



Old Kent Road Area Action Plan
Proposed Submission Version
October 2024

Integrated Impact Assessment

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

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 AAP: Further Preferred Option	December 2017 - March 2018
Consultation on AAP: December 2020 Version	January 2020 – April 2021
Consultation on the submission version Old Kent Road Area Action Plan and Integrated Impact Assessment Report	2024
Submission of the draft Old Kent Road Area Action Plan Integrated Impact Assessment Report to the Planning Inspectorate	2025
Examination in Public	2025
Adoption of the Old Kent Road Area Action Plan	2025

HOW TO COMMENT ON THIS REPORT

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Glossary

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

Section 1. Non technical summary

Purpose of the Area Action Plan

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

Vision

- 1.4 Our vision is for a family friendly Old Kent Road that retains and grows the rich diversity of its residential, business and faith communities, delivering the smile in the Central London Smiley.
- 1.5 "This is Old Kent Road not any old road", was a response from a local resident in a community forum that reflects the pride in its history and a strong sense of belonging. The Old Kent Road area will be a place where communities and families can flourish; a safe place to grow up and to grow old in. It will continue its historic role as a vital artery connecting the commerce and culture of one of the world's great cities to Europe but in a much changed form that places it at the heart of the community.
- 1.6 The Old Kent Road area's strength as a place to live, work and do business in is its Central London location and character. The Bakerloo Line Extension will drive London's growth southwards providing better connections to London's opportunity areas and key employment centres, as illustrated by the Central London Smiley. This will provide tangible, direct benefits to the people of Walworth, Bermondsey and Peckham including a new and improved family friendly environment with housing, youth facilities, schools, parks, leisure and health centers and the creation of a wide

range of jobs. These changes will enable the communities to realise their potential. There should be no poverty of ambition or opportunity in the Old Kent Road area irrespective of race, gender or age.

- 1.7 To achieve this, our plan promotes the intensification of industrial uses, and the co-location of residential and industrial/workspace in order to deliver the homes and jobs targets set out in the plan. Done with care, we believe that this can deliver a special place that is desirable to both live and work in. We want to grow the already significant local economy, not just by accommodating a narrow professional office sector, but by supporting and encouraging a wide range of skills and job types, “from laptops to forklifts”. This will include businesses that serve both the local area as well as central London and beyond.
- 1.8 London’s high streets are an important focus of activity for local communities providing services and opportunities for social interaction. Our plan is to promote the Old Kent Road as a place in which shops, cafés, pubs, cinemas and parks are all within a short 15 minute walk of people’s homes and jobs. We will re-vitalise the Old Kent Road as a high street, adding to the diversity of its shopping and leisure offer whilst retaining the large supermarkets which provide an important and accessible source of affordable groceries to local communities. Segregated cycle lanes, additional trees, wider footways and better crossings will change the character of the Old Kent Road area for the better making it feel safer and more attractive.
- 1.9 Underpinning our approach to housing, jobs and the high street the Greener Belt strategy provides the open space framework that will knit local communities together. Our plan proposes to link the area’s existing open spaces, including Burgess and Southwark Park with new park spaces in the Old Kent Road area, Canada Water and in our neighboring boroughs. Green in every sense of the word, the Greener Belt will accommodate new cycling and walking routes, help reduce flooding, increase biodiversity and provide opportunities for play, sport, food growing, or simply sitting down to take a break. We want to work with local communities to create an environment that delights all the senses.
- 1.10 We want to build new homes, a minimum of 35% of which will be affordable with 25% being at council rents. And while they should come in a range of types, from terraced houses to apartment buildings, they should all be designed to a high standard. The provision of larger sized flats, generous room sizes, high ceilings and large windows will make sure that people have enough space to think and rest, promoting their health and wellbeing.
- 1.11 The Old Kent Road area has the highest proportion of children and young people in the borough and is likely to experience the largest increase in its younger population to 2036. We have been talking to and working with young people to secure the provision of new youth facilities funded by developer contributions at 231 Old Kent Road and Leyton Square, and we will look to expand and develop that offer to meet the growing need.
- 1.12 A key part of our commitment to the Climate Emergency is the delivery of net zero carbon development in the Old Kent Road area. Development will be car free and the promotion of walking and cycling as well as electric buses, taxis and commercial vehicles will help to tackle air and noise pollution. The District Heat Network (DHN)

linking new developments to the South East London Combined Heat and Power Plant (SELCHP), will deliver significant savings in CO2 emissions and cheaper energy costs for residents. This will benefit our collective long term futures.

- 1.13 Living at the centre of one of the world's great cities, with its enviable economic and cultural capital should be an opportunity for all and not just a privileged few. We have a responsibility working with the residents and businesses of the Old Kent Road area to make the most of that opportunity.

What is this document?

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

Why is this document required?

- 1.16 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.
- 1.17 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.

- 1.18 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.
- 1.19 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.
- 1.20 Crucially, assessing policies from these different perspectives - that is 1) a sustainability perspective (including environmental, social and economic sustainability), 2) an equalities perspective and 3) a health perspective - will enable a considered and holistic approach to assessing the proposed policies in the AAP/OAPF in an integrated way.

Why do we need an AAP for OKR?

- 1.21 The purpose of the Old Kent Road Area Action Plan (AAP) is to set out how the best of the Old Kent Road, including its thriving businesses and arts and cultural communities, can be nurtured and developed over the next 20 years (the 'plan period'). It is an innovative plan, with policies that will guide new development to provide urgently needed housing and jobs, whilst providing new opportunities and improving the lives of people who live and work there now. To achieve this, the plan proposes mixing residential and commercial uses, so that new and existing businesses like warehouses, shops, creative workspaces and offices are designed to co-exist with new homes.
- 1.22 This innovative approach is proposed because the unique conditions and character of the Old Kent Road provide an important opportunity to address the challenges faced across London when it comes to accommodating growth in homes, jobs and social infrastructure. These challenges are particularly pressing in Central London, where competition between land uses is at its most intense. By virtue of its location, connections, existing uses, evolving character and development potential, the Old Kent Road is one of the few places in central London that really can deliver innovative solutions to these challenges.

Section 2. Introduction

What does this document do?

- 2.1 The IIA identifies the impacts of the AAP policies on sustainability objectives, health of the population and equality groups. The process has consisted of a collection of baseline information on the environmental, social and economic characteristics of the Old Kent Road (scoping). This has been used to identify sustainability issues, objectives and indicators used to assess the likely impacts of the policies of the AAP and to enable monitoring of the process in the future. The IIA considers the likely impact of two different options for growth in the area, low, medium and high growth based on the evolution of evidence base documents and discussions with the local community. The IIA considers the likely impact of three different options for growth and considers Option B- high growth to be the most appropriate option. The IIA then assesses the policies for development and the character areas containing site allocations in the AAP against the sustainability objectives and identifies any areas which would need to be mitigated or monitored in the plan process.
- 2.2 This submission (Regulation 19 version of the AAP) has been prepared in response to the previous consultations. This consultation is to ensure that all residents and visitors have an opportunity to comment on all policies prior to submission of the plan for an examination-in-public.
- 2.3 The methodology for selecting these IIA Objectives, appraising Proposed changes to the Old Kent Road Area Action Plan policies, sub areas and site allocations and future monitoring of the OKR AAP are established in the subsequent section of the report. Each of the IIA Objectives is monitored by a number of Baseline Indicators, which are established in **Appendix 3: Baseline data – Facts and Figures**. This uses existing data monitored by the council, to regularly indicate sustainability outcomes from the implementation of the OKR AAP. The Baseline Indicators to continuously monitor the adoption of the OKR AAP are presented in table format in Appendix 9: Baseline Indicators Table.
- 2.4 The role of this document is to explain the process that the council has undertaken to establish these IIA Objectives, which are legally compliant with European, national and regional legislation. Secondly, to appraise the OKR AAP policies, sub areas and site allocations using these IIA Objectives and Baseline Indicators, which can be found in **Appendix 5: Assessment of the Strategy, Appendix 6: Assessment of the Strategic and Development Management Policies** and **Appendix 7: Assessment of the Sub Areas and Site Allocation Policies**. Thirdly, this document indicates how the council proposes to continue to monitor the consequences of implementing the draft Old Kent Road Area Action Plan (Option B: High growth scenario with two stations under BLE over Option A: Business-as-usual without the BLE) in Appendix 9: Baseline Indicators Table. As such, it presents a case that the draft OKR AAP is legally compliant with all relevant legislation, plans and programmes, as established in **Appendix 2: Relevant Plans, Programmes and Strategies**.
- 2.5 The Council has previously completed a thorough IIA for the OKR AAP in 2017 and 2020. This IIA has been further updated to reflect the changes in the OKR AAP arising from consultation comments, council objectives, local need and iterations in the Old Kent Road masterplans.

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

What has been taken from the previous IIA?

- 2.9 Having undertaken a detailed IIA through previous draft AAP consultations, it is considered that the six strategic policies (or topic areas) were positively represented through the seventeen IIAOs, and will continue to reflect this in the future monitoring of Baseline Indicators (**Appendix 9**). It is considered that these are applicable to the Old Kent Road Area Action Plan and have been used in this IIA appraisal. Additional Baseline Indicators have been added that reflect the local need, character and demographic of the Old Kent Road.
- 2.10 Key positive impacts are identified in terms of social, economic and environmental sustainability in the summary of appraisals provided in this report. Some risks have been identified but these are generally mitigated by other policies in the plan.

Structure of this Document

- 2.11 This document will firstly outline the policy requirements for the IIA in the following chapter, with more detailed information provided in **Appendix 1 and Appendix 2**. Secondly, it will provide a background into the IIA and the OKRAAP, summarizing how the IIA developed through earlier consultations and how these have informed the iterations to the OKR AAP. Thirdly, it will provide a brief overview to the approach taken to collecting baseline data and subsequently forming baseline indicators that will be used to monitor the future impacts of adopting the OKR AAP. The entirety of

baseline data, including baseline indicators and contextual characteristics are included in **Appendix 3**.

- 2.12 Section four provides detailed overview into the IIA appraisal methodology, describing the conjunction of baseline indicators and IIAOs, used to appraise the OKR AAP policies, area visions and site allocations. The formation of the IIAOs, to inform sustainability, health and equalities targets are provided in **Appendix 4**. This appendix describes how the IIAOs were selected based on the requirements of regulation described in **Chapter 2**, to justify legal compliance of the proposed AAP to meeting sustainability, health and equality targets. It also indicates the targets of the Council's baseline indicators which are continuously being monitored across different teams at the Council, and how these baseline indicators align with the objectives, to support the negative and/or positive impacts of future adoption of the draft AAP.
- 2.13 Section five identifies the process of identifying options within **Appendix 10**, for the OKR AAP, summarizing the OKR AAP Scoping Report that was submitted and consulted upon in 2015.
- 2.14 This is included in full in **Appendix 11** and justifies why the selection of the option for High Growth is identified as more supportive to the health, sustainability and equality objectives than Option A: Business-as-usual. Further information on the Council's considerations of reasonable alternatives for planning for growth and the site allocation capacities which informed the final indicative site capacity assumptions are set out within **Appendix 12**.
- 2.15 Section six sets out how the seventeen objectives were developed that formed the basis of the IIA appraisal methodology and assessment; and further details on how the IIA appraisal was carried out. This sets out the policy options and policy evolution of the OKRAAP.
- 2.16 Section seven sets out what the IIA framework is and how it is compiled.
- 2.17 Section eight summarizes the full Sustainability Appraisal of the OKRAAP policies, found in detail in **Appendix 5, 6 and 7**, and identifies any mitigation or negative impacts that could arise based on the objectives as a result of adopting policies from the draft Area Action Plan. This chapter is a summary and overview as to whether the policies are positively prepared to support the sustainability, health and equality objectives of the regulatory bodies in adopting the draft Area Action Plan. Section eight also summarizes the appraisals from **Appendix 5** of the sustainability of the Strategy.
- 2.18 Section nine summarizes the appraisals from **Appendix 6** of the sustainability of the policies of the OKRAAP.
- 2.19 Section ten summarizes the appraisals from **Appendix 7** of the sustainability of the Sub Area and Sites. Section eight further summarizes the approach to the sequential test (and exception test if required).
- 2.20 Finally, the section 11 chapter sets out how the impacts of the OKR AAP on sustainability, health and equality will be monitored based on continued feedback from the Baseline Indicators. This is included in further detail in **Appendix 8 and Appendix 9**.

Section 3. Regulatory requirements for the IIA

Why is this document required?

