



Old Kent Road Area Action Plan: December 2020 Draft

Consultation Report

November 2021

CONTENTS

1.	Introduction	
1.1	What is the Old Kent Road Area Action Plan?	
1.2	What is this consultation report?	
1.3	Where to get more information	
1.4	What happens next?	
2	Old Kent Road Area Action Plan Consultation	
2.1	Stages of consultation	
2.2	Who was consulted and how?	
2.3	Headline figures	
2.4	Summary of responses on the Old Kent Road AAP	
	Appendices	
	Appendix A: Summary of key issues raised in consultation responses to the survey questions	
	Appendix B: Summary of email responses to the consultation	
	Appendix C: Summary of key issues raised in consultation responses to the survey questions from community groups	
	Appendix D: Consultation Hub Questionnaire data	
	Appendix E: Notification emails for start and extension of consultation	
	Appendix F: Press notice	
	Appendix G: Consultation event summaries	
	Appendix H: Roundtable Meeting Agendas	

1 INTRODUCTION

1.1 What is the Old Kent Road Area Action Plan?

- 1.1.1 The Old Kent Road Area Action Plan (AAP) is a plan to regenerate the Old Kent Road and surrounding area. It sets out a vision for how the area will change over the period leading up to 2040. This includes delivering 20,000 new homes and 10,000 additional jobs. The vision is supported by a strategy with policies we will put in place to deliver it. The AAP will make sure that over the next twenty years we get the right development needed to support a healthy, safe and prosperous community and a fairer future for all in the Old Kent Road area.
- 1.1.2 The AAP will be part of our framework of planning documents. It will be a material planning consideration in deciding planning applications in the opportunity area. It will help ensure that we make decisions transparently, providing clarity for members of the public and giving more confidence to developers to invest in the area. It will also be an opportunity area planning framework (OAPF) and will be endorsed by the Mayor of London.

1.2 What is this consultation report?

- 1.2.1 The purpose of this report is to summarise the consultation carried out to date. After each stage of consultation we will update this report to reflect the most recent consultation.
- 1.2.2 At each stage of consultation we carry out activities in accordance with our Statement of Community Involvement (SCI) (2008). The SCI sets out how the council will consult on all of our planning policy documents. The SCI refers to a number of legal and regulatory requirements, both in terms of methods of consultation and also particular bodies that we must engage with, and sets out how we meet these requirements. When the SCI was produced it was done so with regard to the Town and Country Planning (Local Development) (England) Regulations 2004 and the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. In April 2012, both sets of regulations were replaced by the Town and Country Planning (Local Planning) (England) Regulations 2012. Consultation and procedure has been carried out in accordance with the revised Regulations. We will shortly be updating the SCI.
- 1.2.3 The Localism Act 2011 introduced the “duty to co-operate”, which requires us to engage with a range of bodies on an ongoing basis as part of the production of planning policy documents. Much of the process that is required by the duty is already covered in our SCI and has been an integral part of the preparation of new planning policy in the borough. We will ensure that we meet the requirements of the duty to co-operate at every stage of consultation. This involves writing to and where appropriate meeting and working with our neighbouring boroughs, the Greater London Authority, Transport for London and other prescribed bodies such as Historic England.

1.3 Where to get more information

- 1.3.1 The Old Kent Road Area Action Plan and associated documents can all be viewed on our website:

<https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/area-action-plans-section/old-kent-road-aap/current-and-previous-versions-of-okr-aap>

1.3.2 There is also a dedicated Old Kent Road website:

<http://www.oldkentroad.org.uk/>

1.3.3 Copies are also available by contacting the Planning Policy Team using the following methods:

- Email: planningpolicy@southwark.gov.uk
- Telephone: 020 7525 0146
- Post: Planning Policy, Chief Executive's Department, Southwark Council, FREEPOST SE1919/14, London SE1P 5LX

1.4 What happens next?

1.4.1 Following this consultation, amendments will be made to the 'December 2020 Draft' in response to consultation feedback which will inform the following draft of the plan, known as the proposed submission' version. This will be the plan we intend to submit to the Secretary of State for a public examination by an independent planning inspector. Participants of the final stage of consultation have the right to represent themselves at the public examination.

1.4.2 The inspector will prepare a report for the council and may require mandatory changes to be made to the plan. The final Old Kent Road AAP will then be adopted by the council. This is a decision taken by all councilors at the Council Assembly.

1.4.3 Table 1 shows the stages of preparation and consultation on the AAP.

Table 1 Stages of Consultation

Stage of consultation	Consultation timescale
Informal consultation	2015-2016
Consultation on first draft AAP	June to November 2016
Interim consultation on the AAP	June to September 2017
Consultation on AAP: Further Preferred Option	December 2017 to March 2018
Consultation on AAP: December 2020 Draft	January 2021 to April 2021
Publication/submission version of AAP	September 2022
Submit to the Secretary of State	2022
Examination in Public	2023
Adoption	2023

2 OLD KENT ROAD AREA ACTION PLAN DECEMBER 2020 CONSULTATION

2.1 Previous consultations

- 2.1.1 We have been engaging and consulting the local community and businesses groups over the past five years. We consulted residents and businesses by establishing a community forum which focused on different topics related to the regeneration and planning of Old Kent Road, sharing ideas through workshops and helping to inform the draft of the plan.
- 2.1.2 We published the first draft AAP and undertook extensive consultation between 17 June and 4 November 2016 and we received over 1,000 responses (hereon in referred to as the '2016 consultation'). We consulted on the plan alongside a change to the Community Infrastructure Levy (CIL) charging schedule and Section 106 Planning Obligations and CIL Supplementary Planning Document addendum. This increased the rate paid by residential developments towards important infrastructure including the Bakerloo line extension. Consultation responses to this document were reported on separately and were available for the public examination on the CIL changes. These came into force on 1 December 2017.
- 2.1.3 An 'interim' consultation on some minor new and amended policies took place between 13 June 2017 and 13 September 2017 (hereon in referred to as the '2017 consultation'). We reported on consultation responses received during the 2016 consultation which related to specific policies that we amended in the June 2017 consultation draft. The results of the interim consultation have been reported in the December 2020 Old Kent Road Area Action Plan Consultation report ([link?](#))
- 2.1.4 In February 2017 we also published a summary of the consultation responses we received on our website following the close of the consultation on the first full draft of the plan in November 2016. The Consultation Report published in December 2017 summarises these previous representations.
- 2.1.5 Following the 2016 and 2017 consultation, we have consulted on a Further Preferred Option of the AAP between 13 December 2017 to 7 March 2018 (hereon in referred to as the '2018 consultation'). The consultation responses are included in the December 2020 Old Kent Road Area Action Plan Consultation Report. A number of changes were made to the plan following the 2018 consultation. This version of the plan (hereon referred to as the '2020 draft') is what we consulted on in 2021 and the outcomes are summarised in this report.

2.2 Who was consulted and how?

- 2.2.1 The council consulted a range of local groups, interested individuals, statutory consultees and important stakeholders through a variety of different engagement methods (see below for more information). These included:

- Local residents
- Local businesses
- Local community and special interest groups
- The Mayor of London and London Boroughs
- Landowners, developers and their representatives
- Statutory consultees such as the Environment Agency, Historic England
- Non statutory but important stakeholders such as Thames Water and Network Rail

- 2.2.2 Appendix 1 summarises the comments in response to the questionnaire and Appendix 2 summarises responses received via email. It also identifies where respondents made representations to the previous consultations and the summaries are intended to encapsulate the latest and ongoing submissions.
- 2.2.3 Over the plan preparation period the council sought to reduce the number of letters sent out to contacts on our planning policy mailing list in order to reduce financial and environmental costs of our outreach and to maximise the efficiency and effectiveness of our engagement. We undertook a thorough review of the contacts in our Statement of Community Involvement. We made sure to contact any new groups and organisations that we identified that may be interested in receiving planning policy notifications including on the Old Kent Road.
- 2.2.4 We advertised in the consultation in Southwark News and through mailouts (over 10,000 people sign up to receive updates).
- 2.2.5 The Community Review Panel was created in August 2020 to more fully involve local community in the planning process. The panel gives independent advice on planning in the Opportunity Area, discussing important regeneration issues relating to housing, transport, public space, and the environment. The panel meets once a month to discuss proposals. These discussions are written up as formal reports and feed into the decisions made by the Council. All of the panel's recommendations are given serious consideration and form part of the formal planning process.
- 2.2.6 During the 2021 consultation period the Examination in Public of the New Southwark Plan was going through the public hearing stage. At the request of community members, the consultation period for the AAP was extended so that issues brought up at the hearings could be better addressed in the consultation. This resulted in the consultation lasting from 1 March to 10 May 2021, a period of 10 weeks.
- 2.2.7 Table 2 shows a log of all consultation actions undertaken since the beginning of engagement in 2013.

Table 2 – Log of consultation actions to date

Date	Method of consultation	Comments
July 2013	Two walkabout sessions and a workshop	Full report available on our website
October – November 2014	Business engagement and flyers	Together with the Greater London Authority (GLA), the council walked around the Old Kent Road Opportunity Area and knocked on every business' door to tell them about our aspirations for the future of the area and find out more about the businesses present, their current and future business needs and perceptions of the area. This has informed our evidence base and the results are published in the Old Kent Road Employment Study 2016.

<p>Roughly every 4 to 8 weeks between February 2015 and September 2016.</p>	<p>Old Kent Road Community Forum</p>	<p>11 meetings were held in different venues around the Old Kent Road opportunity area. The forum was set up to start a dialogue between the council local residents, businesses owners and employees, community groups and any other interested stakeholders thought about the Old Kent Road. We wanted to gather views and gain understanding of why people felt the Old Kent Road was unique and what could be improved. We published the feedback and presentation material from each forum on our website.</p>
<p>12 and 13 October 2015 were held for</p>	<p>Further business engagement through presentations and workshops with local business owners and operators</p>	<p>The presentation and report on the feedback gathered during these sessions is available on our website. This has also informed our evidence base for the Old Kent Road Employment Strategy 2016.</p>
<p>14 June 2016</p>	<p>Meeting/ presentation /Q&A/workshop</p>	<p>Future Steering Board at Bells Garden Community Centre.</p>
<p>16 & 23 June 2017</p>	<p>Press advertisements in Southwark News</p>	
<p>17 June 2016</p>	<p>Consultation hub page</p>	<p>Online platform for viewing and providing comments on the plan.</p>
<p>28 June 2016</p>	<p>Meeting/presentation/Q&A/workshop</p>	<p>Southwark Tenant Council meeting at Bells Garden Community Centre.</p>
<p>29 June 2016</p>	<p>Faith Open Day workshop and community outreach</p>	<p>Hosted at the Somali Relief and Welfare Association Mosque at 94 Old Kent Road.</p>
<p>29 June 2016</p>	<p>Announcement and stall at Borough, Bankside and Walworth Community Council</p>	<p>Hosted at Amigo Hall, St George's Cathedral, SE1</p>
<p>4 & 14 July, 22 August and 9 September 2016</p>	<p>Mailouts</p>	<p>To our database of residents, interested persons, community groups, employers, other interested persons, housing providers, planning professionals, the Mayor of London and other London Boroughs and statutory and other important consultees.</p>

