



DRAFT OLD KENT ROAD AREA ACTION PLAN/ OPPORTUNITY AREA PLANNING FRAMEWORK

Interim Integrated Impact Assessment Addendum New and amended AAP policies

No.	Title
Appendix A	Proposed new and amended AAP policies
Appendix B	Proposed changes to the adopted policies map
Appendix C	Integrated impact assessment
Appendix D	Consultation report
Appendix E	Consultation plan
Appendix F	Habitats Regulations assessment

June 2017

CONSULTATION	TIMETABLE
Evidence gathering and refinement of the baseline information, plans , programmes and strategies, key issues, objectives and IIA framework	2015-Spring 2016
Developing and refining options and assessing effects and preparing the Integrated Impact Assessment Report	Spring 2016
Consultation on Integrated Impact Assessment Scoping Report	12 February 2016 - 18 March 2016
Consultation on the draft Old Kent Road Area Action Plan Preferred Option draft AAP policies and Integrated Impact Assessment	June 2016 – November 2016
Consideration of responses and developing the draft Old Kent Road Area Action Plan and Integrated Impact Assessment Report	Autumn 2016
Consultation on the draft Old Kent Road Area Action Plan proposed new and amended AAP policies and Integrated Impact Assessment (this document)	June 2017 – September 2017
Consultation on the submission version Old Kent Road Area Action Plan and Integrated Impact Assessment Report	Late 2017
Submission of the draft Old Kent Road Area Action Plan Integrated Impact Assessment Report to the Planning Inspectorate	2018
Examination in Public	2018
Adoption of the Old Kent Road Area Action Plan	2019

HOW TO COMMENT ON THIS REPORT

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

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Consultation on this document begins in June 2017
 All comments must be received by 13 September 2017

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Appendices

Appendix 1	IIA Appraisal of the AAP policies
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Abbreviations

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

Non technical summary

What is this document?

We have previously consulted on the Integrated Impact Assessment Scoping Report and on the draft Old Kent Road Area Action Plan Preferred Option and Integrated Impact Assessment. These proposed new and amended AAP policies have been prepared in response to the previous consultation and are being consulted on to ensure that all residents and visitors have an opportunity to consult on all amended policies before the formal 'proposed submission' stage.

This document reports on the Integrated Impact Assessment of the draft Old Kent Road Area Action Plan for the proposed new and amended AAP policies. The Law requires local authorities to undertake a sustainability Appraisal when preparing the new plans. A strategic environmental Assessment (SEA) is required to meet European Legislation. The council is also required to consider the impact of new plans on equalities and health of residents in the borough which involves considering groups with protected characteristic as defined by the Equalities Act. This document incorporates the sustainability appraisal, SEA and equalities and health impacts in one document called the Integrated Impact Assessment. The IIA is an ongoing process and will be reviewed and monitored as the AAP progresses.

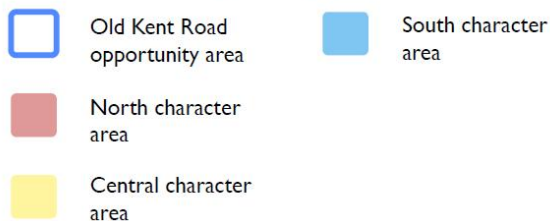
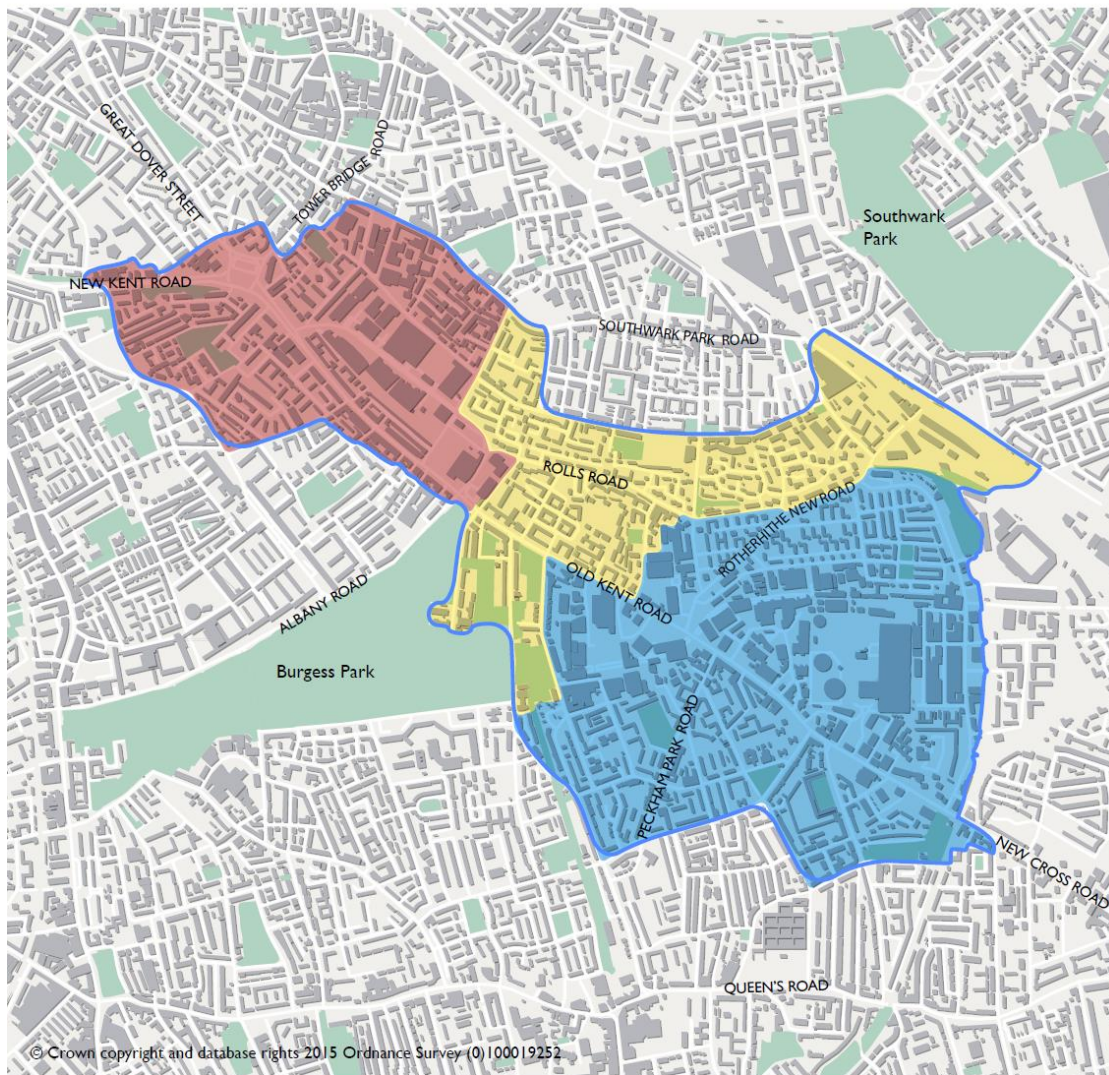
Why do we need an AAP for OKR?

The Old Kent Road is identified as an opportunity area which can deliver the homes, jobs and community infrastructure that meets the local needs. The purpose of the AAP is to provide a planning framework to coordinate growth, directing development to those areas in which is appropriate or desirable, protecting areas which are sensitive and ensuring that growth is supported by appropriate physical and social infrastructure.

The AAP provides guidance on:

- The transition of industrial land and retail parks to mixed use neighbourhoods
- The amount and type of new homes that may be built and their location
- The type and location of new business clusters and the creation of new jobs
- The creation of a revitalised high street and better pedestrian linkages
- The size and design of new buildings, including opportunities for tall buildings
- The improvements to the Old Kent Road transport corridor including an extension to the Bakerloo Line with two new underground stations, buses, walking and cycling which will be required to accommodate growth and development
- Public realm improvements
- The creation of new open spaces and improvements to the connections between them
- The character of areas and heritage assets
- Opportunities to provide a new energy distribution network and cut CO2 emissions

Figure 1 shows the boundary of the Old Kent Road opportunity area and the three identified character areas within (the north, central and south) also shown on figure 1.1



What does this document do?

The Integrated Impact Assessment:

The IIA identifies the impacts of the AAP policies on sustainability objectives, health of the population and equality groups. The process has consisted of a collection of baseline information on the environmental, social and economic characteristics of the Old Kent Road (scoping). This has been used to identify sustainability issues, objectives and indicators used to assess the likely impacts of the policies of the AAP and to enable monitoring of the process in the future.

The IIA considers the likely impact of three different options for growth in the area, low, medium and high growth based on the evolution of evidence base documents and discussions with the local community.

Option A: Business as usual

Establishing the business as usual option considers how the area is expected to evolve without significant intervention. The majority of industrial land would remain intact and only small areas such as land around the Rich Estate and Hatcham Road would come forward to deliver around 5,000-10,000 new homes. There would be fewer opportunities for improving public realm, green space and new transport infrastructure. The Bakerloo Line extension would not be delivered in this scenario.

Option B: Medium growth

This option would provide medium density development around some industrial land and retail parks. However more established industrial areas such as Mandela Way, Sandgate Street and the gas works/waste management facility would be retained. There would be the opportunity to provide around 10-15,000 new homes along with some new jobs, community, health and leisure facilities. This could provide around a third of the total amount of homes Southwark needs to deliver over a 20 year period.

Option C: High growth

This option would transition the majority of the industrial land to provide new mixed use neighbourhoods, providing around 20,000 new homes and 5,000 new jobs. The key driving factor to growth would be significant improvements to public transport through the delivery of the Bakerloo Line extension and two new underground stations. The Old Kent Road would transform to a revitalised high street and enhanced public realm with new green spaces.

The IIA considers the likely impact of three different options for growth in the area but the interim IIA considers Option C- high growth to be the most appropriate option.

Option C: High Growth

This option would transition the majority of the industrial land to provide new mixed use development neighbourhoods, providing around 20,000 new homes and 5,000 new jobs. The key driving factor to growth would be a significant improvement to public transport through the delivery of the Bakerloo Line extension and two new underground stations.

Based on the assessment the high growth option was considered to be the most appropriate direction for the AAP and which resulted in more positive social, economic and environmental effects in the long term which benefits a range of groups and would improve the health of the population. Whilst the industrial nature of the area would change, new jobs would be provided in growing sectors of the economy increasing job opportunities, particularly benefiting young people and the unemployed. The improvements to the public realm, transport infrastructure, retail and community and cultural facilities would significantly benefit many groups in society and help to improve levels of deprivation and crime rates.

The IIA then assesses the policies for development and the character areas containing site allocations in the AAP against the sustainability objectives and identifies any areas which would need to be mitigated or monitored in the plan process. There are many positive effects identified particularly relating to improvements to public health as a result of improved transport infrastructure, green space and walking and cycling, improving physical activity levels and non-vehicular routes.

The AAP aims to deliver an ambitious and positive strategy for growth. However, it is appreciated there may be uncertain impacts particularly relating to the loss of industrial land in the short term, and the challenge to create successful mixed use developments which effectively incorporate a range of uses, including employment, retail, community and residential. There may be a risk that community networks could be affected by redevelopment in the area if meeting places or cultural facilities are displaced by development. However the AAP provides many opportunities to replace, enhance and expand community and cultural functions, which will be an integral part of the place-making strategy.

The conclusions that were reached in undertaking the IIA of the Old Kent Road Area Action Plan policies were a result of qualitative (i.e. subjective) judgement by planning professionals within the council.

Section 1 – Background

1.1 Why is this document required?

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

1.2 Habitats Regulations Assessment

- 1.2.1 The Conservation of Habitats and Species Regulations (as amended) (2010) [the Habitats Regulations] require that HRA is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance.
- 1.2.2 The HRA of the AAP/OAPF will be undertaken alongside the IIA with the findings of the HRA informing the IIA. The methods and findings of the HRA process will be reported separately from the IIA and will be sent to the statutory consultee (Natural England) and placed for consultation for the wider public.