- 3.1 Under the Planning and Compulsory Purchase Act 2004 regulations, a Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA), prepared in accordance with the Strategic Environmental Assessment Directive EC/2001/42 is required for all Development Plan Documents.
- 3.2 Paragraph 32 of the NPPF (2023) states:
- 3.3 “Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)”.
- 3.4 Southwark Council has a statutory duty to consider the equality impacts of its decisions. The public sector Equalities Duty (section 149 of the Equality Act 2010) came into force on the 5th April 2011 which extended the previous duties to cover the following protected characteristics:
- 3.5 “Age, disability, gender reassignment, pregnancy and maternity, race – including ethnic or national origins, colour or nationality, religion or belief – including lack of belief, sex and sexual orientation”.
- 3.6 While there is no statutory requirement to undertake a Health Impact Assessment (HIA), the government has clearly expressed a commitment to promoting HIA’s at a policy level in a variety of policy documents and they are increasingly being seen as best practice.

The move towards Integrated Impact Assessment

- 3.7 The council is also required by UK law to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics, as set out in the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act 2010). The council carries out Equalities Analysis (EqIA) of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals on the key ‘protected characteristics’ in the Equality Act 2010 and on Human Rights.
- 3.8 The Equality Act was introduced in October 2010. It replaces and extends all previous equality legislation into one overarching act. The Equality Act 2010 outlines a number of ‘protected characteristics’, which are the groups of people or communities where the government feels that discrimination or unfair treatment could arise.

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

Strategic Environmental Assessment Directive

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

Habitats Regulations Assessment

- 3.16 The Conservation of Habitats and Species Regulations (as amended) (2010) [the Habitats Regulations] require that Habitats Regulation Assessment (HRA) is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to

assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance.

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

Health Impact Assessment

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

- Housing design and affordability;
- Accessibility and active travel;
- Healthy environment; and
- Vibrant neighbourhoods.

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

Section 4. Background

Purpose of the Integrated Impact Assessment

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

Planning and Sustainable Development

- 4.2 The National Planning Policy Framework (NPPF) (2023) provides the over-arching national policy to deliver sustainable development through the planning process. There are three dimensions to sustainable development: economic, social and environmental, giving rise to the need for the planning system to perform a number of roles:
- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
 - An environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
- 4.3 The National Planning Policy Framework states that: “Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains.” (NPPF, para 32).
- 4.4 The NPPG sets out the key stages and tasks for the SA process and their relationship with the Local Plan process, which are illustrated in Figure 4.1. It is important to note that IIA is an iterative and on-going process. Stages and tasks in the IIA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.

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

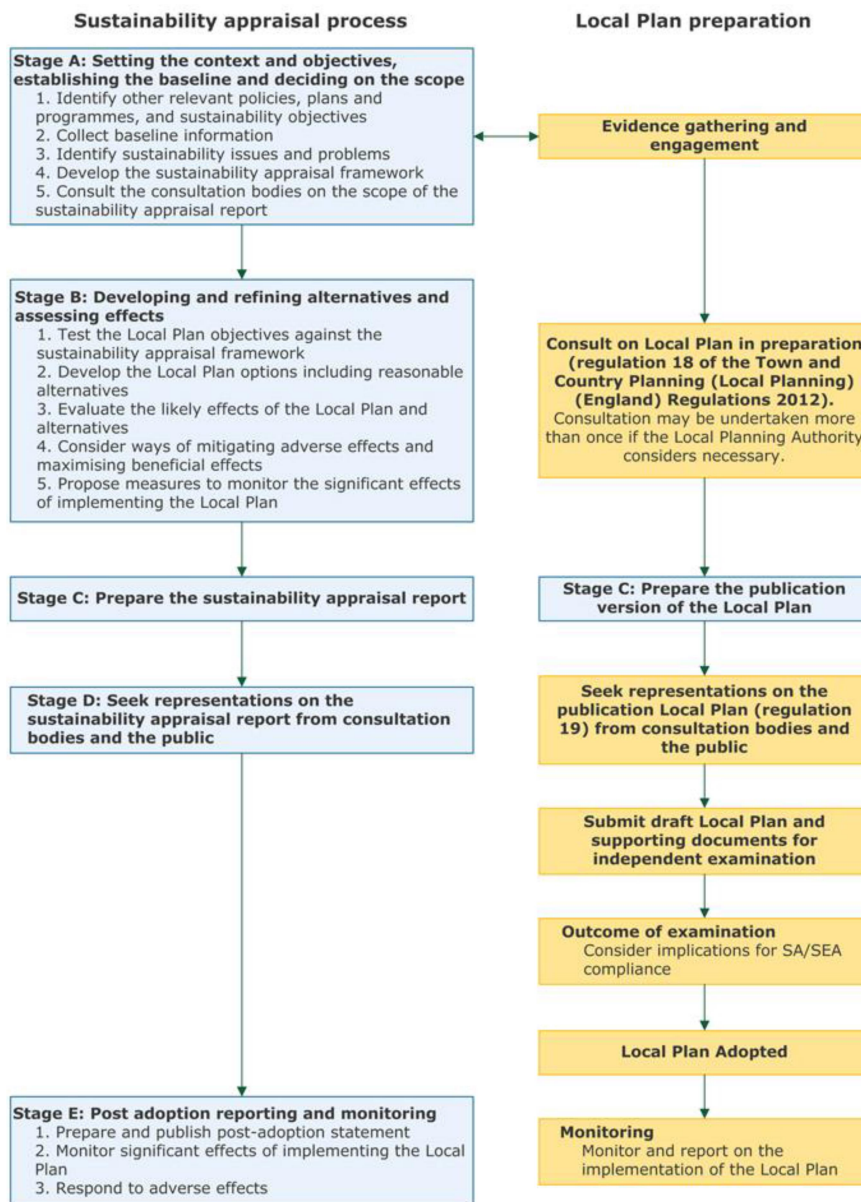


Figure 4.1 from Local plan-making, National Planning Practice Guidance 2014

Process

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

Stages of the preparation on the draft OKR AAP

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

- 4.8 We initially assessed and consulted on three options for the plan. In the 2020 version of the AAP we refined these options to reflect the two scenarios that would likely be delivered in reality, with or without extension of the Bakerloo Line.
- 4.9 In developing the submission version AAP we have continued to assess the sustainability implications across the area. We will also consult the same groups and organisations on the sustainability report at the submission stage. An extensive list of local consultees on our planning policy database were consulted.

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

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

Consultation Responses on the IIA

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

Social Regeneration Indicators (Fairer Future Promises)

- 4.15 Southwark Council has prepared a set of social regeneration indicators which will monitor social regeneration impacts in the borough. The social regeneration indicators

will sit alongside the Council Plan to monitor the high-level impact that our actions are having across the borough and the progress we are making in achieving our regeneration for all ambitions.

- 4.16 The council adopted an initial Southwark Regeneration Framework in September 2017. A revised Regeneration that Works for All Framework was adopted in January 2019. The Framework identifies 10 Social Regeneration Charter Areas in the borough. A Social Regeneration Charter must be prepared for each area which will set out the vision, the specific opportunities, challenges and our priorities for the area, using the Social Regeneration Indicators as a means of monitoring.
- 4.17 Details of the Old Kent Road Social Regeneration Charter are set in **Appendix 2 Relevant Plans and Strategies**. This document was drawn up in consultation with the local community and sets out social regeneration objectives that have informed the vision and objectives for the OKRAAP.
- 4.18 The outcomes measured through the Social Regeneration Indicators inform the IAOs and Baseline Indicators described in **Appendix 4** and **Appendix 8**.

Identifying Other Relevant Plans, Strategies and Programmes

- 4.19 To establish a clear and concise scope for the IIA it is necessary to identify and review the relevant policies, plans and programmes that may influence the content of the draft OKR AAP. The process of an IIA appraisal enables potential relationships to be identified that will allow any synergies to be exploited and any inconsistencies and/or constraints to be addressed. Additional objectives and indicators which would assist in analysing and comparing economic, environmental and social impacts are also identified.
- 4.20 The policy framework is constantly evolving: at a national level, the NPPF and NPPG are now in place; at a regional level, the London Plan 2021 and associated SPG's are subject to on-going review.
- 4.21 At a local level, planning decisions in Southwark are influenced by a number of statutory plan-making authorities and policy is developed with regard to corporate Council-wide strategies. In addition the evidence base draws on the Southwark Plan and associated framework documents which were adopted in February 2022.
- 4.22 **Appendix 2** provides an overview of the key international, national, regional and local policies, plans and programmes that inform the OKR AAP and the accompanying IIA.

Government policy

- 4.23 The National Planning Policy Framework (NPPF) was updated in 2023. To aid understanding and interpretation of the NPPF, the government also produced topic-based National Planning Practice Guidance (NPPG). However, the guidance does not constitute formal policy and so does not hold significant weight in the determination of planning applications. The NPPF seeks to establish planning policies applicable to the UK as a whole. Unless otherwise justifiable, all regional and local planning policy must be in general conformity with the NPPF.

The London Plan

4.24 The London Plan 2021 contains the regional planning policy for Greater London as a whole. The London Plan considers long-term, large scale, strategic issues as well as more detailed policy suited specifically to London, for example prescribing acceptable levels of density in a London context. The Mayor of London also produces more detailed Supplementary Planning Guidance (SPG) to aid understanding and interpretation of the planning policies in the London Plan. Unless otherwise justifiable, all London borough local planning policy must be in general conformity with the London Plan.

Southwark policy

4.25 The Southwark Plan was adopted in February 2022. It contains the overarching spatial plan and vision for the borough; detailed development management policies used to assess planning applications; and incorporates area specific policies. It is noted throughout this IIA that some of the policies in the proposed submission version OKR AAP have been diluted since the 2020 draft version to reflect the adoption of the Southwark Plan.

4.26 Other area and topic based Supplementary Planning Documents (SPD's) - These do not constitute planning policy and their purpose is to aid understanding and provide a more detailed interpretation of and guidance to local Southwark planning policies.

4.27 Neighbourhood Plans – Southwark has several Neighbourhood Forums either established or currently in the process of being established with the objective of designating a Neighbourhood Area. Designated Neighbourhood Forums are able to prepare a Neighbourhood Plan which must be in general conformity with the local, regional and national planning policy. There are currently no Neighbourhood Plans which impact the Old Kent Road area.

4.28 The Local Development Scheme (LDS) sets out the timetable for the preparation and adoption of Southwark's various planning policy documents (such as those listed above). This schedule takes into account the different stages of plan preparation including evidence base preparation, background studies, and various consultation phases and where relevant any public hearings that the Council will need to satisfy before adopting policies. This is updated annually.

Old Kent Road's Area Action Plan

4.29 Once adopted the Old Kent Road Area Action Plan (OKR AAP) will become area-specific planning policy for the Old Kent Road Opportunity Area. New development in the Old Kent Road will need to be in compliance with the OKR AAP and the Southwark Plan.

4.30 The OKR AAP explains the council's vision for regeneration of the Old Kent Road from 2019 to 2036. . The OKR AAP:

- Sets out an indicative masterplan and policies to support:
- The delivery of:
 - 20,000 new homes of which 7,000 will be affordable

- 2 new tube stations on the Bakerloo Line Extension
- 10,000 new jobs
- New health centre
- Two new district town centres and a revitalised high street
- The protection of local businesses and attracts more businesses into Old Kent Road to increase job opportunities
- The enhancement of local distinctiveness and protecting our heritage assets
- The delivery of new open spaces, green infrastructure and to promote opportunities for healthy activities

4.31 The OKR AAP also explains how development will be delivered and may inform future decisions about investment in infrastructure to help implement the Southwark 2030 Plan².

What are the Sub Areas and Site Allocations?

4.32 **Sub Areas:** The Old Kent Road's neighbourhoods each have a rich, varied and unique character. The OKR AAP contains a vision and masterplan for each area setting out what the neighbourhood will be like in the future, and how new development will help achieve this. The sub areas set out the existing individual character of the Old Kent Road's neighbourhoods and how the OKR AAP will help to build on this character as sites come forward for development. They will set out how development will seek to protect, enhance and incorporate heritage assets in new development and will identify key opportunities for new development including improvements in public realm, walking and cycling routes, health and education facilities and green links.

4.33 **Site allocations:** Site allocations comprise a detailed list of potential development sites that the council has identified for future development. Councils are required to identify and allocate development sites in their local plans to help ensure strategic needs for housing, employment, schools and health facilities and more can be met. To ensure this, the council has the opportunity to set out key land use and other requirements for each site, including indicative densities, routes through sites and any other requirements the council deem necessary. Each site also has an illustrative masterplan to indicate how the development will configure together to deliver housing, employment, community facilities, schools and open space. The Old Kent Road site allocations are also proposed in the New Southwark Plan which has been submitted for Examination.

