



Old Kent Road Area Action Plan
Proposed Submission Version
October 2024

Integrated Impact Assessment Appendices

Appendix 11: Scoping Report Consultation Summary and link to OKR AAP Scoping Report

Old Kent Road Area Action Plan 2024 Integrated Impact Assessment: Document Locator	
No.	Title
Appendix 1	SEA Directive Requirement
Appendix 2	Relevant Plans, Programmes and Strategies
Appendix 3	Baseline data – Facts and Figures
Appendix 4	Sustainability Appraisal Framework
Appendix 5	Assessment of the Strategy and Vision
Appendix 6	Assessment of the Strategic and Development Management Policies
Appendix 7	Assessment of the Sub Areas and Site Allocations
Appendix 8	Monitoring Indicators against Sustainability Objectives
Appendix 9	Baseline Indicators Table
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Appendix 12	Reasonable Alternatives Considered
Appendix 13	Mental Well-being Impact Assessment Screening
Appendix 14	OKR AAP References

Consultation on the OKR AAP

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	November 2024 - February 2025
Submission of the draft Old Kent Road Area Action Plan Integrated Impact Assessment Report to the Planning Inspectorate	2025
Examination in Public	2026
Adoption of the Old Kent Road Area Action Plan	2026

Full details of the consultation on the full OKR AAP can be found in Appendix C Consultation Report.

This Consultation Report details the extent of consultation done on the AAP, the consultation events that have been organised and how the council has engaged with the local community, statutory consultees and other stakeholders.

The IIA appraisal has evolved as iterations of the masterplan and as the OKR AAP has been tested and collated. Consultation comments have informed this process.

Consultation comments have also developed the IIA appraisal itself. The consultation response below are made on a previous version of the IIA and the IIA has evolved through different iterations since. The IIA appraisal will continue to be

updated as the OKR AAP evolves through different versions to reflect the changes in the strategy, vision, masterplan and policies.

Consultation on the OKR AAP, Old Kent Road planning application and masterplan iterations is ongoing.

Ongoing consultation with local residents is facilitated in two main ways:

- **231 Old Kent Road**

231 Old Kent Road is a new community space on the Old Kent Road. It is a place where all local residents can get involved with the regeneration in the Old Kent Road.

The idea is to bring the whole community together to help shape the development of Old Kent Road over the next 20 years.

We want 231 to be a place where people who live and work nearby can come and see the latest plans and talk to us about the regeneration programme. But we also want to use the venue for exhibitions and events and to provide space for community groups to hold their own meetings.

231 Old Kent Road officially opened in April 2019 with the Museum of Us, a free exhibition and programme of events. It is open regularly for visitors and residents.

- **Old Kent Road Community Review Panel**

The Community Review Panel is a way for LB Southwark to better understand the needs of the local community in the Old Kent Road.

The panel gives independent advice on planning in the regeneration area. It discusses important issues, including housing, transport, public and green spaces, and the environment. This helps to ensure all new developments are of the highest possible quality and meet the needs of people living and working in the area, both now and in future.

The panel meets once a month to discuss proposals. These discussions are subsequently written up as formal reports to feed into decisions made by the council. All of the panel's recommendations are taken seriously and will be a formal part of the planning process.

The Panel is made up of 12 members who know the local area and the panel is managed by an external group.

Report on Consultation on the Old Kent Road Integrated Impact Assessment Scoping Report

The Old Kent Road Integrated Impact Assessment Scoping Report from 2016 can be found here: https://www.southwark.gov.uk/assets/attach/1734/2.2.7-DL-OKR_AAP_Integrated_Impact_Assessment_Scoping_Report_Feb_2016.pdf

The scoping report set out the current baseline data and information for the opportunity area including environmental, social and economic matters relevant to the area which are likely to be affected by the Old Kent Road Area Action Plan/Opportunity Area Planning Framework (AAP/OAPF). The report also established a framework for undertaking the IIA and set out the sustainability, health and equalities objectives, decision making criteria and potential indicators that are used to assess the impacts of the AAP/OAPF.

