Old Kent Road Area Action Plan

Proposed Submission Version

October 2024

Integrated Impact Assessment Appendices

Appendix 6: Assessment of the Strategic and Development Management Policies

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
Appendix 6	Assessment of the 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
Appendix 10	Options Testing
Appendix 11	Scoping Report Consultation Summary and link to OKR AAP Scoping Report
Appendix 12	Reasonable Alternatives Considered
Appendix 13	Mental Well-being Impact Assessment Screening
Appendix 14	OKR AAP References

Appendix 6: Assessment of the Development Management Policies

The following tables set out the sustainability impacts of the Old Kent Road AAP 'Policies' (these are Policy AAP1 to Policy AAP15) identified through the IIA process. Each of the 15 development management policies is appraised against 17 sustainability objectives (the "IIAOs"), 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 policy 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.

At the bottom of the table, there is an averaged scoring of the 17 objectives to indicate each development management policy's overall efficacy in meeting the sustainability objectives. 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%

Summary of the sustainability appraisal for each policy

The development management policies comprise:

- AAP1 – Delivery of the Masterplan;
- AAP2 – Bakerloo Line Upgrade and Extension;
- AAP3 – Homes for All;
- AAP4 – Student Homes;
- AAP5 – Businesses and workspace – The Bow Tie;
- AAP6 – Life Sciences;
- AAP7 – Town Centres, Leisure and Entertainment;
- AAP8 – Movement – People, Place and Experience;
- AAP9 – The Greener Belt – Parks and Healthy Streets;
- AAP10 – Tall Buildings Strategy – The Stations and the Crossings;
- AAP11 – Character and Heritage;
- AAP12 – Design;
- AAP13 – Climate Emergency;
- AAP14 – Water Management, Air and Noise Quality; and
- AAP15 – Great Start in Life – Child and Youth Provision.

The summary table is provided overleaf. On the pages following the summary table is a series of sixteen tables, one per development management policy, providing the detailed sustainability appraisal.

IIAO	Description	AAP1	AAP2	AAP3	AAP4	AAP5	AAP6	AAP7	AAP8	AAP9	AAP10	AAP11	AAP12	AAP13	AAP14	AAP15
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	-	-	-	-	-	-	✓✓
IIAO 2	To improve the education and skill of the population	✓✓	-	-	✓	✓✓	✓	✓✓	-	-	-	-	-	-	-	✓✓
IIAO 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓✓	✓✓	-	-	✓✓	✓✓	✓✓	✓✓
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	-	-	-	-	-	-	-	-	-	-	✓✓	-	-	✓✓
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	-	✓	✓✓	-	✓✓	✓✓
IIAO 6	To reduce contributions to climate change	✓✓	✓	✓	✓	✓	✓	✓	✓✓	✓	✓	✓	✓✓	✓✓	✓✓	✓
IIAO 7	To improve the air quality	✓✓	✓	-	-	-	-	-	✓✓	-	-	-	-	✓✓	✓✓	-
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	-	-	-	-	-	-	-	-	-	-	-	✓✓	✓	-
IIAO 9	To encourage sustainable use of water resources	✓	-	-	-	-	-	-	-	-	-	-	-	✓✓	✓✓	-
IIAO 10	To maintain and enhance the quality of land and soils	✓	-	-	-	-	-	-	-	-	-	-	-	✓✓	✓✓	-
IIAO 11	To protect and enhance quality of landscape and townscape	✓	-	✓	✓	✓✓	✓	✓✓	-	-	✓✓	✓✓	✓✓	-	-	-
IIAO 12	To conserve and enhance the	✓	-	✓	✓	✓	-	✓	-	-	✓✓	✓✓	✓✓	-	-	-

		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	historic environment and cultural assets															
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	-	-	-	-	-	-	✓✓	-	-	-	-✓✓	✓✓	✓
IIAO 14	To reduce vulnerability to flooding	✓	-	-	-	-	-	-	-	-	-	-	-	✓	✓✓	-
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	✓✓	✓✓	-	-	-	-	-	-	-	✓✓	✓	-	-
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓✓	-	-	-	-	-	✓✓	✓✓	-	-	-	✓✓	-	-
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	-	-	-	-	✓✓	✓✓	-	-	-	-	✓✓	-	✓✓
Averaged Scoring		76	29	32	35	32	21	38	38	26	15	18	41	59	50	41
Efficacy category		Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Neutral