Section 2 – Methodology

2.1 Purpose of the Integrated Impact Assessment

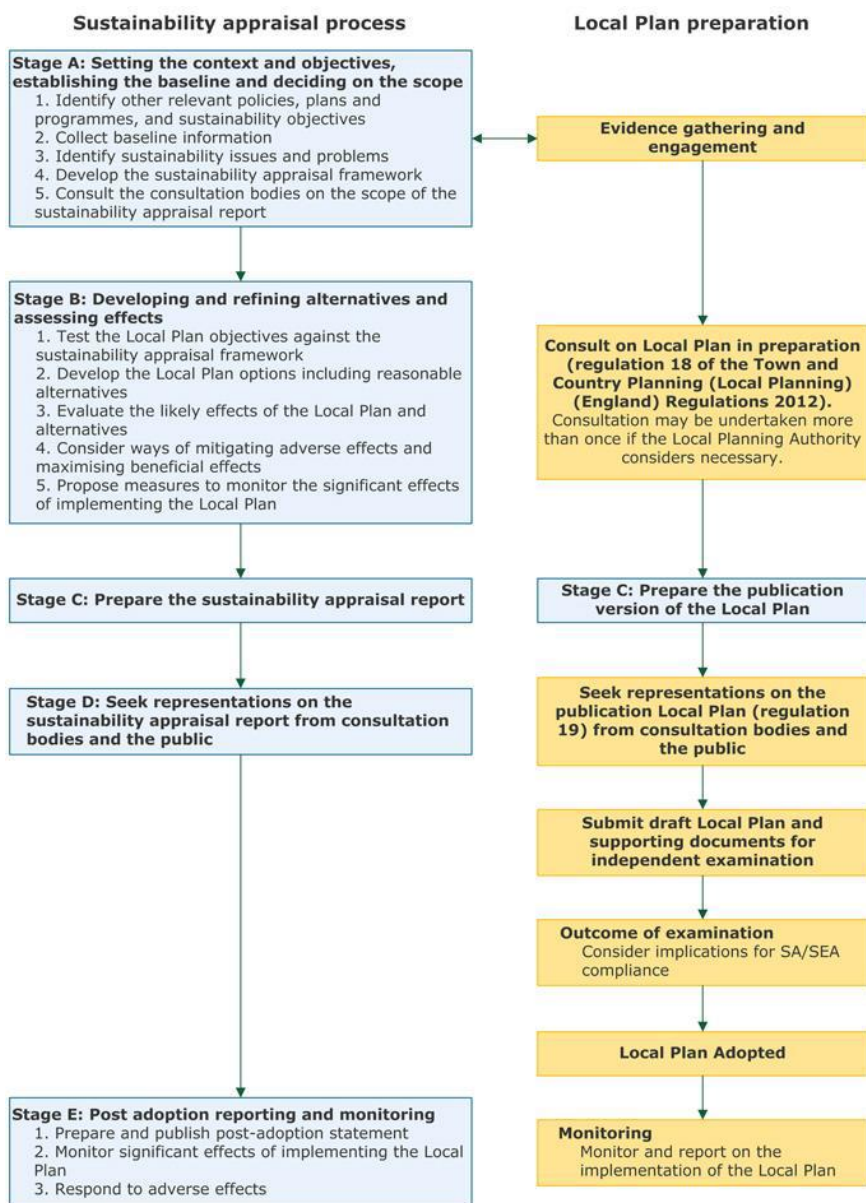
2.1.1 This interim IIA addendum will follow the same methodology as the main document (Appendix C Integrated Impact Assessment). The purpose of sustainability appraisal is to ensure that sustainable developments has been integrated in the formulation of development plans and to verify that due consideration has been given to social, economic and environmental factors. The SA must also show how the requirements of the strategic environmental Assessment (SEA) have been met. The Integrated Impact Assessment considers the sustainability impacts of the plan in addition to impacts on health and equalities.

2.1.2 Planning and Sustainable Development

2.1.3 The National Planning Policy Framework (NPPF) (2012) provides the over-arching national policy to deliver sustainable development through the planning process. There are three dimensions to sustainable development: economic, social and environmental, giving rise to the need for the planning system to perform a number of roles:

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

2.1.4 The NPPG sets out the key stages and tasks for the SA process and their relationship with the Local Plan process, which are illustrated in Figure 2.1. OAPF. It is important to note that IIA is an iterative and on-going process. Stages and tasks in the IIA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.



2.1. Process

Stage A – Scoping	Setting the context and objectives, establishing the baseline and deciding on the scope. Consultation on the scoping report took place from 12 February 2016 - 18 March 2016
Stage B – Testing alternatives	Developing and refining options and assessing effects against the IIA framework. Options were considered in community forum events throughout 2015-2016.
Stage C – Prepare the Integrated Impact Assessment Report	This stage involves testing in detail the impacts of the preferred options. The interim IIA report is prepared for consultation with the public along with the consultation on the draft AAP.
Stage D – Seek representations from consultation bodies and the public	Consultation on updates to the draft AAP and Interim IIA report will take place between June and September 2017.

Stage E – Post adoption reporting and monitoring	Review consultation responses to draft AAP and interim IIA. Prepare submission version of AAP and ongoing monitoring.
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2.2 Consultation

- 2.2.1 Community consultation has been carried out as an ongoing process to make sure that local residents, businesses and stakeholders are informed of the changes within the area. Our SCI sets out how individuals, community groups, developers and anyone else who may have an interest in local plans should be consulted on planning documents. A new community forum for Old Kent Road residents and stakeholders was set up in early 2015 and nine forum events have been held between February 2015 and March 2016 which have covered the main topics of the plan and explored issues and options in preparation for the draft AAP.
- 2.2.2 The first stage of formal consultation for this interim IIA involved the IIA Scoping Report. SEA regulations require that the contents of the scoping report must be consulted on with the following 'authorities with environmental responsibility': Natural England, Environment Agency and Historic England.
- 2.2.3 As we move forward to development the submission version AAP we will continue to assess the sustainability implications across the area. We will also consult the same groups and organisations on the sustainability report at the next stage
- 2.2.4 Government guidance also recommends that additional bodies can be consulted in order to represent the social and economic aspects of sustainability. An extensive list of local consultees on our planning policy database were consulted.

2.3 Monitoring the plan

- 2.3.1 The identification of suitable sustainability indicators within the IIA Framework to ensure issues can be effectively measured and monitored has been an iterative process and taken into consideration comments made in the consultation process. We have borne in mind that the indicators need to satisfy the following characteristics since only these are suitable for monitoring purposes: Importance, supported by readily available information, capabilities of showing trends over time, easy to understand and communicate.
- 2.3.2 At the options identification stage we dealt with general concepts and directions for regeneration and growth in the Old Kent Road opportunity area. This has meant that this initial appraisal has been high level, identifying potential social, environmental and economic impacts.

Section 3 - Context and baseline

3.1 Links to other policies, plans and programs

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

3.2 Summary of baseline information

3.2.2 Both qualitative and quantitative data has been used to inform the baseline. The baseline data has been used to describe the current social, economic and environmental characteristics. A summary of the baseline information is provided below.

Population: 33,241¹ and, without the implementation of the AAP, it is projected to grow by 15% from 2015 to 2036

Deprivation: The OA is affected by relatively high levels of deprivation with 6 small areas in the 30% most deprived, 8 in the 20% most deprived and 3 in the 10% most deprived in the country. The areas of greatest concern are income, barriers to housing and other services, crime levels and living environment.

Housing: The OA is characterised by a range of housing types however flats are the dominant housing typology in the Old Kent Road, comprising 80% of the area's stock. 58% of the housing stock is social rented, 17% of properties are privately owned, and 21% are privately rented.

Social infrastructure (education, health, community): 65.7% of pupils living in the opportunity area achieve 5+ A*-C grade GCSEs², outperforming the borough average. In the OA 5.5% of people report that they are in bad or very bad health, slightly above the average for London³.

Jobs and businesses: Old Kent Road is home to 9 industrial estates/areas, 3 retail parks and 2 high street locations. In 2015, Old Kent Road was home to 748 businesses and 9,500 jobs over 1,026,300 sqm of floorspace. There is a high proportion of small businesses in the area. Although economic trends show a general decline in demand for industrial space, level of demand remains strong in the OA and vacancy levels are fairly low. The OA has seen growth in creative industries and increasing demand for smaller and hybrid workspaces

Retail and leisure: The Old Kent Road has a total of 31,600 sqm of retail floor space, including 11,800 sqm of convenience goods floorspace and 19,800 sqm of comparison goods floorspace.

Environmental Conditions (climate change, waste, air quality, flooding, noise): The mean domestic electricity and gas consumption and the mean non-domestic consumption figures are lower than borough and national averages⁴.

The OA contains a significant integrated waste management facility, processing 88,350 tonnes of waste per annum and improving levels of waste re-use and recycling.

The Old Kent Road corridor currently significantly exceeds the legal air quality standard for Nitrogen Dioxide (NO₂)⁵.

¹ Mid-2014 Lower Layer Super Output Area population estimates for England and Wales, Office for National Statistics

² 2013/14 GCSE and Equivalent Results for Young People by Gender, Referenced by Location of Pupil Residence, Neighbourhood Statistics, Department for Education

³ 2011 Census, Office for National Statistics

⁴ 2013 Sub-national energy consumption statistics, Department for Energy and Climate Change

⁵ Southwark Environmental Protection monitoring

Open Space: The current standard of park provision in the OA is 0.25 ha per 1,000 people⁶. The OA contains areas of natural deficiency, priority areas for biodiversity enhancement. The area also has the potential to be a key wildlife corridor⁷.

Heritage: The Old Kent Road is one of Southwark's distinct, vibrant and connective places that comprises of an array of unique architecture and public realm located in the north of the borough. The road itself has a long history, parts of the road maintain high street character. The area is largely characterised by large industrial and commercial units, retail parks and car parking which demonstrate large grain post war redevelopment. Finer urban grain survives as ribbon development along much of the southern part of the Old Kent Road.

Transport: The Old Kent Road provides good road and public transport access to the Central Activities Zone (CAZ) with a number of buses serving the area. The Old Kent Road is the A2, a busy thoroughfare providing the main route for vehicular traffic from Kent to central London. Due to the levels of traffic there are some risks of pedestrian safety and collisions. The PTAL ratings for the area differ significantly, with good accessibility around the north of the OA (Bricklayers Arms) to lower ratings around the south of area. .

3.3 Problems in collecting baseline data.

3.3.1 Problems arose because in some instances where data did exist it was often either at the wrong geographical scale e.g. borough/regional/national or held over insufficient time to show a trend. There was also a case where some baseline data was no longer being collected. Where qualitative data has been used, it has not always been possible to provide an analysis of trends.

⁶ Southwark Open Space Strategy Evidence Base, 2012

⁷ Forthcoming report of 2015 Ecological Survey of Southwark

Section 4 – Purpose of the IIA and Objectives

4.1 Purpose of the Area Action Plan

4.1.1 The purpose of the AAP is to coordinate growth and set a framework of principles by which development will be expected to achieve over the next 20 years. The Old Kent Road opportunity area is expected to change significantly and this change is already happening. The two key drivers of change are the expansion of central London and its functions and the construction of the Bakerloo Line extension. The effects of land intensification are already being felt in the opportunity area as rents for commercial space are rising and demand is growing for office and managed workspace. The Bakerloo Line extension will bring most of the opportunity area, stimulating growth in homes and jobs. It is vital that this degree of change is well managed and is coordinated by the AAP.

4.2 Vision

4.2.1 The regeneration of the Old Kent Road will be guided by our vision for the opportunity area.

4.3 Key environmental, health and equality objectives

4.3.1 Table 4.1 identifies key sustainability issues that have been identified for the Old Kent Road opportunity area which the IIA will address. These have been identified through monitoring, engagement with stakeholders, a review of relevant policies, strategies and programmes and existing council evidence base documents, and a survey of baseline data and information about the borough.

4.3.2. The sustainability issues are set out in the context of a number of themes, in recognition of the overarching status and the likely format of the emerging AAP/OAPF.

Table 4.1 identifies key sustainability issues that have been identified for the Old Kent Road opportunity area which the IIA will address.