Appraisal of the Sub Areas and Site Allocations

4.34 Sub areas provide the strategic vision for the future of each neighbourhood's illustrative masterplan. They set out key infrastructure enhancements, opportunities for public realm and transport improvements and growth opportunities for new homes and jobs. Sub areas also identify the prevailing character of different places to be renewed, retained or enhanced. Development proposals should be formulated in the context of the relevant sub area and should demonstrate how they contribute towards realising the sub area for that area.

4.35 Site Allocations are planning policies which apply to key potential development sites of strategic importance. Site allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and

contributes towards meeting strategic needs for new homes, jobs and infrastructure. Site allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. For example, site allocations may specify that development must provide new public open space, new public access routes, and new health or education facilities.

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

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

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

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

Table 4.3 Population groups considered in the HIA.

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

4.44 For the EqIA element of the IIA the impacts on the protected characteristics listed below in Table 4.4 will be considered.

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

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 same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).
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.

Table 4.4 Protected Characteristics included in the Equalities Act 2010 and their definitions as set by the Equalities and Human Rights Commission³

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

Southwark Council’s approach to equality: Southwark Council Equality Framework 2021

- 4.43 This report sets out the overarching equality objectives which are linked to the strategic priorities of the council. The objectives below will also be considered in the IIA and are set out below:
- Stand together against all forms of racism and discrimination
 - Tackle health inequalities so everyone can live a healthy life
 - Reduce the number of vulnerable people in our borough, including by providing targeted engagement and support to groups most affected by COVID-19
 - Provide decent homes for all
 - Give young people in our borough the best opportunities in life
 - Put communities at the heart of everything we do from services to decision-making,
 - ensuring everyone is heard especially marginalised communities
 - Deliver a fair and green economic recovery where no-one is left behind
 - Tackle abuse, harassment, exploitation and violence

Section 5. Baseline Data: Summary of findings

Links to other policies, plans and programs

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

Summary of baseline information

- 5.6 The aim of collecting baseline information is to assemble data on the current state of the area and the likely future state. The information then provides the basis for predicting and monitoring effects. Collecting baseline information is also a way of identifying sustainability problems and alternative ways of dealing with them.
- 5.7 Both qualitative and quantitative data has been used to inform the baseline analysis. Quantitative data has been taken from monitoring and research activities

currently being carried out by a variety of organisations. Qualitative information is more often based on judgement and is particularly useful for objectives that relate to the character and quality of the built environment.

5.8 A summary of the baseline information is provided in **Appendix 3**.

Problems in collecting baseline data

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

5.10 Monitoring is carried out more frequently for some indicators than others. In addition, some of the gaps in data still remain. In the future, if data is still not available for some indicators it may be more appropriate to select alternative indicators. However, in some cases where there are no suitable indicators relating to an objective, the objective itself may need to be revised or deleted. The baseline data has been used to describe the current social, economic and environmental characteristics. Where possible, data specific to the borough has been used.

Key environmental, health and equality issues

5.11 Table 5.1 identifies key sustainability issues that have been identified for the Old Kent Road AAP which the IIA will address. These have been abstracted from the findings of **Appendix 3** which divide contextual characteristics and baseline indicators into economic, social and environmental conditions.

5.12 These have also been identified through monitoring, engagement with stakeholders, a review of relevant policies, strategies and programmes and existing council evidence base documents, and a survey of baseline data and information about the borough.

5.13 The sustainability issues are set out in the context of a number of themes, in recognition of the over-arching status and the format of the draft OKR AAP.

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

Table 5.1 : Key environmental, health and equality issues	
Theme 1: Climate Emergency	
Mitigating against and adapting to the Climate Emergency	
•	Address the Climate Emergency by achieving carbon neutrality in the Old Kent Road
•	Create low carbon jobs and businesses
•	Reduce carbon emissions from transport of people and goods, and construction
•	Provision of public transport
•	Reduction in waste and more efficient use of resources

Theme 2: Quality Affordable Housing

Homes

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

Theme 3: Revitalised Neighbourhoods

Revitalised Neighbourhoods

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

Design, Heritage and Environment

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

Theme 4: Strong local economy

Business, Employment and Enterprise

- 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 and affordable workspace by specialist providers
- Maintaining progress in educational attainment, skills and aspirations of residents
- Facilitating the growth of an emerging life sciences cluster for South East London

Town Centres

- 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 5: Well-being: The best start in life, child and youth provision and Healthy streets

Social Infrastructure

- 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
- Provision of training, education, recreation and sports for children and youth

Theme 56: Movement and Transport

Travel

- 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 7: Cleaner, greener, safer

Sustainability

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

Section 6. Options-testing for the AAP

The Assessment of Options

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

Policy evolution

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

	2017	2020	2024
	Vision	Vision	Vision
	Strategy	Strategy	
	Delivery	Delivery	Delivery
	Funding	Funding	Funding
	Plan Objectives	Plan Objectives	Plan Objectives
AAP1	The Masterplan	Delivery of the Masterplan	The Masterplan
AAP2	Site Allocations	Bakerloo Line Extension and Infrastructure	Bakerloo Line Upgrade and Extension
AAP3	Infrastructure and Delivery	Climate Emergency (new policy)	Homes for All
AAP4	Social Regeneration to Revitalise Neighbourhoods	Quality Affordable Homes	Student Homes (new policy)
AAP5	Quality affordable homes	Businesses and workspace – The Bow Tie	Businesses and workspace – The Bow Tie
AAP6	Businesses and workspace – The Bow	Town centre, leisure and entertainment	Life Sciences (new policy)

	Tie		
AAP7	Town centre, leisure and entertainment	Movement – People, Place and Experience (Public and Surface Transport) (new policy)	Town Centres, Leisure and Entertainment
AAP8	Tall Buildings Strategy – The Stations and Crossings	Tall Buildings Strategy – The Stations and Crossings	Movement
AAP9	Character and Heritage	Character and Heritage	The Greener Belt Strategy – Parks and Healthy Streets
AAP10	Parks, streets and open spaces – The Greener Belt	Design (new policy)	Tall Buildings Strategy – The Stations and Crossings
AAP11	Cleaner, greener, safer	Parks and Healthy Streets – The Greener Belt	Character and Heritage
AAP12	Healthy, active lives	Cleaner, Greener, Safer	Design
AAP13	Best Start in Life	Best Start in Life	Climate Emergency
AAP14		Child and Youth Provision	Water Management, Air, and Noise Quality
AAP15		Sub Areas and Site Allocations	Great Start in Life/ Child and Youth Provision

Vision and objectives

- 6.7 The vision remains focused on re-establishing the Old Kent Road as one of London’s most important arteries, connecting the city to the rest of Europe. There are three prongs to the vision: the ‘Greener Belt’; ‘Connecting Communities’; and the South Central Cluster’. The funding section has been updated to reflect changes in funding streams and bids.
- 6.8 The ‘Central London Smiley’ images used in the previous version of the AAP have been retained but reformatted to better to convey the Vision.
- 6.9 The plan objectives have been reviewed and minor amendments made to reflect updates to policies and additional objectives since 2020.

Masterplans and phasing

- 6.10 The text content of AAP1 The Masterplan remains largely similar to policy in the draft OKR AAP 2020, but has been updated to ensure conformity with the Southwark Plan 2022 and the AAP masterplan and design codes. It also shows how the site allocations, including estimated numbers of homes and jobs which are identified in the Southwark Plan 2022 can be delivered.
- 6.11 AAP2 Bakerloo Line Upgrade and Extension now includes definitions to explain the acronyms BLE (Bakerloo Line Extension) and BLU (Bakerloo Line Upgrade). The timelines for the delivery of the BLE have been updated and the timescales of the the two-phase Housing Delivery Plan up to date, setting out that the 9,500 homes within Phase 1 are expected to be constructed by 2032, with the 10,500 in Phase 2 to be complete by 2042. References to investment in schools, health and leisure

facilities have been removed from the policy and placed in AAP13 'Great Start in Life'. With regard to monitoring, the policy upholds the commitment in the 2020 OKR AAP to undertake annual reviews of both the grant of planning permissions and the implementation of schemes.

Homes for All

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

Strong Local Economy

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

the estimated job numbers arising from this.

- 6.19 AAP6: Life Sciences is another new policy to be included in the draft OKR AAP 2024. It has been placed after AAP6 because of the common theme of seeking to diversify and strengthen the Opportunity Area's economy. The Old Kent Road area holds potential to provide wet labs and other facilities associated with medical and life science sectors. The policy is borne out of the Life Sciences Strategy produced and promoted by SC1 London, which aims to make south central London a world-recognised district for life sciences.
- 6.20 AAP7: Town centres, leisure and entertainment has been updated to make it clear that there are two District Town Centres in the Old Kent Road Area. The 'Strategy' section has also been updated to reflect changes to the NHS strategy for the borough by referring to the Old Kent Road health hub and including a map identifying sites where the health hub could be located. The 'Reasons' section of the policy has been updated to include details of redevelopments currently under construction, as well as local investment projects underway, including those that have received Future High Streets granting funding.

Movement

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

Three tall buildings will play in the townscape. There have also been some deletions where the wording reflected the Southwark Plan 2007 tall building policy, as this has now been rescinded since the adoption of the Southwark Plan 2022.

Design and Conservation

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

Environment

- 6.32 AAP13: Climate Emergency (previously AAP3) has been moved to sit alongside the other environment policies. It still sets out the priority for new development to connect to the District Heat Network and to reduce carbon emissions and to make use of waste heat from SELCHP. A map of the proposed District Heat Network which is currently under construction has been added with additional information about how that will be delivered based on the business case and feasibility study worked up over the last two years.
- 6.33 AAP13 also gives focus to reducing emissions generated by transport, through delivering car free development and facilitating new industrial typologies that encourage electrification and cargo bikes/quadracycles. The stacked logistics hub at Mandela Way, granted consent in 2023, is an example of a typology that responds to the Last Mile Logistics challenge.

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

Young people

- 6.36 AAP15: A Great Start in Life has been re-named since the publication of the draft OKR AAP 2020 (at which time it was called 'Best Start in Life') to align with the Great Start in Life policy of the Southwark Plan 2022, SP3.
- 6.37 The current situation with school under-subscriptions in the Old Kent Road area is such that the wording of AAP13 now refers to the "potential" for additional pupil places and new schools to be delivered, depending on demand. This is different to the wording of the policy in the draft OKR AAP 2020, which commits to delivering two new primary schools and a new secondary school. We continue to own the land on which the secondary school could be located so it remains an option should delivery be required in the future.
- 6.38 Policy on Youth, Education and Healthcare has been amalgamated in to AAP15 and includes a new commitment to develop a youth facility and space for local residents and community organisations at Leyton Square. The 'Reasons' section of the policy explains that this would be funded through CIL contributions.

Deleted Policy: Sub-area and Site Allocations

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

Sub Areas

- 6.40 The Masterplan has been updated based on planning applications that have come forward, funding changes, , commissioned design codes, previously approved outline schemes and wider council priority progressions and regeneration.
- 6.41 The core format of each sub area has remained the same coming from looking at OKR in the past, the area today and then the proposed plan and strategy for each sub area and site allocation to deliver housing, employment, green space and community facilities for local people, in an appropriate scale design and character to each section of the sub area.
- 6.42 Sub areas 1-4 have the following structure:
- History
 - Present
 - Future
 - Sites (Completion, under construction, planning permission)

- Building Typologies and Land Uses
- Servicing and Road Network
- High street strategy (sub areas 3 and 4)
- Parks and Recreation
- Building Heights Guidance
- Design Guidance
- Connecting Communities

6.43 Sub area 5 has the following structure:

- History
- Present
- Future
- Building, Typologies and Land Uses
- Phasing
- Servicing and Road Network
- Parks and Communities

Sub Area 1

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

Sub Area 2

6.45 The masterplan in Sub Area 2 has remained unchanged for OKR10 and OKR11 except for where there have been updates to applications or new applications received.

6.46 OKR10 and OKR11 have remained the same in footprint. Some of the densities and typologies have changed to reflect more recent planning applications.

6.47 The masterplan for OKR12 has evolved as it is now considered that a reduced capacity of 40 units across the site is more realistic in order to retain the heritage assets and ensure delivery of affordable housing. A detailed design code has been completed for the Sub Area

Sub Area 3

6.48 The masterplan for Sub Area 3 has seen several updates following extensive work to create a design code OKR13 and to reflect updates to planning applications.

