesses are changing, and there is increasing demand for good quality new space in key areas which provide essential services for both the local and central London economy. Many of these businesses hold specialist skills and local employment. The Old Kent Road is an ideal place to support new development to support a strong local economy. Our 2015 employment study found that there were around 9,000 jobs in the opportunity area. Our aim is to increase this by 5,000 additional jobs within new mixed use neighbourhoods. We have identified Mixed Use Employment Areas which reflect the agglomerations of the existing business community in the Old Kent Road area. Although restructuring will be required, nurturing the existing range of businesses is key to enhancing the area's existing vibrancy and building on its unique economy. In these areas we will expect development to contribute to an innovative mix of uses which contribute to the specific roles and functions of each area.

The Old Kent Road as a linear thoroughfare presents the opportunity to revitalise its role as a high street serving the local community. The town centre hinterland will offer a mix of commercial uses that will benefit the people that live, work and visit Old Kent Road, enhancing and attracting different types of businesses that will thrive and prosper and will in turn ensure the vitality of the high streets retail offer.

### **AAP 11a: Businesses and workspace**

Proposals must:

- Retain or increase the amount of employment floorspace (GIA) on site (B class use or sui generis employment generating uses)
- Consolidate on site servicing for business uses which is separate to residential servicing or managed by an access management plan including deliveries and hours of operation
- Generate employment and result in an increase in the number of jobs provided.
- Accommodate existing businesses on site or in the Old Kent Road area or provide relocation options for businesses that will be displaced by development.
- Provide a business and relocation strategy for incorporating workspaces into mixed use developments (further guidance is provided in Appendix 1).

In addition major developments which provide over 1,000 sqm employment floorspace must:

- Deliver workspace managed by a specialist provider to support existing and new business start-ups and small and medium sized enterprises.
- Include an element of low cost or affordable workspace.

## Reasons

Over the past decade there has been a ripple effect from the expanding commercial activity of the South Bank and a growing presence of the Central Activities Zone (CAZ) in the northern part of Southwark. The Old Kent Road is an important servicing location on the fringe of central London, the most important generator of economic activity in the country, and the area will increasingly become part of the centre of London.

There is significant growth in the technical, professional and digital service economies, as well as bespoke, craft and artisan manufacturing industries which are present in the area. There is continuing demand for space from industrial businesses servicing the CAZ including food service activities, printing, repair/maintenance and transport functions.

This AAP provides the opportunity to set a policy framework which anticipates these changing requirements of business and working life and plans proactively for 'good growth'. Our strategy involves releasing land that is currently designated as preferred industrial location. Notwithstanding long term employment projections, the preferred industrial location accommodates many businesses across a huge range of sectors. Releasing land from the preferred industrial location designation is contingent on securing a range of workspaces in new mixed use developments, including re-accommodating industrial uses, and other regeneration benefits such as affordable housing, which are outlined in the AAP.

### *Business retention and relocation*

In the Old Kent Road there are over 9,500 jobs in a wide range of businesses. The business community is strong and provides key services to the central London economy. The nature of the space businesses required in the future will change, and already there are some external factors such as rising land values and lack of appropriate vehicular access limiting the types of businesses that can continue to thrive in central London.

However many businesses will continue to thrive and will adopt changing and more flexible working practices and requirements for space. New development needs to take account of these changes to help to retain the special characteristics of the Old Kent Road as a creative and productive part of London and maintain the successful business community.

The council has established the Old Kent Road Business Network to understand the requirements and aspirations of existing businesses and inform the types of new business space that are built in the area. Appendix 1 provides further guidance on business and relocation strategies. Specific actions, for example relating to the relocation of existing businesses, will be captured within planning conditions and/or a S106 legal agreement where appropriate.

In cases where relocation would be required, railway arches and retained industrial areas in the Old Kent Road area should be utilised, particularly for businesses that need to temporarily relocate while redevelopment takes place. Suitable and available alternative premises should be identified in the Old Kent Road opportunity area in Southwark and Lewisham. New premises for relocated businesses should be in the right locations to suit specific requirements and affordable to ensure the successful continuation of the business.

### *Affordable business space*

It is important to maintain business space that continues to be affordable for a wide range of users, including those displaced by regeneration elsewhere in the opportunity area or other local small and medium sized enterprises. Affordability differs depending on the specific



requirements of each business and is not necessarily restricted to subsidised rents. Some examples of alternative low cost employment space would be the provision of lower specification space which would be more appropriate for certain sectors and by utilising space in railway arches. Affordable space could also be made available by the provision of units suitable for co-working and encouraging joint functions such as reception services. In major schemes providing over 1,000 sqm of employment floorspace, affordable workspace will be required as part of a planning obligation. This could include a clause to maintain rents which are comparable with existing rents by area or by sector, a percentage discount in rents for a preliminary period, requirements for full fit-out of units or flexible contracts (including flexible terms of lease and break clauses) depending on specific scheme requirements.

At the present time over 65% of businesses in the Old Kent Road employ less than 10 people. All major development proposals will be encouraged to work with a registered workspace provider to manage specialist space for small and medium enterprises from start-up stages and supporting future growth. The council has established a Workspace Provider List for Southwark which responds to the increased demand for small, flexible and well-managed workspace in the borough.