Table 4.1 : Key environmental, health and equality issues	
Theme 1: Quality Affordable Housing	
Homes	
<ul style="list-style-type: none"> • Providing everyone with a decent and affordable home to live in to meet housing needs of present and future generations • Providing and maintaining suitable accommodation for those with specialist need, vulnerable individuals and families. • Improving existing housing stock and delivering new council housing • Providing the right mix and balance of housing types, sizes and tenures in areas of the borough • Optimising the efficient use of land to create mixed use neighbourhoods • Contributing to delivery of the London Plan housing target by maximising the number of homes which can be provided in the opportunity area • Delivering quality housing to help reduce health inequalities and improving health 	
Theme 2: Revitalised Neighbourhoods	
Revitalised Neighbourhoods	
<ul style="list-style-type: none"> • Addressing relatively high levels of deprivation and low incomes among the existing population of the opportunity area • Improving access to services to help reduce health inequalities • Improving the health of the population in the opportunity area by improving lifestyle (such as unhealthy diet) and mitigate the influence of external factors such as noise and air pollution affecting mental and physical illness associated with unemployment and poverty • Reducing the high levels of crime and fear of crime • Accommodating a growing population • Addressing poor parts of the local environment that lead to physical inactivity • Maintaining local distinctiveness and protecting and enhancing place-making assets 	

<ul style="list-style-type: none"> Improving safety and facilities for young people including playspace and sports facilities
Design, Heritage and Environment
<ul style="list-style-type: none"> Ensuring a high quality of design in new developments to ensure accessibility, inclusivity and interaction Protecting and enhancing biodiversity and access to the natural environment Mental health benefits from access to nature, biodiversity, green space and water Addressing existing open space deficiencies and poor access to private open space; improving the use of open spaces for sport, leisure and environmental purposes Increasing green links, for sustainable transport across the area and access to open spaces, improving the public realm and overcoming the severance barrier of the Old Kent Road Need to preserve and enhance the historic environment and built heritage including the conservation areas within and around the opportunity area Securing a positive and viable future for heritage assets at risk Protection of landscape features and designated sites Sensitivities around very tall buildings
Theme 3: Strong local economy
Business, Employment and Enterprise
<ul style="list-style-type: none"> Addressing employment inequalities and reducing the barriers to employment Increasing employment opportunities through training to increase skills Accommodating changing demands as a result of changing trends in industrial activity and the modernisation of businesses Providing new jobs in the opportunity area as part of mixed use development opportunities Providing space for businesses of all sizes to establish and grow Considering impacts of regeneration on existing businesses and a need for relocation strategies where appropriate Providing the incorporation of space for small and medium sized enterprises and encouraging managed workspace by specialist providers Maintaining progress in educational attainment, skills and aspirations of residents
Town Centres
<ul style="list-style-type: none"> Ensuring provision of sufficient shopping space to meet needs and seeking to cluster this within existing or new town centres Supporting a transition from out-of-town style development based around retail parks to town centre and mixed use development Improving retail choice and the balance of retail and other town centre uses Supporting local people to make healthier choices Creating attractive and safe pedestrian shopping environments and encouraging sustainable forms of transport to town centres Attracting and facilitating town centre investment Protecting essential shopping services for local communities
Theme 4: Well-being: The best start in life and healthy active lifestyles
Social Infrastructure
<ul style="list-style-type: none"> The creation of healthy, cohesive, inclusive and safe environments Providing adequate community facilities and infrastructure to meet the needs of a growing population and facilitate social interaction Addressing the needs of faith groups and continuing to provide for multiple places of worship in the opportunity area Identifying appropriate locations for community facilities
Theme 5: Getting around
Travel
<ul style="list-style-type: none"> Improving the transport network and infrastructure on Old Kent Road Improving the legibility and safety of the Old Kent Road including crossing points for pedestrians Improving the health of the population by promoting healthy lifestyles including active forms of travel such as walking and cycling Reducing congestion and pollution and managing traffic flows on the Old Kent Road Reducing car parking

- Managing delivery and servicing activities for mixed use development
- Improving accessibility by public transport
- Supporting provision of the Bakerloo Line extension with two new stations on Old Kent Road

Theme 6: Cleaner, greener, safer

Sustainability

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

Section 5 - Integrated Impact Assessment Framework

- 5.1. What is the IIA framework?
 - 5.1.1. The likely impacts of the AAP/OAPF will be assessed using a set of objectives, which relate to the existing and emerging strategic vision for the opportunity area reflecting the current social, economic and environmental issues affecting the borough.
 - 5.1.2. The 17 objectives set out below in Table 5.1 reflect the move towards integration of impact assessments for the AAP/OAPF. The IIA Incorporates: Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA) and Equality Analysis (EqA).The policy options will be assessed against these objectives.
 - 5.1.3. IIA Framework

5.1.4.

TABLE 5.1		
IIA Objective	Questions to consider for assessment	Potential monitoring indicators
IIAO1: To tackle poverty and encourage wealth creation	<p>Will it improve the range of job opportunities for all local people?</p> <p>Will it help to diversify the economy?</p> <p>Will it increase the numbers of higher paid jobs in the opportunity area?</p> <p>Will it help reduce overall unemployment, particularly long-term unemployment?</p> <p>Will it encourage the retention and /or growth of local employment and training opportunities?</p> <p>Will it assist in providing land and buildings of a type required by businesses, for a range of employment uses?</p> <p>Will it reduce poverty in those communities / equalities groups most affected?</p> <p>Will it improve access to low-cost transport and other facilities?</p> <p>Will it provide for successful neighbourhoods for all?</p> <p>Will it result in a loss of employment land?</p>	<p>Employment land available and take up rates</p> <p>New business formation and Survival a) Rate of Business Formation per 10,000 b) 3 year business survival rate</p> <p>Numbers and % jobs in the OA by sector</p> <p>Southwark compared to London (broken down by micro, small and medium sized businesses)</p> <p>Vacancy levels and non-retail uses in town centres</p> <p>Numbers of unemployed/ numbers receiving benefit (by sector)</p> <p>Indices of deprivation 2015: Employment and income domains</p> <p>Economic activity rates (age/sex/family situation)</p> <p>Children in poverty (under 16s)</p>
IIAO2: To improve the education and skill of the population	<p>Will it provide opportunities to improve the skills and qualifications of the population, for young people and adults?</p> <p>Will it help improve employee education/training programmes?</p> <p>Will it help reduce skills shortages?</p> <p>Will it help to reduce the disparity in educational achievement between different ethnic groups?</p> <p>Will it improve childcare facilities and nurseries and encourage work/life balance?</p>	<p>Indices of deprivation: Education, skills and training domain</p> <p>% of the population with higher education qualifications (and by gender)</p> <p>% of population with no qualifications (national census)</p> <p>Proportion of resident pupils attending Southwark schools achieving 5+ A-Cs including English and Maths (Department for Education)</p>
IIAO3: To improve the health of the population	<p>Will it promote and facilitate healthy living and active lifestyles amongst different groups?</p> <p>Will it improve access to health and social care/treatment for all</p>	<p>Comparative prevalence and change in health risks and causes of poor health or mortality (Joint Strategic Needs Assessment)</p>

TABLE 5.1		
IIA Objective	Questions to consider for assessment	Potential monitoring indicators
	<p>sectors of the community?</p> <p>Will it maintain, enhance and create green infrastructure assets (e.g. green space, woodlands, recreation and sports facilities and allotments) for recreation, exercise and access to locally produced food.</p> <p>Will it improve the quality of housing for all?</p> <p>Will it improve access to jobs for all and otherwise reduce poverty?</p> <p>Will it encourage a range and mix of land uses that underpin local health; for example, avoiding over concentration of hot food takeaways in one location?</p> <p>Will it help facilitate the supply and availability of locally produced food?</p> <p>Will it help improve mental and emotional health, reducing social exclusion?</p> <p>Will it promote non-polluting forms of transport?</p> <p>Will it reduce car use, particularly for daily commuting and short trips?</p> <p>Will it reduce exposure to poor air quality across all groups?</p> <p>Will it reduce the impacts of environmental noise in the design of new neighbourhoods and green spaces?</p>	<p>Indices of deprivation: health deprivation and disability; barriers to housing and services domain; and living environment domains</p> <p>Obesity levels</p> <p>Active People Surveys (Local authority level), Public Health England</p> <p>Mode share for journeys to work</p> <p>Strategic noise maps</p>
IIAO4: To reduce the incidence of crime and the fear of crime	<p>Will it improve safety and security?</p> <p>Will it incorporate measures to reduce crime and the fear of crime, including anti-social behaviour?</p> <p>Will it provide for a well maintained and inclusive public realm and other public facilities?</p> <p>Will it encourage an active and connected, strong and cohesive community?</p>	<p>Indices of deprivation: Crime domain</p> <p>Numbers of types of crime per annum (Metropolitan Police)</p> <p>Percentage of residents who feel fairly safe or very safe outside during the day/night (residents survey)</p> <p>Reports of anti-social behaviour (Metropolitan Police)</p>
IIAO5: To promote social inclusion, equality, diversity and community cohesion	<p>Will it help support the voluntary and community sectors?</p> <p>Will it support active community engagement?</p> <p>Will it support a diversity of lifestyles and communities?</p> <p>Will it promote accessibility for those people who are elderly or disabled?</p> <p>Will it improve access to low-cost transport and other facilities?</p>	<p>Breakdown of other indicators in the framework by equality group</p> <p>Homelessness and council housing waiting lists by equality group</p>

TABLE 5.1		
IIA Objective	Questions to consider for assessment	Potential monitoring indicators
	<p>Will it help to sustain the provision of community facilities and open space that meet local needs?</p> <p>Will it facilitate connection of existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?</p> <p>How will different groups of people be affected by the option or policy - including black and minority ethnic communities, women, disabled people, lesbians, gay men, bisexual and transgender people, older people, young people, children, gypsies and travellers and faith groups? Will it benefit the groups listed above?</p>	Health inequalities highlighted in Joint Strategic Needs Assessment
IIAO6: To reduce contributions to climate change	<p>Will it reduce CO2 and other greenhouse gas emissions?</p> <p>Will it reduce consumption of energy?</p> <p>Will it use renewable sources of energy?</p> <p>Will it help local people cope with hotter drier summers and warmer wetter winters?</p> <p>Will it mitigate against the urban heat island effect?</p> <p>Will it encourage the re-use of resources?</p> <p>Will it encourage water efficiency and drought resilience?</p> <p>Will it encourage the reuse or improvement of buildings and land that are vacant, under utilised or in disrepair?</p> <p>Will it maintain or enhance biodiversity?</p>	<p>BREAAM and Code for Sustainable Homes Scores of major consents</p> <p>Energy consumption (break down by source/type) (Department for Energy and Climate Change)</p> <p>Environmental performance of opportunity area's housing stock (energy performance certificates)</p>
IIAO7: To improve air quality	<p>Will it improve air quality?</p> <p>Will it help to reduce emissions of PM10, NO2?</p> <p>Will it minimise construction impacts such as dust, noise, vibration and odours?</p> <p>Will it encourage a reduction in amount and length of journeys made by car?</p>	<p>Number of days of high air pollution (Old Kent Road monitoring station)</p> <p>Annual average concentrations and number of hourly exceedences of nitrogen dioxide in air (Old Kent Road monitoring station)</p> <p>Annual average concentrations and number of daily exceedences of PM10 in air (Old Kent Road monitoring station)</p>

TABLE 5.1		
IIA Objective	Questions to consider for assessment	Potential monitoring indicators
IIAO8: To avoid waste and maximise, reuse or recycle waste arising as a resource	Will it promote the reduction of waste during construction / operation? Will it minimise the production of household and commercial waste? Will it promote sustainable processing of waste?	Municipal waste land-filled (tonnes) Percentage of municipal waste sent for reuse, recycling and composting (borough waste management performance monitoring) Number of complaints received by the Environment Agency regarding dust, odour and noise from regulated waste management sites (Environment Agency annual data)
IIAO9: To encourage sustainable use of water resources	Will it result in a net increase in the demand for water, and foul sewage disposal? Will it encourage reuse of water? Will it maximise use of rainwater or other local water supplies? Will it reduce discharges to surface and groundwater?	Estimated water consumption of new development (environmental reports for relevant consents) Surface and ground water run-off rates of new development (drainage reports for relevant consents) Annual water pollution incidents
IIAO10: To maintain and enhance the quality of land and soils	Will it result in the loss of open land? Will it promote re-use of previously developed land and buildings? Will it use land effectively and efficiently, including mixed use and higher density development? Will it encourage the remediation of land identified as potentially contaminated? Will it prevent further contamination of soils? Will it improve soil quality?	New homes built on previously developed land Number of identified contaminated sites Number of contaminated sites not remediated
IIAO11: To protect and enhance quality of landscape and townscape	Will it conserve and enhance local landscape and townscape character, and visual amenity? Will it improve the relationship between different buildings, streets, squares, parks and waterways and other spaces that make up the townscape character? Will it have a negative impact on important strategic/local views? Will it incorporate sustainable design and construction techniques?	Housing density BREAAAM scores of relevant consents Design appraisal of consented development (design review panels and urban design advice)
IIAO12: To conserve and enhance the historic environment and cultural assets	Will it protect, maintain and enhance the condition and setting of features and areas of cultural, historical and archaeological heritage in the environment? Will it promote the historic environment and also contribute to better understanding of the historic environment?	Amount of opportunity area covered by Conservation Area or APZ Numbers of heritage assets in the opportunity area on the Historic England buildings at Risk Register

TABLE 5.1		
IIA Objective	Questions to consider for assessment	Potential monitoring indicators
	<p>Will it promote high quality design and sustainable construction methods?</p> <p>Will it respect visual amenity and the spatial diversity of communities?</p> <p>Will it maintain or increase access to leisure, sporting, cultural and arts destinations and facilities?</p> <p>Will it improve leisure, sporting, cultural and arts provision?</p>	<p>Changes in numbers of listed buildings</p> <p>Number of scheduled ancient monuments at risk</p> <p>Number of conservation areas at risk</p> <p>Number of conservation areas with up-to-date appraisal/management plans</p>
<p>IIAO13: To protect and improve open spaces, green corridors and biodiversity</p>	<p>Will it improve the quality and access to open spaces in areas of deficiency?</p> <p>Will it provide a range of play spaces for children and young people?</p> <p>Will it maintain, enhance and create green infrastructure assets and networks (e.g. green space, woodlands, public rights of way, open recreation and sports facilities) across the area?</p> <p>Will it help protect and improve biodiversity in the area overall and in particular avoid harm to species and habitats protected by International and UK law?</p> <p>Will it protect and enhance natural habitats and protect priority species?</p> <p>Will it encourage the creation of new habitats, including through the provision of additional open space and green roofs?</p> <p>Will it help achieve the Biodiversity Action Plan (BAP) targets?</p> <p>Will it protect and provide opportunities for creating/enhancing/improving sites designated for their nature conservation value/geodiversity level (local and national levels?)</p>	<p>Change in quantity of open space (ha)</p> <p>Change in sites of importance for nature conservation</p> <p>Open space deficiency</p> <p>Deficiency in access to nature</p> <p>Protected trees lost</p> <p>No. of green roofs/facades</p> <p>Waterways created, restored, improved or enhanced</p>
<p>IIAO14: To reduce vulnerability to flooding</p>	<p>Will the development be in an area at risk of flooding?</p> <p>Will it minimise the risk of and from flooding to people and property?</p> <p>Will it protect and improve flood defences and allow them to be maintained?</p> <p>Will it promote the use of sustainable urban drainage systems?</p>	<p>Planning permissions granted contrary to Environment Agency advice</p> <p>Number of flooding incidents (including sewer flooding)</p> <p>Condition of any relevant flood defences</p> <p>Flood protection projects delivered as part of</p>