Consultation took place on the scoping report between **12 February 2016** and **18 March 2016** and this document reports on the responses received and how these have been incorporated into the preparation of the Interim IIA for this draft of the OKR AAP.

The following statutory consultees were consulted on the scoping report:

Historic England
Environment Agency
Natural England (no response received)

The following individuals and organisations provided comments on the scoping report:

Highways England
Heiko Steinmann
Old Kent Road People
Thames Water
TFL Taxi and Private Hire
TFL Borough Planning
Richard Lee
Scotia Gas Networks
Southwark Studios
Cass Cities
Jeremy Leach
Friends of Burgess Park

Summaries of comments and council's response

The following table summarises responses by relevant sections/topics of the scoping report and provides the council's response. Many of the comments have been considered and incorporated into the IIA, particularly regarding the key environmental, health and equality issues and the role and criteria for the IIA objectives. Respondents have been added to our consultation database where requested.

The Scoping Report outlined the existing baseline information for the area by which future changes can be monitored and assessed. Strong analytical data has been prepared alongside the issues and options informal stages of preparation in the form of evidence base documents. The findings of these documents as they have evolved have been well communicated with local people through community forums and

business consultations. The evidence base has continually evolved to inform the plan progress and will be published alongside the draft AAP.

Representation	Comments received	Council's response
Exploration of options and consultation		
Richard Lee OKR People	Consultation that has been undertaken does not allow enough time for a full exploration of options with local residents and businesses.	The council undertook informal consultation exploring issues and options over approximately one year, discussing options with local residents in the regular community forum meetings with time for feedback and reflection in each meeting.
Richard Lee	The objectives identified in the scoping report are used to identify options but this document was published earlier this year with little time to consider other options with the community.	The objectives in the scoping report were formulated both with reference to the discussions in the community forum on social, environmental and economic issues and by certain requirements set by legislation such as the SEA regulations. As consultation concluded in March the council has adequate time to consider the options that have evolved and whether the objectives are appropriate following consultation on the scoping report when preparing the draft plan for publication in June.
Richard Lee	The council employed Allies and Morrison Urban Practitioners to develop a masterplan where two options were presented to the community forum with little time for appropriate analysis and comments.	The place-making study is a key part of the evidence base but does not represent a masterplan for the area. It guides place-making principles for new development and explore opportunities for cohesion across the whole opportunity area. The results of the 'planning for real' exercise allowed many discussions to take place and smaller groups created different visions across the areas. This was fed back visually and verbally to subsequent forum sessions demonstrating the many various options explored by local people. These sessions were also guided by previous comments and suggestions from the forum on the thematic issues explored in earlier sessions.
Friends of Burgess Park	How does the Allies and Morrison work fit in to the plan making?	

Jeremy Leach	The AAP needs to ensure the voices of under-represented groups are considered in the plan development.	Suggestions for consultation noted. Opportunities for consultation with a wide range of groups will be continued at formal stages of publication.
Richard Lee OKR People	The East Walworth ward should be removed from the opportunity area boundary as it contains many council housing estates which would not be development sites.	The East Walworth ward borders the Old Kent Road itself highlighting importance for road safety and transport infrastructure improvements in particular. It also includes non-residential sites along the road corridor which may be suitable for redevelopment.
Heiko Steinmann	As a resident of the East Walworth Ward along the OKR the envisaged developments and tube stops along the OKR are welcomed. The East Walworth Ward should be included in the whole planning process.	Support noted.
Friends of Burgess Park	People currently living in Council property are worried that they might find their buildings redeveloped as has happened and is happening to the Heygate and the Aylesbury with implications for local communities and affordability. The speed of change across the central area of Southwark is now happening extremely fast and understanding all the implications of all the activity is very difficult.	Noted. The OKR AAP has focused to date on the redevelopment of retail and industrial land. Local communities are encouraged to participate in the plan-making process and it is important consultation reaches a wide range of groups particularly in delivery and monitoring of plan objectives.
Baseline data		
Richard Lee	The baseline data is partial and prejudicial in relation to housing (affordable housing types are not distinguished) and some issues such as education and health are not at an appropriate local scale.	The baseline data for housing, health and education is based on statistics and available information for the area. Affordable housing encompasses a range of types and tenures including social and affordable