### Skills

Many new jobs and training opportunities will be generated in the opportunity area, both during the construction phases and in completed developments. It is important that new jobs and training opportunities are targeted towards local people, supporting social regeneration in line with the approach established in the New Southwark Plan.

### **AAP 11b: Mixed Use Employment Areas**

Development that responds positively to the function of the Mixed Use Employment Areas outlined in Table 1 will be supported.

The design and distribution of employment floorspace in mixed use development should respond positively to the **Mixed Use Design Guidance document (Appendix 2 in the AAP)**.

**Table 1**

<b>Mixed Use Employment Area</b>	<b>Design and function</b>	<b>Minimum capacity for employment (B class) jobs (gross)</b>
Mandela Way: Central London activities	Mandela Way is in a prominent location on the periphery of central London. High quality mixed use development, including office provision, must be focused around a linear park. The potential to incorporate existing businesses/uses into developments should be explored. Mixed use development will also be expected to contribute to the cultural and educational functions of the CAZ; this area would be a suitable location	At least 4,000 jobs

	for an educational establishment.	
Hatcham Road:  Light industry, creative and cultural cluster	The Hatcham Road area is a thriving location for small businesses, artists' studios and creative enterprises. New mixed use development proposals must provide small business space for creative industries and contribute to reinforcing a cluster of arts, cultural and creative industries, including light manufacturing, co-working space, artist's studios and flexible, affordable workspaces.	At least 600 jobs
Latona Road:  Light industrial workspaces and small businesses	Mixed use development must incorporate industrial uses including flexible, managed workspace for light industry and support the growth of small and medium sized enterprises. Development should incorporate innovative mixed use design which includes horizontal mixing of residential and employment uses on a single plot; this may include separate buildings for business and residential use.	At least 600 jobs
Sandgate Street and St James's Road:  Town centre and industry	On the Old Kent Road frontage, mixed use development should incorporate vertical stacking of town centre uses including retail, office and residential development. The high street should also include employment generating uses in the health, entertainment and leisure sectors.  Beyond the Old Kent Road, development must incorporate innovative mixed use design which includes horizontal mixing of residential and industrial uses on a single plot; this may include separate buildings for business and residential use. There is potential for depots and other larger floorplate uses given the size of the sites.	At least 800 jobs
South-east Bermondsey, IWMF and New Cross electricity substation:  Strategic Industrial Locations	The area must maintain an industrial function which incorporates business uses that are less compatible with residential development. Industrial and warehousing uses should be intensified and development should make effective use of railway arches for a wide range of business uses. The South-east Bermondsey area provides opportunities to relocate businesses from other parts of the Old Kent Road. Development around the Integrated Waste Management Facility and New Cross electricity substation should be carefully managed and designed to avoid conflict of uses.	At least 1,300 jobs