TABLE 5.1		
IIA Objective	Questions to consider for assessment	Potential monitoring indicators
		consents and otherwise
IIAO15: To provide everyone with the opportunity to live in a decent home	<p>Will it improve the supply of housing?</p> <p>Will it contribute towards increasing the range of housing mix, sizes, tenures and affordability, to meet the identified current and future needs of all social groups and local residents, including older households?</p> <p>Will it deliver 'healthy homes'? (e.g. in relation to warmth, overcrowding, noise and mental health?)</p> <p>Will it improve overall design quality, including flexibility of stock to enable it to evolve to meet changing needs?</p>	<p>Amount of homes in the opportunity area</p> <p>Percentage of households living in temporary accommodation</p> <p>Households in housing need</p> <p>Households on the housing register</p> <p>Households unintentionally homeless and in priority need</p> <p>Income to average house price ratio</p> <p>No. of families living in overcrowded properties</p> <p>Proportion of consents meeting lifetime homes criteria</p> <p>No of households in fuel poverty</p> <p>Noise levels</p>
IIAO16: To promote sustainable transport and minimise the need to travel by car	<p>Will it encourage development at locations that enable walking, cycling and/or the use of public transport and connected to local services and facilities?</p> <p>Will it reduce car use?</p> <p>Will it reduce the number and length of journeys undertaken by car?</p> <p>Will it reduce road traffic accidents?</p> <p>Will it improve public transport?</p> <p>Will it promote walking and cycling?</p> <p>Will it allow people with mobility problems or a disability to access buildings and places?</p> <p>Will it improve connections across the area to local services, facilities, places of employment and green infrastructure?</p>	<p>Estimated traffic flows per annum (mil.vehicle km)</p> <p>Transport related CO2 emissions</p> <p>The number of people killed or seriously injured in road traffic collisions</p> <p>Proportion of personal travel made on each mode of transport overall and by equality group</p>

TABLE 5.1		
IIA Objective	Questions to consider for assessment	Potential monitoring indicators
IIAO17: To provide the necessary infrastructure to support existing and future development	Will it provide enough social infrastructure and meet local needs? Will it support opportunities for shared community use and co-location of services? Will it provide enough physical infrastructure? Will it provide enough transport infrastructure? Will it provide enough green infrastructure?	No. and type of existing infrastructure (social, physical and green) Capacity of existing infrastructure (social, physical and green) No. and type of proposed infrastructure (social, physical and green) Capacity of future infrastructure (social, physical and green)

5.2. Comparison of the IIA objectives

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

	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 2	✓															
IIAO 3	✓	0														
IIAO 4	✓	0	✓													
IIAO 5	✓	✓	✓	✓												
IIAO 6	✓	0	✓	0	0											
IIAO 7	✓	0	✓	0	0	✓										
IIAO 8	✓	0	0	0	0	✓	0									
IIAO 9	✓	0	✓	0	0	✓	0	0								
IIAO 10	✓	0	✓	0	0	0	0	✓	0							
IIAO 11	✓	0	0	0	0	?	0	?	0	0						
IIAO 12	✓	0	0	0	0	?	0	?	0	0	✓					
IIAO 13	✓	0	✓	0	0	✓	✓	0	✓	✓	✓	✓				
IIAO 14	✓	0	✓	0	0	✓	0	0	✓	0	0	0	✓			
IIAO 15	✓	0	✓	0	✓	✓	✓	0	✓	0	✓	✓	✓	✓		
IIAO 16	✓	✓	✓	0	✓	✓	✓	✓	0	0	✓	0	✓	✓	✓	
IIAO 17	✓	0	✓	0	0	✓	✓	0	✓	0	0	0	✓	✓	✓	✓

✓ Compatible

0 No significant link

? Depends on implementation

5.3 Method of Assessment

5.3.1 This section explains the proposed approach and methods for the IIA of the AAP/OAPF- this addendum will follow the same methodology.

5.3.2 The IIA Framework presented in Table 5.1 will form the basis for appraising reasonable options for policies and for site allocations. The table sets out the criteria that will be used to determine the nature and ensuring a consistent approach is taken for the appraisal of all reasonable options.

Table 5.2 demonstrates the system of symbols which will be used to represent the findings of the IIA for different elements of the emerging AAP.

Key	✓✓	Major positive
	✓	Minor positive
	xx	Major negative
	x	Minor Negative
	?	Uncertain
	-	Neutral

5.3.3 The IIA is structured under the objectives in the IIA Framework, which incorporate topics in the SEA Directive. This provides a framework and structure to evaluate the likely significant effects of the AAP/OAPF policies against key topics. The appraisal also considers short, medium and long term effects Table 5.3 outlines the grouping structure for the assessment.

Policy themes	Draft AAP Policies
Vision for the Old Kent Road	Vision AAP 0: Social Regeneration AAP 1: The Old Kent Road
Theme 1: Quality affordable housing	AAP 2: New homes AAP 3: Affordable homes AAP 4: Private rented sector homes AAP 5: Optimising delivery of new homes
Theme 2: Revitalised neighbourhoods	AAP 6: Heritage AAP 7: Streets and public spaces AAP 8: Key public realm improvements on the Old Kent Road AAP 9: Building blocks AAP 10: Building heights strategy
Theme 3: Strong local economy	AAP 11A: Workspace and business development AAP 11B: Mixed use Employment Areas AAP 12: Town Centre
Theme 4: Well-being: The best start in life and healthy active lifestyles	AAP 13: Social infrastructure AAP 14: Student housing AAP 15: Arts, culture and leisure
Theme 5: Getting around	AAP 16: Bakerloo line extension AAP 17: Surface public transport AAP 18: Walking and cycling AAP 19: Highways AAP 20: Servicing and freight AAP 21: Car parking
Theme 6: Cleaner, greener, safer	AAP 22: Green infrastructure AAP 23: Flood risk and sustainable urban drainage systems AAP 24: Decentralised energy AAP 25: Air quality
Implementation	AAP 26: Proposals sites AAP 27: Delivering the plan
Character Areas	Draft AAP Character Areas
North Area	Policies AAP 28: North area land use AAP 29: North area revitalised neighbourhoods Proposals sites OKR 1: Bricklayers Arms roundabout OKR 2: Crimscott Street and Pages Walk OKR 3: Mandela Way OKR 4: 107 Dunton Road (Tesco store and car park) and Southernwood Retail Park OKR 5: Salisbury estate car park OKR 6: 96-120 Old Kent Road (Lidl store) OKR 7: Former petrol filling station, corner of Penry Street and Old Kent

	Road OKR 8: Garages on corner of Mina Road and Old Kent Road OKR 9: 4/12 Albany Road
Central Area	Policies AAP 30: Central area land use AAP 31: Central area revitalised neighbourhoods Proposals sites OKR 10: Former Southern Railway stables OKR 11: Galleywall Trading Estate OKR 12: Admiral Hyson Trading Estate OKR 13: Rotherhithe Business Estate, Bermondsey Trading Estate and rail viaducts
South Area	Policies AAP 32: South area land use AAP 33: South area revitalised neighbourhoods Proposals sites OKR 14: Land bounded by Glengall Road, Latona Road and Old Kent Road OKR 15: Marlborough Grove and St James's Road OKR 16: Sandgate Street and Verney Road OKR 17: Devon Street and Sylvan Grove OKR 18: Gasworks and Southwark Integrated Waste Management Facility (IWMF) OKR 19: Hatcham Road and Penarth Street OKR 20: Ilderton Road OKR 21: 760 and 812 Old Kent Road (Toysrus store) OKR 22: 840 Old Kent Road (Aldi store) OKR 23: 684-698 Old Kent Road (Kwikfit garage) OKR 24: 636 Old Kent Road

New and amended policies are highlighted.

5.3.4 The appraisal is undertaken using professional judgment, supported by the baseline information and wider evidence base. The policies highlighted in the table above (table 5.3) are the new and amended policies that are subject to a new assessment. A summary appraisal commentary is provided in Section 7 to set out any significant effects identified along with suggestions for mitigation or enhancement to be made where relevant.

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

5.4 Health Impact Assessment

5.4.1 For the HIA element of the IIA the impacts on the population groups listed in Table 5.3 will be considered:

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

5.5 Equalities Analysis

5.5.1 For the EqIA element of the IIA the impacts on the protected characteristics are listed in Table 5.4

5.5.2 The Equality Act 2010 outlines a number of “protected characteristics”, which are the groups of people or communities where the government feels that discrimination or unfair treatment could arise. The IIA will consider if there are any unintended consequences for some groups and if the policies will be fully effective for all target groups.

Table 5.4	
Age	A person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18-30 year olds).
Disability	A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
Gender reassignment	The process of transitioning from one gender to another.
Marriage and civil partnership	In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
Race	A group of people defined by their race, colour and nationality (including citizenship) ethnic or national origins.
Religion and belief	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.
Sex	A man or a woman.
Sexual orientation	Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Section 6 - Plan Options and Alternatives

6.1. How has sustainability been considered in the development of the AAP?

6.1.1. Exploring the issues and options through community forum workshops, evidence base studies and the findings of the Scoping Report and subsequent consultation carried out earlier in the year helped to guide the sustainability of the draft AAP policy options. Areas of concern identified at the scoping stages have led to development of the policies, objectives and indicators to address areas that had not been covered in sufficient detail.

6.2. What options have been considered and why?

6.2.1 The Old Kent Road has been a designated “action area” since the Southwark Plan was adopted in 2007, and our Core Strategy (2011) sets out a vision for how we will produce an area action plan to help guide and manage the evolution of the area to reach its potential. In January 2014 the GLA identified the Old Kent Road as a potential opportunity area in the draft Further Alterations to the London Plan and this designation was confirmed in March 2015.

6.2.2 Alongside the GLA, TfL and other partners we have worked together to build strong evidence base which has helped to inform the options explored in the preparation of the AAP. The options have also been explored with the Old Kent Road community forum, of which nine workshops have been held to date.

6.2.3 Throughout the plan preparation, TfL consulted on two potential routes for a Bakerloo Line tube extension from Elephant and Castle to Lewisham, either via Camberwell or via the Old Kent Road. TfL then confirmed the preferred route was via the Old Kent Road following consultation in 2015. The options below reflect the growth options for the opportunity area without a tube line and with a Bakerloo Line extension should this occur in 2030. Options B and C assume the provision of two new tube stations to serve the area however other options for one or three tube stations were discussed with TfL and the community forum as an integral part of the consideration of the options. The specific location of tube stations is also part of ongoing discussions.

6.2.4 All options have been analysed and considered in full and can be found in the 2016 IIA.

Option A: Business as usual

6.2.5 This options considers how the area is expected to evolve without any significant intervention. The AAP therefore would need to evolve policies to fit the aspiration as an opportunity area but without any significant changes to existing policy designations and infrastructure. In this scenario the plan would come forward to deliver around 5,000 -10,000 new homes and the Bakerloo line extension would not be brought forward. The ability for the area to deliver additional jobs in this scenario may require incentive for change within the PIL's which may be difficult due to well established uses and land values unlikely to change significantly over the plan period. Existing uses in storage, distribution and warehousing sectors typically have a low floorspace to jobs ratio. Industrial sites are amore likely to remain in industrial use in this scenario whilst our evidence base suggests that the demand for industrial land is in decline.

6.2.6 In this scenario the provision of schools and health facilities and children's play space may be limited to improvements to existing facilities as a result of CIL collected from new development. Significant transport interventions such as the BLE would also have limited opportunity within this scenario and bus priority would be needed to support new development. The creation of new routes to support cycling and walking would also be limited as there would be less change to the structure of the street pattern through redevelopment and it is likely that private car will remain the dominant transport mode. Therefore, in this scenario, it will be more difficult to deliver better areas and improve public realm. There will also be less capacity to accommodate larger site allocations. For the same reasons, there would not be the opportunity to coordinate for larger areas Sustainable Urban Drainage Systems to help alleviate risks of flood.