6.49 The proposed primary school has been removed from the site to reflect changes in pupil projections. However, the masterplan is still flexible enough to re-provide this in future demand deems it necessary. A logistics centre has been introduced on

Verney Road following a planning application, which has meant some of the capacity of the site has had to be redistributed amongst other plots. The linear park has also been relocated to allow for more realistic access and servicing. A detailed design code has been completed for the Sub Area.

Sub Area 4

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

Sub Area 5

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

Options Testing

Summary

- 6.52 Throughout the preparation of the Old Kent Road Area Action Plan, a number of options for development have been assessed. The Old Kent Road Place Making Study 2016 (Allies and Morrison) considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option (20,000 homes), a Bakerloo Line (1 or 2 stations, medium scenario) (13,658 homes) and a no Bakerloo Line extension option (low scenario) (8,468 homes). This was based on indicative massing. The options were presented at Old Kent Road Community Forums in 2016 to begin the process of master planning and community engagement.
- 6.53 The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. Throughout the 2017 and 2020 drafts of the AAP, a detailed masterplan has been prepared informed by multiple local development studies and urban design studies which are available as evidence base. The masterplan has evolved through a series of iterations, testing and feedback from consultation.
- 6.54 As a result of testing a detailed masterplan and preparation of the AAP, the masterplan demonstrates we can achieve a high growth option of 20,000 homes and 10,000 additional jobs over 20 years. This high option would exceed the target set out by the regional plan and provide a healthy buffer to deliver our 5 and 15 year land supply.
- 6.55 Prior to the confirmation of the Bakerloo Line extension the Council has agreed with the Mayor around 9,500 homes could come forward (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). Planning applications will still be permitted for Phase 2, but there is a Grampian condition restricting this development until after agreement by the GLA and TfL, and sign off by LB

Southwark to ensure sufficient transport infrastructure is in place to support the delivery of 10,500 homes.

- 6.56 The options for each site demonstrate the options for capacity in the 2016, 2017 and 2020 versions of the AAP. Since the AAP was published, numerous planning applications have been submitted and approved which reflect the potential capacity consistent with the high option scenario.
- 6.57 Continuous master planning work, which takes into account planning applications and various constraints, has been undertaken for site specific allocations to come to the capacity as various iterations of the AAP have been published. This is informed partly by detailed design of some planning applications received which indicate capacity of some sites in more detail and partly through architectural studies undertaken to inform design codes for specific sub-areas. The Southwark Plan site allocations have been consulted on and were adopted in February 2022. The proposed Old Kent Road site allocations align with these, as set out in the Southwark Plan 2022..
- 6.58 The site allocations within the Old Kent Road will be intensified for mixed use development and industrial co-location. Development will include an innovative new approach to create new town centres which include community facilities, retail, office, education and health uses. Industrial development will be included alongside or underneath new homes with specific design criteria to ensure businesses can operate successfully without harming residential amenity.
- 6.59 In this appraisal, two options have been assessed:
- Option A: 9,500 homes without the BLE (Reasonable alternative)
 - Option B: 20,000 homes with two stations with the BLE (Plan option)

What options have been considered and why?

- 6.60 The Old Kent Road has been a designated “action area” since the Southwark Plan was adopted in 2007, and our Core Strategy (2011) set out a vision for how we would produce an area action plan to help guide and manage the evolution of the area to reach its potential. In January 2014 the GLA identified the Old Kent Road as a potential opportunity area in the draft Further Alterations to the London Plan and this designation was confirmed in March 2015.
- 6.61 Alongside the GLA, TfL and other partners we have worked together to build a strong evidence base which has helped to inform the options explored in the preparation of the AAP. The options were also explored with the Old Kent Road community forum, of which eleven workshops were held.
- 6.62 One of the key drivers for change in the Old Kent Road area is the delivery of the Bakerloo Line Extension and improvements to surface transport on the Old Kent Road itself. Throughout the plan preparation, TfL consulted on two potential routes for a Bakerloo Line tube extension from Elephant and Castle to Lewisham, either via Camberwell or via the Old Kent Road. TfL then confirmed the preferred route was via the Old Kent Road following consultation in 2015.

- 6.63 TFL consulted on BLE station and shaft locations from Elephant and Castle to Lewisham with 4 options for stations along the Old Kent Road in 2017. The Council responded in support of the scheme and have been actively campaigning along with Lewisham Council to Back the Bakerloo. The Council requested three stations along the Old Kent Road, including one at Bricklayers Arms. In 2020, TFL launched another consultation which included the Tfl preferred option location of two stations on Old Kent Road (at the Tesco and former Toyrus sites). The consultation included the following proposals:
- A new integrated station entrance at Elephant & Castle
 - The route of the proposed tunnels from Lambeth North to Elephant & Castle
 - The route of the proposed tunnels from Elephant & Castle to Lewisham
 - The location of the primary and secondary tunneling worksites for the scheme
 - The naming of the two proposed stations on Old Kent Road
 - A possible further extension of the route from Lewisham to Hayes and Beckenham Junction, involving a conversion of the National Rail line
- 6.64 89% of respondents to the consultation made positive or supportive comments about the BLE proposals. Work is ongoing by TfL, the GLA and the boroughs to update the business case for the BLE and complete the feasibility design, including packages of work looking at station design and funding options.
- 6.65 The Secretary of State for Transport has issued directions to safeguard land needed to deliver the BLE. The directions preserve parcels of land for future infrastructure, either temporarily during construction or permanently, to ensure the extension can be delivered as soon as possible. Safeguarding also covers land which, if developed, could otherwise impact on the ability to construct or operate the railway, for example due to foundation design.
- 6.66 The estimated cost of the BLE is £8 billion, and delivery of this major piece of new transport infrastructure remains dependent on a viable funding package being put together. TfL and the Mayor of London remain committed to delivering the BLE as set out in the adopted London Plan 2021.
- 6.67 Since the previous draft and following extensive consultation, nearly 9,500 homes, including shared living and student housing, have been granted on site allocations in the plan, in accordance with the draft masterplan. The masterplan has been updated in the 2024 version of the plan to take into account changes as a result of consultation with the local community. The options below reflect the growth options for the opportunity area without a tube line and with a Bakerloo Line extension. Option B assumes the provision of two new tube stations to serve the area which is reflective of the latest position on the BLE.
- 6.68 The assessment compares the sustainability implications between adopting each alternative of the OKR AAP, or two reasonable alternatives depending on the delivery of the BLE.
- 6.69 The full Option-testing sustainability appraisal is included in Appendix 10, this provides the justification on why the decision to develop and adopt a new Area

Action Plan through the selection of Option B: High growth scenario (20,000 homes) with two BLE stations was deemed preferable to achieve increased sustainability, health and equality objectives in the borough compared to the reasonable alternative.

- 6.70 The reasonable alternatives considered are set out within Appendix 12. This demonstrates how the indicative capacities have changed throughout different iterations of the OKR AAP.
- 6.71 Within this context, potential OKRAAP sub areas and sites options were assessed for their 'reasonableness' prior to being taken forward for appraisal. This involved considering a series of questions:
- Will implementation of the option assist in fulfilling the objectives of the OKRAAP?
 - is it a genuine option?
 - Will the necessary resources be available to deliver the OKRAAP?
 - Will there be sufficient time within the plan period to implement the option?
 - Is there an unacceptable risk that the option will not be fully implemented for one reason or another?
 - Is the option sufficiently flexible to accommodate changing circumstances?
 - Does the option generally conform with the London Plan and Southwark Plan?
- 6.72 All options were assessed against the IIA framework set out in **Appendix 10**.

Option A: Business as usual without BLE extension

- 6.73 This option would be delivered without the extension of the Bakerloo Line. The option would deliver approximately 8,000-9,500 new homes by 2037. There would be limited opportunities to grow the business, arts and cultural communities in the area or to deliver the other benefits to residents unlocked by the Bakerloo Line.

Summary of Option A

- 6.74 This option considers how the area is expected to evolve without any significant intervention. The AAP therefore would need to evolve policies to fit the aspiration as an opportunity area but without any significant changes to existing policy designations and infrastructure. In this scenario the plan would come forward to deliver around 8,000 – 9,500 new homes and the Bakerloo line extension would not be brought forward. The ability for the area to deliver additional jobs in this scenario may require incentive for change within the PIL's which may be difficult due to well established uses and land values unlikely to change significantly over the plan period. Existing uses in storage, distribution and warehousing sectors typically have a low floorspace to jobs ratio. Industrial sites are more likely to remain in industrial use in this scenario.
- 6.75 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.

Option B - High Growth scenario with two stations under BLE

6.76 The key driving factor for growth in this option would be significant improvements to public transport through the delivery of the Bakerloo Line extension and two new underground stations. With this option, development would benefit residents by delivering the following outcomes that would not be achieved under option A:

- 20,000 new homes, with the 8,000 – 9,500 homes expected under Option A delivered 10 years sooner
- 7,000 affordable homes
- 1 further education college and the opportunity for a university
- 2 new tube stations on the Bakerloo Line Extension
- 1 new community health hub
- 10,000 new jobs
- The opportunity for a new new primary school if required
- Primary school expansions
- 3 new parks and other public spaces

Summary of High Growth scenario with two stations under BLE

6.77 In this option, the Old Kent Road Opportunity Area would involve significant new homes, jobs, community, health and leisure facilities which will accompany the addition of two new underground stations as part of an extension to the Bakerloo Line. Key industrial areas will be retained and intensified while some industrial units and large retail warehouses would transition to mixed use neighbourhoods and a revitalised high street providing a high density scenario of around 20,000 new homes and 10,000 new jobs.

6.78 The addition of 20,000 new homes would contribute significantly to the council's housing target and respond to housing needs for all housing types and tenures. Each development scheme would be expected to deliver at least 35% affordable homes.

6.79 Near to the tube stations and along the Old Kent Road, high density new employment space would be delivered such as offices and co-working space for small businesses. There would also be opportunities for small manufacturing, artists' studios and creative enterprises. Further away from the Old Kent Road, new employment space would be lower density and accommodate depots, distribution sheds and industrious workspace that requires better access for HGVs, vans and lorries. Workspaces would remain flexible so they can adapt to changing business needs over time and suit a variety of uses. Developments would be carefully designed to ensure businesses can function effectively and residents can live peacefully. Masterplans would ensure businesses can be clustered to strengthen commercial identity and foster a vibrant business community.

- 6.80 This option would also retain 26 hectares of land kept in industrial use and support these uses to be intensified to make more effective use of space. This would help increase the number of jobs in industrial use, make use of railway arches and continue to provide essential infrastructure such as waste facilities and electricity sub stations.
- 6.81 In a high growth scenario, it is anticipated that there will be considerable demands on the provision of new schools and health facilities. The AAP would encourage a coordinated approach to deliver these facilities in line with phased development. There are considerable opportunities in this scenario to attract new cultural and leisure facilities which would enhance the vitality and perception of the area as a cultural destination. In a high growth scenario, there would also be the possibility of encouraging a major educational institutional such as a University which would further provide more employment opportunities and create a thriving new community.
- 6.82 The Bakerloo Line extension and two new stations along Old Kent Road would significantly improve the accessibility of the area and provide rapid connection to the city and would support the delivery of the scale of development envisaged. There would be considerable improvements to the Old Kent Road highway, improving facilities for buses, pedestrians and cycle links, helping reduce the segregation of areas on either side of the road. Transport improvements would be integrated with public realm improvements to promote better linkages across the road and better facilities for same and convenient routes for pedestrians and cyclists. In a mixed use development, servicing for new employment uses will be an important component of the scheme design and reduce the impact of servicing and heavier traffic on adjoining residential development.
- 6.83 Through larger site allocations, meaningful new areas of public open space or green links could be delivered. There would also be opportunity to support the development of a decentralised energy network to achieve a low carbon energy supply to the population.
- 6.84 Within option B the council considered developing a mansion block typology with a standard size building of around 10-15 storeys in perimeter style blocks. However, this typology would lose the opportunity to retain and provide new business space and 10,000 new jobs. There would also be daylight and sunlight issues and it would lack the opportunity to create new open spaces and provide new routes. An alternative approach is described in the Stations and Crossings policy. This incorporates diversity in landscape and land use and a strategy to locate tall buildings to provide wayfinders and development space for residential homes above retail and a variety of types of businesses that will enable 20,000 new homes and 10,000 new jobs to be built. This type of development with clear guidelines would retain the traditional business space alongside opportunities for new business space, offices and homes to be developed whilst leaving the space for open spaces, public realm and other infrastructure.
- 6.85 To test Option B of the OKR AAP, iterations of the Masterplan were tested to set out how high growth could be achieved in a sustainable way, and so that other uses such as education, community facilities and open space could also be delivered.