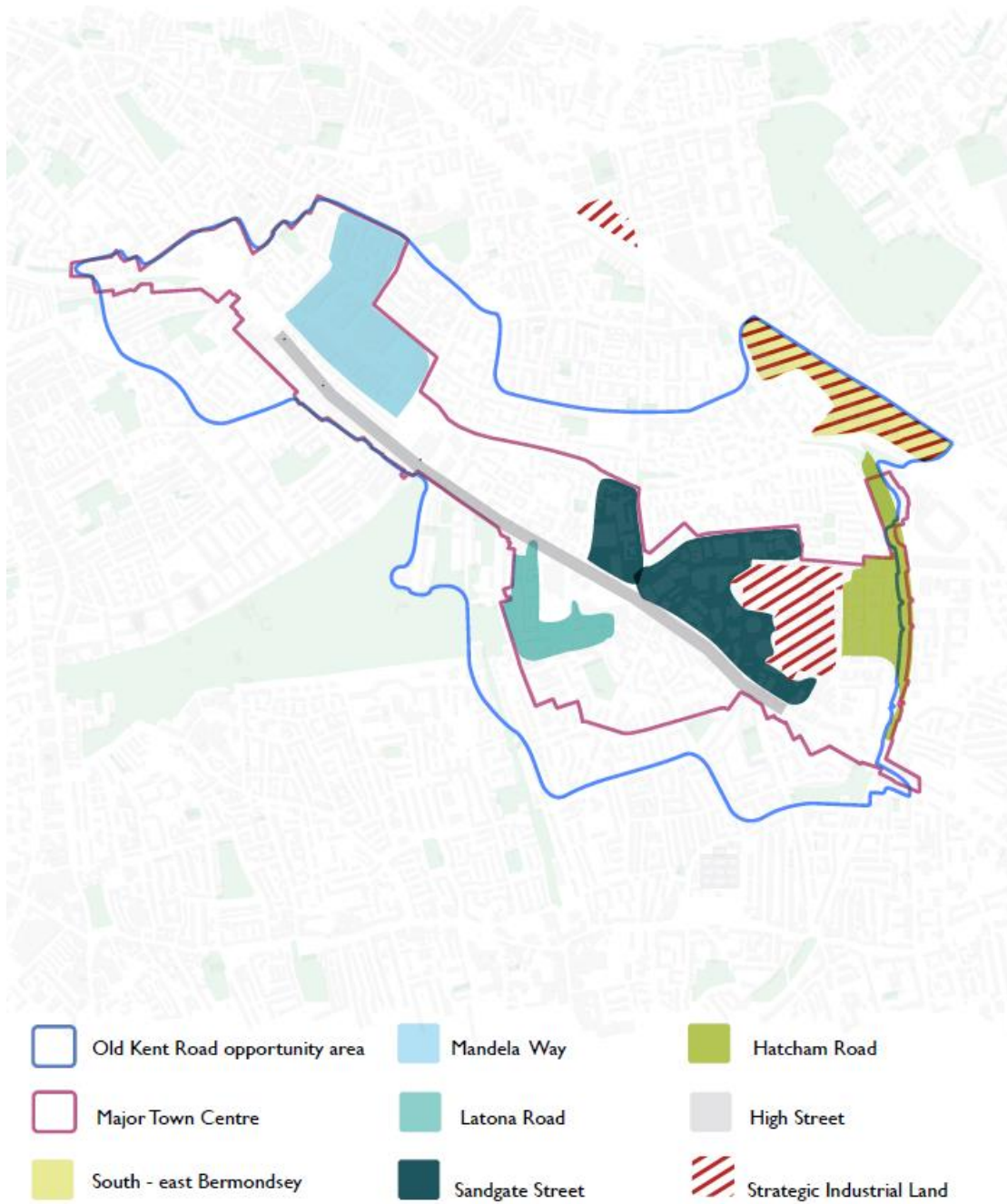
## Reasons

In the Mixed Use Employment Areas there is the opportunity to deliver innovative design solutions to mix light industrial buildings and flexible workspaces with residential development. There is a strong existing light industrial, manufacturing and creative business community in the area and future development presents the opportunity to cluster employment uses to maintain and grow jobs, resources, knowledge and innovation. Development should maintain a vibrant business and cultural community. With the addition of the Discovery Business Park and railway arches outside the Old Kent Road opportunity area, 23 hectares of Strategic Industrial Locations (SIL) will remain in industrial use. In these areas, London Plan policy 2.17 applies.

It is anticipated the Old Kent Road could deliver an additional 5,000 jobs in a range of sectors. Table 1 gives an estimated minimum gross capacity of jobs in each cluster which would relate to employment uses in Class B of the Use Classes Order 1987 or sui generis employment generating uses. Jobs will also be generated in other locations in the Old Kent Road area, along the high street and in a range of sectors. The types of space required in fringe locations such as the Old Kent Road would differ from the high-specification office space that continues to significantly see increased demand in the north of the borough. Instead, purpose-designed light industrial premises, co-working office space and hybrid space would provide the new jobs in the area. Hybrid space would cater for sectors such as craftwork, printing or graphic design requiring space for making and creating as well as requiring an element of office functions. The Old Kent Road already hosts a number of creative industries as well as a growing community of artists' studios and gallery space.

The South-east Bermondsey industrial cluster includes sites across Southwark and Lewisham where there will be opportunities to relocate businesses from other parts of the Old Kent Road and will include joint working with Lewisham council.

Map 1: Mixed Use Employment Areas



## **AAP 12: Town centre**

Development must support the revival of the Old Kent Road as a high street and its role as a major town centre.

For sites within the Old Kent Road frontage an appropriate mix of uses should be provided. This should include retail (A Class uses) such as shops, cafes and restaurants, but could also include other uses which help strengthen the role of the Old Kent Road as a high street such as community, leisure, cultural and business uses.

A range of retail unit sizes should be provided on the Old Kent Road to create a primary shopping frontage. Secondary frontages with smaller retail units should be established in streets connecting onto the Old Kent Road within a network of streets and squares.

Town centre sites behind the Old Kent Road frontage will be the main foci for non-retail commercial development and intensification, including residential development.

Provision of small scale retail uses (Class A uses) will be supported in these other locations where it serves to meet the need of the local population.

## **Reasons**

The Old Kent Road already contains the equivalent retail floorspace of a Major Town Centre at 95,000sqm, employing approximately 1,500 people. Reimagining the Old Kent Road as a high street, rather than fragments of a high street interspersed with a series of retail parks, is a core part of our vision for the opportunity area. This will build on its existing strengths, particularly at the northern end which already functions as a high street and breathe new life into the southern end, re-providing the popular existing retail offer (including furniture, DIY, electronics) within new high street stores. It also reflects its historical importance as a high street which was once a destination with shops, civic amenities, cinemas and entertainment venues.

A vibrant mix of uses will bring life to the Old Kent Road at different times of the day and naturally meet the needs of a growing population, supporting social regeneration. Over time we expect retail provision on the Old Kent Road to evolve with “big box” retail sheds being replaced by high street type stores. The Old Kent Road frontage presents the opportunity to accommodate larger floorplate stores including supermarkets whilst a network of streets and squares beyond the Old Kent Road will help to accommodate additional smaller shops, cafés and restaurants. Depot uses like builders merchants have retail spaces and there may be scope to front these onto the high street with the service function behind, particularly on larger sites.

We will designate the entire opportunity area as a major town centre in Southwark’s hierarchy of centres and anticipate that it will serve a local catchment of existing and future residents and workers. It is important that new shops and town centre facilities reinforce the role of the Old Kent Road and do not divert trade away from it. New Southwark Plan policy DM27 requires re-provision of retail use in town centres. Any loss of space will need to be justified by factors such as the role and function of the centre and the aspiration to reinforce the Old Kent Road as a high street, likely demand and a need to minimise car parking.

