

Old Kent Road Area Action Plan
 Proposed Submission Version
 October 2024

Integrated Impact Assessment Appendices

Appendix 10: Options Testing

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Appendix 10: Options Testing

This appendix sets out the sustainability appraisal of the two options considered for the Proposed changes to the Old Kent Road AAP. Each option was appraised against the 17 sustainability objectives, encompassing economic, social and environmental aspects. Each objective is measured on a scoring scale (Key 1), with each grade assigned a numeric value, symbol and colour. Alongside the scoring, a detailed commentary on the objectives is provided.

Key 1: Individual scoring against each objective

Symbol and colour	Scoring Value (%)	Score	Description
✓✓	100	Major or direct positive	The proposed option/policy contributes significantly to the achievement of the objective.
✓	50	Minor or indirect positive	The proposed option/policy contributes to the achievement of the objective but not significantly or indirectly.
-	0	Neutral	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
x	-50	Minor or indirect negative	The proposed option/policy detracts from the achievement of the objective but not significantly.
xx	-100	Major or direct negative	The proposed option/policy detracts significantly from the achievement of the objective.
?	N/A	Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.

The colour bar below (key 2) divides the overall scoring into three categories from positive, neutral to negative.

Key 2: Averaged IIA objectives scoring for each policy

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

The Table1 below sets out the averaged scoring of the 17 objectives to indicate each options overall efficacy in meeting the sustainability objectives.

Table 1: Averaged scoring for the three options considered

	Option A: Business as usual without BLE extension	Timescale			Option B: High growth scenario with two stations under BLE	Timescale		
	Overall	S	M	L	Overall	S	M	L
IIAO 1	✓	-	-	X	✓✓	✓✓	✓✓	✓✓
IIAO 2	?	-	-	X	✓✓	✓	✓	✓✓.
IIAO 3	?	-	X	X	✓✓	✓	✓	✓✓
IIAO 4	-	-	-	X	✓✓	✓	✓	✓✓
IIAO 5	?	✓.	✓.	✓.	✓✓	✓	✓	✓✓
IIAO 6	?	-	-	-	✓✓	✓✓	✓✓	✓✓
IIAO 7	X	-	X	XX	✓✓	✓	✓✓	✓✓
IIAO 8	✓.	✓.	✓.	✓.	✓	✓	✓	✓
IIAO 9	✓	-	-	-	✓	✓	✓	✓
IIAO 10	✓	-	-	X	✓✓	✓.	✓.	✓✓.
IIAO 11	?	-	-	X	✓✓	✓.	✓.	✓✓.
IIAO 12	?	-	✓.	✓.	✓.	✓.	✓.	✓.
IIAO 13	?	-	-	X	✓	-	-	✓.
IIAO 14	?	✓.	✓.	✓.	✓	✓.	✓.	✓.
IIAO 15	?	-	✓.	✓.	✓✓	✓.	✓.	✓✓.
IIAO 16	?	-	X	X	✓	-	-	✓✓.
IIAO 17	?	-	?	?	✓	-	-	✓✓.
Avg.	25%	9%	6%	-16%	79%	47%	50%	85%