July 2016	Summary and leaflet questionnaire	This was sent out to 15,000 residents and businesses in the Old Kent Road opportunity area explaining the consultation and how to respond.
July - November 2016	Dialogue – online ideas sharing platform.	We set up a series of online discussion pages using the dialogue online discussion platform to help gather views and generate ideas across a range of themes including homes, jobs, transport, parks and green spaces and local facilities and services.
From July 2016	Libraries	Copies of the draft Old Kent Road AAP and key supporting documents were made available to view in all the local libraries around the opportunity area including Peckham, SE15, Camberwell, SE5, East Street (Walworth/Old Kent Road) SE1, the Blue (Bermondsey), Canada Water, SE16 as well as the council's offices on Tooley St, SE1.
From July 2016	360 degree aerial photography	To aid discussion and show a new perspective on the Old Kent Road and surrounding neighbourhoods, we had drone aircraft take 360 degree aerial photos from Burgess Park and Bridgehouse Meadows (in the London Borough of Lewisham).
6 July 2016	Stall, flyering and engaging local residents	Eid Festival, Burgess Park
7 July 2016	Design Review Panel	Regular panel of built environment professionals providing comment and critique of the draft plan.
7 July 2016	Meeting/ presentation/ Q&A/ workshop	Walworth Society meeting at St Peter's Church, SE17
11 July 2016	Presentation/Q&A	Ledbury Estate Tenants and Resident's Association Annual General Meeting
11 July 2016	Presentation/Q&A	Peckham Area Housing Forum at Bells Garden Community Centre.
12 July 2016	Announcement at planning committee	Held at Southwark Council Offices, Tooley Street, SE1.
13 July 2016	Presentation/Q&A	Bermondsey East Area Housing Forum - Marden Square Tenants and Residents Association Hall.
13 July 2016	Presentation/Q&A	Southwark Tenant Management

		Organisation Committee meeting, hosted at the Leathermarket JMB office, SE1.
14 July 2016	Old Kent Road Walking Tour	Organised jointly between Southwark Council and New London Architecture, with conference hosted at London South Bank University.
18 July 2016	Presentation/Q&A	Camberwell East Area Housing Forum hosted at the Marie Curie Tenants and Residents Association Hall, Sceaux Gardens Estate, SE5
19 July 2016	Presentation/Q&A	Aylesbury Area Housing Forum hosted at Aylesbury Neighbourhood Housing Office, SE17
20 July 2016	Presentation/Q&A	Bermondsey West Area Housing Forum hosted at Neckinger Tenants Hall, SE16.
23 July 2016	Stall, flyering and engaging local residents	Pembroke House street party
26 July 2016	Cultural workshop	We held a consultation event specifically for businesses and practitioners who work in the cultural sector. The workshop provided the opportunity to give feedback on how cultural provision should align with development and growth in the Old Kent Road.
27 July 2016	Old Kent Road Heritage Walk	We led a walking tour around the Old Kent Road to explore the area's history, its heritage assets that remain and have been lost, and how we can best ensure a heritage-led regeneration of the area respects and enhances the Old Kent Road's unique history.
4 August 2016	Presentation/Q&A	Walworth East Area Housing Forum hosted at Salisbury Tenants and Resident's Association Hall.
9 August 2016	Presentation/Q&A	Rotherhithe Area Housing Forum hosted at the Silverlock Tenants and Resident's Association Hall.
3 September 2016	Stall, flyering and engaging local residents.	Tustin Estate Funday
7 September 2016	Young people's workshop	We invited young people between 11 and 24 who live, go to school or visit the Old Kent Road and surrounding area to take part in a workshop to discuss what they thought the future of the Old Kent Road should look like, and how it should

		accommodate the needs of young people better.
13 September 2016	Announcement & questions	Bermondsey and Rotherhithe Community Council hosted at the Oxford and Bermondsey Club, SE1
15 September 2016	Press advertisements in Southwark News	
21 September 2016	Presentation/Q&A	Northfield House Tenants and Residents Association.
21 September 2016	Presentation/Q&A	Southwark Homeowner Council meeting hosted at 160 Tooley Street.
21 September 2016	Announcement & questions	Peckham and Nunhead Community Council hosted at Rye Church Hall, SE15.
21 September 2016	Announcement & questions	Camberwell Community Council hosted at Employment Academy, SE5.
21 September 2016	Presentation/Q&A	Southwark Travellers Action Group meeting hosted at the Soujourner Truth Centre.
21 September 2016	Presentation/Q&A	Borough and Bankside Housing Area Forum.
29 September 2016	Presentation/Q&A	Big Local Partnership South Bermondsey sub group.
5 October 2016	Announcement & questions	Borough, Bankside & Walworth Community Council hosted at New Covenant Church, SE1
10 October 2016	Presentation/Q&A/ workshop	For residents living near the northern end of the Opportunity Area centred around the Bricklayers Arms, hosted at the Roundhouse Hall, SE1.
February 2017	Old Kent Road Business Network and further engagement	In February 2017 we set up the Old Kent Road Business Network to continue our earlier information gathering about businesses in the Old Kent Road, establish their needs for the future and how they can be effectively involved in the regeneration of Old Kent Road. We sent out a letter inviting businesses to join the Network as well as a FAQ's document about our consultation. The Business Network is ongoing and is still available to join online .
25 February, 9, 21 and 29 March and 1 April 2017	Council officer posted at TfL Bakerloo line extension drop in session to answer	Transport for London held several drop in sessions across the opportunity area during the consultation on the Bakerloo line extension. Due to the intrinsic link between the aspirations of the AAP and the Bakerloo line extension, officers were

	questions about the AAP.	on hand to answer any planning/AAP related questions. These sessions were hosted at the East Street Library, Christ Church (Old Kent Road) and Artworks (Walworth Road).
21 June 2017	Consultation hub page	Online platform for viewing and providing comments on the new and amended policies proposed for the plan.
22 June 2017	Mailouts	To our database of residents, interested persons, community groups, chairs and secretaries of TRAs and TMOs, local businesses and employers, other interested persons, housing providers, planning professionals, the Mayor of London and other London Boroughs and statutory and other important consultees. See appendix 6.
29 June 2017	Press advertisements in Southwark News	
15 Dec 2017	Presentation/Q&A	NLA Launch breakfast meeting hosted at the Building Centre, WC1E
9 January 2018	Announcement & questions	Borough, Bankside and Walworth Community Council hosted at St Peter's Church, Walworth
10 January 2018	Announcement & questions	Bermondsey and Rotherhithe Community Council
12 January 2018	Presentation/Q&A	Southwark Pensioners Fourm hosted at Southwark Pensioners Centre, SE5
16 January 2018	Meeting/ presentation /Q&A/workshop	Southwark Future Steering Board hosted at Bells Gardens Community Centre, SE15
17 January 2018	Announcement & questions	Peckham and Nunhead Community Council
18 January 2018	Presentation/Q&A	Tustin Estate Tenants and Residents Association hosted at Tustin Estate TRA Hall, Ilderton Road, SE15

19 January 2018	Creative Enterprise Zone (CEZ) meeting	Talk with cultural organisations within the Old Kent Road hosted at Southwark Council Offices, Tooley Street, SE1
22 January 2018	Group discussion	Youth Council hosted at Southwark Council Offices, Tooley Street, SE1
22 January 2018	Announcement & questions	Tenants Council hosted at Southwark Council Offices, Tooley Street, SE1
24 January 2018	Announcement & questions	Dulwich Community Council hosted at Herne Hill Baptist Church, SE24
30 January 2018	Announcement & questions	Camberwell Community Council hosted at The Employment Academy, SE5
6 February 2018	Q&A	Old Kent Road drop-in session 1 hosted at the Rich Estate, SE1
8 February 2018	Presentation/Q&A	Nunhead and Peckham Rye Area Housing Forum hosted at Harris Academy, SE15
12 February 2018	Presentation/Q&A	Peckham Area Housing Forum
12 February 2018	Presentation/Q&A	Ledbury TRA
13 February 2018	Presentation/Q&A	Rotherhithe Area Housing Forum
13 February 2018	Presentation/Q&A	Walworth West Area Housing Forum hosted at Pelier TRA Hall, SE17
14 February 2018	Presentation/Q&A	Bermondsey West Area Housing Forum
15 February 2018	Presentation/Q&A	Dulwich Area Housing Forum, Lordship Lane and Melford Court TRA Hall, SE22
20 February 2018	Presentation/Q&A	Conservation Advisory Group
20 February 2018	Presentation/Q&A	Aylesbury Area Housing Forum
21 February 2018	Presentation/Q&A	Camberwell West Area Housing Forum
26 February 2018	Big Local Meeting	Hosted at Avondale Community Hall, Avondale Square Estate, SE1

7 March 2018	Q&A	Old Kent Road drop-in session 2 hosted at Christ Church Peckham, SE15
7 March 2018	Presentation/Q&A	Borough and Bankside Area Housing Forum
9 March 2018	Primary school workshop	Phoenix Primary School Visioning workshop (see Appendix 7)
12 March 2018	OKR Business Workshop	Hosted at New Covenant Church, SE1
14 March 2018	Presentation/Q&A	Southwark Housing Action Group hosted at Southwark Council Offices, Tooley Street, SE1
19 March 2018	Old Kent Road Retail Workshop	Hosted at Southwark Council Offices, Tooley Street, SE1
21 March 2018	Presentation/Q&A	Bermondsey East Area Housing Forum
23 March 2018	Presentation/Q&A	Meeting with Page's Walk residents
26 April 2018	Presentation/Q&A	Walworth East Area Housing Forum
6 June 2018	Secondary school workshop	Charter Secondary School workshop (Year 9) (See Appendix 7)
6 June 2018	Presentation/Q&A	Southwark Housing Association Group hosted at Southwark Council Offices, Tooley Street, SE1
15 July 2018	Presentation Q&A	Action OKR hosted at Treasure House at the former Livesey Museum
8 September 2018	OKR Forum Session 1: Introductions and general discussion	Hosted at Christ Church Peckham, SE15
17 October 2018	Presentation/Q&A	Stephenson Crescent residents meeting hosted at Links Community Centre, SE16
20 October 2018	OKR Forum Session 2: Transport	Hosted at Christ Church Peckham, SE15
17 November 2018	OKR Forum Session 3: Business and workspace	Hosted at Christ Church Peckham, SE15
5 December 2018	Meeting with Northfield House residents	Berkeley Homes (applicant for Malt Street) presented their scheme, of which residents asked a number of questions around building heights, affordable

		housing, design quality and cladding, car parking.
27 December 2018	Meeting with Glengall Road residents	Berkeley Homes (applicant for Malt Street) presented their scheme, of which residents asked a number of questions around building heights, overshadowing, construction impacts, parking, wind impacts, fire policy.
15 December 2018	OKR Forum Session 4: Tall buildings	Hosted at Christ Church Peckham, SE15
9 January 2019	Presentation/Q&A	Unwin and Friary Tenants Residents Association hosted at Friary and Unwin TRA Hall, SE15
19 January 2019	OKR Forum Session 5: Open Space	Hosted at Christ Church Peckham, SE15
28 January 2019	Presentation/Q&A	Canal Grove Residents Meeting hosted at Christ Church Peckham, SE15
29 January 2019	Presentation/Q&A	Tustin Estate TRA hosted at Tustin Estate TRA Hall, SE15
30 January 2019	Meeting with Pastors/Community leaders	Hosted at Victory House, SE17
31 January 2019	The Ark Globe Academy Youth Networking Event	Hosted at The Globe Academy, SE1
2 February 2019	Q&A	231 Old Kent Road drop in session 1 hosted at East Street Library SE1
5 February 2019	Presentation/Q&A	Friends of Burgess Park meeting hosted at Burgess Park Community Sports Centre, SE5
5 February 2019	Discussion	Christ Church Peckham meeting with Vicar
6 February 2019	Presentation/Q&A	Space Studios Launch
7 February 2019	Q&A	231 Old Kent Road drop-in session 2 hosted at Christ Church Peckham, SE15
12 February 2019	Presentation/Q&A	Radford Court residents meeting hosted at Radford Court, SE15
14 February	Secondary School	The Charter School, East Dulwich, SE22