Option B - Medium Growth

- 6.2.7 In this scenario, we see a more significant increase in new homes, jobs, community, health and leisure facilities than the first option A. Some of the existing industrial areas and large retail warehouses would transition to mixed use neighbourhoods and a revitalised high street providing a medium density scenario of around 10-15,000 new homes. Some of the more well-established industrial areas would be retained. The 10-15,000 new homes would be a good contribution to the council's housings target and responds to all types of housing needs and tenures. Residential amenity is likely to be improved in this scenario due to the ability to deliver larger scale sites. The AAP would need to redirect some existing PIL's to transition to mixed use neighbourhoods providing the appropriate leisure, health and social facilities. It may be more difficult to deliver meaningful areas of green space and high quality public realm particularly as some industrial areas will be retained. There would be the need to introduce taller buildings in this scenario however the majority of growth would incorporate mid-rise buildings. The identity of the area as an industrial setting may limit a change in perception in the area, particularly around the waste facility visible from Old Kent Road and Mandela Way which would remain unchanged. In a medium growth scenario some of the sites designated as IL and other appropriate sites would be designated for redevelopment to provide mixed use neighbourhoods for homes and new jobs. Some jobs will be retained in the established industrial areas however, there will be opportunities to create some new jobs in different sectors within the mixed use development. In this scenario, there would also be more opportunities to provide new retail in the form of smaller units to create a better high street environment. Some of the larger supermarkets may remain operational for longer periods of time, limiting the opportunity for a significant change to the retail environment in the short term.
- 6.2.8 In this scenario, growth would put significant pressure on demand for the provision of infrastructure and the AAP would need to encourage a coordinated approach to deliver those, in line with the phased development. There are some opportunities in this scenario to attract new cultural and leisure facilities but difficult to accommodate whilst improving the attractiveness of the area with the retention of large scale industrial areas.
- 6.2.9 The Bakerloo Line extension is less likely to come forward in a medium growth scenario as the option would deliver a lower level of development at medium densities. There would be fewer opportunities to generate funding and the overall rationale for the delivery of major infrastructure would not be as strong as in the high growth scenario. In this scenario opportunities for new areas of public open space, green links or SUDS could be limited to smaller areas as there would less development and funding to deliver large areas of new green space.

Option C - High Growth

- 6.2.10 In this option, the Old Kent Road Opportunity Area would involve significant new homes, jobs, community, health and leisure facilities which will accompany the addition of two new underground stations as part of an extension to the Bakerloo Line. The majority of existing industrial areas and large retail warehouses would transition to mixed use neighbourhoods and a revitalised high street providing a high density scenario of around 20, 000 new homes and 5,000 new jobs.
- 6.2.11 The addition of 20,000 new homes would contribute significantly to the council's housing target and respond to housing needs for all housing types and tenures. Each development scheme would be expected to deliver 35% affordable homes. The AAP would need to direct existing PIL's to transition to mixed use neighbourhoods providing the opportunity to deliver high quality homes and jobs accompanied by new public spaces, pedestrian and cycle links as well as community and leisure facilities. This full scale transition of PILs would ensure that sites can be delivered in a coordinated way, transforming the built environment. Residential amenity is likely to be improved in this scenario due to the ability to deliver larger scale sites with appropriate consideration for a quiet, pleasant residential accommodation. There will need to be appropriate consideration for the impact of new residential development on

existing residents in scheme designs close to existing residential development on existing residents in scheme designs close to existing residential development.

- 6.2.12 In the high growth scenario, all sites designated as PIL and other appropriate sites would need to be designated for comprehensive redevelopment to provide a substantial number of new homes and jobs. It is important that such redevelopment would not result in the loss of existing jobs in the opportunity area in the retail, community and employment 'B class' uses. Given the current nature of the industrial areas which provides these jobs may be considerably altered and there is a risk that some of the traditional industrial sectors in the Old Kent Road would not be suited to a mixed use development. The AAP would need to facilitate mixed use development to accommodate a range of sectors to provide jobs in a carefully managed way. There would be retained industrial areas around south east Bermondsey and the ability to maximise the potential of railway arches to provide new business premises and jobs.
- 6.2.13 In a high growth scenario, it is anticipated that there will be considerable demands on the provision of new schools and health facilities. The AAP would need to encourage a coordinated approach to deliver these facilities in line with phased development. There are considerable opportunities in this scenario to attract new cultural and leisure facilities which would enhance the vitality and perception of the area as a cultural destination. In a High growth scenario, there would also be the possibility of encouraging a major educational institution such as a University which would further provide more employment opportunities and create a thriving new community.
- 6.2.14 The Bakerloo Line extensions and two new stations along Old Kent Road would significantly improve the accessibility of the area and provide rapid connection to the city and would support the delivery of the scale of development envisaged. There would be considerable improvements to the Old Kent Road highway, improving facilities for buses, pedestrians and cycle links, helping reduce the segregation of areas on either side of the road. Transport improvements would be integrated with public realm improvements to promote better linkages across the road and better facilities for same and convenient routes for pedestrians and cyclists. In a mixed use development, servicing for new employment uses will be an important component of the scheme design and reduce the impact of servicing and heavier traffic on adjoining residential development.
- 6.2.15 Through larger site allocation, meaningful new areas of public open space or green links could be delivered. Larger areas of sustainable Urban Drainage Systems (SUDS) would be coordinated in to help alleviate flood risks and provide amenity and biodiversity benefits. There would also be opportunity to support the development of a decentralised energy network to achieve a low carbon energy supply to the population.
- 6.3. Which option was chosen for the AAP and why?
- 6.3.1. The AAP and interim policies have been prepared according to the principles outlined in Option C. There are considered to be more social, economic and environmental benefits in this scenario which will improve the health and wellbeing of communities. Whilst the scenario itself presents a number of challenges, the council considers the AAP can help guide and deliver redevelopment successfully.
- 6.3.2. The AAP would give confidence to the ability of the Old Kent Road to undergo a transformation that creates a new identity and position in central London. The provision of 20,000+ new homes would significantly contribute to needs of a growing and diverse population, particularly the provision of affordable homes. The AAP would provide robust policies, and detailed guidance to coordinate development to achieve the best possible outcome for the benefit of local people. The AAP would address the challenges identified through new policies that would be less affected by uncertainty and potentially incompatible objectives. In this scenario it is anticipated that the most benefits will be seen in relation to levels of crime and deprivation, improved health of the population through better physical activity and better modes of transport, and less exposure to harmful pollutants and poor air quality. These benefits, along with improving social cohesion would positively impact on a

wide range of equality groups. However to accommodate this level of development there are likely to be significant pressures on infrastructure and environmental considerations such as water consumption and waste management. Increased construction activity in the short to medium term is likely to bring adverse environmental impacts which could affect residential amenity and climate change.

- 6.3.3. Option C would require significant change to existing industrial areas and in the short term could lead to a loss of jobs in these sectors and loss of the existing servicing and manufacturing economy in the OA. The impact of this should be addressed carefully in the evolution of policies to ensure mixed use development can accommodate a range of new employment sectors and opportunities to the area, whilst accommodating ensuring existing businesses have the opportunity to relocate within the OA. The delivery of the high growth option would also need to include high density development including tall buildings, and the AAP would need to ensure the strategy for place-making, urban design and a high quality public realm supported by new green spaces and connections is strongly maintained.

Section 7 - Effects of the plan policies

7.1. Appraisal of the draft AAP/OAPF policies and proposals sites

- 7.1.1. The AAP/OAPF has strong objectives for improving the quality of the environment in Old Kent Road including fostering community cohesion, improving health and equal opportunities for all. The plan has been carefully prepared mindful of the potential impacts considered at options stages. This is an update to the IIA, a full report of the impacts of the IIA can be found in the May 2016 Integrated Impact assessment. The Old Kent Road OA experiences relatively high levels of deprivation with poor health and crime as contributing factors. The OA is on the fringes of the CAZ and the functions of central London and extending these beneficial functions to the Old Kent Road will help to improve opportunities for new jobs, homes and infrastructure. The business clusters will help to focus and reinforce networks of creative workspaces which contribute to the central London economy. The scope of the AAP/OAPF also brings the opportunity for increased funding from new development through changes to CIL charges. The BLE will play a major role in improving transport infrastructure in the area, and the vision for creating a revitalised high street, improving the street network and connections for walking and cycling will bring significant benefits to the OA.
- 7.1.2. The new and amended policies within the draft AAP/OAPF seek to further guide future development and set out the clear aspirations for the OA: improving access to green space, improving health, preserving the environment and providing additional employment and SIL space throughout the OA to help address deprivation, crime and poor health.
- 7.1.3. Site allocations are also considered within the character areas, setting out the expected uses, capacity and phasing and implementation. The full appraisal of the new and amended policy themes and character areas are provided as **Appendix 1**.

7.2. What are the significant positive effects of the plan amendments?

- 7.2.1. The plan's amended policies generate major positive impacts relating to tackling poverty and encouraging wealth creation particularly in relation to the creation of additional employment clusters and supporting the aspiration to deliver mixed use development. The benefits will be seen in the short to medium term, particularly as associated infrastructure and public realm improvements. However the long term effects are anticipated to bring stronger benefits as the OA becomes increasingly incorporated into central London functions through the extension of the CAZ and providing opportunities to diversify the economy and further increase the number of jobs available, responding to the existing and future aspiration of the area as it changes over time.
- 7.2.2. The plan would also bring about significant improvements to the quality of the townscape, particularly with the additional green and open spaces policy. The opportunities for new and improved areas of open space would also bring positive effects in terms of improving public realm as well as contributing to thriving biodiversity amidst high density development.
- 7.2.3. The plan also generates positive impacts for sustainability improvements. There are strong links between improvements to sustainable transport modes and improving health. The plan encourages car free development but also recognises that where PTAL ratings are low, it is essential to promote the use of low emission vehicles. The policy AAP21 has been amended to include the provision of electric charging points on all development parking spaces to encourage the use of lower emitting vehicles. Policy AAP23 ensures that pressure on our current water and sewage infrastructure has been addressed so as to reduce risks of flooding.

7.3. What are the significant negative effects of the plan?

- 7.3.1. There will be some negative environmental impacts in the short term as a result of higher levels of construction. Construction traffic and methods could also affect the health of the population in the short term by the increase of noise, dust and disruption to active travel routes.

7.3.2. Whilst it is acknowledged economic and employment trends are changing in the area, and although policy changes to retain additional land as industrial, there is a risk that industrial land and associated jobs would be lost in the short and long term, particularly if development occurs outside of the business clusters.

7.4. Proposed Mitigation

7.4.1. Where the SA identified potential shortcomings of particular policies, mitigation measures are proposed to help off-set the negative impacts. Many of these mitigation measures are policy requirements in either the Core Strategy or Supplementary Planning Documents (SPDs) or in the emerging New Southwark Plan where some of the negative impacts will be mitigated.

7.4.2. Whilst there may be short term negative environmental effects relating to construction in the OA, the longer term effects could have more positive impacts. The amended policy AAP23 introduces a section 106 offset payment to mitigate residual runoff from new development. It is anticipated that additional jobs could be provided within the OA - the AAP new and amended policies further retains industrial land in the central area to ensure industrial functions are maintained and additional space in railway arches can be utilised. Employment clusters have been extended to cover all sites in the OA and there are aspirations to extend the CAZ boundary to include parts of OKR.

7.5. Uncertainties and Risks

7.5.1. The conclusions that were reached in undertaking the IIA of the Old Kent Road Area Action Plan policies were a result of qualitative (i.e. subjective) judgement by planning professionals within the council. Predicting the outcome of a potentially complex mix of social, economic and environmental factors is an inherently difficult task to undertake, and can only be undertaken on the basis of the background data that is available.

7.5.2. Consequently, there may be some questions about the way some policies were ranked against particular sustainability objectives. However, whilst some individual rankings may possibly be challenged at this level, it is the overall performance of a policy against the IIA Framework taken as a whole, which is the most important element to consider.

Section 8 – Implementation

8.1. What are the next stages in the plan preparation?

IIA PRODUCTION STAGE	TIMETABLE
Preparation of the final IIA report to accompany the publication version of the Old Kent Road AAP.	2017
Consultation on Old Kent Road AAP publication version and draft final IIA report	2017
Adoption of the AAP and publication of the final IIA report.	2018

8.2. How will the plan be implemented?

- 8.2.1. We will ensure the AAP is implemented by working local communities, businesses developers, Lewisham council, GLA, TFL and other partners but also explore joint governance arrangements with our partners to reflect the commitment to supporting growth.
- 8.2.2. Implementation of the AAP policies will be achieved through our development management function when we make decisions on planning applications. We will work with landowners and developers to ensure schemes make effective use of land across the OA and consider the wider context. We will use the council's delivery programmes to help deliver new council homes and using our compulsory purchase powers where necessary to ensure that land is made available for development where it is needed to deliver the AAP vision and policies.
- 8.2.3. Our Statement of Community Involvement (SCI) sets out how and when the community will be involved in preparing planning policy documents and in making decisions on planning applications.
- 8.2.4. Development should not be permitted unless essential infrastructure (social infrastructure such as schools, health and other community facilities; physical infrastructure such as transport and utilities; green infrastructure such as parks and open spaces) can be completed prior to occupation of the new development.
- 8.2.5. We will use S106 planning obligations/CIL to overcome negative impacts of development and to make sure that infrastructure needed to support development is provided. Through implementing this SPD and collecting CIL we will secure financial contributions to mitigate the impacts of development. We will also undertake a review of the CIL in the OA to maximise funding available for infrastructure and review the CIL regularly to ensure it reflects changing values.