AAP1 – The Masterplan

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The delivery of the Masterplan will provide opportunities for jobs within construction, offices, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The delivery of the Masterplan will provide new and improved facilities for education and employment that will contribute to improving the skills of the local population.
IIAO 3	To improve the health of the population	✓✓	✓✓	The provision of a new Health facility will increase the capacity of the local health service and address the overcrowding issue, which is one of the key determinants of health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The retention or provision of active frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The Masterplan will aid in the delivery of new Class F uses on site could provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.
			✓✓	The Masterplan seeks to improve areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, and community halls.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	The Masterplan will deliver development that must be in conformity with water management, District Heat Networks, open space and sustainable construction to reduce contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	The Masterplan sets out that development must be in conformity with policies set out in the OKR AAP, which include policies to reduce combustion and increase urban greening to improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	Substantial demolition and intensification of development will create new waste demands to be managed. Southwark Plan 2022 policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	✓	✓	The Masterplan will deliver development that must be in conformity with water management policies.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	The Masterplan will ensure that development is consistent with policy that ensures good environmental quality including that of land and soils. Policies in the Southwark Plan 2022 which also apply to development in the Old Kent Road Opportunity Area will ensure that contamination of soil is mitigated against properly.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	All development will be required to be in keeping with the local townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The Old Kent Road Opportunity Area has a number of listed buildings and conservation areas and development should conserve the setting and the assets themselves.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The Masterplan will deliver a series of improvements to and new green and open spaces through the delivery of the Greener Belt.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The Masterplan policy will ensure that development is in conformity with policy that states development should follow the drainage hierarchy to reduce vulnerability to flooding.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	The Masterplan policy will ensure the delivery of affordable homes in a range of sizes and tenures to meet local needs.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	The Masterplan policy ensures that all development is in conformity with policy set out in the OKR AAP. Policy AAP8 'Movement' sets out a strategy for a modal shift away from cars to more active modes of travel such as cycling and walking but improving infrastructure and safer routes for pedestrians and cyclists.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

AAP2 – Bakerloo Line Upgrade and Extension

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	The Bakerloo Line Upgrade and Extension will unlock further capacity in town centres for development and therefore provide opportunities for jobs within construction, offices and retail. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of education and training but it does not negatively impact on it. The extension and upgrade of the Bakerloo Line could have secondary effects for local businesses and employers which could enable them to upskills staff.
IIAO 3	To improve the health of the population	✓	✓	The delivery of public transport reduces the dependency of individuals on cars. This reduces combustion and the emission of carbon dioxide and other pollutants which will contribute to improved air quality and therefore impact positively on the health of the local population.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it. The provision of more public transport will provide an alternative mode of transit that some may feel safer using.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	The delivery of the Bakerloo Line Upgrade and Extension improves permeability and connectivity across the Old Kent Road Opportunity Area will combat severance between communities and encourage community interaction.
IIAO 6	To reduce contributions to climate change	✓	✓	The delivery of the Bakerloo Line Upgrade and Extension increases accessibility to public transport, which reduces combustion from individual vehicles and reduce the emission of carbon dioxide which mitigates against the issues of global warming and climate change.
IIAO 7	To improve the air quality	✓	✓	The delivery of the Bakerloo Line Upgrade and Extension increases accessibility to public transport, less reliance on private vehicles which results in less combustion and carbon emitted as well as other pollutants which creates cleaner air improving air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of soil quality but it does not negatively impact on it.
IIAO 11	To protect and enhance quality of landscape and townscape	-	-	This policy does not explicitly address the issue of landscape and townscape quality but it does not negatively impact on it. Any associated development with the Bakerloo Line Upgrade and Extension will be sensitive to and enhance landscape and townscape quality.
IIAO 12	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of biodiversity but it does not negatively impact on it.
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	The delivery of the Bakerloo Line Upgrade and Extension increases the capacity for the Opportunity Area to delivery more homes and more affordable homes to meet local needs.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	The delivery of the Bakerloo Line Upgrade and Extension improves accessibility to public transport for residents in the Old Kent Road Opportunity Area and beyond by improving connectivity to other parts of the borough. This minimises the need to travel by car.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The delivery of the Bakerloo Line Upgrade and Extension provides the necessary infrastructure to support the increase in housing and employment in the local area and to provide greater opportunities for local residents.