2019	workshop (Year 9 feedback session)	(See Appendix 7)
16 February 2019	OKR Forum Session 6: S106 and CIL	Hosted at Christ Church Peckham, SE15
4 March 2019	Presentation/Q&A	Meeting with Astley and Cooper Road TRA hosted at Wessex House, SE1
16 March 2019	OKR Forum Session 7: Design Quality	Hosted at Christ Church Peckham, SE15
25 March 2019	Q&A	Canal Grove residents Meeting
25 March 2019	Meeting with Penarth Centre artist	Hosted at Southwark Council Offices, Tooley Street, SE1
25 March 2019	Youth Council meeting	
26 March 2019	Youth Voice Event	Hosted at Ministry of Sound, SE1
1 April 2019		Meeting with Church Pastor at Redeemed Christian Church of God, SE1
4 April 2019	Community Hub Launch at 231 Old Kent Road	
5 April 2019	Old Kent Road Community Hub Drop-in session	2 Week drop in session from 5 April to 18 April
5 April 2019	Youth outreach programme	5 April to 18 April
18 April 2019	Youth Event	
26 April 2019	NLA Breakfast Talk	Hosted at the Building Centre, WC1E
7 May 2019	Q&A	Radford Court residents meeting hosted at Radford Court, SE15
13 May 2019	Q&A	Canal Grove residents meeting hosted at Southwark Council Offices, Tooley Street, SE1
17 May 2019	Q&A	Pages Walk residents meeting hosted at Christ Church Peckham, SE15
1 June 2019	231 Reopening	
17 February 2020	OKR Business Meeting	Hosted at Southwark Council Offices, Tooley Street, SE1

11 March 2021	OKR Business Roundtable meeting	Held virtually over Zoom due to COVID-19 restrictions
18 March 2021	OKR Residents/Communities Roundtable	Held virtually over Zoom due to COVID-19 restrictions
18 March 2021	Walworth Society	Held virtually over Zoom due to COVID-19 restrictions
22 March 2021	OKR Community Review Panel	Held virtually over Zoom due to COVID-19 restrictions
23 March 2021	OKR Developers and Landowners Roundtable meeting	Held virtually over Zoom due to COVID-19 restrictions
8 April 2021	Ledbury RPG	Held virtually over Zoom due to COVID-19 restrictions
13 April 2021	Youth Roundtable	Held virtually over Zoom due to COVID-19 restrictions
22 April 2021	Retail Roundtable	Held virtually over Zoom due to COVID-19 restrictions
27 April 2021	Tenants Resident Association Roundtable	Held virtually over Zoom due to COVID-19 restrictions

2.3 Headline figures

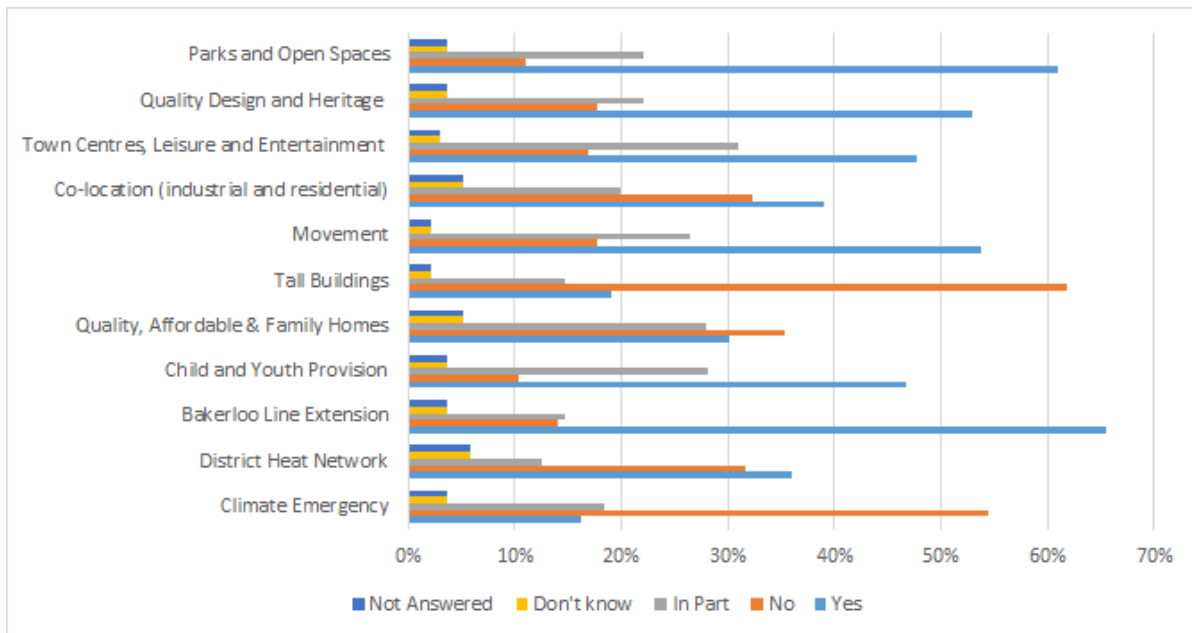
2.3.1 182 formal representations were received from statutory consultees, community groups and members of the public.

2.3.2 The breakdown of who responded to the consultation and how is set out in Table 3 below. Further details on all representations are provided in section 2.4 Summary of responses received.

Table 3 – Breakdown of who responded and how

	No. of responses	Statutory consultees	Businesses and landowners	Individuals	Community groups etc
Emails	46	10	24	8	4
Hub	136	0	1	123	12
Total	182	10	25	130	17

2.3.3 Below are the responses from the Consultation Hub Questionnaire on support for the main themes of the AAP.



2.3.4 Detailed summaries of responses to the online questionnaire can be found in Appendix A and the raw data informing this table can be found in Appendix D. The more detailed summaries of the written representations can be found in Appendix B.

2.3.5 In addition to the written representations and questionnaire responses, 8 consultation events were held, mostly in the form of roundtable discussions. These were held on Zoom due to COVID-19 restrictions preventing in-person meetings. The focus of these groups included:

- Businesses
- Landowners
- Youth
- Retail

- Residents/Community

2.3.6 Presentations were also made at the OKR Community Forum, Walworth Society and Ledbury Residents Project Group meetings.

2.4 Summary of responses received

2.4.1 The table below provides a high level summary of the main issues raised under each theme of the AAP. More detailed summaries of the representations received can be found in Appendices A, B and G.

2.4.2 Various inaccuracies and inconsistencies have been raised in the written representations. These have been noted and will be corrected during the preparation of the next draft of the plan in order to ensure clarity and factual accuracy.

2.4.3 One late representation was received by email on 2 February 2022. This has been taken account of and included in the analysis of the consultation responses. A full summary of the comments can be found in Appendix B.

Table 4 – Summary of representations by theme

The Masterplan	Developers and landowners want to see a sufficient flexible and not too prescriptive masterplan in order to guide a comprehensive and phased approach to development. One respondent would like more consultation on the design of each plot of the masterplan by ensuring residents know the pipeline of work in progress and future stages of development.
Bakerloo Line Extension	There is strong support for the Bakerloo Line Extension among all respondents and it is considered that the extension is vital to connect the southeast to central London. However, major concerns are raised over the delivery of the extension in light of the COVID-19 pandemic and TFL's funding constraints.
Climate Emergency	It is strongly felt that the AAP is not doing enough to address the climate emergency. The demolition-led approach, construction, and the focus on tall buildings as part of the strategy are cited as exacerbating climate problems.
Quality Affordable Homes	While it is acknowledged that there is a need for affordable homes in the Old Kent Road, there is concern whether the homes being built will actually be affordable to local people. Concerns are also raised about the delay in the delivery of the Bakerloo Line Extension will mean that the target of 20,000 homes will not be achieved.
Business and Workspace – The Bow Tie	There is concern over co-location of industrial and residential uses and the conflicts this will pose in regards to noise, pollution, and servicing and access. There is concern from developers and landowners that this will deter development of true industrial space and the aim of no net loss of industrial land will not be achieved.

Town Centres, Leisure and Entertainment	Most respondents favoured small, independent shops over bigger chains on the high-street. More is needed in protecting pubs and theatres and the lack of sports facilities was also an issue.
Movement	There was an overall supportive response to predestination and public transport. However, there were concerns on car free proposals on local people especially working-class community, less able bodied and the elderly. There is also reliance on delivery and servicing (e.g. plumbing, electrics and building maintenance), which is facilitated by vans and trucks.
Tall Buildings Strategy	The majority were opposed to the tall buildings plan. The main concerns were the negative effects of cooler microclimates created by tall buildings on biodiversity; the lack of greenspaces; loss of character and the safety of tall buildings.
Character and Heritage	The strategy is supported but there are doubts raised over the effectiveness of safeguarding heritage assets. The new conservation areas and local listing is supported. There is concern over the quality of design of new developments.
Design	Retrofitting should be the strategy used instead of a demolition-led scheme was a main theme. There were concerns over the loss of heritage assets and high-rise developments will create characterless places.
Parks and Healthy Streets	The majority of respondents are in support of the strategy to increase the quality and number of parks and would like it to go further than the proposals set out in the AAP. There is concern over the infill of green spaces on Council Estates and the impacts that shadowing from tall buildings will have on open space and biodiversity.
Cleaner, Greener and Safer	Majority of respondents has safety and cleanliness issues on the co-location strategy. Many believe the scale of the development and the demolition approach is contradictory to net zero. Strategy to contribute to biodiversity net gains and/or enhancing important sites and populations of protected species should also be included.
Best Start in Life	Questions are raised over the proposals for new schools in the AAP when existing schools have been closed.
Child and Youth Provision	The addition of Child and Youth provision in the AAP is supported and it is strongly emphasized that this needs to be truly inclusive and accessible to all. It is also considered that future provision of facilities needs to replace facilities which have already been lost. There needs to be more engagement with young people.
Sub Areas and Site Allocations	Landowners and developers had various comments on specific site allocations, mostly relating to increasing flexibility on requirements for their respective sites and not placing restrictions on development for viability reasons.
Engagement and consultation	There is a recurring theme coming from the consultation that not enough involvement of local people and that

	engagement is lacking in relation to new developments and the preparation of the plan.
Approved developments	There are concerns being raised that the schemes which are being approved are not being assessed against adopted policy as the plan is still in draft form.



Appendix A:

Summary of key issues raised in consultation responses to the survey questions

Old Kent Road Area Action Plan: Consultation Report

November 2021

Introduction

This document is a summary of the consultation conducted in 2021 with residents, businesses and interest groups regarding the draft Old Kent Road Action Area Plan (OKR AAP). All comments received from Southwark's Consultation Hub are summarised and analysed below. For email representations please see Appendix 2.

Composition of respondents

The below shows most of the representations received from the Consultation Hub were from residents.