## **AAP 1: Car parking**

Car parking provision should be minimised and should not exceed the following maximum levels:

- Residential development in areas with a PTAL of 5 or 6 (very good or excellent access to public transport) should be car free. In areas with lower PTALs, car parking could be provided at up to 0.1 spaces per unit, taking account of public transport facilities and the nature of the proposals. Car parking should generally be prioritised for larger, family sized residential units as well as to Blue Badge holders and should be managed rather than allocated or sold with a specific unit.
- Non residential development should be car free, with the exception of justified operational and blue badge parking. If there are any circumstances in which non-residential car parking is provided, it should be publically accessible and managed to ensure it is used efficiently throughout the day and evening.
- Development must provide electric vehicle charging points for all parking spaces

Car club provision should be provided where appropriate, with funding for provision and initial membership through Section 106 planning obligations.

A car parking management plan will be required. Where necessary, developers should pay for the implementation or alteration of a Controlled Parking Zone to mitigate the potential impact of their scheme, through Section 106 planning obligations. Residents of new developments will be exempted from being able to secure CPZ permits.

Appropriate car parking provision should also be made for Blue Badge holders.

## **Reasons**

To ensure successful regeneration it is imperative that additional vehicle trips arising from development are minimised and that the benefits of new and improved public transport facilities proposed to serve the opportunity area are fully utilised. Through ensuring that car parking is restricted to only those developments and users where it is absolutely necessary residents and visitors will be encouraged to walk, cycle and use public transport. It will also reduce the amount of land required for car parking that could otherwise be used for development or public space and the costs and impacts of provision within basements or elsewhere in a development.

As well as ensuring that on site parking provision is minimised, we will also need to ensure that this parking is properly managed, that the scheme is designed and managed to ensure that there no informal parking and that overspill parking does not occur on surrounding streets. A car parking management plan will be required and developers will be expected to enter into legal agreements restricting the rights of occupiers to apply for parking permits in Controlled Parking Zones (CPZs) surrounding the site. Where no CPZs currently exist, we will look to introduce these over the life of the AAP. Car club provision allows access to a vehicle when required, without the need for car ownership.

## **AAP22: Green infrastructure**

The following text is proposed as an addition to Policy AAP22:

Development providing 20 or more new homes should provide 5 square metres of publicly accessible open space per dwelling.

The open space or spaces provided should:

- be well-designed, safe and inclusive, and include places to sit, meet and play;
- maximise use of trees and soft landscaping/planting;
- be individually not less than 100sqm;
- complement and support adjacent active frontages and uses, such as cafes, cultural or workspace clusters;
- be appropriately located as part of a local open space network within an area.
- be a pedestrian friendly environment;

Where it is not feasible to deliver the required publicly accessible open space on site, the council will secure a section 106 contribution to deliver improvements to existing spaces in the locality.

The above requirements will not apply to development sites that fall within areas covered by SPDs where open space provision has been planned across the sub-area to achieve the open space target.

### **Reasons:**

With the very considerable exception of Burgess Park, the area is sparsely supplied with green spaces. Given the high density of development proposed in the opportunity area it is important to ensure that sufficient public green/open space is delivered across the OKR area to soften perceptions of the area and create high quality places that feel comfortable to spend time in. This includes pocket parks, small squares and other civic spaces. Such provision is important for providing opportunities for people to rest and interact with others and for supporting social regeneration and a healthy, cohesive, multi-generational community. Maximisation of urban greening is also important to create an attractive environment, address poor air quality in the area, moderate peak summer temperatures (important in our warming climate) and reduce surface water flood risk.

Our evidence base indicates that provision of 5sqm of public open space per dwelling is the minimum level required to sustain current per capita provision of green space in the area, which is already lower than in other parts of the borough. The minimum area of 100sqm for a new space is based on a review of the size of our pocket parks.

This requirement applies in addition to requirements for amenity space and play space in the New Southwark Plan. Schemes delivering parts of 'strategic' spaces such as the Surrey canal route on site can count this towards their site's delivery of the 5sqm per dwelling target.

The Section 106 and Community Infrastructure Levy SPD sets out the charge used for provision of amenity space where on site provision falls short. We would apply the same charge where provision of publicly accessible open space on site falls short of the target. The £205 per square metre charge in the SPD represents an average cost in Southwark for improving open space, taking into account all costs including fees and construction costs.

### **AAP23: Flood risk and sustainable urban drainage systems**

The proposal is to add the following text below the bullet points in the existing policy:

Where it is demonstrated that a greenfield runoff rate is not feasible, runoff rates should be minimised as far as possible and a section 106 offset payment will be required to mitigate the residual runoff.

### **Reasons**

In the OKR opportunity area there are increasing risks of surface water and sewer flooding linked to climate change and ongoing development and intensification. High level hydraulic modelling by Thames Water indicates no spare capacity within the combined sewer and an increased risk of combined sewer flooding in the opportunity area without a reduction in surface water runoff. Limiting surface water and sewer flood risk will reduce or avoid the need for expensive and disruptive upgrades to the combined sewer network.