		rented. The needs for the opportunity area in terms of education and health facilities will be carefully considered in the plan.
CASS Cities	The extent of the baseline information is not adequate for the scope of the area in question and does not have consistent boundaries which can be accurately compared to the Opportunity Area. The use of specific examples is not considered to be fair or representative of the OA.	The Scoping Report acknowledges limitations in data, gaps and encourages continuous review and updates. Different boundaries are a necessary limitation of the available data but the areas referred to from each data source are noted in the scoping report for clarity. Significant planning applications are considered to be relevant to understanding current development trends in the area.
CASS Cities	Has there been any further study into potential population growth after the implementation of the AAP and the extension of the Bakerloo Line to the Old Kent Road?	Population estimates based on the growth options are considered in the IIA and the AAP in terms of meeting future needs.
CASS Cities	Mosaic data does not correlate with the census data and presents a misleading picture of the demographic of the Opportunity Area.	The mosaic household index has been used as a broad indicator of socio-economic conditions in which people live with the limitations recognised and hence a cross-check provided with other indicators in the report.
CASS Cities	Growth in churches and art galleries/studio space are clustered around the north side of the OA, nearer the Central Activity Zone. Will the council commit to expanding civic space in line with population growth?	The provision of cultural space to support a larger population and contribute to place-making in the AAP is an important component of the plan.
Richard Lee	No evidence is provided on the impact and viability of an extension to the Bakerloo Line.	The impacts of the options for transport infrastructure including the BLE are considered in the IIA.

<p>Richard Lee CASS Cities</p>	<p>Evidence on industrial activity does not make use of the GLA/Southwark Employment Study 2015 and it has not been made public. Summary statements seem to show a lack of understanding about the existing economic make-up of the area and do not align with the findings of the GLA report.</p>	<p>The evidence base has been continually prepared throughout the issues and options informal consultation to inform the plan and will be published alongside the draft plan. The early findings of the evidence base has been consistently presented to the community forum/businesses and provided a forum for discussion and evolution of the documents (e.g. Place-making study, characterisation study, employment strategy). The LBS/GLA Employment Study and University studies give a detailed picture of the existing economy and employment uses in the area at the present time and this is reflected in the IIA. Many of the trends in economic change anticipated in the area are outlined in our Employment Land Review and emerging Employment Strategy for the OKR which has been used to inform the plan.</p>
<p>CASS Cities</p>	<p>SME's are a key component of Southwark's economy. Will the Council commit to expanding all types of space required to accommodate SMEs?</p>	<p>The council is developing policies in the New Southwark Plan and the OKR AAP to support the large proportion of SME businesses in the OA. The inclusion of existing businesses in redevelopment in sectors which are currently thriving will be encouraged.</p>
<p>Southwark Studios</p>	<p>Although the importance of workspace providers is noted there are not yet recommendations, protections or suggestions as to how to keep creative workspace providers in the area as redevelopment occurs.</p>	<p>The scoping report identifies the current baseline data for the area. However it will be a key part of the plan to ensure cultural facilities and provision of workspace for small businesses and creative industries can participate in regeneration opportunities.</p>
<p>Historic England</p>	<p>The design and heritage section should briefly and consistently summarise the historic significance of the heritage assets and their sensitivities. There are a number of points within the baseline summary</p>	