The masterplan testing has been done by urban design work, capacity modelling and detailed masterplanning options to inform the current version of the plan.

What have the options identified?

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

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

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

6.88 The AAP would give confidence to the ability of the Old Kent Road to undergo a transformation that creates a new identity and position in central London. The provision of 20,000 new homes would significantly contribute to needs of a growing and diverse population, particularly the provision of affordable homes. The AAP would provide robust policies, and detailed guidance to coordinate development to achieve the best possible outcome for the benefit of local people. The AAP would address the challenges identified through new policies that would be less affected by uncertainty and potentially incompatible objectives. In this scenario it is anticipated that benefits will be seen in relation to levels of crime and deprivation, improved health of the population through better physical activity and better modes of transport, and less exposure to harmful pollutants and poor air quality. These benefits, along with improving social cohesion would positively impact on a wide range of equality groups. However to accommodate this level of development there are likely to be significant pressures on infrastructure and environmental considerations such as water consumption and waste management. Increased construction activity in the short to medium term could bring adverse environmental impacts affecting residential amenity and climate change.

6.89 Option B would ensure mixed use development can accommodate a range of new employment sectors and opportunities to the area, whilst ensuring existing businesses have the opportunity to be accommodated in redevelopment or relocated within the OA. The retention of industry in the area would be maximised by protecting and intensifying industrial land. The delivery of the high growth option would also need to include high density development including tall buildings, and the AAP needs to ensure the strategy for place-making, urban design and a high quality public realm supported by new green spaces and connections is strongly maintained.

6.90 We have also assembled an extensive evidence base which confirms both the need and opportunity for large scale redevelopment of land in Southwark as well as

the need for planning policy to guide development to ensure that it is sustainable, equitable and supports health and wellbeing.

- 6.91 Option B provides in excess of our strategic housing targets for housing without compromising other strategic aims of the borough, including good design principles, heritage, provision of non-residential uses including industrial co-location and open spaces. It provides a healthy buffer of housing, over our London Plan housing target which is identified in the 5 and 15 Year Housing Land Supply Report.
- 6.92 Appendix 10 (Table 1) sets out the averaged scoring for the three options against the 17 sustainability objectives, encompassing economic, social and environmental aspects. The options appraisal found that Option B: High Growth would have an overall score of 79% against the sustainability objectives and this option would result in positive impacts overall. 17 of 17 objectives received a positive scoring in achieving the sustainability objectives.
- 6.93 This option will provide more positive social, economic and environmental benefits than Option A, which will improve the health and wellbeing of Old Kent Road's communities.
- 6.94 The benefits anticipated through this preferred approach will be achieved through securing growth in housing, employment, town centre amenities, primary health and care facilities, school places, higher education and public open spaces. They will also be served by enhancing and expanding physical networks of sustainable transport and habitats for wildlife, social interaction and economic interaction within local business clusters.
- 6.95 The options appraisal considers Option A to have an overall neutral score of 25%, and this option would have overall neutral social, economic and environmental impacts. The majority of the objectives in this option have scored uncertain (11 out of 17) and positive (3 out of 17). The sustainability appraisal found that without the identification of land to provide infrastructure, including new education, health facilities and open space and without the identification of area-wide improvements the delivery of infrastructure would be uncertain and less coordinated. Furthermore, without guidance on sites and areas, opportunities to improve places for community cohesion and support for a diversity of lifestyles could be missed. Without guidance the full consideration of heritage assets and opportunities for heritage-led regeneration might not be incorporated into development proposals; and without the identification of opportunities for new open space and green links sufficient space might not be provided to serve the needs of a growing population or habitats provided and connected for wildlife.
- 6.96 Option A has not been taken forward as the preferred option. Whilst it would be a reasonable alternative to identify opportunity sites for development and rely on other local plan policies to shape growth, the social, economic and environmental effects would be deeply uncertain. The lack of improved transport infrastructure from the Bakerloo Line extension would be a significant disbenefit for local residents and to generate growth. It would create uncertain impacts for growth, would not deliver as much housing to help achieve our short and long term housing supply and would not achieve strategic ambitions such as providing park spaces across multiple sites (e.g. linear park).

What are the significant positive effects?

- 6.97 The policies in the AAP seek to guide future development and set out the clear aspirations for the OA over the next 20 years. Detailed policies guide the strategy for homes, jobs, shopping, leisure, arts, culture, education, health, public realm, heritage, transport, sustainability and high quality design of buildings. The plan also describes how the objectives of revitalised neighbourhoods can be achieved in five sub areas across the OA. Site allocations are also considered within the sub areas, setting out the expected uses, design, supporting infrastructure, capacity and phasing. The full appraisal of the policy themes and sub areas are provided as Appendix 5.
- 6.98 The AAP preparation has also been subject to a Mental Well-being Impact Assessment (MWIA) screening tool which has been designed to help people who are planning or providing policies, services, programmes or projects to begin to find out how they might make a difference to mental well-being. A wide range of potential long term and short-term impacts on the determinants of mental well-being have been identified by the screening and a range of equalities groups are considered. The screening report is provided as Appendix 13.
- 6.99 The plan generates major positive impacts relating to tackling poverty and encouraging wealth creation due to the large increase in the number and diversity of jobs in the area. These benefits will be seen in the short to medium term, with the long-term effects anticipated to bring stronger benefits as the OA becomes increasingly incorporated into central London functions and increases opportunities to diversify the economy and increase the number of jobs available. This will improve opportunities for young people, unemployed people and low-income groups through new apprenticeships and learning new skills, contributing to improving levels of deprivation in the area.
- 6.100 The provision of new homes will significantly improve supply and help to meet local needs across all tenures including private rented, homes for sale and affordable homes. The plan would also bring significant improvements to the quality of the townscape, particularly with the creation of a revitalised high street environment for the Old Kent Road, improved public realm, new connections for walking and cycling, high quality design of new buildings and new parks and green infrastructure. This would create a better-quality environment in which people can live, work and visit and may particularly benefit accessibility for those with mobility problems, such as disabled or elderly people. It would also generate positive impacts in relation to reducing crime and the fear of crime, as new routes in mixed use neighbourhoods would increase footfall and security. This would benefit a number of groups particularly those who would be more vulnerable to crime and low-income groups.
- 6.101 The plan also generates positive impacts for sustainable transport and major infrastructure improvements. There are strong links between improvements to sustainable transport modes and improving health. The BLE will have a major impact on public transport accessibility in the area in the long term, and improvements to surface transport including junctions will have positive effects for sustainable transport modes in the short to medium term. The creation of better

crossing points on the Old Kent Road and pedestrian environment would help to reduce road traffic accidents and providing accessibility to essential services. Improvements to cycling and walking routes will encourage sustainable modes of transport, in turn improving air quality by reducing the need to travel by car. New attractive cycling and walking routes would have positive effects for health, promoting physically active lifestyles.

6.102 The opportunities for new and improved areas of open space will also bring positive effects in terms of improving public realm and air quality, which will have a beneficial health impact. Improvements to infrastructure such as education, health, cultural and community facilities will enhance accessibility to health and social facilities benefiting a wide range of groups. The integrated of sustainable urban drainage systems in new development would also help to reduce flooding in the long term, and improve opportunities for biodiversity and an attractive urban environment.

6.103 Accelerating the delivery of housing development will provide major contribution towards providing everyone with the opportunity to live in a decent home. By creating certainty around the requirements for other land uses and infrastructure on site allocation this will also support affordable housing delivery by allowing the more accurate understanding of development costs in the valuation of land.

6.104 Option B helps meet our London Plan housing target as detailed in the 5 and 15 Year Housing Land Supply without compromising our other strategic aims of the borough including good design principles, heritage, provision of non-residential uses and open spaces.

6.105 The plan generates major positive effects to tackle poverty and encourage wealth creation. The acceleration of development in most areas will create jobs in construction. Where a significant uplift in commercial floor space is planned for there will be further increases in employment opportunities. The opportunity for the occupation of affordable workspace to provide support for start ups, small or independent businesses is vital to secure Southwark's thriving economy. This will include job opportunities secured for local people as well as procurement opportunities for other local businesses. Support for the most promising economic clusters within the borough will generate higher wages and economic resilience.

6.106 The policies seek to retain some of the previously removed Strategic Protected Industrial Land and to allocate three sites as Locally Significant Industrial Sites (LSIS); this will ensure the retention of the businesses and employment on these sites.

6.107 The health of the population will be improved by encouraging active lifestyles and wellbeing through a network of green links, cycle routes and open spaces across the borough and maintained by additional health and care facilities. These will provide the opportunity to deliver integrated health services to improve the quality of their operation. Public spaces, public realm, cultural facilities and a flexible range of new town centre amenities will have major long term positive effects to promote social inclusion, equality, diversity and community cohesion by creating spaces for interaction as well as a diversity of different lifestyles.

6.108 In parts of the borough redevelopment will deliver area-wide improvements in the architectural quality of buildings and the public realm alongside new or enhanced open space and urban greening. These will deliver major positive effects and enhance the quality of landscape and townscape.

What are the significant negative effects?

6.109 There will be some negative environmental impacts in the short term as a result of higher levels of construction. Increased construction traffic, methods of construction and embodied carbon emissions in demolition and construction could adversely contribute to climate change. Similarly construction traffic and methods could also adversely affect air quality in the short term, and improvements in public transport may not occur immediately. This could also affect the health of the population in the short term by the increase of noise, dust and disruption to active travel routes. The proposals for significant new development and population increase in the area will place additional pressure on waste facilities, including safe disposal, recycling and management of waste. There will also be increased demand for water and foul sewage disposal which could put increased pressure on the water and sewer network and water resources.

6.110 The plan does not generate major negative effects in the appraisal although there are residual areas of uncertainty, discussed further below, which could result in negative effects; particularly where they are cumulative in nature.

6.111 The sub areas and site allocations and area visions seek to steer development opportunities that already exist towards delivering a sustainable regeneration strategy. Furthermore they are supported by the strategy and vision and development management policies to further mitigate negative effects.

6.112 The appraisal does indicate minor negative effects in the short term in some areas towards social inclusion, equality, diversity and community cohesion. This is related to the loss of some community assets in the short term, which may impact particular groups, and the potential disruption of social interaction through the impacts of construction. This would be in locations where the acceleration of development brings forward a number of sites concurrently within a small area as development management policies will seek general mitigation of the impacts of construction. The appraisals indicate that this disruption will occur in areas that will likely accrue more significant benefits in the long run towards this sustainability objective. Nevertheless, opportunities for further mitigation in the short term could be explored through targeted community infrastructure development and the coordination of quick wins from regeneration and meanwhile uses.

Uncertain impacts

6.113 The plan provides a positive strategy for growth however there are some impacts that may be uncertain at this stage. The plan encourages mixed use development and this will intensify land across the OA to provide high density development where a range of uses will be expected to be provided, along with key infrastructure improvements and open space. The plan encourages the retention of existing businesses and provides design guidance for the effective mixing of uses. This presents a challenge for new development, particularly if industrial uses are sited in

close proximity to residential development. The servicing arrangements, public realm and practical functions for workspace will need to be carefully balanced in mixed use development. The provision of tall buildings will also need to be carefully designed and located to positively contribute to improvements to the public realm. Similarly new high density development will need to ensure heritage assets are appropriately conserved and enhanced in the public realm strategy.

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

come forward for housing, then the commercial uses proposed for co-location may not come forward either. Some of the infrastructure which would provide public benefit on the phase 2 sites, such as new open spaces may also be at risk.