Achieving a 'greenfield rate' of runoff can be challenging on individual development sites, therefore developers will be expected to collaborate to design, plan and deliver offsite attenuation measures (e.g. within local green spaces) to address residual runoff. Developments will be required to make a financial contribution to off-site solutions where a greenfield runoff rate cannot be achieved. The OKR Integrated Water Management Strategy provides guidance on designing SUDS systems for the opportunity area and the evidence base for the SUDS offset charge for the OKR opportunity area.

### **AAP25: Air quality**

The following text is proposed to replace the existing policy:

Proposals must:

- Meet or exceed air quality neutral standards in the London Plan
- Avoid locating schools and other sensitive receptors immediately adjacent to busy roads
- Be car-free in highly accessible areas, with the exception of parking for disabled people and to meet business operational needs; car club bays will be supported in appropriate locations where they are reserved for electric vehicles
- Provide electric vehicle charging points for all parking spaces
- Provide bike infrastructure and support the extension of the bike hire scheme in appropriate locations
- Create neighbourhoods that are designed to be easy to walk around
- Create retail/café public realm off the OKR frontage, where appropriate, so that people can sit in cleaner, quieter surroundings
- Maximise greening of public realm and buildings, while ensuring that street tree provision is designed so that it does not reduce air circulation on busy roads and thereby exacerbate poor air quality

Proposals for tall buildings should model impacts of building form and massing on wind flows and air quality at street level.



## Reasons

Poor air quality in London is leading to nearly 9,500 premature deaths per year. Air quality on the Old Kent Road is particularly bad. TfL has identified the northern end of the Old Kent Road as an Air Quality Focus Area because exposure to pollutants such as PM2.5, PM10 and NO2 is high. Given the scale of development anticipated there is potential for the situation to get worse without adequate mitigation.

Mayoral initiatives such as the emissions surcharge from October 2017 (which will mostly affect vehicles registered in 2005 and older) and the proposed introduction of the Ultra Low Emission Zone with a wider boundary that include all of the OKR opportunity area in 2019 should help to improve air quality in the OKR area but these are not sufficient on their own. The council is also using wider mechanisms to improve local air quality in the opportunity area, including by seeking the support of TfL for creating a Low Emission Bus Zone on Old Kent Road and delivering a Healthy Streets pilot. The measures highlighted above will be sought as part of new development to further address, and reduce exposure to, poor air quality. Providing electric vehicle charging points to all parking spaces will help encourage lower emission vehicles as alternative choices to more polluting vehicles.

Mitigation of air quality may be secured by a financial contribution through Section 106 planning obligations.

## Site allocations

Note that the proposed changes to Policy AAP 11 (business and workspace) will have implications for the site allocations. The re-provision of employment floorspace as part of mixed use development will be required on sites where we previously identified only residential as a required use. Site allocations will be updated in the Submission Version of the AAP to reflect this policy.

## Proposed amended site allocations

### OKR 11: Galleywall Trading Estate

The site is a Strategic Industrial Location (SIL) where London Plan policy 2.17 applies.

Required land uses: Employment (B use class)

Other acceptable land uses: Community (D use class); sui generis employment generating uses

Indicative capacity: 250 jobs

Phasing and implementation: The site is in private ownership and is currently occupied.

## Reasons

The site is located adjacent to proposed site allocation OKR13 which is proposed to be retained for industrial uses and intensification of the site for industrial purposes including use of railway arches. Galleywall Trading Estate provides further opportunity to intensify industrial uses in this location.

### **OKR13: Rotherhithe Business Estate, Bermondsey Trading Estate and rail viaducts**

The site is a Strategic Industrial Location (SIL) where London Plan policy 2.17 applies.

Required land uses: Employment (B use class).

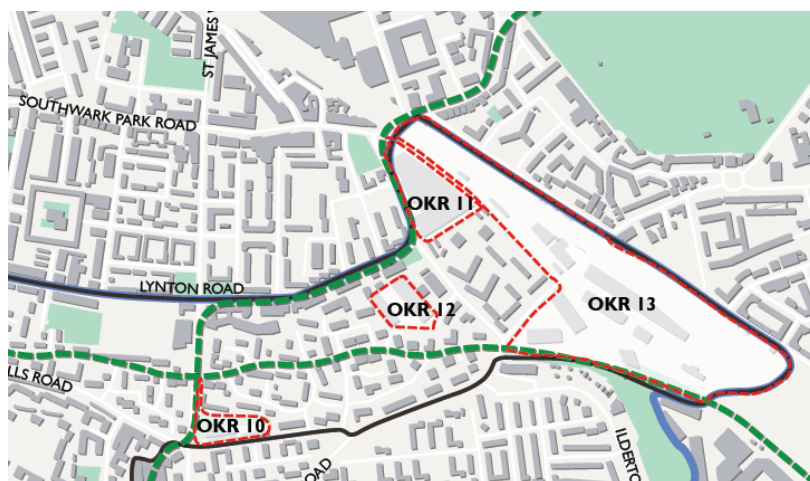
Other acceptable land uses: Community (D use class); sui-generis employment generating uses.

Indicative capacity: 1,300 jobs

Phasing and implementation: The railway arches can be brought back into use after the completion of Thameslink in 2018.

### **Reasons**

The Rotherhithe Business Estate and Bermondsey Trading Estate are well functioning and self contained industrial estates. Together with the rail viaduct they are a good location to intensify employment uses, including industry and warehousing.