Total	Unknown	Businesses and landowners	Residents	Community/ Interest groups
136	---	1 (0.7%)	122 (89.7%)	13 (9.6%)

Do you support the plans for the Bakerloo Line Extension with two stations along Old Kent Road?

Total	Yes	No	In part	Dont know
131	89	19	20	3

- Most of the comments in favour state that the BLE has been over-due and is critical in the development of Old Kent Road. This will ensure the area is not "left-behind" and is connected to the rest of London, which will bring further investment, generating benefits to residents and businesses. Further comments also suggest that the BLE will reduce traffic flow.
- However, 20 representations were in part as although benefits of the BLE were recognised, representations do not support the mass development of the area without the initial development of the BLE first as the current transport infrastructure is failing to support the growing population and is doubtful of the scale of the project and the proposed timescales. Further work is needed to support current transport infrastructure, including bus services, dedicated carriageway and tram and these should be delivered first.
- The representations that were unsupportive of BLE highlighted that there is uncertainty with the impacts of the line extension.
- Representations had concerns about the recent news that TfL announced of mothballing the BLE and other transport infrastructure, such as Crossrail 2 is behind schedule.

Do you agree that Old Kent Road Area Action Plan will address the climate emergency?

Total	Yes	No	In part	Dont know
96	14	61	15	6

- Fourteen representations were received in support of the question two but only two comments were submitted. One representation stated that urban densification is one of the best strategies for improving carbon efficiency. They were glad that the council are replacing space intensive car parks with homes especially close to

public transport. The second representation stated that the OKR AAP will only address climate emergency if net zero is achieved by “2020.”

- Majority of the responses were skeptical about whether the OKR AAP addresses the climate emergency and whether carbon neutrality can be achieved by 2030. Issues shared by the majority objecting to question 2 expressed problems surrounding tall buildings, reduction of open spaces, the scale of the project, the level of carbon footprint produced by construction and the unsustainable materials used during construction.
- The current method of construction is demolition-led, contributing to carbon footprint. Representations suggest it should be retrofitting-led, make full use of empty buildings and more alternative sustainable materials should be used including Hempcrete.
- The scale of the development is so huge at every stage was also a concern. Construction and cumulative development in general have an influence on air quality.
- A representation stated that XR Southwark Lobbying group think that the scale and massing of the development proposed is incompatible with Cleaner, Greener, Safer policies outlined in AAP12.
- The problems with high-rise buildings conveyed by residents and community groups said that cooler microclimates were created, which in return affects the local biodiversity and heightens heating consumption. They state tall buildings also consume more resources to build and energy – e.g., with the use of elevators. Loss of sunlight, unable to garden, influences physical and mental wellbeing. The wind tunnels created by tall buildings will also make it difficult to cycle.
- There is a reduction of open spaces. For example, OKR 12 seeks to build an OOS, which conflicts the NSP and previous plans maintain amenity land for residents.
- A respondent stated that Fossil Fuel District Heating System is costly and that the council makes no attempt to utilise modern renewable modes of heating and encourage use reduction. However, a representation welcomes the introduction of the District Heating System but should not be the main solution to the AAP3.
- There is still some support for the use of cars and one representation expanded that car-free will affect the working-class population.
- Southwark Law Centre state there is no evidence-based targets included nor a monitoring structure.

Do you support the proposals to provide 20,000 new homes, including affordable and family homes?

Total	Yes	No	In part	Dont know
129	41	48	38	2

- Respondents in support of question 3 commented that there should be more family homes especially 3-4 beds, as well as accommodate people with disabilities and individuals from a lower income background. One emphasised that only 8% of Southwark’s existing can afford homes at full property value price
- If possible, taller buildings should be built as they house more homes.
- More information needed of the percentage of affordable homes built.
- New council homes should go to those already in the waiting list and favour key workers with an emphasis of keeping communities together
- Disagrees with the provision to allow developers to pay instead of providing affordable housing as this dilutes the provision of affordable housing
- Provision of affordable without the BLE is unthinkable and retrofitting empty homes

should be an option, as 1 in 24 homes in Southwark are empty.

- Disagrees - increasing the number of private sale homes and unaffordable shared ownership homes will force both private rents and commercial rents up as landlords cash in. This will displace existing poor local people
- Already overpopulated – noise
- Not about quantity but the design – tall buildings issue
- 13,000 of the new homes will be unaffordable to Southwark and London resident - long existing residents will be priced out, for example, in Elephant and Castle.
- The current climate should be considered in the plan. For example, the negative migration due to crippling housing prices, desire for green space, working from home, reduction in student influx and migration to Europe following Brexit.
- Not enough affordable social rent
- The housing does not justify the scale of the development.
- It must be truly affordable and not luxury homes, bought by overseas investors.
- Pages Walk believes 20,000 is too many for the area - destruction of communities by development, new homes should provide social regeneration
- Old council homes removed
- Too much without the necessary transport and social infrastructure
- It should be 50% social rent and the rest to be affordable
- More acknowledgement needed accommodating Gypsy and Travellers.

Do you know how to find affordable housing built in the area?

Total	Yes	No	In Part	Don't know
131	26	81	18	6

- There seems to be confusion about 'affordable' rent as opposed to social rent.
- A representation stated that as developers increase house prices within their development and the area, more assurances is needed to ensure 'affordable rent' will be capped at London Living Rent.
- Rent capped at London Living Rent was a common theme among the respondents.
- A respondent claimed it was easy for them as they own a leasehold property
- Some needed more information on this as they could not find
- A dedicated website or social media was suggested
- Needs to be easily and quickly available
- £60k isn't affordable.

Do you agree with the strategy to mix industrial uses with new homes?

Total	Yes	No	In Part	Don't know
102	26	44	27	5

- There is lack of high street shops but respondents like the OKR's business park as it includes large supermarket stores, pet and garden centres.
- "Retaining industrial uses in the Old Kent Road area is unquestionably necessary in order to retain the character of the area and continue to support the large number of businesses to continue to provide essential services to central London and beyond.

- However, only 10% of redevelopment industrial land and workspace will be affordable. This percentage should be increased to at least 50% to ensure that local businesses can afford to remain in the area.
- Open to the mix of uses as focused on non-cars, that drives local communities and local businesses as we meet, eat, play in local parks, cafes and restaurants we build together.
- Delivery access and sufficiently sized space needs to be provided to ensure industries old and new can thrive. To provide for only maker spaces would be a mistake.
- People need jobs near to where they live.
- Majority of the respondents had Issues on co-location: e.g., safety, noise, cleanliness, unpractical– in reality, who would like to live in this sort of environment.
- Also depends on what type of industrial it is.
- Careful planning is needed.
- There is a requirement of servicing of industrial – lorries and vans and this should be researched more.
- There is no requirement of office space – many are now empty due to the pandemic.
- Questions around enough greenspaces in this mixed-use environment
- John Bussy response -
- Mixing is counterproductive. There are many unkept and ugly industrial land.
- Questions how industrial land can thrive with the high street and how to make the high street become more attractive.
- Constantine, Martin Speed, Jayhawks, Blue Apron plus Tate Store and White Cube store. All these companies are being forced out through compulsory purchases. Zone 2 is close enough to service the art galleries and museums in central London. By taking the action of removing this industry from the area, there will be job losses and storage facilities will have to move further out, increasing the carbon footprint and pollution.
- Local people should be able to purchase homes before anyone else. - should not be in this section.
- Respondents in part stated that it depends if it works favour on the environment and the type of industrial use is proposed.

Do you agree with the strategy to create a high street including new shops, restaurants, cafes, local services and leisure uses?

Total	Yes	No	In Part	Don't know
132	65	23	42	2

- Strongly agree as this will attract more businesses and jobs in the area and increase for people to shop more locally and jobs should be for the local people.
- The majority would like to see small, independent shops (e.g., small boutique owners, artisan creators) but one respondent stated they only would like chain shops as they do not trust food hygiene in smaller restaurants.
- To provide affordable retail at the same time to incorporate human-scale design – it should facilitate for human interaction and community participation.
- A respondent asked whether there will be a council owned leisure centre and sports facilities.
- The main concern was the loss of pubs and no strategy for retaining pubs as many

people these are social assets.

- No strategy that can create a high street and deliver a vibrant mix of shops restaurants, cafes etc. This happens organically over time where things naturally evolve in response to the needs of the local population. Pubs need to be
- Theatre Trust state within part 4, reference performance space in addition to cinema or museum as there is a shortage in the borough.
- To allow to develop shopping frontages into the way they would like
- More mention of pubs - pubs aren't listed amongst the figures on page 15 of the plan under "schools and communities", or on Page 50 under "High Street Character and Ground Floor Strategy". These buildings are communities too – especially for the elderly, and working class people; they are a key part of our social fabric, even if they are now a minority interest. By ignoring these important buildings and the businesses within them, further anger and division is caused.
- OKR is home to a rich mix of ethnic minorities. Much of the wide diversity already existing in terms of cafes and restaurants on OKR will be lost when rents increase as part of the regeneration/gentrification drive. We don't want another high street full of familiar chains, we wish to preserve the existing distinct mix.
- Majority of the respondents would like to keep the high street local
- Commercial rents need to be set at a level suitable for small business owners rather than large chains.
- One respondent said they would like to see light industrial on the high street

Do you agree with the strategy to ensure public transport, cycling, walking and scooting are the first choices of travel for local residents?

Total	Yes	No	In Part	Don't know
133	73	24	36	-

- Majority of the respondents in favour of the strategy commented on the positive approach of cycling and would like to see connective cycle lanes to central London.
- However, there should be more consideration of cycle movement and improved road crossings at Burgess Park. Friends of Burgess Park recommended an orbital route along Albany Road and St George's Way.
- Prioritisation of pedestrians and public transport users over cyclists.
- Safety measures set in place for such infrastructure needed - e.g., walking can be dangerous and especially for children.
- Cycle theft is a huge problem.
- Further development of electric charging points was recommended.
- Concerns over the delivery of a "Healthy Highstreet" for the whole of OKR without the delivery of the BLE.
- Representations were concerned on the effect of car free proposals upon local people especially the working-class community, less able bodied and elderly.
- There is still a reliance on deliveries and servicing (electrics, plumbing, building maintenance etc.,) all of which means trucks and vans.
- Respondents that were against the transport strategy stated that the pedestrian crossings were "staggered" and would like to have a "simple, and plain, direct pedestrian crossings"
- More clarification the segregation of bus lanes and cycle lanes – whether if this is for the whole of OKR.
- Problems with e scooters being dangerous and illegal.

Do you agree with the new tall buildings plan?

Total	Yes	No	In part	Dont know
133	26	84	20	3

- The majority of respondents do not support the tall buildings plan
- Concerns over the harm caused to the London skyline and the impact of wind tunnels on the Old Kent Road
- Many respondents are worried about the loss of natural light and the shadowing of open spaces caused by tall buildings
- Concerns over the safety of tall buildings planned as single stair buildings with no alternative means of escape in the event of fire
- Grenfell is cited many times as a reason not to have tall buildings
- Studio flats are sub-standard accommodation and should not be permitted
- Tier 1 buildings feel claustrophobic, intimidating and impact poorly on mental health – human scale development is more favorable
- Although tall buildings signify strategic points it is considered that the buildings proposed at tube stations are too high
- Tall buildings are too bland and not architecturally distinct
- The high-rise housing provision of social and affordable housing will create a character-less development which will alienate the local community
- STAG reported that Gypsies and Travellers feel oppressed by tall buildings overlooking their sites
- Shadowing negatively effects biodiversity
- Concerns over the impact which tall buildings have environmentally during construction and the higher use of energy during occupation - office and residential buildings use more energy per square meter, the taller they are
- The size and massing of the buildings is continuously increasing despite assurances given to existing residents and there is worries over the loss of character of the local area
- Lack of outside space and being able to relate to the scale of the people in the street lead to feelings of separation, isolation and depression. This is particularly acute within families especially where young children are involved. Numerous studies illustrate tall buildings are detrimental to individuals and society/community. The majority of those studied experienced greater mental health problems; higher fear of crime, fewer positive social interactions and more difficulty rating children and depression.