	Option A: Business as usual without BLE	S	M	L	Commentary on Results
IIA 1 To tackle poverty and encourage wealth creation	✓	-	-	x	The OA has relatively high levels of deprivation and without significant interventions to existing policies the area is unlikely to be improved significantly through access to housing, jobs and an improved living environment. The area would be unlikely to change significantly in relation to encouraging wealth creation, for example opportunities for new shops, community and leisure facilities would be limited. The decline in demand for industrial land may reduce the appeal and opportunities in the area in the long term which could affect opportunities for young people. However, in the short and medium term there may be retention in the number of industrial sector jobs or a slight loss with general decline. This could also limit the ease of access to facilities for residents with disabilities or pregnant women. It could have an adverse impact on the health of residents due to lack of interventions on the Old Kent Road traffic and industrial uses. The BLE would attract investment to the Opportunity Area as the PTAL rating is increased which means that residential and non-residential development is more viable and incentivised as it is supported by transport infrastructure. Without this, it would be more difficult to tackle poverty and encourage wealth creation.
IIA 2 To improve the education and skill of the population	?	-	-	x	There would be fewer opportunities for training and apprenticeships as a result of new development and the general decline or stagnancy with existing industrial areas. BME groups are strongly represented in the population statistics for the area and lack of access to education or new skills could have an impact on young people in these groups and young people in general.
IIA 3 To improve the health of the population	?	-	x	x	In the OA people in bad health are slightly above the average for London. In this scenario there are fewer opportunities for improving and providing new health facilities, new green spaces and leisure facilities which can help decrease lifestyle risk factors such as smoking, poor diet, substance misuse and lack of exercise. Poor health can be exacerbated by socio-economic challenges such as poor housing and unemployment and in this scenario there are fewer opportunities for significant improvement to the OA.
IIA 4 To reduce the incidence of crime and the fear of crime	-	-	-	x	The relatively high levels of deprivation in the area highlight particular issues in income and crime levels. Young single people aged 18-35 in rented accommodation are more likely to be victims of high rates of crime. Without significant improvements to the public realm across the OA including safety features, it is unlikely crime would be substantially reduced for the benefit of residents.
IIA 5 To promote social inclusion, equality, diversity and community cohesion	?	✓	✓	✓	The OA has a number of existing community networks and a diverse population. There are high numbers of faith premises in the area which benefit many religious groups. The AAP would have the opportunity to promote these networks and improve social cohesion.
IIA 6 To reduce contributions to climate change	?	-	-	-	There would be fewer opportunities to improve green energy in this scenario as redevelopment is less likely to occur and existing buildings are unlikely to be refurbished. Cycling and walking could be encouraged however car use would remain the dominant mode of transport in the OA. This may have a longer term impact on the health of the population through pollutants and harmful emissions from industry, traffic and domestic life. There would be less impact on climate change in the short term as less construction would occur. By not delivering the BLE there are huge disbenefits relating to sustainability and reduction in carbon emissions, by not delivering sustainable transport options like public transport via the tube, it is encouraging people to use private vehicles and increase pollution and congestion This is a major issue that needs to be addressed to ensure that we are addressing the Climate Emergency.
IIA 7 To improve the air quality	x	-	x	xx	The OA corridor has very high levels of air pollution predominantly caused by high levels of traffic and congestion. Without significant improvements to reduce car use and improve modes of public transport this is unlikely to change significantly. Poor air quality has a detrimental effect on the health of the population and particular groups could be more vulnerable such as older people, children, pregnant women, people with a long term illness and the homeless.
IIA 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	✓	✓	✓	The area benefits from the Southwark Integrated Waste Management Facility which recycles and diverts waste away from landfill. This facility benefits the whole of the borough. The AAP could seek to improve waste management in industrial and residential areas, benefiting the cleanliness and sustainability of the area, which would in turn benefit the health of the population.
IIA 9 To encourage sustainable use of water resources	-	-	-	-	The demand for water is likely to slightly increase with some new development, and the AAP can encourage sustainable reuse of water and use of rainwater limiting the impact on surface and groundwater in new development. The sustainable use of water would benefit the health of the population.