## OKR 18: Gasworks, Southwark integrated waste management facility (IWMF) and electricity substation

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**Part A** Required land uses: Residential (C3 use class); employment (B use class), community (D use class), public open space; town centre uses.

Other acceptable land uses: Student housing (sui generis). Appropriate temporary or meanwhile uses prior to the site becoming available for comprehensive development.

Indicative capacity: 550 homes

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**Part B** The site is a Strategic Industrial Location (SIL) where London Plan policy 2.17 applies.

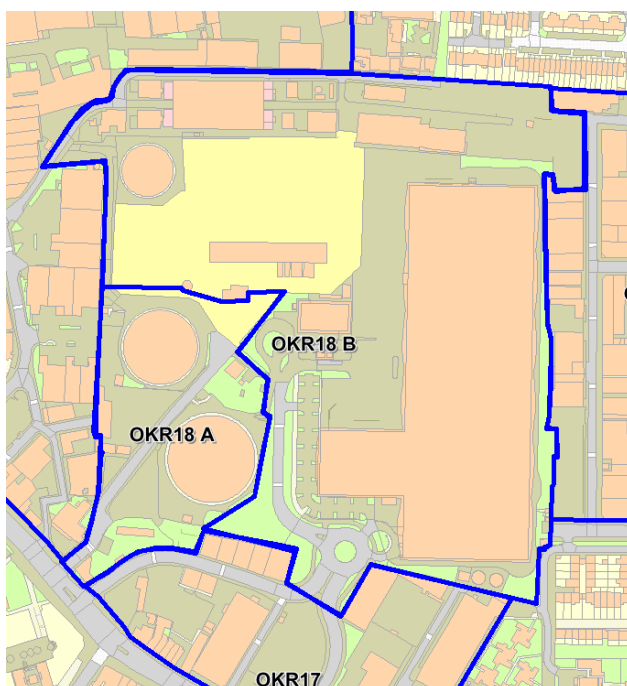
Required land uses: Waste management (sui generis) on the site of the Integrated Waste Management Facility, electricity substation (sui generis) on the site of the New Cross electricity substation.

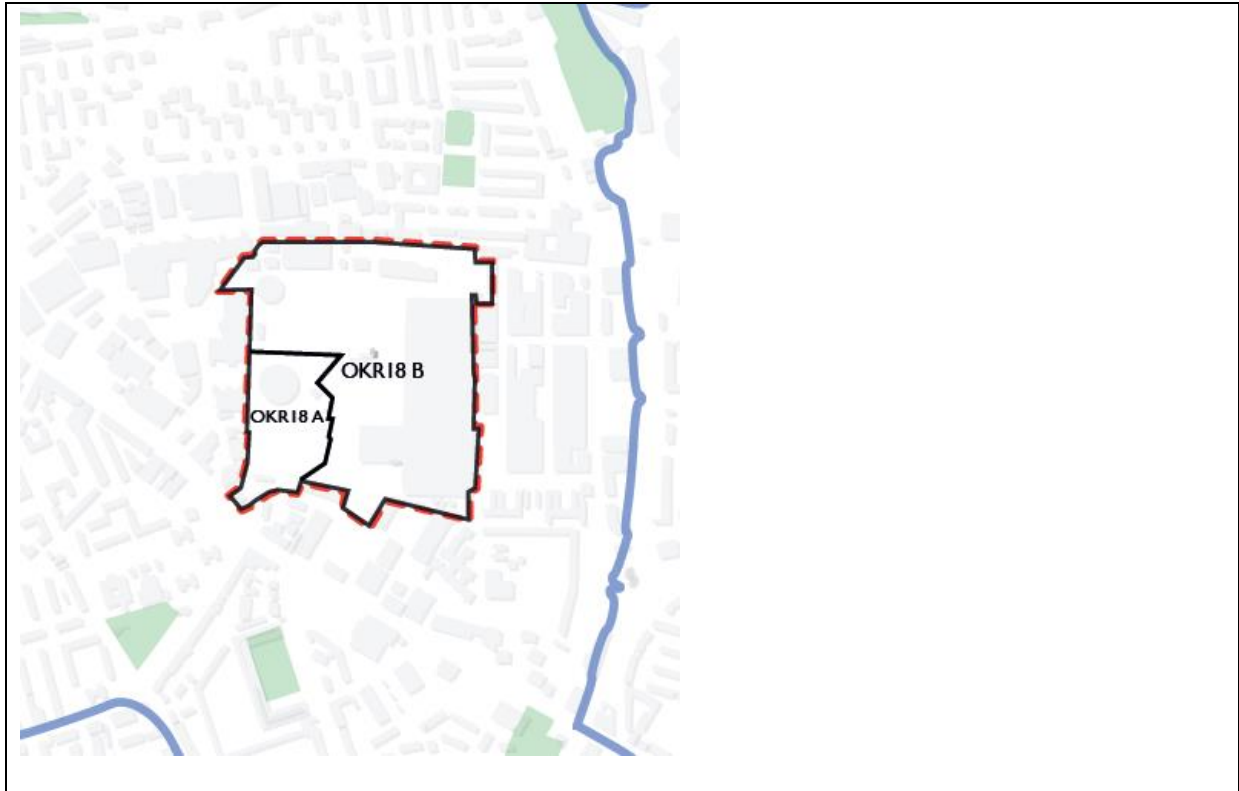
Other acceptable land uses: Employment (B use class), sui generis employment generating uses

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Site OKR 18 has an indicative capacity of 1,925 homes taking into account the longer term potential of the redevelopment of the IWMF.