Do you agree with the strategy to safeguard heritage and deliver high quality design?

Total	Yes	No	In part	Dont know
131	72	24	30	5

- Respondents agree with the strategy but are skeptical that it is being achieved as in reality there is so much demolition and redevelopment of heritage assets
- There is much concern over the heights of buildings and how these should conform to the restrictions set out in the NSP
- The scale and height of development proposed is considered contradictory to the safeguarding of heritage assets and harms the settings of conservation areas and heritage assets with which they are in proximity of

- One respondent notes that the plans for OKR12 to preserve the existing stables and forge are at odds with the drawings which show 3 large multi-storey buildings where these assets are located
- There are multiple objections to the loss of the former Duke of Kent pub (now the Old Kent Road Mosque, no.365) and calls to see the existing building protected as a heritage asset
- Multiple requests to have the historic interior of the Thomas Beckett pub reinstated
- There are concerns that pubs are not listed under schools and communities or as part of the High Street and Ground Floor Strategy as they are important community assets
- Green Man pub (closed 2021) should be protected as a heritage asset and mentioned in the plan
- Retaining and retrofitting would be welcomed so many are concerned about the demolition led nature of the plan
- There is desire to see modernist buildings (the North Peckham Civic Centre) the same heritage significance as Victorian buildings
- There is severe concern from the residents of Page's walk that the proposed developments are going to cause considerable harm to the Conservation Area

Do you agree with the strategy to increase the quality and number of parks and open spaces in Old Kent Road?

Total	Yes	No	In part	Don't know
131	83	15	30	3

- The need for open space is acknowledged by most respondents
- Respondents would like to see a much greater increase in the provision of open space in the plan as the proportion of open space is low compared to the number of new homes and to account for the future increase in population
- Many respondents believe that the existing green space provision would need to be more than doubled for Southwark to retail its ranking as 5th worst borough in London for access to green space
- Many people want to see small parks and open spaces connected
- Suggestion for green routes to and from Burgess Park down Old Kent Road
- Multiple concerns were raised that the current trend of Council infill schemes on their estates, the loss of green space and children's play areas means a continued loss and so any proposals for more green space is outweighed by the removal of current spaces
- There is concern that there will be an overall loss of trees as the 3000 new trees committed for planting in the AAP is less than the trees already lost to development
- There is concern that shadowing caused by tall buildings will have negative impacts on biodiversity and cast greater proportions of the street in shadow, creating dark alleyways where concentrations of stagnant air and pollution can be found
- Some respondents raise concerns about the proposed Mandela Way Park and how this will affect existing road layout and accessibility
- Many who express support the plans are still concerned about trees, loss of green space to infill schemes, the impacts of tall buildings on open space and the location of Mandela Way Park
- One respondent does not support the strategy as they feel that there are enough

parks already which are not looked after properly

- One respondent points to the need for more sporting facilities as existing ones are oversubscribed and in poor condition
- Green and open space is beneficial but not at the cost of having tall buildings which destroy the enjoyment of the open space
- There is concern that much of the green space being proposed is for private use and not accessible to all
- One respondent supports the strategy as long as carbon capture is implemented
- There are concerns that the existing stock of parks and open spaces is not being safeguarded due to the volume of new development which is planned
- There is approval for the proposal to create a new park at the gas works
- It is important to make sure that these green spaces are not simply paved areas with a few trees and the occasional planter

Do you agree with the proposed AAP14 for the provision of facilities and spaces for children and young people?

Total	Yes	No	In part	Don't know
130	63	14	38	15

- Almost half of the respondents to this question support the proposals for facilities and spaces for children and young people
- Respondents recognise the need for more youth facilities in the area and that this should not be at the expense of upkeeping existing facilities
- Many respondents support youth provision but want to see replacement of facilities which have already been lost and for the policy to be able to provide for an increasing population
- Many respondents do not think the proposals for 231 Old Kent Road and two new schools will meet the needs of the existing community or future population growth
- The sale of Bermondsey Library, Bermondsey, Peckham and Walworth Town Halls, a number of schools and a homeless hostel are cited many times as big losses to the community
- Multiple respondents point to the need for park improvements and the importance of outdoor facilities to create safe spaces for young people and reduce youth crime
- Burgess Park is highlighted several times as an opportunity for improvements for young people
- Smaller open spaces around the Old Kent Road are also recognised as playing a vital role for children and young people e.g. Galleywall Nature Reserve, Nile Terrace and Ekington Gardens
- Several respondents would like to see the protection of casual recreational play areas used by children and young people such as ball courts, open areas and green space
- One respondent suggests the integration of sports facilities into development not just in parks and green spaces
- There are objections to the proposals for two new schools when existing schools are facing closure
- The proposals should be brought forward designing with and for such people, using consultants and design teams that reflect the diversity of the demographic of Old Kent Road.
- There is a need to create inclusive, multi-cultural spaces and facilities which are integrated into the communities and resounding cries that proposals are truly

accessible to all

- There are concerns about the location of these facilities in relation to road safety and how this will relate to minimising traffic
- There is concern that there is not enough being done to provide for older children and young adults and that the policy is too focused on young children
- Two respondents would like to see more connections to training and job opportunities in the proposed facilities
- One respondent points to encouraging youth to start their own businesses through affordable workspace and wants to see development providing more mixed-level, mixed-use community facilities with affordable workspace and youth training facilities, where young people could be provided mentorship and work experience / overshadowing opportunities by local businesses renting workspace
- There are concerns about who will take ownership of the spaces and how valuable it will be if there is no clear ownership
- Southwark Law Centre suggest that the policy could be improved by further effective consultation and a map of the current and proposed youth provision so people can clearly visualise the plans

What do you think of development completed to date?

- Representations received were largely skeptical or pessimistic about the developments completed to date. The only positive representations stated that developments were “good so far,” “exceptional” and “attractive.”
- The majority believed that the developments were impersonal, cold, too high, lack of greenspaces, low quality,
- Lack of greenspaces in developments and greenspaces in general are disjointed.
- Concerned in the reduction of community assets
- Developments concerned on the provision of housing and lack of local community facilities improvements.
- Communities unaware of proposed developments
- Problems with local government, little consultation for the general public,
- Slow development
- Expensive
- Against gated communities as it creates social exclusion
- Buildings fronting onto Crimscott Street should be between 6 - 8 storeys; yet we are already seeing the finished construction of 9 storeys as part of the London Square development which incidentally is one of the ugliest buildings to be constructed in recent years bearing more resemblance to a multi-storey car park or the recently demolished Heygate Estate rather than referencing existing builds in the area or working in any sympathy with the neighbouring Conservation Areas of Grange Road and Pages Walk.
-

What could the council and developer do to make sure that you are kept up to date about the construction on site and dealing with disturbance?

- Signage and letters in the post to residents, consultations and engagement
- Ensure that forums (like Next Door Neighbour) are regularly updated
- Create a text alert system for major works
- A web forum or Twitter feed
- More frequent emails and regular consultation

- A newsletter posted to residents
- Use the hoardings more effectively, not just for marketing
- Hold public information events – even online
- Organise virtual tours of what the development will look like
- Send leaflets
- Interactive map with the pipeline of work in progress and future stages of the masterplan - could also be used to consult on the design of each plot while still in the design stage
- Far greater openness and genuine consultation with residents. Go and talk to residents.
- Notification boards on site
- The council and developers need to do much more to engage, involve and inform Gypsy, Roma and Traveller communities in Southwark. A proper health and equalities impact assessments should be completed before all new constructions are started and Gypsies, Roma and Travellers should be specifically considered within these, as part of the Council's Public Sector Equality Duty.
- Bad practice of developers framing questions to ensure that existing residents can only give the answers that the developers need for the proposal to be approved
- The council has frequently extended construction working hours throughout the pandemic on many sites across Southwark. This is totally unacceptable with so many people in lockdown working from home and home schooling
- Many sites were also using floodlights to work these extended hours in the dark which created a light pollution issue on top of the noise nuisance.
- Many roads have been made difficult to access next to huge developments. This combined with LTNs has actually increased traffic and carbon emissions rather than addressing them.
- There is a total failure to work with the existing community in regard to developers carrying out works with no notice being given as to when works are starting etc., generally it is left to the public to complain as and when things happen. More positive engagement needs to happen with such an ambitious building programme.
- Southwark Council have to do more to protect existing residents from unscrupulous developers working unlawfully. Currently residents have to take construction companies to court for damage to their property caused by construction.

Do you have any other comments on the December 2020 draft Area Action Plan that you would like to share?

- For many respondents the delivery of the Bakerloo Line Extension is critical for the success of the plan and there is concern that TFL do not have the financial means to ensure the project goes ahead
- The Council's desire to build buildings that are crafted to a high standard and the use of materials and construction that will last, weather well and stand the test of time is applauded
- There is a desire to see more bike hangars and recycling bins in the whole of the Old Kent Road
- Those who are supportive of the plan and its ambitions want to see development happening at a faster pace
- Some residents report that they feel disregarded and stepped on
- A common theme is more discussion and engagement with local residents

- Improved and extended cycle and routes and planting more trees to separate pedestrians and cyclists from traffic on Old Kent Road need to be the first step towards creating a high street that serves the local community and supports the local economy
- It is felt that the Bricklayers Arms site allocation is confusing



Appendix B:

Summary of email responses to the consultation

Old Kent Road Area Action Plan: Consultation Report

November 2021

	No. Of responses	Statutory consultees	Businesses and landowners	Individuals	Community groups etc
Emails	46	10	23	8	4
Hub	136	0	1	123	12
Total	182	10	24	130	17

STATUTORY CONSULTTEES

Natural England	
Written rep received	-
<ul style="list-style-type: none"> Nothing to comment on this consultation 	

Highways England	
Written rep received	2018
<ul style="list-style-type: none"> No comments or objections at this time. 	