8.3. Links to other tiers of plans, programs and other guidance

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

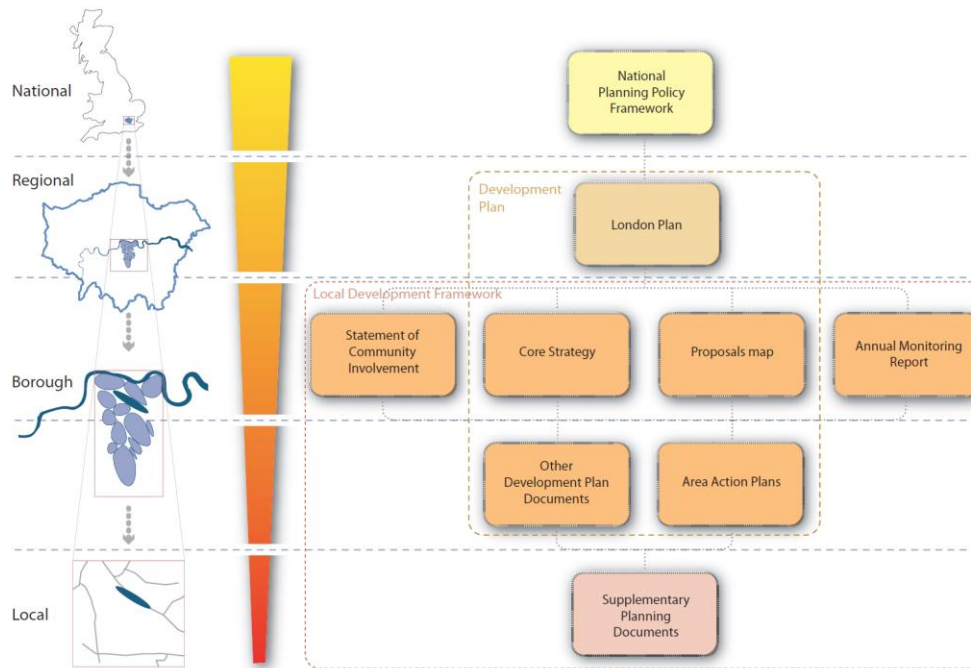


Figure 8.1

8.4. Proposals for monitoring

- 8.4.1. It is important that the plan is monitored to keep track of whether it is working in the way it should. The most appropriate way to monitor the area action plan is through the Local Development Framework Authority's Monitoring Report (AMR). The AMR monitors the type of development that is occurring as a result of all of the council's planning policies and guidance and what effects this development is having in terms of sustainability. Where new indicators have been identified, through the IIA process, these will be added to the AMR. The AAP sets out a monitoring framework to ensure new development meets the objectives of the plan. These indicators will be added to our AMR once the AAP is adopted.
- 8.4.2. The council has also secured funding on a project on enhancing the impact of planning policy on health outcomes. This will develop an enhanced evidence base to inform and monitor the Old Kent Road policies and the research will be developed over the next two years, with ongoing monitoring of health impacts to follow. The approach to the project has been informed by the Mental Well-being Impact Assessment screening.

Appendix 1: IIA Appraisal of the AAP policies

IIA Objectives	Vision and CAZ	Timescale			Vision
		S	M	L	Commentary on Results (social regen)
IIA 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓	✓✓	The extension of the CAZ to incorporate the OA and the vision for the future of the Old Kent Road sets out a long term strategy that will help to tackle poverty and encourage wealth creation. There will be job opportunities benefiting groups such as young people through apprenticeships, the unemployed and low income groups improving levels of deprivation. It will improve local facilities and public transport in the area lowering costs for residents and requiring less need to travel further afield for shopping, community, health and leisure facilities. This would benefit many groups including disabled people, pregnant women and young adults. There may be better provision of facilities for those on low incomes or with specialist needs such as alcohol and drug problems, people who experience domestic violence or people with a long term illness.
IIA 2 To improve the education and skill of the population	✓	-	✓	✓✓	There would be more opportunities for training and apprenticeships as a result of new development and new jobs in mixed use neighbourhoods. Redevelopment of industrial land would bring change in the type of jobs available and improve the floorspace to jobs ratio however it would be important to maintain industries which service central London and contribute to the current function of the OA as an industrial area. BME groups are strongly represented in the population statistics for the area and improved access to education or new skills would have a positive impact on young people in these groups and young people in general as well as the unemployed and those on low incomes.
IIA 3 To improve the health of the population	✓✓	-	✓	✓✓	The vision incorporates a place-making approach including new health facilities, new green spaces and leisure facilities which can help decrease lifestyle risk factors such as smoking, poor diet, substance misuse and lack of exercise. Poor health can be exacerbated by socio-economic challenges such as poor housing and unemployment and the vision anticipates significant improvements to the OA. Improvements to access to health facilities, better quality housing, employment opportunities, better public transport and new green spaces would improve physical and mental health. Improving connectivity and green routes lessens to the impact of vehicular pollutants and better air quality and would particularly benefit disabled people and pregnant women. The new social regeneration policy responds to the council's commitment to social regeneration in the Area Action Plan. It will assure that the development provides the best outcomes for all residents by ensuring that all development contributes towards social regeneration particularly with issues relating to health facilities and well-being of the borough's residents, identified as a major concern to address.
IIA 4 To reduce the incidence of crime and the fear of crime	✓✓	-	✓	✓✓	The relatively high levels of deprivation in the area highlight particular issues in income and crime levels. Young single people aged 18-35 in rented accommodation are more likely to be victims of high rates of crime. Improvements to public transport accessibility, new and safer routes and safety features would significantly reduce the risk of crime. Introducing residential areas and new streets to existing large scale and quiet industrial areas would improve the amount of footfall and overlooking of public areas improving public realm and safety.
IIA 5 To promote social inclusion, equality, diversity and community cohesion	✓	-	-	✓✓	The OA has a number of existing community networks and a diverse population. There are high numbers of faith premises in the area which benefit many religious groups. The vision is to foster mixed communities and these will need to be maintained and improved in redevelopment. The vision includes reinforcing healthy and sustainable neighbourhoods and the CAZ functions emphasise the importance of cultural functions in central London. The provision of new community space would be suited to a range of groups and improving areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, pubs, faith premises and community halls. The redevelopment opportunities will reduce physical barriers and severance improving the layout of the streets and promoting social interaction.
IIA 6 To reduce contributions to climate change	-	x	-	-	The AAP envisages District heating solutions, sustainable urban drainage systems and measures to improve air quality will help tackle pollution and climate change. Two new underground stations and improved surface transport would reduce the reliance on the private car reducing emissions from vehicles. New walking and cycling routes would also be provided improving sustainable modes of transport. This would improve the health of the population by reducing exposure to pollutants and harmful emissions from industry, traffic and domestic life. However the increased construction traffic and methods of construction could have negative impacts on climate change including significantly increasing the population density in the OA.
IIA 7 To improve the air quality	✓	-	✓	✓✓	The AAP encourages a reduction in the number of journeys made by car by the introduction of the BLE and two new underground stations, as well as significant improvements to the walking and cycling network and surface transport. This would improve air quality in the area if car journeys are reduced although the Old Kent Road will remain a key vehicular route in and out of London. Improvements to air quality and less exposure to vehicular and industrial emissions will improve the health of the population particularly older people, children, pregnant women, people with a long term illness and the homeless.
IIA 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	x	x	x	?	The amount of development envisaged would increase the pressures on waste and recycling. The waste disposal and recycling facilities for commercial and residential development would need to be carefully managed in mixed use schemes.

IIA 9 To encourage sustainable use of water resources	x	x	x	x	The demand for water and foul sewage disposal is likely to increase with significant levels of new development. The AAP encourages sustainable reuse of water and use of rainwater limiting the impact on surface and groundwater in new development. The sustainable use of water would benefit the health of the population.
IIA 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓✓	The AAP envisages effective use of land through reuse of previously developed land which would remediate issues of contamination which may affect many industrial areas around the OA. Soil quality will improve with more opportunities for new green spaces. Remediation of the effects of contamination would have a positive impact on health, particularly on more vulnerable groups.
IIA 11 To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	Improving the quality of townscape and landscape creating a new network of streets, improved connectivity and new green spaces is a strong part of the vision. Sustainable construction techniques would be encouraged. This would create opportunities to improve health and wellbeing and security, which could affect groups such as the homeless, women, older people and those with physical disabilities.
IIA 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	-	Policy AAP 1 looks to sensitively incorporate heritage assets into high quality development of a scale and density which befits a central London location. Large scale regeneration would need to carefully consider impact on adjoining conservation areas and listed buildings and impact in the longer term. The vision and policy AAP 1 seek to promote new cultural, leisure and sports facilities which would enhance the health of the population and provide facilities for children and young adults.
IIA 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	New green spaces, parks and green infrastructure provided are a major part of the vision, creating opportunities to improve biodiversity. The provision of green space would need to be well located and designed to benefit significant increases in population and use. The provision of green spaces would improve the long term health and wellbeing of the population and may benefit children through provision of new play spaces.
IIA 14 To reduce vulnerability to flooding	-	-	-	-	The effects of pluvial and surface water flooding in the OA to achieve the level of development envisaged would need to be carefully considered to reduce the impact of flood risk and improve safety for local people. The vision encourages the provision of SUDS.
IIA 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	The vision includes the ambitious housing strategy which will significantly improve the supply in Southwark and help meet local housing need as well as providing new affordable homes. High quality design of the public realm in residential schemes will also improve living conditions. There will need to be careful management of mixed use neighbourhoods so that other uses such as employment, leisure, retail, education or community uses combined with residential remain compatible and appropriately managed. Providing good quality housing benefits the health and wellbeing for many groups including families, children and older people, and people with specialist needs such as those with learning or physical disabilities.
IIA 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓	✓✓	The significant improvements to public transport envisaged in the AAP would reduce the need to travel by car by the introduction of the BLE and two new underground stations, improved walking and cycling routes and improved surface transport and buses. Improvements to crossing points and pedestrian connectivity along the Old Kent Road as well as better management of surface transport and junctions will reduce road traffic accidents. This would significantly improve the health and safety of local people, such as older people and children who are more likely to be involved in road traffic accidents. Better accessibility will also benefit groups such as people on low income, the unemployed, residents, disabled people and older adults.
IIA 17 To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	Large scale infrastructure improvements to transport, green space and community facilities would be provided to support revitalised neighbourhoods. This would benefit all groups and improve accessibility to health and social facilities.