IIA 10 To maintain and enhance the quality of land and soils	✓	-	-	x	There will be fewer opportunities to make effective use of land through redevelopment and remediate issues of contamination which may affect many industrial areas around the OA. Soil quality is unlikely to improve with fewer opportunities for green spaces. Exposure to contamination would have an adverse impact on health, particularly on more vulnerable groups.
IIA 11 To protect and enhance quality of landscape and townscape	?	-	-	x	There would be fewer opportunities to enhance the quality of townscape and landscape with the majority of industrial areas remaining in situ and limiting the creation of a network of streets, improved connectivity and new green spaces. This would limit the opportunity to improve health and wellbeing and security, which could affect groups such as the homeless, women, older people and those with physical disabilities.
IIA 12 To conserve and enhance the historic environment and cultural assets	?	-	✓	✓	Historic assets such as listed buildings and conservation areas will remain relatively unaffected by this scenario, and the emphasis in the AAP would be to preserve historic assets. However there would be limited ability to enhance and highlight heritage assets in place-making for the area. There would be fewer opportunities to promote new cultural, leisure and sports facilities which would not enhance the health of the population and provide facilities for children and young adults.
IIA 13 To protect and enhance open spaces, green corridors and biodiversity	?	-	-	x	There would be fewer new green spaces and green infrastructure provided in this scenario, and the OA is not currently well served by green spaces and opportunities to improve biodiversity. The lack of provision of green spaces could impact on the long term health and wellbeing of the population particularly due to proximity to heavy traffic.
IIA 14 To reduce vulnerability to flooding	?	✓	✓	✓	The Southwark Local Flood Risk Management Strategy seeks to manage the effects of pluvial and surface water flooding in the OA. Managing the impact of flood risk improves safety for local people. In this scenario there may be fewer opportunities for the implementation of natural flood risk management such as SUDS.
IIA 15 To provide everyone with the opportunity to live in a decent home	?	-	✓	✓	In this scenario there would be some opportunities for new housing however this would need to be carefully balanced with the proximity to existing industrial areas. Improvements to living conditions and public realm would be provided at a more site specific level. Providing good quality housing benefits the health and wellbeing for many groups including families, children and older people, and people with specialist needs such as those with learning or physical disabilities. By not delivering the BLE it is not unlocking further potential for the delivery of new homes supported by sustainable transport infrastructure.
IIA 16 To promote sustainable transport and minimise the need to travel by car	?	-	x	x	The use of the private vehicle is likely to remain the dominant mode of transport and traffic levels of the Old Kent Road and use of heavy vehicles to service industrial areas is unlikely to change significantly. It would be difficult to promote more walking and cycling without significant interventions to the transport network to improve connectivity. This could have an impact on the health and safety of local people, such as older people and children who are more likely to be involved in road traffic accidents. The area would benefit from improvements to bus networks particularly if bus rapid transit was introduced. The Bakerloo Line Extension not being delivered would bring significant disbenefits because it would not address issues of connectivity and accessibility in and around the Old Kent Road. By not delivering the BLE it is not addressing the issue of the dominance of private vehicles and reliance on unsustainable modes of travel, this causes huge disbenefits in terms of sustainability, access and community cohesion.
IIA 17 To provide the necessary infrastructure to support existing and future development	?	-	?	?	Without the identification of land to provide infrastructure including new education and health facilities and open space and the identification of area-wide improvements the delivery of infrastructure would be less coordinated. This could lead to delays in bringing forward necessary projects and slow down development depending on them. NSP policies would otherwise require development to deliver supporting infrastructure.