- 6.122 The initial date for the delivery of Phase 2 was for completion in 2030 but delays to the start of the project means completion is more likely to be 2038. The Transport Works Act order is expected to be made in 2028, with the letting of the construction contract anticipated for 2030. The 10,500 homes will be delivered 2030.
- 6.123 Southwark Council together with Lewisham have been actively campaigning and promoting the BLE given its importance for the delivery of homes in the boroughs. This infrastructure is essential to meet our future housing need up to 2036, given the planned delivery of new homes in the Old Kent Road Opportunity Area in Southwark and New Cross and Catford Opportunity Areas in Lewisham. Both parties are also working with the Greater London Authority and Transport for London to develop these proposals for the BLE and to make the case to government to ensure the project is delivered. We have agreed a phasing plan for the delivery of these new homes with the GLA and TfL.
- 6.124 However, should the BLE not be delivered or delivery be delayed, this could significantly impact upon our housing land supply for years 6-15 and beyond should some pipeline permissions, site allocations or windfall sites not come forward.
- 6.125 There would be significant disbenefits to the transport network and local residents if Option B (20,000 new homes) were to be delivered without the Bakerloo Line being extended. The transport evidence base prepared for TfL (Old Kent Road Opportunity Area Strategic Transport Study) indicates that the forecasting of traffic impacts of development associated with the high growth option demonstrates that it would not be sustainable to rely on the current bus network to accommodate increased demand (Para. 9.1.6).
- 6.126 The bus network can accommodate shorter term support for the initial phases of development and the low growth scenario. A programme of improvements to how the Old Kent Road highway functions along with its improved urban realm and pedestrian environment can be developed to deliver bus priority, improved cycling facilities that increase protection and ease of cycling and optimised signal phases and turning movements at junctions to ensure traffic flow is kept to acceptable levels of performance (para 9.1.8). However, to support the high growth option and avoid deteriorating conditions on the highway for motorised public and private transport and cycling a significant amount of further public transport capacity and new options for travel are required. TfL's analysis demonstrates that the BLE is the preferred intervention to achieve transport objectives in the long term (para 9.1.7).
- 6.127 While on the whole the allocation of flexible employment space will have major positive effects for the local economy and employment, redevelopment of sites will in several instances result in the loss of existing businesses. For lower value storage or industrial space or where businesses are less compatible with existing land uses similar operations may be challenging to re-incorporate. In order to maintain and enhance economic diversity there may be further opportunities for mitigation from regeneration and engaging stakeholders to curate the offer of commercial space within vision areas.

- 6.128 Sustainable transport improvements and greening will help to mitigate the causes of climate change. However, traffic congestion impacts of construction could add to emissions in some locations. There may be further opportunities to reduce emissions overall all in the medium to long term through decentralised energy. A district heating network is currently under construction in the Old Kent Road area which will contribute to the reduction of emissions from domestic gas boilers. Congestion could similarly affect air quality and there may be as yet unidentified opportunities for area-wide responses.
- 6.129 Within critical drainage areas policy will seek flood risk assessments and sustainable drainage measures. Where redevelopment is particularly concentrated there may be a greater risk of cumulative impacts. Opportunities for strategic solutions to manage any risk could be further investigated.

Cumulative impacts

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

effect; or where several individual effects (e.g. noise, dust and visual) have a combined effect.

- 6.135 Synergistic effects interact to produce a total effect greater than the sum of the individual effects. The potential of these are outlined in Appendix 10. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.
- 6.136 There could be cumulative impacts with development occurring in Southwark and the surrounding boroughs. Engagement is continuous with these boroughs to ensure the cumulative impact of development can be realised and mitigated where required. In particular, Lewisham also has significant growth planned within the Opportunity Areas, there is continuous communication with Lewisham to ensure there is the required infrastructure for the planned development. This includes working positively and in cooperation with Greater London Authority and Transport for London to support the business case for, and secure delivery of, the Bakerloo Line Extension which will run through Old Kent Road, Lewisham and beyond to Hayes.
- 6.137 The cumulative impact of policies with a minor negative or uncertain impact could result in a major negative impact overall. It is difficult to assess the extent of such impacts at this stage in the process with the lack of detailed information on the design of proposals for individual sites. Providing that suitable mitigation measures are applied to individual proposals it is considered that the potential negative impacts will remain minor and, with the development of new technologies and regulations, could even be reduced further over time. Cumulative impacts may also be positive – for example several minor positive impacts on open space and biodiversity could lead to a major positive impact for an area as a whole.
- 6.138 The cumulative impacts of the policies will need to be kept under review through the monitoring process and assessment of planning applications to measure the success of implementing the policies and inform any amendments that may be needed to policies and guidance.

Proposed mitigation

- 6.139 Where the SA identified potential shortcomings of particular policies, mitigation measures are proposed to help off-set the negative impacts. Many of these mitigation measures are policy requirements in either the emerging Southwark Plan where some of the negative impacts will be mitigated.
- 6.140 Whilst there may be short term negative environmental effects relating to construction in the OA, the longer-term effects could have more positive impacts. For example, redevelopment of existing industrial and retail land would present the opportunity to employ more sustainable building techniques and enable long term carbon savings. There would also be opportunities to include renewable energy in new developments, good insulation in homes and harvest rainwater. This could help create more positive impacts for climate change in the future. In relation to the demand for water, efficiency of water resources would be encouraged in new

schemes. We have published an Integrated Water Management Strategy prepared with Thames Water and the GLA for the opportunity area to manage future demand.

6.141 It is anticipated that additional jobs will be provided within the OA. The AAP retains some strategic industrial land to ensure industrial functions are maintained and additional space in railway arches can be utilised. Retaining the quantum of employment space on allocation sites with premises configured to different sectors will also help to maintain business networks and provide purpose-built new industrial space.

6.142 In relation to community space, the AAP provides many opportunities to replace, enhance and expand community and cultural functions, which will be an integral part of the place-making strategy. The implementation of the AAP will ensure high quality development is delivered across the OA, encouraging sites to consider wider considerations to achieve the aspirations of the plan, including new green spaces, connecting routes and high-quality new buildings. Disruption to communities will also be mitigated by a social regeneration approach to ensure existing residents can access the opportunities created by regeneration and supporting full engagement in the planning process.

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

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

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

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

Section 7. IIA Appraisal Methodology

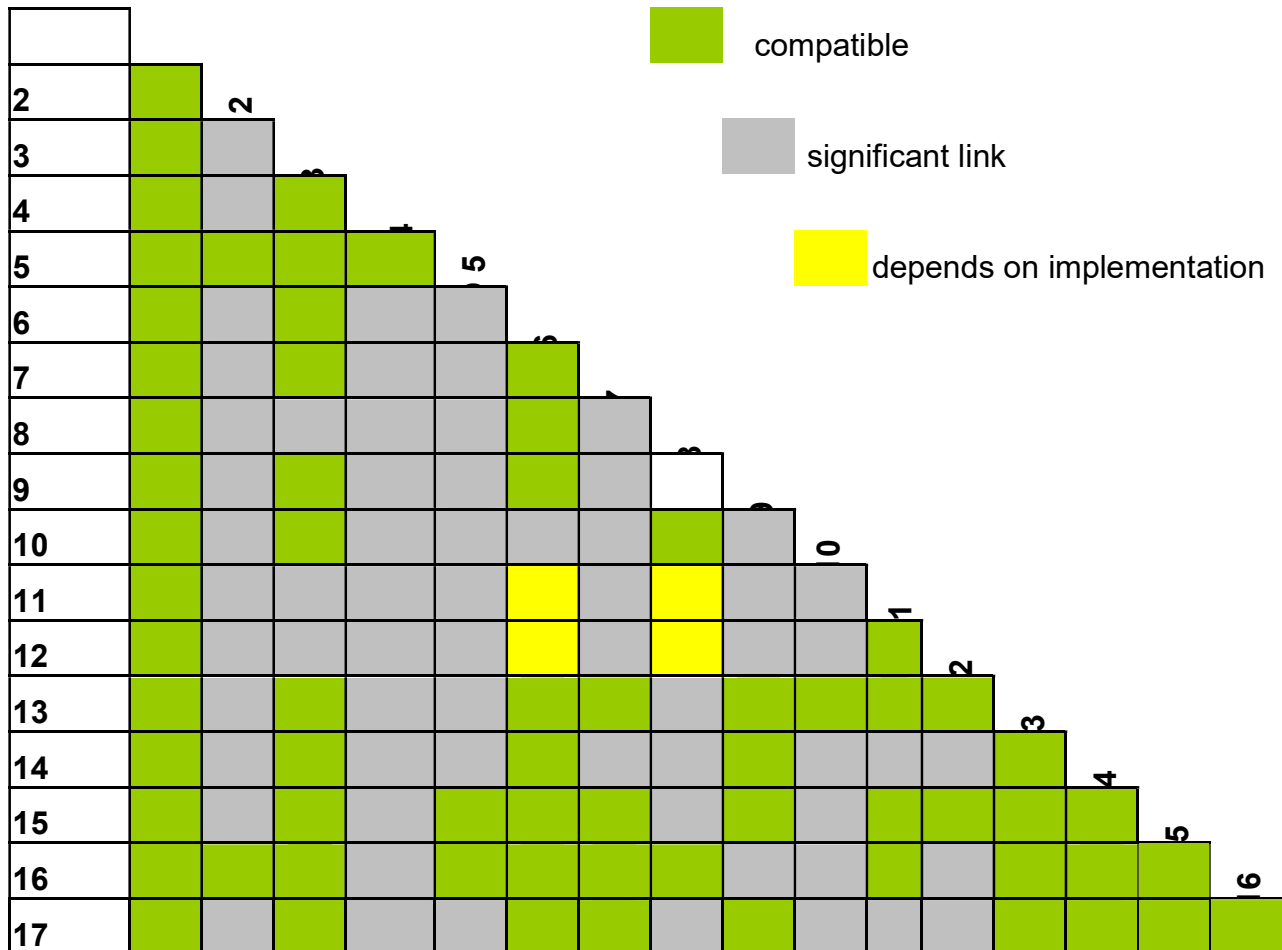
- 7.1 The establishment of appropriate objectives and indicators is central to the assessment process and provides a way in which the performance of the polices can be assessed. By researching specific issues affecting Southwark through a detailed desktop analysis and internal discussions, seventeen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

What is the IIA framework?

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

Comparison of the IIA objectives

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



Method of Assessment

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

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

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

7.8 The appraisal is undertaken using professional judgment, supported by the baseline information and wider evidence base.

7.9 A summary appraisal commentary alongside the system of symbols is provided in **Appendix 5, 6 & 7** of this IIA report to set out any significant effects identified for the proposed submission version of the OKR AAP 2024, masterplan, sub areas, site allocations and implementation policies, along with suggestions for mitigation or enhancement to be made where relevant. The nature of the likely effects (including positive/negative, duration, permanent/ temporary, secondary, cumulative and synergistic) are described, along with any assumptions or uncertainties noted. Where necessary, the appraisal commentary also identifies any potential cumulative effects for that option.

7.10 Table 7.1 demonstrates the system of symbols which will be used to represent the findings of the IIA for different elements of the emerging AAP.

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

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

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

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

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

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

Policy themes	Draft AAP Policies
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Vision	Area Today Connected Communities: The Best of London The Central London 'Smiley'
Delivery	Delivery Funding Plan Objectives AAP1: The Masterplan AAP2: Bakerloo Line Upgrade and Extension
Quality affordable homes	AAP3: Homes for All AAP4: Student Homes
Strong local economy	AAP5: Businesses and workspace – The Bow Tie AAP6: Life Sciences AAP7: Town centre, leisure and entertainment
Movement	AAP8: Movement
Parks and Open Space	AAP9: The Greener Belt Strategy – Parks and Healthy Streets
Design	AAP10: Tall buildings strategy: The Stations and the Crossings AAP11: Character and heritage AAP12: Design
Environment	AAP13: Climate Emergency AAP14: Water Management, Air and Noise Quality
Best start in life	AAP15: Great Start in Life/Child and Youth Provision
Sub Areas	Draft AAP Sub Areas
1 Mandela Way, Crimscott Street and Old Kent Road (North)	OKR1: Bricklayers Arms roundabout OKR2: Crimscott Street and Pages Walk OKR3: Mandela Way OKR4: Dunton Road (Tesco store and car park) and Southernwood Retail Park OKR5: Salisbury Estate Garages OKR6: 96-120 Old Kent Road (Lidl Store) OKR7: Former petrol filling station, 233-247 Old Kent Road OKR8: Kinglake Street Garages OKR9: 4/12 Albany Road
2 Cantium Retail Park and Marlborough Grove	OKR10: Land bounded by Glengall Road, Latona Road and Old Kent Road OKR11: Marlborough Grove and St James's Road OKR12: Former Southern Railway Stables
3 Sandgate Street, Verney Road and Old	OKR13: Sandgate Street and Verney Road OKR14: 634-636 Old Kent Road

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

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

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

Section 8. Appraisal Summary for the Strategy and Vision

Appraisal of the draft OKR AAP

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

Appraisal Summary for the Development Management Policies

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

Vision

Overall Summary: Positive

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

Strategy (Delivery and funding)

Overall Summary: Positive

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

Plan Objectives

Overall Summary: Positive

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

Section 9. Appraisal Summary for the Development Management Policies

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

AAP1: The Masterplan

Overall Summary: Positive

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

AAP2: Bakerloo Line Upgrade and Extension

Overall Summary: Positive

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

AAP3: Homes for All

Overall Summary: Positive

- 9.6 AAP3 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors. It should be noted that the scope of the policy has been reduced due to the adoption of the Southwark Plan.