AAP3 – Homes for All				
IIA Objective	**Description**	**Averaged Grading**	**Sub grading**	**Commentary**
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Delivering development that provides space for employment as well as homes would help increase the job opportunities in the area. Delivering 7,000 affordable homes and further endeavouring for 50% of all homes (with a minimum requirement of 35%) to be affordable would contribute to tackling housing poverty.
IIAO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of training and education but it does not negatively impact on it.
IIAO 3	To improve the health of the population	✓✓	✓✓	High density development would support walking for more active lifestyles. Delivering homes for all people would provide the opportunity for people to remain or move to the area and benefit from the healthy environment created through redevelopment. Ensuring vulnerable residents are helped to live independently would support their health and wellbeing.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Delivering 7,000 affordable homes and endeavouring for 50% of homes (with a minimum requirement of 35%) to be affordable would give people on lower incomes the opportunity for a home in the area and support diversity in the population. 4,000 family homes would give that opportunity to households with children; likewise, 2,000 accessible and adaptable homes would give that opportunity to people with disabilities. Ensuring vulnerable residents are helped to live independently would make the area more inclusive. Enabling residents to take pride in their homes and the area would support community cohesion.
IIAO 6	To reduce contributions to climate change	-	-	The delivery of homes must meet BREEAM excellent standards and reduce carbon emissions onsite. The delivery of homes in the Old Kent Road is through medium to high densities which is a more sustainable density to reduce carbon emissions further through construction, operation of the building by occupants and the movement of occupants following the 15 minute city theory.
IIAO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly reference land and soils quality but high-density development would make efficient use of land.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	The provision of decent homes will enhance the quality of landscape and townscape as the new homes will be of good design and sensitive to the character and existing local landscape and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The provision of decent homes will enhance the quality of landscape and townscape as the new homes will be of good design and sensitive to the existing historic environment and cultural assets.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of biodiversity but it does not negatively impact on it.
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Delivering 20,000 new homes of every kind, including 7,000 affordable homes, 4,000 family homes and 2,000 accessible and adaptable homes would greatly increase opportunities to live in the area for diverse groups of people. Endeavouring for 50% of homes to be affordable would extend those opportunities as far as possible to people on lower incomes. Ensuring housing across different tenures meets the same high quality standards would ensure that all new homes are decent homes.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it.
IIAO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.

AAP4 – Student Homes				
IIA Objective	**Description**	**Averaged Grading**	**Sub grading**	**Commentary**
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Delivering development that provides space for employment as well as student homes would help increase the job opportunities in the area. The Policy is clear that student homes must be brought forward in tandem and in proportion with Class C3 housing, and Class C3 affordable homes, in order that housing poverty is tackled.
IIAO 2	To improve the education and skill of the population	✓	✓	Increasing the supply of student housing will ensure high quality managed housing options are available to those in higher education, improving their overall education experience. A sufficient supply of student housing locally will help support the growth of the HE institutions operating in and around the Opportunity Area, potentially expanding the availability of higher education opportunities amongst the local population.
IIAO 3	To improve the health of the population	✓✓	✓✓	High density development would support walking for more active lifestyles. Delivering homes for the student population would provide opportunities for people to remain or move to the area and benefit from the healthy environment created through redevelopment. Ensuring wheelchair user residents in HE are helped to live independently would support their health and wellbeing.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Delivering student homes alongside conventional housing, and requiring those PBSA developments to provide facilities where the student population can interact with the wider community, will help contribute towards mixed and balanced neighbourhoods. Ensuring vulnerable residents are helped to live independently would make the area more inclusive. Enabling residents to take pride in their homes and the area would support community cohesion.
IIAO 6	To reduce contributions to climate change	✓	✓	The delivery of homes must meet BREEAM excellent standards and reduce carbon emissions onsite. The delivery of homes in the Old Kent Road Opportunity Area is through medium to high densities which is a more sustainable density to reduce carbon emissions further through construction, operation of the building by occupants and the movement of occupants following the 15 minute city theory.
IIAO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly reference land and soils quality but high-density development would make efficient use of land.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	The provision of decent student homes will enhance the quality of landscape and townscape as the new homes will be of good design and sensitive to the character and existing local landscape and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The provision of decent student homes will enhance the quality of landscape and townscape as the new homes will be of good design and sensitive to the existing historic environment and cultural assets.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of biodiversity but it does not negatively impact on it.
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy sits under the 'parent' student homes policies of the London Plan and Southwark Plan, which provide a route for affordable student rooms to be delivered where viability allows – which would potentially enable local lower-income young people entering higher education to live affordably in their local area. In addition to this, AAP4 promotes high quality residential design to ensure the student demographic can enjoy the same high quality living standards as other sections of the population.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it.
IIAO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.