IIA Objectives	Policy Theme 3	Timescale			Draft AAP Policies
		S	M	L	Commentary on Results
IIA 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Policies support the provision of 5,000 new jobs in employment clusters and a revitalised high street improving the range of job opportunities for the OA. Policies AAP11A and AAP11B have been added to further expand the employment clusters and now apply to all sites in the OA. Additional employment is expected to be provided given the aspiration to transition from PIL to mix use development This would benefit groups such as young people through apprenticeships, the unemployed and low income groups improving levels of deprivation. It will diversify the economy and increase the number of higher paid jobs in the area as technical, digital and professional service industries. The extension of the CAZ will encourage a greater diversity of jobs in a variety of functions central to London's economy.
IIA 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	There would be more opportunities for training and apprenticeships as a result of the provision of new jobs in the mixed use employment areas and town centre. Redevelopment of industrial land would bring change in the type of jobs available and improve the floorspace to jobs ratio however it would be important to maintain industries which service central London and contribute to the current function of the OA as an industrial area. BME groups are strongly represented in the population statistics for the area and improved access to education or new skills would have a positive impact on young people in these groups and young people in general as well as the unemployed and those on low incomes.
IIA 3 To improve the health of the population	✓	✓	✓	✓	In the OA people in bad health are slightly above the average for London. Poor health can be exacerbated by socio-economic challenges such as unemployment therefore the provision of new jobs and apprenticeships will improve health, particularly mental health, benefiting groups such as young adults, the unemployed and low income groups.
IIA 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	The relatively high levels of deprivation in the area highlight particular issues in income and crime levels. Introducing mixed use neighbourhoods and a variety of jobs and shopping facilities to existing large scale and quiet industrial areas would improve the amount of footfall and overlooking of public areas improving public realm and safety.
IIA 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	The provision of new jobs, and support for SME businesses through low cost workspace promotes the diversity of people, ideas and the economy in the OA. The council has established the OKR Business Network to regulate and provide guidance and relocation strategies to ensure successful continuation of businesses within the redevelopment of the area. The council has also established a workspace provider list which responds to the demands for different dimensions of floorspace to suit various sizes and types of business especially regarding the growing demand for smaller workspaces within the borough. The enhancement of shopping facilities in the area may benefit a variety of ethnic minority businesses as there will be more footfall and residents to use local facilities.
IIA 6 To reduce contributions to climate change	-	x	✓	✓	New workspace and development incorporating retail would need to meet high standards of sustainability, renewable energy and efficient use of resources. Two new underground stations and improved surface transport would reduce the reliance on the private car to travel to work reducing emissions from vehicles. New walking and cycling routes would also be provided improving sustainable modes of transport. This would improve the health of the population by reducing exposure to pollutants and harmful emissions from industry, traffic and domestic life. The impacts of construction may have short term negative impacts on climate change.
IIA 7 To improve the air quality	-	x	-	✓	The AAP would encourage a reduction in the number of journeys made by car to visit shops and to travel to work by the reduction in car parking particularly in existing retail parks. The introduction of the BLE and two new underground stations would reduce car use, as well as significant improvements to the walking and cycling network and surface transport. This would improve air quality in the area if car journeys are reduced although the Old Kent Road will remain a key vehicular route in and out of London. Improvements to air quality and less exposure to vehicular and industrial emissions will improve the health of the population particularly older people, children, pregnant women, people with a long term illness and the homeless. The impacts of construction may have short term negative impacts on air quality.
IIA 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	?	The AAP would need to promote the reduction of waste in construction particularly as large scale change is envisaged. The waste disposal and recycling facilities for commercial and residential development would need to be carefully managed in mixed use schemes and increased population and jobs will increase waste.
IIA 9 To encourage sustainable use of water resources	-	-	-	-	The demand for water and foul sewage disposal is likely to increase with significant levels of new development, and the AAP would need to encourage sustainable reuse of water and use of rainwater limiting the impact on surface and groundwater in new development. The sustainable use of water would benefit the health of the population.
IIA 10 To maintain and enhance the quality of land and soils	✓✓	✓	✓✓	✓✓	There will be many more opportunities to make effective use of land through reuse of previously developed land and remediate issues of contamination which may affect many industrial areas around the OA. Soil quality will improve with more opportunities for new green spaces. Remediation of the effects of contamination would have a positive impact on health, particularly on more vulnerable groups.
IIA 11 To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	The quality of townscape and landscape would be enhanced particularly through the introduction of mixed use employment areas and a revitalised high street in the town centre, improving links between spaces and providing outdoor public space and pleasant surroundings for workers and residents alike. Sustainable construction techniques would be encouraged. Tall buildings would need to be carefully considered in terms of local and strategic views and ensuring public realm on ground level remains high quality and well used. This would create opportunities to improve health and wellbeing

					and security, which could affect groups such as the homeless, women, older people and those with physical disabilities.
IIA 12 To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	The AAP would present the opportunity to enhance and highlight heritage assets in place-making for the area. However large scale regeneration for employment and retail uses would need to carefully consider the impact on adjoining conservation areas and listed buildings. There would be many opportunities to promote new cultural, leisure and sports facilities which would enhance the health of the population and provide an attractive place to work and shop.
IIA 13 To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	There would be improved access to green spaces and new parks and green infrastructure provided in mixed use development to improve biodiversity. The provision of green spaces would improve the long term health and wellbeing of workers and encourage people to visit and shop in the area.
IIA 14 To reduce vulnerability to flooding	-	-	-	-	The effects of pluvial and surface water flooding in the OA would need to be carefully considered to reduce the impact of flood risk and improve safety for workers and local people. New employment and mixed use development would need to utilise SUDS techniques in scheme design. Schemes should reduce flows to a greenfield rate or minimise run off rates as far as possible.
IIA 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	Mixed use development will incorporate high quality new homes and provide jobs and shopping facilities for the benefit of local people.
IIA 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓✓	✓✓	There would be significant improvements to public transport and reducing the need to travel by car to work or shop in the OA by the introduction of the BLE and two new underground stations, improved walking and cycling routes and improved surface transport and buses. Improvements to crossing points and pedestrian connectivity along the Old Kent Road will enhance its ability to improve the high street environment and better management of surface transport and junctions will reduce road traffic accidents. This would significantly improve the health and safety of local people, such as older people and children who are more likely to be involved in road traffic accidents. Better accessibility will also benefit groups such as people on low income, the unemployed, residents, disabled people and older adults.
IIA 17 To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	Large scale infrastructure improvements to transport, green space and community facilities would be provided to support revitalised neighbourhoods. In this scenario it is likely a review of CIL would take place to help fund large scale infrastructure improvements in the OA. This would benefit all groups and improve accessibility to health and social facilities.

IIA Objectives	Policy Theme 5	Timescale			Draft AAP Policies
		S	M	L	Commentary on Results
IIA 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Growth of 5,000 net jobs and diversification of the economy in the OA will rely on the Bakerloo Line extension bringing accessibility up to Central London levels and making land suitable for a greater range of employers. Local people will also be able to access a greater number of jobs outside the OA where public transport accessibility is increased. This will provide opportunities for people on lower incomes or who are unemployed.
IIA 2 To improve the education and skill of the population	✓	-	✓	✓	Development providing a greater range of education facilities will be enabled by transport improvements, benefitting children and young adults in particular.
IIA 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	Providing opportunities for active transport and discouraging car use will encourage healthy lifestyles, although this may not directly benefit people with disabilities and older people. Improving air quality, highways safety and reducing the impacts of construction such as dust and noise will reduce associated disease or injury. Development providing health improvements through housing, employment and social infrastructure provision will be enabled by transport improvements. Reducing highways impacts will allow more interaction in the public realm, which can improve mental and emotional health.
IIA 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Reducing highways impacts and prioritising walking will create a more inclusive public realm, reducing the fear of and opportunities for crime.
IIA 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Prioritising limited car parking provision for families with children and people with disabilities will help ensure the accessibility of new development for these groups. Car sharing and transport infrastructure could reduce transport costs, improving equality of access to a range of services for people on lower incomes or who are unemployed. The enhancement of the Old Kent Road and other public realm will enable interaction and social cohesion among different groups.
IIA 6 To reduce contributions to climate change	✓✓	✓	✓	✓✓	Reducing use of the private car and efficient highway design will reduce carbon emissions.
IIA 7 To improve the air quality	✓✓	✓	✓	✓✓	Reducing congestion through public transport improvements, low or car free development, management of freight servicing, mitigating construction impacts and maintaining the movement function of the Old Kent Road will reduce harmful emissions and improve air quality. Car-free development is encouraged and policy AAP 21 has been amended to include the requirement of 0.1 car parks per unit in lower PTAL areas. The policy has also been amended to specify that for all parking space, development must provide electric vehicle charging spaces to promote alternative/low emission vehicles In those low PTAL areas which simultaneously also addresses poor air quality throughout the OA.
IIA 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Transport improvements are unlikely to lead to operational waste generation but waste from construction should be managed sustainably.
IIA 9 To encourage sustainable use of water resources	-	-	-	-	Transport improvements are unlikely to lead to operational water use and sewerage generation.
IIA 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	Reducing the amount of land required for car parking will allow the more efficient use of land for development.
IIA 11 To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	The enhancement of the Old Kent Road as a place, legibility measures, mitigation of the impacts of congestion on the public realm and strictly limiting the amount of car parking spaces will improve the interaction of different elements of the built environment and improve the overall townscape.
IIA 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-	The design of transport improvements should respect the historic environment and access to cultural assets.
IIA 13 To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	Improvements to the cycling and walking network will improve access to open space.
IIA 14 To reduce vulnerability to flooding	?	-	-	?	Transport and access arrangements for new development should be designed to allow safe access and egress in the event of flooding. Streets should be designed to incorporate sustainable drainage alongside their other functions, which may present design challenges.
IIA 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	The delivery of 20,000 homes will be enabled by the improved public transport accessibility provided by the Bakerloo Line extension. This will include specialist and affordable housing for low income groups, unemployed people, people with a long term illness or disability and older people.
IIA 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓	✓✓	The Bakerloo Line extension, bus infrastructure, pedestrian access, cycle access, hire and network improvements, way-finding and interchanges between sustainable transport modes will allow existing and new residents and visitors to make sustainable transport choices.
IIA 17 To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	✓✓	✓✓	Transformation in the area will be made deliverable by the uplift in development capacity in advance of the Bakerloo Line extension. New tube stations will be designed to accommodate development above them. Development will contribute to tube infrastructure and interchanges with other modes, enabling the overall transformation. Accommodating additional demand for buses, encouraging more walking and cycling and mitigating impacts of new development on highways will facilitate its delivery.

IIA Objectives	Policy Theme 6	Timescale			Draft AAP Policies
		S	M	L	Commentary on Results
IIA 1 To tackle poverty and encourage wealth creation	✓	-	✓	✓	Decentralised energy can help reduce fuel poverty and provide protection against future price rises. The security of energy supply from decentralised energy can benefit local businesses and help retain employment as well as creating energy related jobs locally.
IIA 2 To improve the education and skill of the population	✓	-	-	✓	New education facilities can benefit from energy security and affordability and reduced water and sewerage costs.
IIA 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	New open space for informal recreation, events, sports, cycling and walking will help to encourage active lifestyles among all groups. Improvement and enhancement of open space, including quiet natural spaces, and planting within the public realm and on redeveloped sites can lead to mental and emotional health benefits. Sustainable drainage systems will maximise its amenity benefits to local people.
IIA 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	New open spaces should be designed to prevent opportunities for crime.
IIA 5 To promote social inclusion, equality, diversity and community cohesion	✓	-	✓	✓	New open spaces will provide the opportunity for different groups to interact and contribute to social cohesion. Reduced energy and water costs in new affordable homes will benefit low income, unemployed or older people living in new homes, but similar cost savings may not be available to the same groups living in existing homes in the OA.
IIA 6 To reduce contributions to climate change	✓✓	✓	✓✓	✓✓	Sustainable drainage systems will help to mitigate the increased frequency of heavy rainfall associated with climate change. Reinforced habitat corridors and space for nature conservation will help to protect biodiversity from climate change impacts. The creation of an Old Kent Road heat network will reduce the carbon emissions from new development.
IIA 7 To improve the air quality	✓✓	-	✓	✓✓	Meeting or exceeding air quality neutral standards and measures to improve air quality will help to address the unacceptable levels of air pollution in the OA.
IIA 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Environmental infrastructure and open spaces should maximise the opportunities for waste reuse and recycling.
IIA 9 To encourage sustainable use of water resources	✓✓	✓	✓✓	✓✓	Encouraging the use of greywater re-use systems in major development will reduce the demand for potable water. Sustainable drainage systems will reduce the demand on sewerage and the need for sewer upgrades.
IIA 10 To maintain and enhance the quality of land and soils	✓	-	✓	✓	Design standards for sustainable drainage systems will prevent soil contamination.
IIA 11 To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	New and enhanced open space, trees, landscaping and green surfaces will make a significant contribution to local landscape character. Greening will soften the townscape impact of dense new development.
IIA 12 To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	New space for cultural events will add to the OAs assets and may be of benefit to local groups such as faith communities. New open space has the opportunity to enhance the setting of historic environment assets.
IIA 13 To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓	✓✓	✓✓	New parks, green routes, trees, planted landscaping, green surfaces and enhancements to existing open spaces will expand and reinforce the wider green infrastructure network. Including nature conservation in the role of open space and enhancing strategic habitat corridors will protect and enhance biodiversity and increase access to nature. The biodiversity benefits of sustainable drainage systems will be maximised. The new key amendment to the Green Infrastructure policy aims at securing sufficient public and open space given the high density of development proposals. This will help in enhancing access to open and green space as well as serve as a beneficial policy in terms of biodiversity.
IIA 14 To reduce vulnerability to flooding	✓	-	✓	✓	Major development will incorporate sustainable drainage systems to reduce the risk of surface water and sewer flooding, which could mitigate risk to vulnerable groups such as homeless people. To avoid expenditure and disruptive upgrades to the current sewer network, key amendments have been made relating to S106 payments to minimise surface runoff from new developments that would contribute to water and sewer flood risk.
IIA 15 To provide everyone with the opportunity to live in a decent home	✓	-	✓	✓	Green and environmental infrastructure will help enable the delivery of new homes.
IIA 16 To promote sustainable transport and minimise the need to travel by car	✓	-	✓	✓	Green links will encourage people to choose to cycle or walk for more journeys, making routes more attractive for older people, children and for people with certain disabilities or mental health problems.
IIA 17 To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	Sufficient open space will be provided to prevent a decrease in provision standards with the increased population from new development. Maximising street trees and green surfaces will allow the acceptable design of denser urban neighbourhoods. Collaborative approaches to sustainable drainage greywater systems, flexible delivery of the neat network and area-based approaches to air quality improvements will help facilitate deliverability across groups of sites