- 9.7 Notwithstanding this reduction in scope AAP3 is anticipated to have positive impacts for all because it ensures the delivery of range of size, type and tenure of homes that meet the local need. This will provide greater security for residents and impact positively on their mental wellbeing and sense of place.

AAP4: Student Homes

Overall Summary: Positive

- 9.8 AAP4 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 9.9 AAP4 is anticipated to have positive impacts because it will ensure the successful integration of student housing without jeopardising the delivery of the other plan's priorities such as affordable housing, commercial business space and, public open space. This will contribute to the creation of mixed and inclusive neighbourhoods within the Old Kent Road and residents will benefit from increases in the student population.

AAP5: Businesses and Workspace – The Bow Tie

Overall Summary: Positive

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

AAP6: Life Sciences

Overall Summary: Positive

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

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

AAP7: Town centres, leisure and entertainment

Overall Summary: Positive

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

AAP8: Movement

Overall Summary: Positive

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

AAP9: The Greener Belt Strategy - Parks and Healthy Streets

Overall Summary: Positive

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

AAP10: Tall Buildings Strategy: The Stations and Crossings

Overall Summary: Positive

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

AAP11: Character and Heritage

Overall Summary: Positive

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

AAP12: Design

Overall Summary: Positive

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

AAP13: Climate Emergency

Overall Summary: Positive

9.28 AAP3 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.

9.29 AAP3 has positive impacts for all because it sets out how the climate emergency should be mitigated against in development to ensure that new development is as close to net carbon zero as possible. It sets out how development can be designed to minimise emissions and connect to a low carbon district heating network. This has wider benefits for improving housing and non-domestic building stock as these will be made more efficient.

AAP14: Water Management, Air and Noise Quality

Overall Summary: Positive

9.30 AAP14 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.

9.31 AAP14 is anticipated to have positive impacts because it addresses how development can adapt to climate change, improve air quality and how it can manage its environment to benefit local people and businesses. It aims to improve air quality biodiversity and green infrastructure for sustainability and .

AAP15: Great start in life

Overall Summary: Positive

9.32 AAP15 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.

9.33 AAP15 aims to improve the quality of education providing buildings to make sure these are well designed and adapted to climate change too. This is crucial to ensure that all local children can access education which is close to where they live to reduce the need to go by car and enable children to be more active.

9.34 The policy on Child and Youth provision has now been amalgamated into AAP15 and is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors. It aims to deliver facilities with the capacity for mentoring, opportunities to improve skills and sports, as well as delivering safer open spaces and parks for a range of ages. These will be inclusive and accessible for all to promote greater community cohesion and equality.

Section 10. Appraisal Summary for the Sub Areas, Site Allocations and Flood risk

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

Sub Area 1

Overall Summary: Positive

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

Sub Area 2

Overall Summary: Positive

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

Sub Area 3

Overall Summary: Positive

- 10.8 Sub Area 3 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 10.9 Sub Area 3 proposes sports facilities which will address the lack of child and youth provision in the local area. This will provide increased opportunities for education, training and mentoring to give local young people the best start in life. The sports facilities and school also bring wider opportunities to local people by reinforcing a sense of place and greater community cohesion as well as delivering facilities that the wider community can use to encourage healthier, active lives.
- 10.10 The Linear Park is a key green space link throughout the OKR Opportunity Area and provides safer spaces for walking and cycling. This is anticipated to have a positive impact on local residents because it will address issues of childhood obesity and promote positive behavioural changes to walk and cycle more

Sub Area 4

Overall Summary: Positive

- 10.11 Sub Area 4 is anticipated to have an overall positive impact on the future economic, social and environmental sustainability of the Old Kent Road and the health and equality of residents, workers and visitors.
- 10.12 Sub Area 4 proposes one of the two tube stations on the Bakerloo Line Extension. This will increase mobility for local residents and improve accessibility to employment, services and recreation and reduce the need to travel by car. The proposed tube line as unlocks greater potential for housing and employment which enables the OKR AAP to improve the quality and sustainability of housing and employment space, as well as creating new jobs in the area to support a strong local economy.
- 10.13 In the emerging masterplan, mixed use development has been proposed with a number of green spaces to address the deficiency of open space in the opportunity area. This encourages residents to walk and cycle more and lead more healthy active lifestyles. This includes Pat Hickson park, which is newly opened.

Sub Area 5

Overall Summary: Positive

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

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

Flood Risk of Site Allocations

10.16 The borough is at risk of flooding from a number of sources including from the River Thames as well as from ground and surface water flooding. Within the sustainability appraisals set out in Appendix 7, Objective 14 details how the sequential test (and exception test if required) has been applied with further analysis for each site allocation.

10.17 The next section within this chapter sets out the NPPF approach to flood risk management in the preparation of a local plan; and further information on the sequential and exceptions tests. This section further elaborates on the Council's approach to flooding and an appraisal summary for site allocations sequential and exception tests.

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

10.18 The National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance emphasise the responsibility of Local Planning Authorities to ensure that flood risk is understood and managed effectively and sustainably throughout all stages of the planning process.


10.19 The greatest risk to property and life from flooding within the Old Kent Road is as a result of tidal activity within the River Thames. However, the Borough is currently protected from combined tidal and fluvial flooding by the River Thames Tidal Defences, up to the 1 in 1000 year event. The risk is therefore of a residual nature, associated with overtopping or breaching of defences. Excepting the River Thames, there are no other watercourses within Southwark known to present a risk of fluvial flooding. A potential risk of flooding from other (non-river related) sources exists throughout the Borough, including sewer surcharge and surface water flooding as a result of heavy rainfall and/or blocked drainage systems.

10.20 Southwark plays a key role in managing this risk as a Lead Local Flood Authority, under the Flood and Water Management Act (2010) and the Flood Risk Regulations (2009). Areas of the Borough are also thought to be

susceptible to elevated groundwater levels, which may additionally interact with and exacerbate these other sources of flood risk. It is expected that changing climate patterns will have a substantial impact on the level of flood risk from all sources within Southwark.

10.21 The NPPF approach aims to ensure that flood risk is considered at all stages of the planning process and to avoid inappropriate development in areas of greatest flood risk; steering development towards areas of lower risk. Development is only permissible in areas at risk of flooding in exceptional circumstances where it can be demonstrated that there are no reasonably available sites in areas of lower risk, the sustainability benefits of that development outweigh the risks from flooding and, the development will be safe for its lifetime without increasing flood risk elsewhere.

10.22 Such development is required to include mitigation/management measures to minimise risk to life and property should flooding occur. Building on these principles, the NPPF and Technical Guidance have established a process for the assessment of flood risk, with each stage building upon the previous assessment with a refinement of the evidence base. Utilising a Source – Pathway – Receptor approach, the source of flooding, the spatial distribution of flood risk and the vulnerability of development types are assessed to inform decision making through each of the key stages of the Flood Risk Management Hierarchy, as outlined in the NPPG and shown in the table below.



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

Applying the sequential test

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

10.24 Planning Practice Guidance requires inappropriate development in areas at risk of flooding (i.e. in flood zones 2 and 3 or land within flood zone 1 which has critical drainage problems) to be avoided by directing development away

from areas at highest risk. Where development is necessary, it is required that it is made safe without increasing the risk of flooding elsewhere. The NPPF sets out a sequential approach in order to achieve this. This requires that development can be located in flood zone 2 and then flood zone 3 only if there are no reasonably available sites in flood zone 1. The Sequential Test should be carried out on all development sites and can be applied at all levels and scales of the planning process, both between and within Flood Zones.

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

Flood risk vulnerability of land uses

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

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

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

- iv. Less vulnerable**
Includes:
 - Police, ambulance and fire stations which are not required to be operational during flooding;

- Buildings used for shops; financial, professional and other services; restaurants and cafes; hot food takeaways; offices; general industry; storage and distribution; non-residential institutions not included in 'more vulnerable', and assembly and leisure;
- Land and buildings used for agriculture and forestry;
- Waste treatment;
- Minerals working and processing;
- Water treatment works;
- Sewage treatment works.

v. Water-compatible development

Includes:

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

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

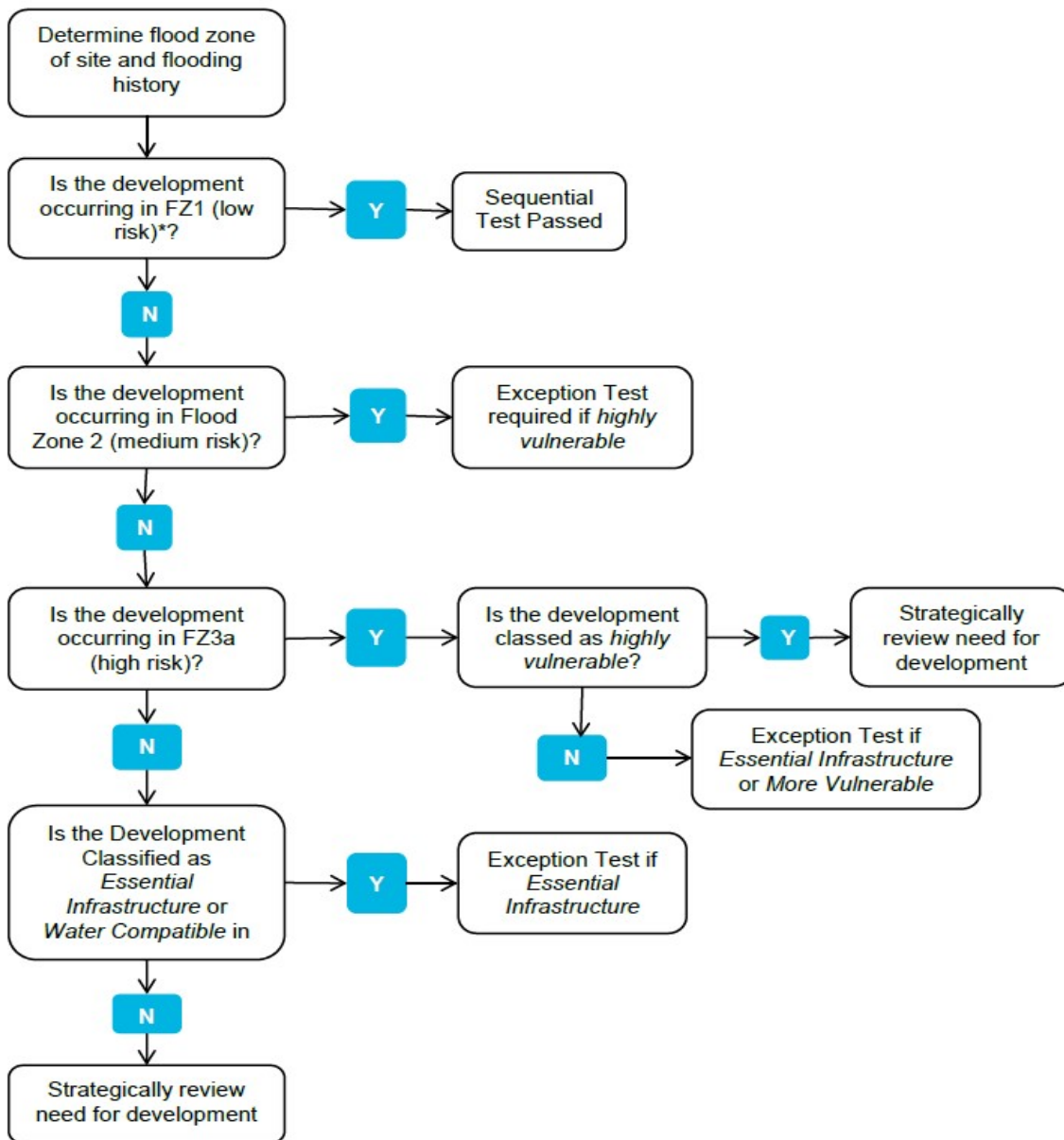
1) Flood zones and development compatibility

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

Notes: *only if Exception Test passed

The Sequential Test

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



* Other sources of flooding also need to be considered

10.28 The Old Kent Road is in the north of the borough. The majority of the Opportunity Area land is located in flood zone 2 and 3. Therefore locating all required development away from these areas is unlikely to be achievable. In order to effectively manage flood risk, a sequential test has been applied for each site allocation in the *Strategic Flood Risk Assessment (SFRA) Level II: Sequential test of site allocations* according to the NPPF risk-based approach. The test confirms if the proposed land use is acceptable and compatible with the flood risk zone or requires an additional exception test to allow the development to occur for wider sustainability reasons (paragraph 169 of the NPPF).