AAP5 – Businesses and workspace – The Bow Tie				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Creating 10,000 new jobs by 2036 —achieved through retaining and increasing floorspace as well as increasing jobs density— would greatly increase employment opportunities in the area. Delivering a more diverse mix of light industrial, offices, manufacturing, distribution, and creative workspaces suitable for occupiers would make these opportunities accessible to people from different groups. The creation of a new major town centre with jobs in retail, leisure, education, health and entertainment would also diversify the jobs offer. Space for existing small and independent businesses to grow through retention, managed relocation and provision of managed workspace and affordable workspace would support local wealth creation and a healthy local economy.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Working with businesses to deliver specific training to enable access to new job opportunities would build work skills of residents. Informal education in a network of cultural spaces would improve the wellbeing of people of all ages.
IIAO 3	To improve the health of the population	✓✓	✓✓	The innovative mixing of uses and an improved pedestrian environment both on the Old Kent Road and in a wider network of shopping frontages, streets and squares across the new town centre would encourage walking for active lifestyles. The creation of spaces to gather and socialise in the town centre would encourage social interaction. More opportunities for leisure, entertainment, recreation, play and culture would support improved wellbeing. A new community health hub would improve the delivery of primary and community healthcare services and support health improvement and healthy lifestyles.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Increasing the numbers and types of jobs in the area would create more opportunities for working age people of all backgrounds. Affordable workspace for non-profits could provide accommodation for community groups and organisations that support diversity in the local population. Convenient facilities would make town centre amenities more accessible and inclusive. Space to gather and socialise and for events would encourage community cohesion.
IIAO 6	To reduce contributions to climate change	✓	✓	Transforming the format of retail from car-based warehouses to city centre shops and an environment to encourage walking would discourage private car use and contribute to carbon emission reductions.
IIAO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it. Delivering an innovative mix of land uses would encourage the efficient use of land.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Development creating a more attractive street environment with buildings of an innovative design would improve the townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	Stitching together the historic high street with new shopping frontages on the Old Kent Road would enhance the historic environment by recovering the character of the street that has been lost. Raising the profile of the area as a cultural destination would improve its cultural assets.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open spaces but it does not negatively impact on it.
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIAO 15	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of new homes delivery but it does not negatively impact on it.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it. Mixing land uses and providing improved pedestrian routes would encourage walking and discourage car use.
IIAO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.

AAP6 – Life Sciences				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Creating 10,000 new jobs by 2036 by retaining and increasing floorspace and increasing jobs density would greatly increase employment opportunities in the area. Policy AAP6 is important in this regard in its aim to expand the range of employment uses, including in a higher paid and higher skilled emerging sector. The creation of a new major town centre with jobs in retail, leisure, education, health and entertainment would also diversify the jobs offer. This would support local wealth creation and a healthy local economy.
IIAO 2	To improve the education and skill of the population	✓	✓	Policy AAP6 requires life sciences developments to demonstrate a strategy for working with the local medical and higher education sectors to create new employment, training and research opportunities for those living, studying and working locally. This will help to build the work skills of residents.
IIAO 3	To improve the health of the population	✓	✓	Providing new employment opportunities for the resident working population in an emerging sector would support local wealth creation, impacting positively on the mental health of the local beneficiary population.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	Increasing the numbers and types of jobs in the area would create more opportunities for working age people of all backgrounds, and in so doing would foster community integration and cohesion.
IIAO 6	To reduce contributions to climate change	✓	✓	Life sciences developments must meet excellent standards and reduce carbon emissions on-site. New life science land uses would be delivered in medium to high densities, and often in co-location with other non-employment uses, creating more sustainable densities. Carbon emissions would be reduced further through the construction stage, the operation of the building by occupants and the movement of occupants following the 15 minute city theory.
IIAO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it. Delivering an innovative mix of land uses would encourage the efficient use of land.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	Development creating a more attractive street environment with life sciences buildings of high quality design would improve the townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of heritage assets but it does not negatively impact on it
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open spaces but it does not negatively impact on it.
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIAO 15	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of new homes delivery but it does not negatively impact on it.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it.
IIAO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.

AAP7 – Town Centres, Leisure and Entertainment				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The creation of active ground floor uses and vibrant town centres will create employment opportunities for local people. This would support local wealth creation and a healthy local economy.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The creation of a healthy local economy and diversifying uses creates opportunity for local people to benefit from employment, skills and training.
IIAO 3	To improve the health of the population	✓✓	✓✓	By improving accessibility to more vibrant town centres and employment opportunities, it will improve the mental wellbeing of local residents as they are able to experience a better high street experience in a safer way, with more opportunities for social interaction. This reduces social isolation for local residents as well.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	This policy aims to deliver a mixed-use high street to improve the high street experience by making it feel safer and more inclusive as well as successfully integrating with surrounding development. Attracting people back to the high street, creating a stronger sense of place, and enabling social encounters all help to promote community cohesion. A critical element in achieving this is the ground floor strategy for the Old Kent Road, which seeks to diversify uses and creating smaller local shopping frontages that are quieter and more accessible for all residents.
IIAO 6	To reduce contributions to climate change	✓	✓	By altering the format of town centres and attracting pedestrians back to the high street, the high street is transformed from car-based warehouses to city centre shops and an environment to encourage walking would discourage private car use and contribute to carbon emission reductions.
IIAO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	By creating active ground floor frontages this improves the landscape and townscape of the by making them more vibrant and attractive.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The policy requires ground floor uses to be visible from the street and sets out a preference for shutters not to be used. This enhances the historic environment and cultural assets by improving the appearance of the high street and ensuring it is sensitively designed with these assets in mind.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open spaces but it does not negatively impact on it.
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIAO 15	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of new homes delivery but it does not negatively impact on it.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	This policy aims to deliver social and health infrastructure in town centres to improve accessibility to vital services and infrastructure needed to support existing and future development to meet local need.