Historic England	
Written rep received	2016, 2017 and 2018
<ul style="list-style-type: none"> Their principal concern remains the tall buildings strategy and the potential impact on the setting of heritage assets and on local character. Historic England acknowledges that the taller elements will be limited to key junctions and transport heights, however they emphasise that it is vital that both taller elements and podium heights respect the significance of heritage assets and development preserves and where possible enhances this significance. The height and mass of proposed new development should also be informed by street widths and care will need to be taken to avoid an oppressive sense of enclosure - recommends the Allies and Morrison/Urban Practitioners research which concluded the importance of prioritising street structure and the need for scale to reflect street width Historic England urge the Council to explore alternative and innovative approaches which would help mitigate the need for extensive tall buildings within narrow street patterns and would enable "landmark" buildings to genuinely serve the purpose of the identification of key locations. Suggestion to amend policy of AAP8 'The design of tall buildings must' to include wording relating to the preservation and enhancement of heritage assets Figure 12 would benefit from being tested to conclusively demonstrate that the proposed heights will not cause harm to the strategic views or outstanding universal values of world heritage sites. It is noted that the Tall Buildings Study referred to in the evidence base has not been published Would like to see more sound analysis of the impacts on the significance of 	

heritage assets in relation to the concept of 'Stations and Crossing' and the three-tier approach to Tall buildings

- Encourages the Council to define a maximum height for Tier 1 buildings to give clarity to the vision and enable more effective planning of the surrounding townscape
- Historic England think that many of the proposed sites would benefit from more detailed illustrative masterplanning and design codes
- Supportive of AAP9 Character and heritage and the inclusion of the policy to safeguard historic street surfaces
- Historic England recommend early identification of "risk" and a strategy to address this to take advantage of the opportunities to enhance local character and refurbish and enhance buildings to successfully support the vision for revitalised local amenities and town centres.
- In SA1 new development fronting Old Kent Road should seek to reinforce the high street typology and to reintroduce a consistency of finer grain development through the design of the facades
- Recommend consideration be given to how new development can help promote improvements to physical condition and economic activity of the surviving historic high street section
- In SA2 the commitment to integrating heritage assets into new development and the proposal to introduce a linear park to reflect the former canal route is welcomed.
- The height and location of tier one and two buildings around Burgess Park has some cause for concern in order to avoid a wall of development create canyon like streets
- In SA3, the vision for reinstating an active high street frontage which better reflects the historic high street grain is to be welcomed, as is the intention to utilise designated heritage assets as a focus for local character by incorporating them into new public realms and parkland.
- It would be helpful to clarify the retained buildings in OKR13 Heritage section
- In SA4, it is recommended that the need to consider the impact of taller development on the heritage asset needs to be included in all the Sub Area 4 Site Allocations – references to tall buildings are too vague as to the numbers or locations of tall buildings
- In SA5, Historic England have no specific comments but encourage the Council

Forestry Commission

Written rep received

-

- No specific comments but encourages the use of green infrastructure and using locally sourced wood in construction

Sport England

Written rep received

2016, 2017 and 2018

- The location and strategic need for a new sports and leisure facility needs to be evidenced

- Proposals for new public open space, green links and to make whole of the Old Kent Road a healthy Street are fully supported.
- Recommend to reference Sport England's Active Design Guidance and suggest the concept of 'Active Design' be incorporated into policy

Thames Water

Written rep received	2016, 2017 and 2018
----------------------	---------------------

- The reference to the Integrated Water Management Strategy (IWMS) is welcomed.
- Thames Water are in the process of creating long term drainage and wastewater management plans (DWMP) with objectives that overlap with those for Old Kent Road, such as being cleaner, greener and safer and supportive green open spaces.
- They are also supportive of the inclusion of water efficiency measures, and surface and grey water reuse within developments and appreciate that Old Kent Road is committed to SuDS, parks, and grey water reuse and support the references to the IWMS in Policy AAP12 and the requirement to follow the SuDS hierarchy which builds on Policy SI13 of the London Plan.
- Concerned about development along the Old Kent Road, specifically regarding the cumulative impact on the trunk sewer and that is being investigated through the DWMP
- Would like to see SUDS included in the plans for new and redeveloped parks
- In order to ensure that development is aligned with any water and wastewater infrastructure upgrades necessary to support the development Thames Water would like some wording added to AAP12: Cleaner Greener Safer advising applicants to seek pre-application advise from them. This can help reduce the need for phasing conditions to be sought on planning approvals to prevent the occupation of development ahead of the delivery of any necessary network reinforcement works.
- To assist in network capacity assessments, all applications should include current and proposed drainage plans, including points of connection and estimations of flow rates.

TFL Commercial Development

Written rep received	2016 and 2018
----------------------	---------------

- The inclusion of the Bricklayers Arms Roundabout as a site allocation is supported
- Questions where the 400-600 capacity has come from and suggests that development capacity figure is not included in the site allocation until more detailed assessment has been undertaken.
- If it is considered necessary to include a figure at this stage, TFL suggest that a lower range of 400 is used as a minimum rather than including a set range with a limit of 600 homes.
- It is noted that in Figure 12 the Bricklayers Arms site has not been included as a site which may be suitable for Tier 1 to Tier 3 building heights.
- TfL CD consider that Bricklayers Arms should be identified as a suitable location for Tier 2 heights on the parts of the site not affected by the strategic views as it is

considered that the Bricklayers Arms is a key junction within the AAP area.

TfL Spatial Planning

Written rep received

-

- TFL Spatial Planning acknowledge the strong support and vision articulated in the AAP in support of the Bakerloo Line Extension.
- Given the position on funding for the BLE, more work needs to be done to support other transport improvements until the Bakerloo line arrives e.g. accelerating ambitions of Healthy Street project and improved bus services.
- There is a need to focus on improving pedestrian, cyclist, bus connectivity in the area, improving other rail-based transport and public realm environment.
- The AAP states that the BLE will be operational by 2031, which is no longer likely, given current funding constraints – more emphasis could be placed on the importance of improving pedestrian, cycle and bus connectivity in the area, improving other rail-based transport in the interim and to support the BLE once operational.
- Healthy Streets strategy and the Healthy Streets scheme for the Old Kent Road should be referenced
- It is suggested that the milestones for the BLE and the associated development phasing are given without specific dates in the AAP – TFL welcome further discussion as to how best communicate this
- It is recommended that the safeguarding directions for the BLE are set out within the policy maps in the AAP, and referred to in policy AAP2.
- TFL welcome the new section on the COVID-19 response and the emphasis it places on pedestrian amenity and public space
- The importance of high-quality public space and provision for active travel in the AAP area could be more clearly underlined in the COVID-19 response
- In the Funding section, the cost of the BLE should be reviewed considering funding constraints and TFL would be happy to discuss further.
- TFL comment that the role of different stakeholders including, but not only, Southwark and Lewisham Council, landowners and developers in the planning and delivery of the BLE could be better communicated and more information on the safeguarding directions could be provided
- The Greener Belt Diagram (Figure 3) should show the alignment proposed TFL.
- In the plan objectives under the Movement section, TFL concur with the aim to create an exemplary Healthy Street, but are concerned that the wording proposed sets up the unrealistic expectation that there can be physically separated bus and cycle lanes through the whole length of OKR.
- The commitment ‘to joint working with TfL, GLA and Lewisham Council to secure the BLE and delivery of at least two new stations on OKR’ is welcomed but suggest that the words ‘help deliver’ in place of ‘secure’ would be better.
- TFL recommend specific wording relating to the safeguarding directions for the BLE to be inserted into AAP2.
- The policy wording of AAP2 should explicitly relate development phasing in the AAP area to the letting of the BLE construction contract in accordance with the phasing agreements that were agreed between the Council, the Mayor and the GLA and TfL in 2018

- TFL suggest the addition of the wording 'improved bus services provided' when talking about the upgrade of physical infrastructure, in order to avoid overlooking the importance of increased bus capacity in the first phase of development.
- TFL suggest several minor amendments to the wording of the accompanying text in regard to the proposed route, correcting the dates and being clear that the Grampian condition would prevent development from proceeding until the construction contract for the BLE has been let.
- TFL welcome measures to achieve this including: car free development, safe and accessible walking and cycling routes, and walkable neighbourhoods – reducing the use of motor vehicles should be a priority.
- To reduce the share of commercial vehicle movements, last mile deliveries or collection on foot or by cargo cycle needs to be encouraged.
- TFL state that the Agent of Change principle should be applied when there is co-location of different uses and noise, air quality or vibration sensitive uses are introduced to industrial and related areas, including development sites that are close to transport infrastructure and services, or transport support functions.
- The requirement for development to create a pedestrian friendly and healthy environment on the high street and the relationship it sets up between ground floor land use, active frontages and high street public realm is welcomed.
- In AAP6 under the 'Development must' section, it is suggested that the reference to retaining or increasing the amount of retail uses may need clarifying in context of the changes to the Use Classes Order.
- Within policy AAP6, there may be an opportunity to require additional public cycle parking to support the proposed high street and the two district centres.
- TFL welcome the requirement for car free development in AAP7
- TFL suggest that the proposed exception for 'essential parking and deliveries for businesses to operate' should be clarified to ensure it is justified on a site-by-site basis and won't be used to provide general parking
- The intention to manage a reduction in parking on estate redevelopment is welcomed
- A stronger emphasis in AAP7 on the importance of providing capacity and infrastructure improvements, particularly in the early years leading up to the full opening of the BLE - development decisions will need to provide funding for new and enhanced bus services and help to create the conditions for an increased number of buses to operate effectively by providing improvements to supporting infrastructure and measures to improve journey times.
- TFL point to the need for additional bus capacity/connectivity between OKR and Canada Water using Rotherhithe New Road, for example a new bus route, is likely to be a key requirement to support both Opportunity Areas.
- The intention to maximise footway widths is welcomed and it is suggested that the Healthy Streets Approach in AAP11 is cross referenced here.
- The requirements for off street servicing where possible and electric charging points (where parking is provided) is supported and it is suggested that all disabled parking spaces should have active charging facilities from the outset
- TFL welcome the consolidation servicing which should apply to deliveries and construction and suggest that consideration should be given to seeking rapid-charging facilities for operational vehicles where appropriate.
- TFL suggest that the list of financial contributions should be prioritised with the first call on funds for necessary bus capacity improvements followed by active travel improvements as part of the Healthy Streets scheme

- TFL do not consider a blanket requirement for a free three-year membership of a car club appropriate as it is likely to act as an incentive to greater car use over sustainable travel
- The aspiration to maintain 50 per cent less driving than before lockdown and to create a modal shift is welcomed and it is suggested to explain and provide justification for measures that will help to achieve this.
- TFL welcomes the requirements for Transport Assessments to include an Active Travel Zone Assessment – it is suggested the word ‘Survey’ is changed to ‘Assessment’ - and for the submission of Construction Environmental Management Plans (or Construction Logistics Plans) and Delivery and Servicing Plans.
- It is suggested that where parking is re-provided as part of estate regeneration, and in the event of parking being permitted elsewhere, a Parking Design and Management Plan should be submitted showing how parking will be allocated, monitored, and reduced over time.
- New Bermondsey Station should be referred to as Surrey Canal Station - this applies to several references throughout the document
- TFL suggest that clarity is needed in the targets section on whether the 4km refers to the total of separate bus and cycle lanes or whether it includes bus lanes which allow cycling.
- The proposed extension of the Controlled Parking Zone is welcomed but TFL have some concerns about the detail shown on Figure 11 including:
 - The location for proposed new cycle hire stations and improved pedestrian crossing facilities needs to be agreed with TFL
 - The map does not show how the movement for pedestrians and cyclists is intended to evolve over time including the phasing of works
 - The status of green links is unclear, and it is unclear why they are focused only in the central section
 - The proposed cycle network is confusing and appears only partial – it is suggested that to focus less on identified routes and more on the network of streets where people can safely and comfortably cycle, emphasising where change is needed
 - It is also unclear if the crossings are intended for cycle as well as pedestrian use
 - It is suggested a separate cycle network strategy drawing would be helpful
 - Liveable Neighbourhoods boundaries are difficult to see and there is no indication of what this means for the movement network
 - There are inconsistencies between Figure 11 and the sub-area drawings e.g. the East Street to Hendre Road crossing is highlighted as a key link on the drawing on page 111, which we support, but it does not appear on the Movement drawing as a crossing or junction that needs improvement
 - While the green link and crossing at the Olmar Street to Marlborough Road intersection is referenced in the sub-area section, the next green link crossing OKR to the east, before the St James’s Road junction, is not. It is not clear from the block form shown in the sub-area plan how this could be a green link.
 - An improved crossing should be shown in the vicinity of Hyndman Street
 - There is a cycling link missing at Dunton Road between Lynton Road and Mandela Way, as well as Marcia Road and OKR to create direct connectivity