<p>Environment Agency</p> <p>Scotia Gas Networks</p>	<p>which need to be further clarified. We would recommend that the development of the scoping should seek to identify the potential for impact on heritage assets over a wider area based on the potential impact for taller development proposed within the area.</p> <p>We consider the Integrated Impact Assessment objectives and indicators appropriate. Southwark SFRA was prepared in 2008; therefore there is need for review to incorporated changes in the national planning policy.</p> <p>The OKR AAP should re-evaluate the existing allocation for the gasworks site.</p>	<p>The AAP includes detailed policies relating to design and heritage, written in conjunction with our design and conservation team recommendations to inform all mitigated and potential impacts. The Characterisation Study part of the evidence base provides extensive detail and analysis of the history and composition of the Old Kent Road OA. The findings of this study and a more comprehensive analysis of the existing heritage baseline is included in the IIA.</p> <p>Southwark is preparing an updated SFRA due to be published shortly (mid 2016). This can be used to review flood risk management in the future development of the AAP. AAP policies will encourage management of flood risk and the incorporation of SUDS.</p> <p>The gasworks site is included in the OA and will be considered in the AAP.</p>
<p>Water efficiency and management</p>		
<p>Thames Water</p>	<p>Development within the Old Kent Road area could impact on water supply and sewerage infrastructure. An IWMS should be commissioned to highlight the long term infrastructure requirements for water demand and drainage in the AAP area. The water mains referred to in section 3.4.30 provide clean water and are not part of the sewerage network.</p>	<p>Policies in the AAP/OAPF will encourage the efficient use of water resources, sustainable reuse of water and encourage the delivery of SUDS and rainwater harvesting. Southwark is exploring the opportunities for an Integrated Water Management Strategy with Thames Water and the GLA for the opportunity area to manage future demand. Correction noted.</p>
<p>Transport</p>		
<p>TFL Taxi and private hire</p>	<p>Taxi and private hire vehicles should be included in the consideration for the AAP, particularly in terms of provision of taxi ranks and set down/pick up facilities benefiting disabled and elderly members of the public.</p>	<p>New development will be required to provide appropriate servicing and taxi drop off points particularly for development such as new hotels or large scale retail development. There may be</p>

CASS Cities	The OA is not particularly well served by existing underground stations and PTAL ratings are lower than outlined in the scoping report.	opportunities to incorporate taxi ranks in the development of the underground stations and this can be a part of the detailed considerations for the stations at a later stage of the plan period.
Friends of Burgess Park	What does the council and local people actually want to achieve, what big, key beneficial changes. One proposal would be for the OKR to transferred into a tunnel, it has a major negative impact on the area. Air pollution levels are extremely high should any housing or schools be near the OKR as it currently is?	The scoping report gives a wider analysis of transport connections in the area however it is agreed the Elephant and Castle underground station has limited ability to service the whole of Old Kent Road and the PTAL ratings are lower in some parts of the OA particularly towards the south. This has been updated and reflected in the IIA.
TFL Borough Planning	Support for transport interventions encouraging safer walking and cycling which has positive effects on equalities health and the environment.	Noted. The introduction of the BLE would introduce positive impacts on air pollution and sustainability for the area.
		Noted.
Green space		
CASS Cities	CASS Cities research shows the OKR area to be above the London average for green space rather than under-served as reflected in the scoping report.	The open space baseline information refers to the Southwark Open Space Strategy sub-area rather than ward data, in which the proximity of Burgess Park is recognised. The Cass study area has been drawn to include the park, but excludes other neighbourhoods served by the park so may not be fully representative.

Jeremy Leach	The low provision of green space in the area demonstrated innovative ways need to be found to create useable and accessible open space in the OKR area.	Noted and will be evolved through policies in the AAP.
Friends of Burgess Park	The IIA which seems very comprehensive although it talks about children and young people but does not specifically mention early years provision or access to open air sports or gym facilities. Access to Burgess Park is mentioned plus green routes and linking Burgess Park to Southwark Park. Limited green space in the area is noted as it the need for increasing provision. Shortage of play facilities in the area also noted.	Nurseries and early years education is mentioned at the Community Uses section (page 23). Sports and gym facilities are mentioned under Commercial Leisure Uses (page 33). New and improved provision of these facilities will be encouraged in the AAP.
Comparison of IIA Objectives		
TFL Borough Planning Jeremy Leach	The links between IIA 3 and IIA 16 could be made clearer.	The links between improved transport facilities particularly walking and cycling and improvements to public health have been made clearer throughout the report. The objectives are noted as compatible in the IIA.
Richard Lee	Whether the objectives are compatible with each other will depend upon formulation of policy as well as implementation.	It is appreciated that the interaction of objectives is complex and assumptions made cannot pick up every eventuality of how policies will interact with several objectives. However it is considered good practice to undertake a high level comparison in order to anticipate areas where incompatibility may arise.
Key environmental, health and equality issues (Table 4.1)		
TFL Borough Planning	The links between health and transport should be strengthened as transport choice is an increasingly important factor in health.	The links between healthy lifestyles and active forms of travel have been added to Table 4.1 in the IIA. The strong links between walking and cycling and health benefits are noted in the IIA.