AAP8 – Movement – People, Place and Experience

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	The 'Movement' policy aims to address the issue of poverty by providing opportunities for safer and more active movement and travel for all. By improving walking and cycling routes this improves accessibility to active travel and ensures that all are able to benefit from the opportunities associated with greater mobility.
IIAO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of education and training but it does not negatively impact on it.
IIAO 3	To improve the health of the population	✓✓	✓✓	The 'Movement' policy aims to improve walking and cycling routes to encourage more people to travel more sustainably. This has multiple benefits, for air quality improvements, to reduced combustion of carbon dioxide, to promoting more active travel modes. All of the foregoing would ensure local residents are able to lead more healthy and active lifestyles and rely less on private vehicles.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	By increasing the availability, appeal and ease of walking, cycling and public transport options, the accessibility of amenities, services and community facilities will be improved for everyone living in, working in and visiting the Opportunity Area. It also enables residents to engage more in their local communities, as well as encounter people on their more active commutes. As new and existing communities in and around the Old Kent Road Opportunity Area become more accessible for all, this promotes a sense of inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Ensuring that walking, cycling and public transport are the first choice for movement in the Old Kent Road Opportunity Area will reduce reliance on private vehicles and therefore reduce combustion of carbon dioxide which contributes to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	By ensuring that walking, cycling and public transport are the first choice for movement in the Old Kent Road Opportunity Area this will reduce reliance on private vehicles and therefore reduce combustion of nitrogen dioxide and other pollutants which contribute to poor air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of wate resources but it does not negatively impact on it
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it
IIAO 11	To protect and enhance quality of landscape and townscape	-	-	This policy does not explicitly address the issue of townscape but it does not negatively impact on it
IIAO 12	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of heritage assets but it does not negatively impact on it
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open spaces but it does not negatively impact on it
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it
IIAO 15	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of homes but it does not negatively impact on it. The provision of sustainable transport does increase the capacity of new homes in the Opportunity Area.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-✓✓	-✓✓	By ensuring that walking, cycling and public transport are the first choice for movement in the Old Kent Road Opportunity Area, AAP8 will reduce reliance on private vehicles and therefore reduce combustion. This is achieved by delivering the Bakerloo Line Upgrade and Extension to improve access to public transport alongside the delivery of a safe, segregated cycle and bus lanes, complemented by quiet walking routes. All of the latter would incentivise sustainable and active travel modes to reduce the reliance on the car.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	-✓✓	This policy focuses on the delivery of sustainable transport infrastructure which is necessary to support existing and future development, to ensure that local residents can access employment, servicing and recreation easily and safely.

AAP9 – The Greener Belt – Parks and Healthy Streets

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	-	-	This policy does not explicitly address the issue of wealth creation but it does not negatively impact on it
IIAO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of skills and training but it does not negatively impact on it.
IIAO 3	To improve the health of the population	✓✓	✓✓	The Greener Belt would improve existing residents' quality of life, thereby ensuring they benefit from regeneration. AAP9 would encourage these residents –as well as all (existing and future) visitors, residents and workers in the Opportunity Area– to walk and cycle more, rather than rely on motorised vehicle travel options. The Greener Belt strategy would minimise everybody's exposure to air pollution, provide easy healthy food options, create affordable places to meet throughout the year, and improve mental health and wellbeing with urban greening.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The Greener Belt would ensure development benefits existing residents as well as newcomers, tackling health inequalities and supporting community cohesion. Social interaction across communities would also be facilitated in new affordable places to meet throughout the seasons.
IIAO 6	To reduce contributions to climate change	✓	✓	The delivery of more green and open spaces would encourage local residents to walk, cycle and/or use more sustainable modes of travel. AAP9's aspiration to deliver green space within walking distance of the home would help reduce the need to get into the car in order to access places of recreation. This reduces combustion of carbon dioxide which contributes to climate change.
IIAO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it.
IIAO 11	To protect and enhance quality of landscape and townscape	-	-	This policy does not explicitly address the issue of townscape but it does not negatively impact on it.
IIAO 12	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of heritage assets, other than promoting the retention of heritage assets where they exist in existing green spaces to lend those spaces a greater sense of place and 'rootedness', but it does not negatively impact on it.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The plan would deliver access to more and better green spaces, including new parks and improved existing parks. This would address the open space deficiency in the Old Kent Road Opportunity Area and therefore enhance the urban environment and biodiversity.
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it
IIAO 15	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of homes but it does not negatively impact on it
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Delivering the Greener Belt (including the associated sustainable travel arteries such as the Trim Trail) would ensure that walking and cycling are safe, convenient and pleasurable activities.
IIAO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.