IIA Objectives	Central area	Timescale			Draft AAP Policies
		S	M	L	Commentary on Results
IIA 1 To tackle poverty and encourage wealth creation	✓	-	✓	✓	There may be a displacement of businesses and jobs from development sites in the central area due to some existing employment sites and trading estates which are proposed for residential use. If these sites come forward for redevelopment before the mixed use employment areas have intensified there will be fewer opportunities for retention. However in the Galleywall Trading Estate and Bermondsey Trading Estate and railway arches in this area, the industrial sector is anticipated to grow and be protected. Impacts on jobs and the population will vary depending on phasing however in the long term land uses are expected to be more compatible in this location. OKR 11 and OKR 13 have been retained as strategic industrial land to ensure the retention of industrial land in the OKR area and ensure continuation of current sectors.
IIA 2 To improve the education and skill of the population	✓	-	✓	✓	New school places will be provided to serve the increased population and increasing the education options for children and young people. Diversification of the economy will provide opportunities for a greater range of employee training. It will be important to manage the access to people who are currently unemployed or on low incomes.
IIA 3 To improve the health of the population	✓✓	x	✓	✓✓	New healthcare and treatment facilities will be provided to serve the increased population and improved accessibility may benefit groups dependent on regular healthcare access. The consolidation of employment areas and reducing the impact of existing trading estates within residential areas would benefit health. Short term impacts of construction through dust, noise, air quality and disruption to active travel routes could affect the resident population and will need to be managed.
IIA 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Improvements to the residential neighbourhoods by establishing new housing, links and open spaces would improve crime levels and reduce fear of crime around quiet industrial areas.
IIA 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	New open space and social infrastructure will maintain the overall level of provision for the population. New housing will benefit all groups, including older people, people with disabilities, people on low incomes and students. Better community cohesion may be established by introducing new housing to existing residential areas and consolidating industrial areas away from residential.
IIA 6 To reduce contributions to climate change	✓	x	-	✓	The densification of under utilised land and improved performance of new development can enable long term carbon savings. In the short term the embodied carbon emissions in demolition and construction will adversely contribute to climate change.
IIA 7 To improve the air quality	-	-	-	?	It will be important to manage the impacts of construction on air quality and the long term sensitivity of intensified development to the existing poor air quality in the area and achieve improvements if possible.
IIA 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Additional population levels will increase waste from both commercial and domestic developments. It will be important to maximise the reuse and recycling of waste during construction and in new development.
IIA 9 To encourage sustainable use of water resources	-	-	-	-	Additional population levels will increase water consumption from both commercial and domestic developments. It will be important to maximise the efficiency of water use and reuse during construction and in new development.
IIA 10 To maintain and enhance the quality of land and soils	✓	-	✓	✓	Providing higher density mixed use development will use land more efficiently as a resource and provide opportunities to remediate contamination benefiting health.
IIA 11 To protect and enhance quality of landscape and townscape	✓✓	-	✓	✓✓	The central area will benefit from strengthening neighbourhoods by the redevelopment of industrial sites as residential where sites are in established residential areas. The consolidation and growth of industrial areas make efficient use of land adjacent to railways where residential development would be less suitable. This will benefit overall health by creating quiet residential only neighbourhoods limiting the impacts of heavy traffic and pollution. Care will need to be taken to successfully manage the impact of tall buildings and maximise their contribution to the urban design of the area.
IIA 12 To conserve and enhance the historic environment and cultural assets	✓✓	✓	✓	✓✓	The central area introduces opportunities to sustain and enhance the significance of heritage assets including three conservation areas and key listed buildings within residential neighbourhoods.
IIA 13 To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	New open space would be expected to accompany new high density residential development. The provision of green spaces would improve the long term health and wellbeing of the population and may benefit children through provision of new play spaces.
IIA 14 To reduce vulnerability to flooding	-	-	-	-	It will be important to ensure new developments maximise flood resilience and the use of sustainable drainage systems.
IIA 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	The central area will benefit from strengthening residential neighbourhoods and amenity for existing and new residents by the redevelopment of industrial sites as residential where sites are in established residential areas. Providing good quality housing benefits the health and wellbeing for many groups including families, children and older people, and people with specialist needs such as those with learning or physical disabilities.
IIA 16 To promote sustainable transport and minimise the need to travel by car	✓	-	-	✓	Improving linkages across the area to encourage walking and cycling will improve health through physical activity. Some areas of redevelopment will be further away from Old Kent Road and new underground stations however improving connections will be key.
IIA 17 To provide the necessary infrastructure to support existing and future development	✓	?	-	✓	It will be important to ensure new residential development is accompanied or served by good health, community and education facilities and improves public transport options, to benefit the health of the population.

IIA Objectives	Southern area	Timescale			Draft AAP Policies
		S	M	L	Commentary on Results
IIA 1 To tackle poverty and encourage wealth creation	✓✓	?	✓	✓✓	There will be an overall increase in the number of jobs in the area, from approximately 1,800 now to approximately 2,000 by the end of the plan period which will increase opportunities for employment. New employment space will build on the existing strengths of the current character of the area such as encouraging the provision of light industrial, creative workspaces in focused workspace clusters. It will also diversify the overall job market by introducing more retail and other town centre uses and services along the Old Kent Road frontage. This will increase both access to jobs and services for the local community, which will reduce the chances of unemployment and poverty. This will be supported by a large number of new homes in which local residents and people from further afield will be able to stimulate the local economy through local spending. Targeted clusters for types of workspaces will enable the local employment market to sustain itself in a more intense urban form, gaining a critical mass and opening up opportunities for other supplementary services such as retail and other customer facing aspects of business. This will also open up the integration of community and training schemes with the employment clusters and jobs sectors. There is a short term risk of displacement of existing employers being displaced by redevelopment; however employers which currently contribute to the Old Kent Road local economy should be accommodated for in new development where appropriate and feasible. Land ownership is relatively fragmented across the majority of development sites, meaning it is currently difficult to plan which sites come forward for development in phases.
IIA 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	New schools will be delivered to accommodate the increased population in the area. There is the potential to increase opportunities for education and training schemes by intensifying jobs into focused clusters which build on the existing strengths of the southern area's employment uses. This opportunity may be through linking with the light industrial creative manufacture studio-based employment and creative premises and cultural organisations like those currently in the area. The southern area is also relatively close to the arts-based Goldsmiths College in New Cross in the London Borough of Lewisham, providing future opportunities for cross-boarder skills, training and education schemes. The large amount of development, much of which will be large schemes delivered on large sites, will enable us implement our borough-wide planning policy of requiring local construction training and apprenticeship programmes, as well as guaranteed employment for local residents in the completed development, where appropriate.
IIA 3 To improve the health of the population	✓	?	✓	✓✓	There is a large opportunity to improve the health of the population through rationalising and re-integrating existing employment sites into higher density sustainable mixed use neighbourhoods. Such a change in land uses, urban form and layout will encourage walking and cycling, avoiding the current concentration of industrial sites, which can cause a large amount of Heavy Goods Vehicle traffic and air pollution. New open and green spaces will also provide the opportunity for recreation and exercise, improving the health of the population. The increased residential population through the large number of new homes will create demand for new health centres and facilities which will need to be delivered as part of development proposals in the area. In the shorter term, there is a risk of potentially increased HGV movements due to increased construction activity which may have air quality, safety and amenity impacts for pedestrians and cyclists. These impacts will need to be carefully assessed and managed.
IIA 4 To reduce the incidence of crime and the fear of crime	✓✓	✓	✓✓	✓✓	The current urban form for much of the southern area (for example, industrial estates and retail parks) is not designed to minimise the incidence of crime or perception of crime through typical designing-out-crime principles. Development proposals for these types of sites will be required to implement designing-out-crime principles, including a clear network of streets and paths for way finding, a mix of land uses enabling street activity through out the day and evening and architectural and landscaping details. These measures will help to reduce the incidence of crime and fear of crime. An increased residential population and intensified and increased employment clusters will increase street activity, helping to engender a greater sense of safety.
IIA 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	?	✓	✓✓	The redevelopment of the current employment sites in the southern area of the Old Kent Road opportunity area will promote community cohesion by enabling people to reconnect and mix in walkable sustainable neighbourhoods. Redevelopment of sites will improve general accessibility through improved public realm for groups with mobility issues. The increased residential population will create demand for new community facilities and open and green spaces in the area which will be delivered as part of development. There is a risk that many church groups based in industrial and other types of no-purpose-built buildings could be displaced if not reprovided for in development proposals. These church groups are largely composed of people from BME backgrounds, meaning there could be a disproportionate impact on this group. However, we will be encouraging the best use of community facilities to include provision for faith groups to meet in spaces shared with other uses such as schools. Increased construction activity has the potential to disrupt residents and will need to be managed carefully.
IIA 6 To reduce contributions to climate change	✓	x	?	✓	Creating new walkable higher density mixed use neighbourhoods based around public transport connections and open space will help to reduce carbon emissions. Due to the quantity of development potential, there is a risk the scale of intensification of land uses will use more energy and contribute to a greater amount of carbon emissions. However, other policies in the plan, such as our energy and flood risk policies, will help to manage and mitigate this impact carefully. There is also a short term risk of increase in carbon emissions through construction activity.
IIA 7 To improve the air quality	?	x	-	?	There is a risk that due to the intensification of land uses proposed and the higher density the land uses will be delivered in, air quality could be impacted negatively through increased building and vehicle emissions, particularly during extended construction phases of development. However, the AAP air quality policy will attempt to offset this. The development of a new tube station in the south area should improve air quality in the long term by reducing car use.

IIA 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	?	The southern area currently hosts the Integrated Waste Management Facility (IWMF), a state of the art waste processing plant for both the public and wider waste industry contractors to use. The facility has several different sustainable functions to process waste in a variety of ways. The AAP seeks to secure future-proof development around the IWMF. Additional population levels will increase waste from both commercial and domestic developments. It will be important to maximise the reuse and recycling of waste during construction and in new development.
IIA 9 To encourage sustainable use of water resources	?	?	?	?	An increased population living and working in the opportunity area will increase demand on water resources. These impacts will need to be carefully managed through planning policy and monitoring.
IIA 10 To maintain and enhance the quality of land and soils	✓✓	✓	✓✓	✓✓	Enabling the redevelopment of industrial sites, particularly the gasworks as a park, will require land remediation where contamination exists, before development proposals are built out. This will improve the quality of the land and soils. The gas works site is likely to come forward later rather than sooner in the plan period.
IIA 11 To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	The southern area currently has limited buildings and spaces identified as having townscape merit, and where they do exist they will be required to be successfully integrated into and enhanced by development proposals. Due to the current lack of identified buildings and spaces of townscape merit there is a significant opportunity for development proposals to enhance the quality of the town and landscape through redevelopment.
IIA 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	The southern area currently has a small number of listed buildings and conservation areas. There are also several buildings of architectural or historic interest scattered across the area. These assets will be required to be successfully integrated into and enhanced by development proposals.
IIA 13 To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓	✓✓	✓✓	The southern area has several existing open and green spaces which are well used, and in the future the area will need more due to the increased population. The southern area has several larger open spaces indicatively planned as part of site allocations, as well as a key green spine proposed along the route of the former Surrey Canal. This will help to enhance access to open and green space and biodiversity.
IIA 14 To reduce vulnerability to flooding	✓	?	✓	✓	New green spaces in the southern area will help reduce flood risk by slowing down surface water runoff. However, it is anticipated that the green spaces will be delivered later in the plan period rather than sooner. There is a need to ensure development proposals reduce the risk of flooding through applying the AAP's flood risk and SUDs policy.
IIA 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓	✓✓	The southern area has the potential to accommodate approximately 13,700 new homes. This will significantly increase the opportunity to access housing which is well designed, built to a high standard and fit for purpose. However it will be important to ensure a proportion of the homes are affordable so they are accessible to people on lower and middle incomes, as these are the groups that in some circumstances would otherwise not be able to access decent housing.
IIA 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓	✓✓	The southern area is likely to host one of the two London Underground stations for the Bakerloo Line Extension (BLE). This would improve public transport accessibility and enable a rationalisation of bus services which currently clog the Old Kent Road. Development would also be required to implement walking and cycling routes and connect and integrate with surrounding neighbourhoods and development sites which will promote and encourage walking and cycling. The proposed residential densities and clustering of employment uses will help ensure a critical mass to sustain all necessary services within easy walking distance. Car parking provision will be minimised and the large surface car parks currently on the big box retail development sites in the southern area such as the Cantium retail park will not be reprovided for space-for-space, and will not be at grade level. This will help to minimise travel by car.
IIA 17 To provide the necessary infrastructure to support existing and future development	✓	?	✓	✓✓	The southern area contains a large amount of development potential, including a significant number of homes and jobs. This will also require supporting infrastructure including public transport provision, community, and health and education facilities as well as public and private green and open space. This supporting infrastructure will be required to be delivered through the site allocations in the AAP. Site allocation OKR 18 has been expanded to include the New Cross electricity substation and has been amended to maintain the longevity of the waste management facility but remains within the site allocation to reflect the aspiration for integration in the long term