- Regarding AAP11, TFL welcome and actively support Southwark Council's aspirations to turn OKR into a Healthy Street by 2036, including prioritising people walking and cycling and improving crossings.
- It is suggested that cross referencing AAP11 in other policies would be helpful as the Healthy Streets Approach underpins many of the measures proposed under other policies, e.g. Movement and Design.
- TFL recommend that Specific guidance on how development can facilitate delivery of the OKR Healthy Streets project should also be included and suggest a three pronged approach:
 - developer contributions (in kind and/or financial) We would suggest that as all developers will benefit from the HS scheme consideration should be given to how to secure contributions from those with sites not fronting the OKR;
 - safeguarding of land for local widening to create space for active travel or public transport, where required;
 - control of on-street servicing for developments fronting OKR or its junctions by requiring off-street/side street servicing and/or shared delivery consolidation areas.
- In AAP12, the requirement for development to be designed in line with Agent of Change principle is welcomed and it is suggested that it would be useful to cross reference this in other sections on Business and Workspace and Design
- TFL suggest that it would be useful for all sites and masterplan pages in the sub-areas section to reiterate the requirement of policy AAP7 that seven-metre wide footways/public realm should be achieved.
- In the sub-areas and site allocations, it would be preferable to TFL for the more flexible use of wording regarding road network changes as these are subject to design, modelling and approval by TFL which may evolve through the duration of the project.
- On OKR3 the dial-a-ride depot must be retained in line with the requirements of policy T3 of the London Plan unless a suitable alternative site with at least current capacity and allowing for expansion can be provided within the area.
- TFL would welcome a discussion with the Council to identify potential sites within the area for a bus garage with at least replacement capacity of the one previously located at OKR3 in order to support the expansion of bus services.
- TFL welcomes the proposal to use part of OKR3 for the relocation of Tesco in order to accommodate the BLE station at OKR4.
- The requirement for OKR4 to accommodate the new BLE station and associated works is supported but suggest that the dates in the phasing section should be removed and three additional bullet points are added to the 'Redevelopment must' section
- It is suggested at OKR1 that the AAP needs to reflect the fact that the Bricklayers Arms roundabout and flyover are part of the TfL Road network and can only be altered subject to funding and a full assessment of the impacts of any changes, particularly on buses and active travel.
- TFL are pleased that the reference to a potential BLE station at OKR1 has been removed
- Regarding the Servicing and road network for sub-area 1, TFL are recognise the benefits of the strategy but suggest it would be preferable convey more flexibility about the exact form of these two junctions, particularly as this is likely to change through the various phases of development.

- The proposed geographical extension of Controlled Parking Zones and the expansion of their hours of operation are both welcomed.
- On OKR10 site allocation TFL suggest three additional bullet points under 'Redevelopment must:' should read: 'provide a suitable building set-back on Old Kent Road frontage to facilitate the Healthy Streets scheme, if required', 'facilitate bus service improvements' and 'facilitate the Rotherhithe to Peckham strategic cycle route'.
- It is considered that due to their size, OKR10, OKR13 and OKR16 may be suitable for bus standing and/or bus stops to support bus service improvements
- OKR10 could also potentially play an important role in delivering improvements to the recently announced Rotherhithe-Peckham strategic cycle route, for example by allowing a substantially car-free cycle link between Rotherhithe New Road/OKR junction and Frensham Street/Latona Road.
- On site allocations OKR11, OKR13, OKR14, OKR15, OKR16, OKR17 and OKR18, TFL suggest additional policy wording under 'Redevelopment must' to include reference to building set back to facilitate the Healthy Streets scheme
- The proposal for a triangular public open space on OKR north of the Olmar Street junction on the current McDonald's site is supported as it creates an appropriate break in the building line and facilitates green links. It is suggested that the significance of the space is outlined in the text
- It is suggested that the enhanced crossings shown in Figure 11 be included on the servicing and network plans for each relevant sub area
- As OKR17 is planned to be a location for a BLE station, and this site and the SG Smith land are required as a work site, it is recommended that future safeguarding requirements should be given more prominence now that these have been confirmed.
- Regarding the Servicing and road network for sub area 4, it is considered that there may need to be more flexibility in relation to the proposed realigned Asylum Road, two-way working on Devonshire Grove and stopping-up of Devon Street.
- TFL note that there is an error on the overground station key to the map as it should refer to a London Overground station called Surrey Canal on Surrey Canal Road rather than BLE station.
- On the Park and Recreation section for sub area 4, TFL note that the Old Kent Road station is shown in a different location here compared to elsewhere
- TFL suggest that given that various options for the form and location of station public realm will be considered, this document might more usefully refer to high quality public space around the new station, supporting accessible, comfortable interchange without specifying a particular form and location of this space at this stage.
- Improvement to servicing and plans to minimise the impact of queuing vehicles are welcomed
- Maximising the use of cargo cycles and consolidation of loads to reduce vehicle traffic is also supported

Mayor of London	
Written rep received	2018
<ul style="list-style-type: none"> • The Mayor strongly supports the high-level ambitions set out in the draft Plan's 	

vision, namely, to build 20,000 new homes, to support and grow the area's economy by taking advantage of its proximity to and links with central London, to address inequality and to deliver the new social infrastructure the area's new and existing communities will require.

- The Mayor also acknowledges the strong support and vision articulated in the AAP in support of the Bakerloo Line Extension. However, given the position on funding for the BLE more work will need to be done to support other transport improvements until the Bakerloo Line arrives.
- The Mayor is keen to accelerate ambitions of the Healthy Streets project and improved bus services to provide improvements to the Old Kent Road in the short-medium term ahead of the BLE arrival and enable delivery of homes not dependent upon the capacity and access provided by the BLE.
- It is noted that the plan states that BLE will be operational by 2031, which is no longer likely given funding constraints.
- The Mayor suggests that the plan should place greater emphasis on the short-term upgrades that can be made, both to improve the environment and to stress the importance of these options as a means of serving the pre-BLE build out in the area.
- It is also requested that a review of dates and milestones in the AAP around the delivery and operation of the BLE is undertaken with TFL.
- The ambition of the plan to deliver the quantum of growth set out (20,000 homes and 10,000 jobs) is supported and should be supported by a strategy and evidence that is realistic and achievable.
- The overarching ambitions and vision set out are strongly supported
- The high street focus is clear and re-enforced in the sub area plans making a comprehensive and compelling case to see a reinvigorated high street along the length of the Old Kent Road but it is suggested that further reference be added to the potential restructuring of the high street as a result of factors such as online retail - more effort may need to be made to ensure the high street remains an important place not only for commerce, but also for community and cultural uses.
- The GLA are keen to support the Council on the successful allocation of the Future High Street Fund for the Old Kent Road, welcoming further discussion and collaboration as the project develops.
- The London Plan 2021 makes it clear that the AAP should focus on how industrial land can be intensified and provide space for businesses that need to relocate from any Strategic Industrial Land (SIL) and from any identified for release.
- Existing workspaces for creative industries should be protected and supported and the proposed town centres should be designated close to the potential new tube stations.
- To be consistent with the London Plan 2021 the plan should recognise the need to provide essential services to the Central Activities Zone (CAZ) and sustainable 'last mile' distribution/logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions.
- The ambition of the AAP for the area to be net zero-carbon is welcome and the Mayor recognises the positive contribution this approach will make in achieving his priority that London becomes a zero-carbon city
- The Mayor welcomes the reflections on the impact of COVID-19 on communities in the Old Kent Road Area and acknowledges how the AAP identifies how this impact

has disproportionately impacted Black, Asian and Minority Ethnic groups.

- It is acknowledged and strongly supported that the Council has taken account of the learning from COVID-19 and will look at ways to maximise pedestrian space and support measures to make it easier to walk, cycle and use public space whilst removing traffic.
- It is suggested that the AAP could make a stronger link to the importance of access to outdoor public space as highlighted during the pandemic and look to ways to maximise use and activity as lockdown is eased.
- The Mayor welcomes the intention of the draft AAP to support the delivery of much needed genuinely and high-quality affordable housing over the course of its life.
- It is suggested that policy AAP 4 could reflect the Mayor's strategic target that 50% of all new housing should be affordable as set out in Policy H4 of the London Plan 2021.
- The Mayor notes that the AAP intends to rely on the NSP policy for affordable housing which requires a 40% threshold for developers to follow the Fast Track Route and that the AAP does not refer to the 50% threshold level of 50% on publicly owned land and on industrial land where there would be a net loss of industrial capacity.
- It is recommended that Southwark should only consider threshold levels that differ from those set out in the London Plan 2021 where they are supported by local and up-to-date evidence.
- It is recognised that the NSP is undergoing examination and the affordable housing thresholds have been subject to discussion so the Mayor will review his position on this matter when the OKR APP is formally submitted in the light of the Inspector's report on the NSP and any proposed modifications put forward by Southwark.
- The ambition to achieve no net loss of industrial and related floorspace capacity in AAP5 is supported by the Mayor and the proposed approach is consistent with the Mayor's Good Growth objective GG2 Making the best use of land which is welcomed.
- The reconfiguration of designated industrial land within the OKR area appears to be consistent with the agreement made between the Deputy Mayor and the Leader of Southwark Council in September 2018 and this is noted and supported.
- The draft Plan clearly sets out industrial development typologies and suitable locations. The great level of detail regarding proposed built forms and many other aspects of the plan are noted and welcome.
- As currently drafted the Plan does not establish that it can support the quantum of industrial development - 70,000sqm - within the South Bermondsey area and nor is there published evidence which provides a realistic indication about how much industrial space could be provided through intensification.
- The Mayor considers that although AAP5 generally supports and promotes industrial intensification, and 28ha of SPIL is identified in the sub areas and site allocations, the policy does not set out how much industrial capacity could be delivered over the Plan period.
- It is recommended that the AAP should explore in more detail, with a view to providing sufficient confidence about delivery, what types of capacity could be provided in different sites, taking into account plot sizes, yard and servicing space and access.
- In order to fully comply with the London Plan 2021 the borough should provide additional evidence to demonstrate that the intensification envisaged is deliverable over the life of the plan and answer a set of questions relating to viability, market

demand, existing planning applications and infrastructure improvements.