	Option B: High growth scenario with two stations under BLE	S	M	L	Commentary on Results
IIA 1 To tackle poverty and encourage wealth creation	✓✓	✓✓	✓✓	✓✓	<p>The area-wide redevelopment will revitalise the neighbourhood with an improved living environment that will encourage inward investment and boost local economy such as retail uses serving the local community. The growing population under the intensification and revitalisation of the existing industrial and residential area will produce economic synergy by creating new job opportunities for local residents and providing enterprise opportunities in the business area.</p> <p>It will diversify the economy and increase the number of higher paid jobs in the area as technical, digital and professional service industries. It will improve local facilities and public transport in the area lowering costs for residents and requiring less need to travel further afield for shopping, community, health and leisure facilities. This would benefit many groups including disabled people, pregnant women and young adults. There may be better provision of facilities for those on low incomes or with specialist needs such as alcohol and drug problems, people who experience domestic violence or people with a long term illness.</p>
IIA 2 To improve the education and skill of the population	✓✓	✓	✓	✓✓	<p>There would be more opportunities for training and apprenticeships as a result of new development and new jobs in mixed use neighbourhoods. Redevelopment of industrial land would bring change in the type of jobs available and improve the floorspace to jobs ratio however it would be important to maintain industries which service central London and contribute to the current function of the OA as an industrial area. BME groups are strongly represented in the population statistics for the area and improved access to education or new skills would have a positive impact on young people in these groups and young people in general as well as the unemployed and those on low incomes.</p>
IIA 3 To improve the health of the population	✓✓	✓	✓	✓✓	<p>In the OA people in bad health are slightly above the average for London. In this scenario there are many more opportunities for improving and providing new health facilities, new green spaces and leisure facilities which can help decrease lifestyle risk factors such as smoking, poor diet, substance misuse and lack of exercise. Poor health can be exacerbated by socio-economic challenges such as poor housing and unemployment and in this scenario there are more opportunities for significant improvements to the OA. Improvements to access to health facilities, better quality housing, employment opportunities, better public transport and new green spaces would improve physical and mental health. Improving connectivity and green routes lessens to the impact of vehicular pollutants and better air quality and would particularly benefit disabled people and pregnant women.</p>
IIA 4 To reduce the incidence of crime and the fear of crime	✓✓	✓	✓	✓✓	<p>The relatively high levels of deprivation in the area highlight particular issues in income and crime levels. Young single people aged 18-35 in rented accommodation are more likely to be victims of high rates of crime. Improvements to public transport accessibility, new and safer routes and safety features would significantly reduce the risk of crime. Introducing residential areas and new streets to existing large scale and quiet industrial areas would improve the amount of footfall and overlooking of public areas improving public realm and safety.</p>
IIA 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓	✓✓	<p>The OA has a number of existing community networks and a diverse population. There are high numbers of faith premises in the area which benefit many religious groups. The AAP would need to ensure the existing community networks are maintained and improved in redevelopment. There would be significantly more opportunities for new community space suited to a range of groups and improving areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, pubs, faith premises and community halls. The redevelopment opportunities will reduce physical barriers and severance improving the layout of the streets and promoting social interaction.</p>
IIA 6 To reduce contributions to climate change	✓✓	✓✓	✓✓	✓✓	<p>With the progressive policies, there would be significantly more opportunities to improve green energy in this scenario through requiring new development to meet high standards of sustainability, renewable energy and efficient use of resources, including connection to district heating network. Two new underground stations and improved surface transport would reduce the reliance on the private car reducing emissions from vehicles. New walking and cycling routes would also be provided improving sustainable modes of transport. This would improve the health of the population by reducing exposure to pollutants and harmful emissions from industry, traffic and domestic life. The densification of under utilised land and improved performance of new development can enable long term carbon savings.</p>