AAP10 – Tall Buildings Strategy – The Stations and the Crossings				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	-	-	This policy does not explicitly address the issue of wealth creation but it does not negatively impact on it
IIAO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of training and education but it does not negatively impact on it
IIAO 3	To improve the health of the population	-	-	This policy does not explicitly address the issue of health but it does not negatively impact on it
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	-	-	This policy does not explicitly address the issue of inclusion but it does not negatively impact on it
IIAO 6	To reduce contributions to climate change	✓	✓	Building at higher densities is more sustainable as it allows occupants to live closer to employment, amenities and services – which helps to make cycling and walking the preferred means of travel instead of private vehicle usage. This typology is also an efficient use of land.
IIAO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Tall Buildings will be built around stations and crossings to reinforce these locations as transport nodes and landmarks. This will distribute tall buildings to reinforce the proposed hierarchy of built form, places and streets, all of which is intended to improve legibility and create a well-articulated townscape and skyline. Tall buildings must be of an exemplary design and preserve the Borough and LVMF views.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Having a strategy for the delivery of tall buildings in the Old Kent Road Opportunity Area ensures that the historic environment and cultural assets are conserved and enhanced. Design of all tall buildings must be exemplary and they must only be located at key junctions and nodes so as to not negatively impact on the historic environment or cultural assets.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open spaces but it does not negatively impact on it
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it
IIAO 15	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of homes but it does not negatively impact on it
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it
IIAO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.

AAP11 – Character and Heritage				
IIA Objective	**Description**	**Averaged Grading**	**Sub grading**	**Commentary**
IIAO 1	To tackle poverty and encourage wealth creation	-	-	This policy does not explicitly address the issue of wealth creation but it does not negatively impact on it
IIAO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of education and training but it does not negatively impact on it
IIAO 3	To improve the health of the population	-	-	This policy does not explicitly address the issue of health but it does not negatively impact on it
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	The character and heritage of the Old Kent Road Opportunity Area will be protected and enhanced in such a way to promote inclusion, diversity and community cohesion through ensuring that existing neighbourhoods are conserved to ensure that residents have a secure sense of place and that these new and existing neighbourhoods will be well connected and cohesive with one another.
IIAO 6	To reduce contributions to climate change	✓	✓	The OKR AAP encourages retrofitting to reuse materials and make use of existing embodied carbon in existing buildings, this also plays an important role in conserving and enhancing existing character and heritage.
IIAO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	By conserving and enhancing the existing character and heritage of the Old Kent Road Opportunity Area the policy aims to protect and enhance the quality of the landscape and townscape by retaining identified buildings and features of townscape merit and repurposing existing landmarks and designating new conservation areas to protect heritage assets. The policy also aims to conserve the rich local social history which will further enhance the landscape and townscape in the Old Kent Road Opportunity Area.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	By conserving and enhancing the industrial character and heritage assets in the Old Kent Road Opportunity Area it will conserve and enhance the wider historic environmental and cultural assets. The policy identifies that both listed buildings and buildings and features of townscape merit and buildings of architectural and historic interest should be retained and protected. New development must improve the Old Kent Road's historic fabric in order to enhance the historic environment.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open spaces but it does not negatively impact on it
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Conserving existing character and heritage contributes positively to creating a strong sense of place and community cohesion, this creates a decent place to live when delivering new homes.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it
IIAO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.

AAP12 – Design				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	-	-	This policy does not explicitly address the issue of wealth creation but it does not negatively impact on it
IIAO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of education and training but it does not negatively impact on it
IIAO 3	To improve the health of the population	✓✓	✓✓	Design of new development in the Old Kent Road should be designed with proper ventilation and heating and cooling to regulate temperature and ensure access to green space and amenity is delivered to ensure that residents have opportunities to exercise and socialise in outdoor spaces to benefit their physical and mental wellbeing.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Design of new development should be adhere to secure by design principles with security measures proportionate to their use and function. This will reduce the incidence and fear of crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Design of new development should be inclusive and achieve and exemplary standard of residential design to ensure it is accessible and inclusive for all. This applies to residential and public buildings to ensure inclusion and equality of opportunity for all in accessing housing, and amenities. Community cohesion is delivered through ensuring the design of schemes will foster a positive relationship with existing development and communities.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Design of new development should be of sustainable design and reuse materials. This is achieved by ensuring all development meets the net zero carbon target, uses high performing building fabric, connects to SELCHP and makes efficient use of materials.
IIAO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	New development will respond to the emerging and existing character and context of the area. For each sub area further guidance is set out to further ensure that the quality of landscape and townscape are high.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Design of new development should incorporate and safeguard buildings and features of architectural and historic interest. The retention of traditional design features and materials is set out in the sub areas to ensure consistency of design and style which will conserve and enhance the historic environment and cultural assets.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	This policy does not explicitly address the issue of open space but it does not negatively impact on it.
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	All homes should be designed to an exemplary standard of residential design to ensure that everyone lives in a good quality home.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it
IIAO 17	To provide the necessary infrastructure to support existing and future development	-	-	This policy does not explicitly address the issue of infrastructure delivery but it does not negatively impact on it.