Phasing and implementation: There are likely to be significant remediation costs associated with a redevelopment of the gasworks.





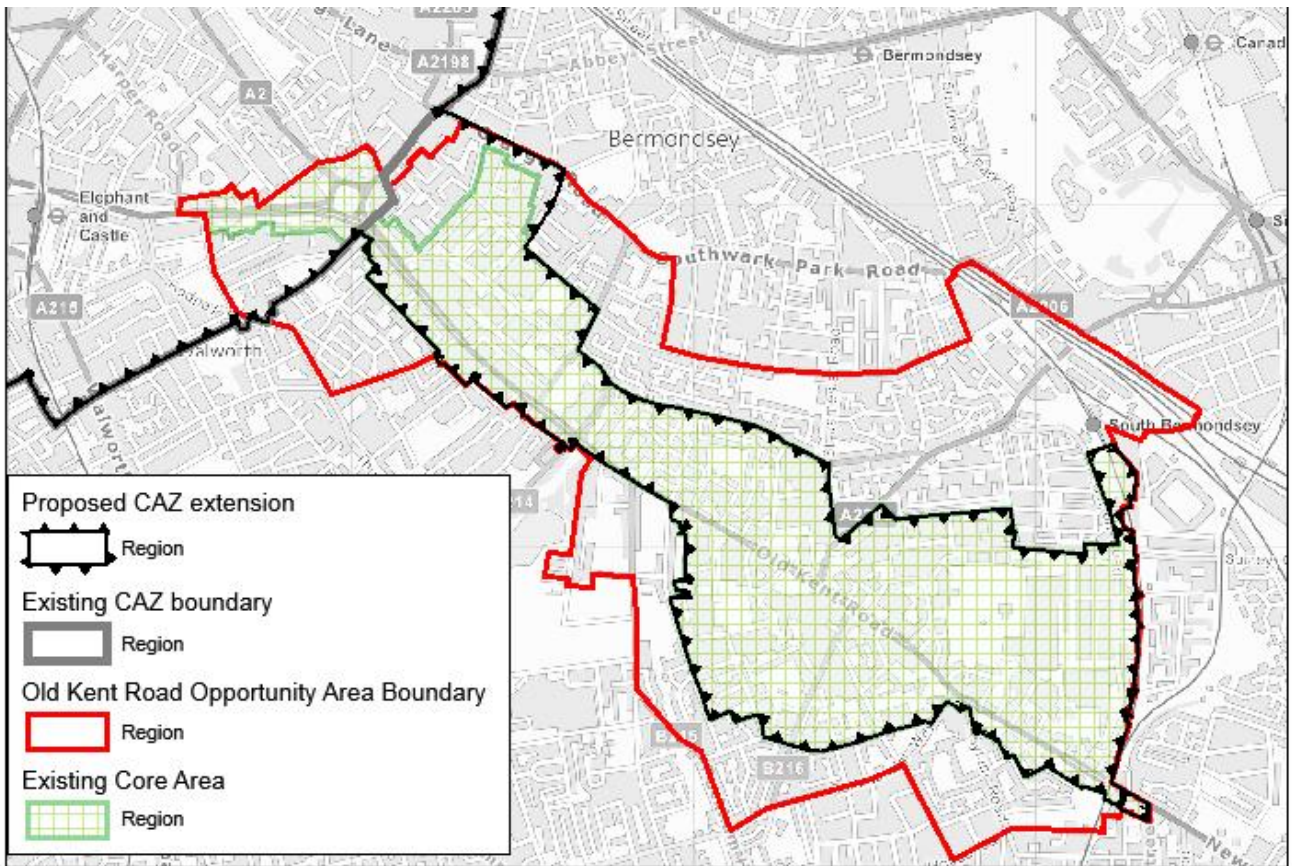
## Reasons

The gasworks will not be used again for gas storage and represents an obvious opportunity, subject to adequate remediation. The IWMF has longer term potential and development around it should be future proofed to enable its integration at some point in the future. Site OKR18 B, including the IWMF and the New Cross electricity substation is retained as a Strategic Industrial Location (SIL) as those uses are continued.