<p>IIA 7 To improve the air quality</p>	<p>✓✓</p>	<p>✓</p>	<p>✓✓</p>	<p>✓✓</p>	<p>The AAP would encourage a reduction in the number of journeys made by car by the introduction of the BLE and two new underground stations, as well as significant improvements to the walking and cycling network and surface transport. This would improve air quality in the area if car journeys are reduced although the Old Kent Road will remain a key vehicular route in and out of London. Improvements to air quality and less exposure to vehicular and industrial emissions will improve the health of the population particularly older people, children, pregnant women, people with a long term illness and the homeless. It will be important to manage the impacts of construction on air quality and the long term sensitivity of intensified development to the existing poor air quality in the area and achieve improvements if possible.</p>
<p>IIA 8 To avoid waste and maximise, reuse or recycle waste arising as a resource</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>The AAP would need to promote the reduction of waste in construction particularly as large scale change is envisaged. The waste disposal and recycling facilities for commercial and residential development would need to be carefully managed in mixed use schemes. Additional population levels will increase waste from both commercial and domestic developments. It will be important to maximise the reuse and recycling of waste during construction and in new development. For new development in the area services will be provided by the Old Kent Road integrated waste management facility including materials recovery and mechanical biological treatment.</p> <p>The development in the area will connect to SELCHP district heat network that turns waste into energy and converts the excess heat to heat that can be used in heating buildings. This is considered to be a renewable source of heat, a process to more sustainably manage waste through combustion, to reduce the amount of waste going to landfill.</p>
<p>IIA 9 To encourage sustainable use of water resources</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>The demand for water and foul sewage disposal is likely to increase with significant levels of new development, and the AAP would need to encourage sustainable reuse of water and use of rainwater limiting the impact on surface and groundwater in new development. The sustainable use of water would benefit the health of the population.</p>
<p>IIA 10 To maintain and enhance the quality of land and soils</p>	<p>✓</p>	<p>✓.</p>	<p>✓.</p>	<p>✓✓.</p>	<p>There will be many more opportunities to make effective use of land through reuse of previously developed land and remediate issues of contamination which may affect many industrial areas around the OA. Soil quality will improve with more opportunities for new green spaces. Remediation of the effects of contamination would have a positive impact on health, particularly on more vulnerable groups.</p>
<p>IIA 11 To protect and enhance quality of landscape and townscape</p>	<p>✓✓</p>	<p>✓.</p>	<p>✓.</p>	<p>✓✓.</p>	<p>There would be many more opportunities to enhance the quality of townscape and landscape creating a new network of streets, improved connectivity and new green spaces. Sustainable construction techniques would be encouraged. Tall buildings would need to be carefully considered in terms of local and strategic views and ensuring public realm on ground level remains high quality and well used. This would create opportunities to improve health and wellbeing and security, which could affect groups such as the homeless, women, older people and those with physical disabilities.</p>
<p>IIA 12 To conserve and enhance the historic environment and cultural assets</p>	<p>✓.</p>	<p>✓.</p>	<p>✓.</p>	<p>✓.</p>	<p>The AAP would present the opportunity to enhance and highlight heritage assets in place-making for the area. However large scale regeneration would need to carefully consider impact on adjoining conservation areas and listed buildings. There would be many more opportunities to promote new cultural, leisure and sports facilities which would enhance the health of the population and provide facilities for children and young adults.</p>
<p>IIA 13 To protect and enhance open spaces, green corridors and biodiversity</p>	<p>✓</p>	<p>-</p>	<p>-</p>	<p>✓.</p>	<p>There would be improved access to green spaces and new parks and green infrastructure provided in this scenario creating opportunities to improve biodiversity. The provision of green spaces would improve the long term health and wellbeing of the population and may benefit children through provision of new play spaces. It would be vital to balance new high density development with increased population levels with an appropriate level and quality of green spaces that improves the townscape particularly around tall buildings.</p>
<p>IIA 14 To reduce vulnerability to flooding</p>	<p>✓</p>	<p>✓.</p>	<p>✓.</p>	<p>✓.</p>	<p>The effects of pluvial and surface water flooding in the OA would need to be carefully considered to reduce the impact of flood risk and improve safety for local people. In this scenario there may be more opportunities for the implementation of natural flood risk management such as SUDS.</p>
<p>IIA 15 To provide everyone with the opportunity to live in a decent home</p>	<p>✓✓</p>	<p>✓.</p>	<p>✓.</p>	<p>✓✓.</p>	<p>In this scenario there would be major opportunities for new housing significantly improving the supply in Southwark and meeting local housing need as well as providing new affordable homes. New housing would meet appropriate space standards and provide a mix of size and tenures, using good quality materials to provide decent homes for all. High quality design of the public realm in residential schemes will also improve living conditions. There will need to be careful management of mixed uses in this scenario so that other uses such as employment, leisure, retail, education or community uses combined with residential remain compatible and appropriately managed. Providing good quality housing benefits the health and wellbeing for many groups including families, children and older people, and people with specialist needs such as those with learning or physical disabilities.</p>

<p>IIA 16 To promote sustainable transport and minimise the need to travel by car</p>	✓	-	-	✓✓•	<p>There would be significant improvements to public transport and reducing the need to travel by car by the introduction of the BLE and two new underground stations, improved walking and cycling routes and improved surface transport and buses. Improvements to crossing points and pedestrian connectivity along the Old Kent Road as well as better management of surface transport and junctions will reduce road traffic accidents. This would significantly improve the health and safety of local people, such as older people and children who are more likely to be involved in road traffic accidents. Better accessibility will also benefit groups such as people on low income, the unemployed, residents, disabled people and older adults.</p> <p>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).</p> <p>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).</p>
<p>IIA 17 To provide the necessary infrastructure to support existing and future development</p>	✓	-	-	✓✓•	<p>Large scale infrastructure improvements to transport, green space and community facilities would be provided to support revitalised neighbourhoods. In this scenario it is likely a review of CIL would take place to help fund large scale infrastructure improvements in the OA. This would benefit all groups and improve accessibility to health and social facilities.</p>