AAP13 – Climate Emergency

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	-	-	This policy does not explicitly address the issue of wealth creation but it does not negatively impact on it.
IIAO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of education and training but it does not negatively impact on it.
IIAO 3	To improve the health of the population	✓✓	✓✓	The reduction of carbon emissions and other pollutants improves air quality and therefore improves respiratory health of local people.
			✓✓	By addressing the Climate Emergency, heating and cooling is improved in the public realm and in homes to minimise the adverse effects of temperature change on the health of vulnerable people.
			✓✓	The provision of promotion of urban greening and new public open spaces will provide opportunities for play and open-air sports facilities, enabling exercise which supports good physical health and mental health as well as facilitate relaxation and socialising is also beneficial for health and wellbeing.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of fear of crime but it does not negatively impact on it.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	-	-	This policy does not explicitly address the issue of inclusion but it does not negatively impact on it.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	New development should connect to the DHN to access a more sustainable source of heat and to reduce carbon emissions form heating. Gas boilers are not permitted in new development unless they are an interim solution before connection to the DHN.
			✓✓	Retrofitting is encouraged to ensure that embodied carbon is accounted for and materials are reused. This aims to achieve higher carbon savings onsite to reduce the emission of carbon in construction and throughout the life and sue of the building.
			✓✓	New public spaces will encourage urban greening to adapt to the effects of climate change, reduce the urban heat island effect and increase ecological resilience. Creating a new walkable public realm will reduce car use and therefore CO2 emissions and contributions to climate change. CO2 emissions may suffer as a result of accelerated levels of construction and demolition. Southwark Plan 2022 policies seek to minimise carbon dioxide emissions from development.
IIAO 7	To improve the air quality	✓✓	✓✓	AAP13 sets out that development must reduce carbon emission onsite through improved and more sustainable design and more sustainable connections to heat. This improved air quality as there are fewer emissions from construction and operation of buildings.
			✓✓	A walkable public realm will reduce car use and therefore CO2 emissions will promote active and sustainable transport modes, improving air quality and mitigating greenhouse gas emissions.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	Substantial demolition and intensification of development will create new waste demands to be managed. The policy sets out new development should retrofit and reuse older materials for new development in order to avoid waste.
IIAO 9	To encourage sustainable use of water resources	✓✓	✓✓	Water as a resource should be used sustainably as part of the construction process and operation of the building.
IIAO 10	To maintain and enhance the quality of land and soils	✓✓	✓✓	This policy does not explicitly address the issue of landscape and soils. But it does deliver positive impacts for the use and improvement of green and open space and to utilise soils and greening for carbon sequestration.
IIAO 11	To protect and enhance quality of landscape and townscape	-	-	This policy does not explicitly address the issue of landscape and townscape quality but it does not negatively impact on it.
IIAO 12	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	New green spaces, parks and green infrastructure provided are a major part of the vision, creating opportunities to improve biodiversity.
IIAO 14	To reduce vulnerability to flooding	✓	✓	AAP13 sets out that development should be sustainable and use resources in a sustainable way which includes water use and reducing vulnerability to flooding.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	AAP13 sets out that design should be sustainable and have effective systems of heating and cooling which reduce emissions and costs for occupiers, which improves the quality of the housing stock in the Old Kent Road Opportunity Area and therefore access to decent homes for local people.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	AAP13 sets out that movement should be people centred to address the issue of carbon emissions. This means influencing behavioural change in movement and consumption to allow for locals to use more active travel modes and less private vehicles to reduce combustion and pollution.

| IIAO 17 | To provide the necessary infrastructure to support existing and future development | ✓✓ | ✓✓ | Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development. |