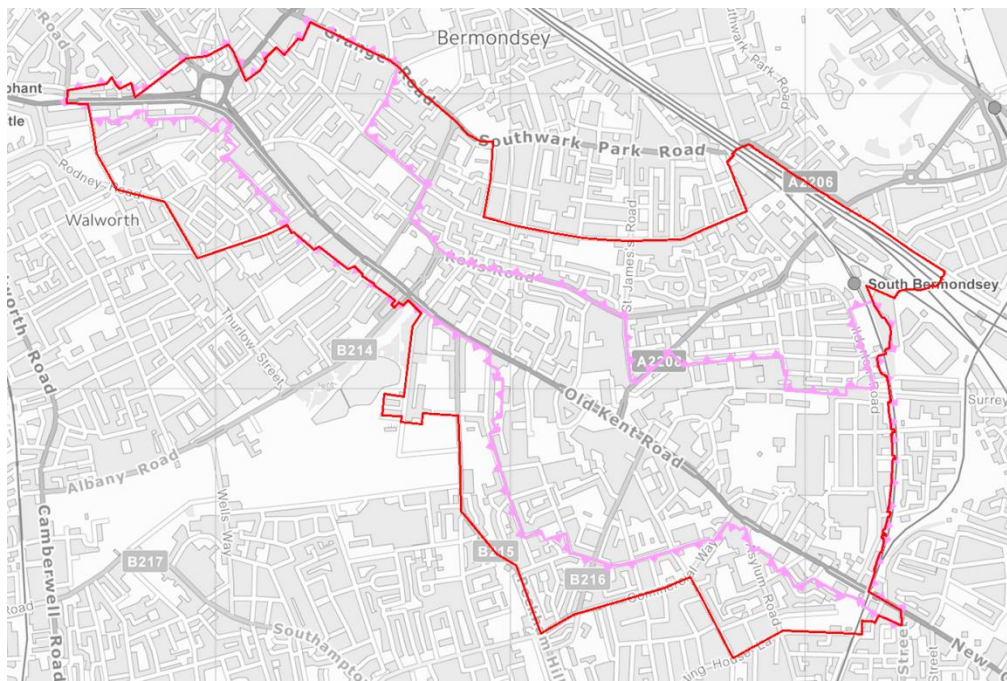
In the long term these sites have the potential to make a significant contribution to the regeneration of the Old Kent Road area. The design and distribution of development will need to be considered carefully to manage the relationship with the New Cross electricity substation to the north.



**Map 1: Amended CAZ boundary**



**Map 2: Old Kent Road Major Town Centre Boundary**



# Appendix 1

## Guidance on Business and Relocation Strategy

### Introduction

Policy AAP 11a requires the provision of a business and relocation strategy for incorporating workspaces into mixed use development. This will be required where one or more existing business premises would be affected as a result of redevelopment of a site. This guidance explains the information expected to achieve the requirements of Policy AAP 11a including the expected content of the required business and relocation strategy.

### Schedule of existing site and business premises

1. Existing floorspace

The existing level of non-residential floorspace on the site (gross internal area in square metres) should be provided. This should include separate calculations of business (B class uses), sui generis uses, faith premises or community facilities (D class uses) or retail (A class uses). Vacant units should be specified and included in the floorspace calculations. The site area covered by yards should also be included and specified whether these are associated with a building or a separate business.

2. Schedule of existing businesses

This should include a schedule of existing businesses operating on the site alongside the floorspace calculations for each building or yard. The schedule should include the sector/type of business, known or estimated number of employees and lease terms.

### Proposed development

1. Proposed floorspace

The proposed level of non-residential floorspace on the site (gross internal area in square metres) should be provided. Where business (B class uses) or sui generis employment generating uses exist on the site the level of proposed employment floorspace should match or increase the existing level.

2. Proposed demand

Employment space should be provided in redevelopment schemes which is consistent with the Mixed Use Employment Areas contained in Policy AAP 11b. Details of the expected employment sectors that will be targeted and demand for the type of space that is proposed to be developed should be provided. The Mixed Use Design Guidance (Appendix 2) provides further clarity on the design principles for mixing uses and the incorporation of a range of employment spaces into redevelopment proposals.

3. Engagement with existing businesses

Details of discussions with existing businesses regarding the incorporation of the businesses into the new scheme should be provided. The strategy should provide analysis of specific business requirements including size and type of premises required, servicing requirements and fit-out. These requirements should be incorporated into the proposed scheme design where existing businesses can be accommodated. Planning obligations may be used to secure lease and rent terms for existing businesses.

4. Temporary relocation

Where businesses will be incorporated into the new scheme, details of the arrangements for temporary relocation should be provided to ensure the business can continue operating during construction of the scheme. Where possible the scheme will be phased to ensure ease of transition of the business on site. Alternatively, temporary relocation off-site should occur within the Old Kent Road opportunity area.

5. Managed workspace

Policy AAP 11a requires schemes over 1,000 sqm to deliver workspace managed by a specialised provider to support new business start-ups and SME's. Applicants should seek to partner with a workspace provider as early as possible to enable the scheme design to incorporate the specific requirements of the workspace provider.

### Relocation strategy

1. Aspirations of existing businesses

Where businesses wish to cease trading rather than relocate, a statement from the business confirming this and the reasons for ceasing trading should be provided.

2. Relocation options

Where businesses cannot be accommodated on site, reasons should be given why this cannot be achieved. A strategy should be provided for exploring relevant options for relocation with individual businesses on the site and details of the assistance that will be provided.

3. Identifying suitable sites

Suitable and available alternative premises should be identified in the Old Kent Road opportunity area in Southwark and Lewisham. Applicants should work with the local authority to identify opportunities for relocation, including retained industrial areas such as South Bermondsey and the railway arches. Where no suitable sites exist, relocation sites should be identified in adjacent boroughs. Evidence should be given in collaboration with existing businesses that the relocation option is suitable for the viable continuation of the business.

4. Collaboration

Applicants should collaborate with other landowners to establish whether suitable workspace for existing businesses could be accommodated on sites in different phases of the development program. Applicants should consult businesses that are signed up to the Old Kent Road Business Network to establish future potential occupiers for new workspace.