10.29 The greatest risk to property and life from flooding within the Old Kent Road (LBS) is as a result of tidal activity within the River Thames. However, the Borough is currently protected from combined tidal and fluvial flooding by the

River Thames Tidal Defences (TTD) up to the 1 in 1000 year event. The risk is therefore of a residual nature, associated with overtopping or breaching of defences. Excepting the River Thames, there are no other watercourses within Southwark known to present a risk of fluvial flooding.

10.30 A potential risk of flooding from other (non-river related) sources exists throughout the Borough, including sewer surcharge and surface water flooding as a result of heavy rainfall and/or blocked drainage systems. Southwark plays a key role in managing this risk as a Lead Local Flood Authority, under the Flood and Water Management Act (2010) and the Flood Risk Regulations (2009).

10.31 Areas of the Borough are also thought to be susceptible to elevated groundwater levels, which may additionally interact with and exacerbate these sources of flood risk. It is expected that changing climate patterns will have a substantial impact on the level of flood risk from all sources within Southwark.

10.32 The SFRA identifies the tidal floodplains associated with the River Thames and presents Flood Zone Maps that delineate the flood zones outlined in the NPPF. Breach modelling has additionally been undertaken to enable a greater understanding of the residual risk associated with this source. The resulting hazard, depth and velocity mapping contained within the SFRA provide further definition of the spatial variations of flood risk within Flood Zone 3.

10.33 The majority of the northern half of the Borough is located within Flood Zone 3a and therefore classed as at high risk of flooding. The floodplain areas within Southwark associated with the River Thames do not have a Flood Zone 3b or functional floodplain associated with them, as they are classed as defended and would not flood during a 1 in 20 year event. Therefore, the functional floodplain has been defined as the area situated on the river side of the raised defence line.

10.34 OKR site allocations are required to deliver the quantum of housing necessary to meet the borough needs, as well as the development of employment and retail floorspace, particularly in the Central Activities Zone (north of the borough). Additional social infrastructure and new parks will also be delivered as part of the regeneration objectives of these areas. The development of these areas, in conformity with the London Plan objectives for growth and housing targets, is considered to bring significant sustainability benefits to the local communities.

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

Southwark Plan Policy P67 to ensure the developments are safe. The sequential test for the site allocations is therefore considered to be passed.

The Exception Test

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

10.37 **Appendix 7** contains a detailed sustainability appraisal, where every area vision and site allocation was assessed against the Council's objectives. For every site allocation under objective 14 (To reduce vulnerability to flooding) it is set out whether it has satisfied the sequential test, or an exception test was required. As set out in SFRA Level II, if the sequential test is passed, the development is permitted as it proposes 'less vulnerable' land uses which are acceptable within the respective Flood Zone. If the sequential test confirms that the site will have 'more vulnerable' land uses, an exception test has been carried out to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. Within the exception test two criterion need to be satisfied, as per paragraph 170 of the NPPF as follows:

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

10.39 *Evidence of wider sustainability benefits to the community should be provided, for instance, through the sustainability appraisal. If a potential site allocation fails to score positively against the aims and objectives of the sustainability appraisal, or is not otherwise capable of demonstrating sustainability benefits, the local planning authority should consider whether the use of planning conditions and/or planning obligations could make it do so. Where this is not possible the Exception Test has not been satisfied and the allocation should not be made.*

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

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

10.42 Where an exception test was required, to satisfy the sequential test criterion, under objective 14 we have set out the wider sustainability benefits for each site allocation in Appendix 7 such as social, economic and environmental benefits that would be brought to the community that outweigh flood risk.

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

- Making use of brownfield sites;
- New homes to meet and exceed our housing targets including affordable housing to meet the borough needs of social rented and intermediate housing
- An increase in high-quality office accommodation to support the growth of the local economy and bring increased job opportunities and prosperity to the borough including the provision of affordable workspace;
- A variety of town centre uses and retail at ground floor level to provide active frontages and create a vibrant urban area;
- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development;
- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant;
- Delivery of the Low Line walking route creating improved accessibility and the quality of experience for walking. Improved walking networks encourage active travel and exercise, which is beneficial for health, as well as activating railway arches for a variety of commercial uses;
- Bringing more destinations closer to residents through strategic walking routes and improved accessibility, with improved pavements, crossings and public spaces encourage people to walk more. Measures to encourage walking can also help tackle social isolation and routes should accommodate parents and older or disabled people;
- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will

- improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
- New homes will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health;
 - Some sites are required to deliver new open space in areas of deficiency. New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialisation, nature conservation, food growing and cultural events. This will maintain and improve open spaces to ensure health and wellbeing benefits associated with these activities are accrued;
 - The provision of open space is valuable in supporting active travel and walking which has the potential to encourage a reduction in climate change. By reducing the intensity of carbon emissions released in a certain area contributes to better air quality;
 - The increased provision of open space will help absorb negative CO2 emissions and this will contribute to better air quality;
 - The requirement to improve pedestrian movement and permeability through site developments will enhance connectivity across the area, promoting healthy lifestyles and improving access to services.
 - Redevelopment opportunities will also enable social infrastructure such as schools and health facilities to be provided.

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

10.45 Furthermore, to meet the second requirement that the development is safe for its lifetime, and that flood risk to people and property will be managed satisfactorily, recommendations set out in the SFRA Level II report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS have been incorporated under objective 14 in Appendix 7 for each site. The site allocations in Flood Zone 3 are in the 'defended' zone, meaning they benefit from protection from combined tidal and fluvial flooding by the River Thames Tidal Defences (TTD) up to the 1 in 1000 year event. The risk is therefore of a residual nature, associated with overtopping or breaching of defences.

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

10.47 Policy AAP12 Cleaner, greener, safer requires a number of measures to mitigate against issues of water and sewage capacity in the OKR Opportunity Area to ensure flood protection by setting out a target greenfield run off rate

onsite, utilising Sustainable Urban Drainage and limit water discharge to greenfield run off rates.

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

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

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

10.50 Where an approved application is relevant to a site allocation, further information has been provided under objective 14 to set out the flood risk considerations that were taken into account during the decision making process, and what recommendations have been made to reduce flood risk and making the development safe for its lifetime. The SFRA also recommended using Integrated Water Management Strategies (IWMS) for areas which would receive a significant amount of development to manage surface water run-off on a strategic scale. An IWMS has been prepared for the Old Kent Road AAP incorporating these principles. Overall, the site allocations requiring the exceptions test are considered to be able to demonstrate the development will be safe, protecting the vulnerability of its users, and without increasing flood risk elsewhere by using the principles of Policy P67 of the Southwark Plan, Integrated Water Management Strategies and individual Flood Risk Assessments, in accordance with Part 2 of the Exceptions Test.

10.51 The sustainability appraisal of objective 14 (in Appendix 7) was undertaken using professional judgment, supported by the baseline information and wider evidence base. Out of 82 sites located in the Southwark Plan, all sites have passed the sequential test. A number of sites also required additional exception tests. All sites required for the exception test have satisfied the two criteria of the exception test. None of the site allocations represented inappropriate development which is incompatible with the flood risk level as defined in the NPPF.

10.52 As such, overall the sustainability appraisal of each site demonstrates a positive appraisal. No risks have been identified as part of the site appraisals and if any arose at a later time, they are generally mitigated by other policies in the Southwark Plan.

Section 11. Monitoring and Implementation

Proposals for monitoring

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

How will the plan be implemented?

- 11.8 We will ensure the AAP is implemented by working with local communities, businesses developers, Lewisham council, GLA, TFL and other partners but also explore joint governance arrangements with our partners to reflect the commitment to supporting growth.
- 11.9 The OKR AAP will be implemented in the context of the Southwark Plan. This plan will shape development in Southwark from 2019 to 2036 through the application of area vision guidance and strategic, development management and site allocation policies to planning proposals. As a spatial planning document, the Southwark Plan will also influence the investment decisions of the council and its development and infrastructure partners.
- 11.10 Southwark Council together with Lewisham will continue to actively campaign and promote the BLE given its importance for the delivery of homes in the boroughs. This infrastructure is essential to meet our housing target, given the planned delivery of new homes in the Old Kent Road Opportunity Area in Southwark and New Cross and Catford Opportunity Areas in Lewisham. Both parties will continue working with the Greater London Authority and Transport for London to develop these proposals for the BLE and to make the case to government to ensure the project is delivered.
- 11.11 Implementation of the OKR AAP policies will be achieved through our development management function when we make decisions on planning applications. We will work with landowners and developers to ensure schemes make effective use of land across the borough and consider the wider context. We will use the council's delivery programmes to help deliver new council homes and using our compulsory purchase powers where necessary to ensure that land is made available for development where it is needed to deliver the OKR AAP vision and strategy.
- 11.12 Our Statement of Community Involvement (SCI) sets out how and when the community will be involved in preparing planning policy documents and in making decisions on planning applications. The SCI was developed by working with many local people, businesses, voluntary and community organisations, councillors and statutory organisations. The SCI includes: information on different consultation methods; how to overcome barriers to involve different groups and; the consultation process for both planning policy documents and planning applications. Involving the community at the earliest stage possible in the planning process helps to implement development that is wanted and needed by the community.
- 11.13 New development also needs to be supported by adequate social, physical and green infrastructure. This includes: social infrastructure such as schools, health and other community facilities; physical infrastructure such as transport and utilities; green infrastructure such as parks and open spaces. Where infrastructure is needed to support development, it should be provided along side it.
- 11.14 We will continue to work in partnership with infrastructure providers, including both internal council departments and external agencies, throughout the

development of the OKR AAP to identify infrastructure required to facilitate the development set out in the plan.

11.15 We will use S106 planning obligations/CIL to overcome negative impacts of development and to make sure that infrastructure needed to support development is provided. We will use planning obligations in accordance with government guidance, set out in the CIL Regulations. We have an approved Planning Obligations/CIL SPD which explains our policies in more detail and sets out a series of standard charges to be applied to development. Through implementing this SPD and collecting CIL we will secure financial contributions to mitigate the impacts of development.

Links to other tiers of plans, programmes and other guidance

11.16 The OKR AAP will be continuously influenced by other tiers of planning at national, regional, borough and local levels. Any changes to other spheres of planning legislation will require the IIA and OKR AAP to be updated accordingly to align with these new targets set.

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

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

11.19 Figure 11.1 demonstrates the various tiers of planning at national, regional, borough and local levels. The National Planning Policy Framework updates the approach to plan making by simplifying the process and returning to a system of Local Plans.

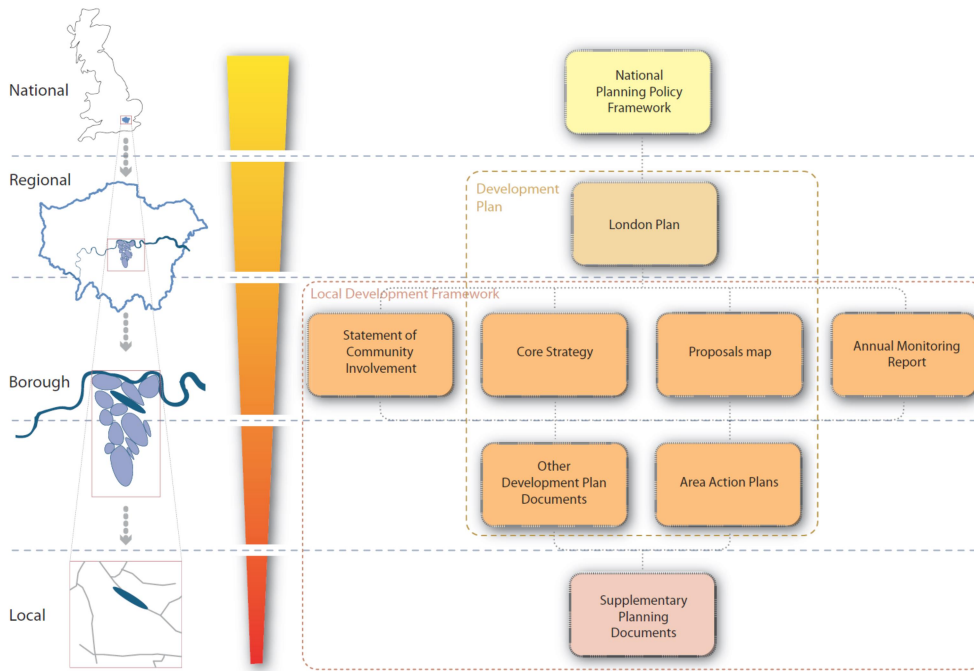


Figure 11.1

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