AAP14 – Water Management, Air and Noise Quality

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	-	-	This policy does not explicitly address the issue of wealth creation but it does not negatively impact on it
IIAO 2	To improve the education and skill of the population	-	-	This policy does not explicitly address the issue of skills and training but it does not negatively impact on it.
IIAO 3	To improve the health of the population	✓✓	✓✓	Reintegrating the urban environment and designing new buildings so that people can walk and cycle around easily would encourage physical activity. Providing leisure facilities and fun environments that encourage exercise would also enable active lifestyles.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	This policy does not explicitly address the issue of crime but it does not negatively impact on it.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The delivery of improved streets and open spaces through urban greening and improved biodiversity will integrate new development with existing neighbourhoods would encourage community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	This policy aims to help development and the existing built environment adapt to climate change through ensuring that greenfield run off rates do not exceed existing water and sewer capacities.
IIAO 7	To improve the air quality	✓✓	✓✓	Urban greening would improve air quality. 3D modelling of development impacts would avoid or mitigate air pollutant hot spots. Serving new commercial development with the least polluting vehicles would prevent them from worsening air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	✓	This policy does not address the issue of waste directly, but has indirect benefits for sustainable use of resources which will reduce waste.
IIAO 9	To encourage sustainable use of water resources	✓✓	✓✓	Ensuring that drainage from development achieves 100% greenfield runoff rates and a minimum of 70% greenfield run off rates onsite using sustainable urban drainage systems would reduce the risk of surface water flooding. This also ensures that water is used in a sustainable way.
IIAO 10	To maintain and enhance the quality of land and soils	✓✓	✓✓	Urban greening would create areas of enhanced soil quality.
IIAO 11	To protect and enhance quality of landscape and townscape	-	-	This policy does not explicitly address the issue of townscape but it does not negatively impact on it.
IIAO 12	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of heritage assets but it does not negatively impact on it.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	This policy ensures that development delivers urban greening and opportunities for improved biodiversity to address the
IIAO 14	To reduce vulnerability to flooding	✓✓	✓✓	Ensuring that drainage from development achieves 100% greenfield runoff rates and a minimum of 70% greenfield run off rates onsite using sustainable urban drainage systems would reduce the risk of surface water flooding.
IIAO 15	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of homes but it does not negatively impact on it
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	Providing an energy centre and decentralised heat networks, green infrastructure and sustainable urban drainage systems would support development with essential new infrastructure.

AAP15 – Great Start in Life – Child and Youth Provision

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	New early years childcare places would allow parents to choose to work.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Education choices would be improved and match the level of housing growth with the expansion of existing schools and the provision of 2 new primary schools and a new secondary school. Learning conditions would be supported by schools that meet high design standards responding to context, protecting pupils from air pollution, including safe and welcoming entrances, safeguarding children and protecting privacy of neighbours and providing light, airy and connected teaching rooms. New and improved higher and further education facilities would bring opportunities to continue education closer to residents.
IIAO 3	To improve the health of the population	✓✓	✓✓	Improvement of child and youth play space in existing parks and sharing indoor and outdoor facilities in schools for community use would support physical activity and social interaction. Good-sized entrances to schools located away from busy junctions would encourage walking to school.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Designing schools for safeguarding and protecting privacy of neighbours would prevent opportunities for crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The delivery of improved schools and associated facilities it will promote a greater sense of inclusion as it has wider benefits for the residents of all ages as they will have greater access to services and facilities for sports and recreation too. This also promotes community cohesion as it connects new and existing communities and promotes greater social interaction.
IIAO 6	To reduce contributions to climate change	✓	✓	The delivery of schools closer to the homes of local residents will reduce the need to travel by car by parents and encourage more active travel by children and young people, which would reduce carbon emissions which contribute to climate change.
IIAO 7	To improve the air quality	-	-	This policy does not explicitly address the issue of air quality but it does not negatively impact on it
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	This policy does not explicitly address the issue of waste but it does not negatively impact on it
IIAO 9	To encourage sustainable use of water resources	-	-	This policy does not explicitly address the issue of water resources but it does not negatively impact on it
IIAO 10	To maintain and enhance the quality of land and soils	-	-	This policy does not explicitly address the issue of land and soils but it does not negatively impact on it
IIAO 11	To protect and enhance quality of landscape and townscape	-	-	This policy does not explicitly address the issue of townscape but it does not negatively impact on it.
IIAO 12	To conserve and enhance the historic environment and cultural assets	-	-	This policy does not explicitly address the issue of heritage assets but it does not negatively impact on it
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The improvement of child and youth play space would enhance existing parks.
IIAO 14	To reduce vulnerability to flooding	-	-	This policy does not explicitly address the issue of flooding but it does not negatively impact on it
IIAO 15	To provide everyone with the opportunity to live in a decent home	-	-	This policy does not explicitly address the issue of homes but it does not negatively impact on it
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-	-	This policy does not explicitly address the issue of sustainable transport but it does not negatively impact on it.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	Development would be supported by childcare places, space for schools to expand in the future, further and higher education places and the improvement of child and youth play spaces.