<p>TFL Borough Planning Richard Lee CASS Cities Jeremy Leach Historic England Environment Agency</p>	<p>A number of suggestions for alterations or additions to Table 4.1 have been suggested by respondents.</p>	<p>The additional issues identified are noted and taken into account in the IIA. Many of the additional issues identified are already covered by broader issues identified in Table 4.1 however some points have been further clarified or added.</p>
<p>Methodology</p>		
<p>CASS Cities</p>	<p>How does the system of symbols employed to represent findings help in the decision making process?</p>	<p>The identification of major and minor impacts is good sustainability appraisal practice and allows reasonable alternatives to be understood and the reasons for choosing a preferred option explained. The findings across objectives are not compared quantitatively. The IIA gives further qualitative analysis of options and policies when measured against the objectives.</p>
<p>IIA Objectives (Table 5.1)</p>		
<p>TFL Borough Planning Richard Lee CASS Cities Jeremy Leach Historic England Environment Agency Friends of Burgess Park</p> <p>CASS Cities</p>	<p>A broad range of new questions and additional monitoring measures were suggested.</p>	<p>A broad range of new questions and additional monitoring measures have been added to Table 5.1 in the IIA where this is considered appropriate.</p> <p>The questions to consider in Table 5.1 are intended to help those carrying out the assessment and the report reader to interpret the IIA objectives as they apply to the subject matter of the AAP. They are not exhaustive.</p> <p>We can therefore consider the suggested additional questions whilst carrying out the assessment where they relate to the scope of options and policies under consideration and where assumptions can be drawn from the evidence base.</p>

	The IIA objectives thoroughly highlight the issues that face any area challenged with projecting a future for itself, but do not appear to be particularly tailored towards the Old Kent Road.	The objectives do represent issues in common with other areas but the pertinent data in the baseline, emerging studies and consultation are considered in more detail in the IIA to understand local issues.
Additional plans, strategies and programmes		
TFL Borough Planning Friends of Burgess Park Historic England Environment Agency Richard Lee CASS Cities	The council received suggestions for updates and additions to Appendix 1 of the scoping report. The work completed by neighbourhood forums and University studies should be included in the baseline.	All suggestions for updates and additional documentation have been taken into account in Appendix 3 of the IIA. The Appendix also includes an additional neighbourhood tier of documents whereby research and reports prepared by Universities and neighbourhood forums is included and considered in the preparation of the plan and IIA. The document can be updated as additional plans and projects are published.
Monitoring		
CASS Cities Richard Lee	Monitoring should include a longitudinal study of the impacts of the regeneration on existing residents and businesses. Will the Potential Monitoring Indicators be used in future monitoring? The IIA could contain more statistical information from the evidence base to minimise the chance of misinterpretation in future monitoring	Monitoring will be longitudinal in nature as it will be carried out continuously over a long time period and through authority annual monitoring reports. The potential indicators in Table 5.1 will pick up impacts to both existing and new residents and businesses. The IIA considers impacts on social networks as part of the analysis and assessment. Future monitoring indicators are provided. The suggestion is noted however the evidence base is complex and also incorporates non-statistical analysis which is considered when preparing the IIA and will be an important part of future monitoring.