- It is recommended that a monitoring framework is set up to ensure that where industrial capacity is released for other uses, its replacement is carefully accounted for and monitored.
- The Plan should endeavour to develop increased industrial capacity through intensification first, prior to the release of industrial capacity from other parts of the Plan area.
- The proposals in AAP5 for 10% of workspace to be affordable is welcomed by the Mayor, however, it is suggested that the Plan should follow the approach set out in Policy E3 of the London Plan 2021 which clearly sets out that planning obligations may be used to secure affordable workspace for a specific social, cultural, or economic development purpose.
- The Mayor considers that part 7 of policy AAP5 is more closely aligned with Policy E2 of the London Plan and suggests that AAP5 be amended accordingly so that it takes both Policies E2 and E3 into account.
- In the Town Centres section, the Mayor suggests that Old Kent Road/East Street and Old Kent Road/Peckham Park Road are referenced in the Plan as having the capacity, demand and viability to accommodate new office development, generally as part of mixed-use developments including residential use as both areas have been identified as future potential District town centres.
- The strategy to create two new District town centres is strongly supported, as well as the the delivery of new uses in leisure, entertainment, recreation and play for local people of all ages to get out and have fun in the day and night-time which chimes with the 24-hour city vision set out by the Mayor.
- The town centre boundaries are welcomed by the Mayor.
- The intention for new office development to be focused in town centres as set out in AAP5 is welcomed as it follows the approach set out in Policy E1 of the London Plan 2021.
- The Mayor suggests that the supporting text should set out how much office development is projected within the area over the course of the Plan period and this should be supported by evidence.
- The Mayor is pleased to see the AAP has adopted the approach advocated in his High Streets for All report which uses Old Kent Road as a case study and explores the uses of ground floor strategies and encourages Southwark to continue to engage with the GLA on the High Streets for All report and more recently the High Streets mission work.
- It is acknowledged that a great deal of high street interventions are already underway or delivered and these should be cited in the AAP.
- The potential for new conservation areas to be designated in key parts of the high street is also welcomed to help preserve historic high street and buildings of interest.
- The Mayor supports the council's ambition to transform the Old Kent Road into an exemplary Healthy Street by 2036 and should consider further discussion with the GLA/TFL on how the delivery of the scheme can be accelerated
- The GLA and TFL advise that the proposal to have segregated bus and cycle lane along the entire length of Old Kent Road as set out in AAP7 will not be possible especially at the northern section of the Old Kent Road where existing high street buildings constrain achieving the 24m wide section required.
- The Mayor supports the ambition to maintain 50% less traffic than before lockdown.

- The Mayor suggests referencing the work the borough is undertaking as part of Southwark Stands Together to help promote local character and diversity in the public realm.
- It should also be recognised that the Old Kent Road will continue to fulfil a crucial function for London as a freight corridor.
- The Mayor suggests that although Figure 12 illustrates the protected views, that these be illustrated much more clearly so that the precise limit of each can be determined.
- The mapping and locations for Tier 1-3 buildings is welcomed but it is considered that these could be displayed more clearly.
- To be consistent with Policy D9 Part B2 and paragraph 3.9.2 of the London Plan 2021 for Tier One tall buildings, maximum heights should be set out clearly for specific locations and these too should be indicated clearly on maps.
- The added focus on supporting communities through the ‘connected communities’ section of the AAP is welcomed and it is considered that specific reference to BAME communities as being integral part of the local area should be made
- The Mayor commends the efforts being made to support virtual and permanent youth facilities in the plan and reference to providing inclusive access to social and physical infrastructure is also supported.
- The Mayor is pleased to see progress being made on an open space strategy for the area.
- The ambitions stated under AAP11 to: Increase the amount of public open space from 15 hectares to at least 25 hectares, rising to 30 hectares by 2045 is supported.
- The borough is encouraged to produce a robust, overarching open space strategy carried out in line with London Plan policy 7.18 and policy G4.
- The Mayor is pleased with the progress the Growth Partnership has made in setting up the design review workshops across Old Kent Road, New Cross and Lewisham.
- The overarching ambitions stated within AAP 9: Heritage and Character are supported, and specific references made to conserving key area of historic high street through new conservation status is particularly welcomed.
- It is suggested that the Heritage and character section may benefit from referencing the work the borough is undertaking as part of Southwark Stands Together to help promote local character and diversity in the public realm
- The Mayor provides more detailed comments relating to specific excerpts of text as an Annex

London Gypsies and Travellers

Written rep received

-

- There is great concern over the Old Kent Road Area Action Plan proposals related to the Bakerloo Line extension and the site allocations in the vicinity of Ilderton Road, Burnhill Close and Brideale Close, the three local authority run Gypsy and Traveller sites in the area.
- There are concerns over how the Plan does not make any attempt to identify possible locations for new culturally suitable accommodation for Gypsies and Travellers (as identified in the council's Gypsy and Traveller Accommodation

Needs Assessment 2020).

- In previous consultations, it has been suggested that OKR 16 and OKR17 could provide a mix of residential use and a small number of family pitches.
- It is also suggested that the sites should be considered for meeting any current and future accommodation needs in the form of additional pitch provision.
- They request a detailed appraisal of site allocations in the AAP assessed against the potential to deliver Gypsy and Traveller accommodation alongside other uses.
- A detailed impact assessment that focuses on the sites adjacent to Ilderton Road, Burnhill Close, Brideale Close and Bakerloo Line Extension is also requested.

National Grid

Represented by	Avison Young
Interest	Electrical assets across site allocations – OKR10, OKR13 and OKR16
Written rep received	-
<ul style="list-style-type: none"> • No specific comments but states OK10, OK13 and OK16 are near electrical assets. • National Grid is happy to provide advice and guidance to the Council concerning their networks. 	

DEVELOPERS/ LAND OWNERS

Safestore

Represented by	Savills
Interest	Leaseholder of Safestore, 737 Old Kent Road – OKR18
Written rep received	2016 and 2018
<ul style="list-style-type: none"> • Supportive of exploring redevelopment opportunities provided Safestore can retain or re-provide its operation within redevelopment • AAP1 The masterplan is overly prescriptive and not flexible enough to respond to changes in market conditions (suggest word change) • Supports annual review of BLE Phasing and do not wish to be prejudiced in the chronological ordering of applications coming forward • AAP3: Climate Emergency is overly prescriptive and has the potential to impact upon the viability and subsequent deliverability of planning applications within the OKR • Savills and Safestore are supportive of the target set within AAP4: Quality Affordable Homes of achieving 20,000 new homes but opposed to the requirement for 35% to be affordable due to viability • The intention of the co-location approach in AAP5 are supported but Safestore object to the requirement to retain or increase the amount of employment floorspace and the requirement for 10% affordable workspace as they believe it is impractical when considered in relation to Use Class B8 storage and distribution operations. 	

- Savills and Safestore support the clarity that designations for areas appropriate for tall building development bring but consider that as currently drafted, AAP 8 is unduly prescriptive and will form a barrier to the optimisation of some sites.
- The designation of the Safestore site as Tier 3 (up to 15 storeys) is questioned when in previous versions it was placed at 25 storeys and the sites abutting Safestore are designated as Tier 1.
- It is stated that when read in conjunction with the Site Allocation OKR18 it appears to contradict Figure 12 - the third bullet point outlines that tier one and two buildings could in fact be considered acceptable within OKR18.
- Safestore invite LB Southwark to continue engagement with the landowner to discuss what quantum of development is achievable on the site.
- Savills are pleased to see the recognition LB Southwark has to the potential development opportunities of the wider area and consider that the potential of OKR18 to deliver this significant contribution should not be curtailed by any restrictive policy on heights on site
- Safestore express concern over the extension of Caroline Gardens Conservation Area into OKR18 shown in Figure S.A 4.1 as they claim that there was no consultation regarding a proposed amendment to the conservation area boundary.
- Concern is also expressed on Figure S.A 4.3 which designates the land uses on site as being 'small industrial' as it is fundamental that any proposed development would include B8 Storage and Distribution land use so that Safestore can seek to retain their presence on Old Kent Road.
- It is suggested that the AAP be revised to indicate that 'medium-large storage and distribution' is appropriate on OKR18.
- Safestore suggest that a variety of uses in addition to those currently listed on page 182 should be encouraged to create an active frontage on OKR, as Safestore relies on visible entrances on Old Kent Road for their business strategy.
-

Apex Capital Partners

Represented by	WSP
Interest	Owner of 310-330 St James's Road – OKR11
Written rep received	-
<ul style="list-style-type: none"> • Supportive of inclusion of their site within the draft site allocation OKR11 for the delivery of 1,200 new homes • Supportive of the masterplan but consider that it must be recognised that individual sites will be coming forward for development as part of a phased approach to the delivery of the masterplan, and as such, the delivery of new homes and employment uses on sites which are deliverable now, should be supported • Subject to viability, Apex Capital Partners are supportive of the target to provide a minimum of 35% affordable homes on new sites in the Old Kent Road area • Opposes the 60% of homes to provide 2 or more bedrooms and a minimum of 20% family homes with 3 or more bedrooms in the Action Area Core • AAP5: The provision of affordable workspace is supported but Apex Capital would like less prescriptive policy and the provision to be more demand driven and believe there should be no restrictions on the types of businesses who can occupy space, 	

provided they are uses falling within Class E.

- It is considered that the requirement to provide affordable workspace at discount market rent for at least 30 years is overly onerous and requires flexibility due to the changing nature of the market.
- It is suggested that the draft policy requirement to retain or increase the amount of employment floorspace (GIA) on site (Use Class E (g)) or sui generis employment generating uses) should also be made more flexible to allow for alternative types of employment uses within the different sub-areas in response to market demand.
- AAP7: the delivery of car-free development in the Old Kent Road OA is supported, with the exception of disabled parking and essential parking and deliveries for businesses to operate
- AAP8: Tall buildings should be a guide but not overly prescriptive and would like Figure 12 updated with proposed massing for 310-330 St James's Road
- Apex Capital consider that an evidence base is required to assess location where tall buildings would be acceptable but do not consider the Tall Buildings Background Paper (June 2020) to provide that evidence base. It sets out the Council's current thinking on their tall buildings Stations and Crossings Strategy, but it itself not an evidence base for the strategy which is referred to in the draft policy.
- It is suggested that criteria 1 of AAP9 should be clarified that when it states that development must "protect and improve the Old Kent Road's historic fabric by requiring the retention and reuse of buildings and features that add character to Old Kent Road" that this only refers to buildings which can be said to have genuine local heritage value in accordance with the definition set out in national policy.
- Although Apex Capital agree with the policy aim of AAP10, they consider that the policy approach should be in accordance with the guidance on heritage asset set out in the NPPF and reference to buildings of townscape merit should be removed as this is not in accordance with national policy.
- Apex Capital consider that it is important to ensure the provision of fewer high quality play spaces which allows residents of all ages to mix, to avoid the creation of under-used amenity spaces on sites in higher density urban area.
- The designation of the buildings at 328 and 330 St James's Road being listed as buildings and features of townscape merit is not supported as there has been no heritage assessment.
- Apex Capital agree with the proposed phasing for the former Lobo factory site on St James's Road which it says is expected to come forward for development in the mid-2020s (BLE Phase 1), however, it is suggested that this be updated to refer to the buildings at 310-330 St James's Road, which is the assembled site coming forward for development following the submission of a planning application in spring 2021.
- Figure SA2.3 should be updated to reflect proposal coming forward for 310-330 St James's Road as the arrangement as it is currently shown is not accurate and could not feasibly be built.
- Apex Capital claim that no VU.CITY modelling has been included to illustrate planning applications height, massing and impact on townscape.
- It is considered that there is clear potential for a tall building of over 30 metres at the rear of the site at 310-330 St James's Road, based on existing and emerging context of the site allocation.
- It is suggested that the proposals for 310-330 St James's Road be included within the submission version of the OKR AAP.

- Apex Capital would like 310-330 St James's Road included as a standalone site with a capacity of 200 homes.

Tribe Student Housing

Represented by	HGH Consulting
Interest	Own the freehold of KFC, 671,679 Old Kent Road – OKR13
Written rep received	-
<ul style="list-style-type: none"> • Tribe supports the Council's proposed approach in principle but wishes to emphasise that OKR13 covers a large and diverse area and therefore the site requirements need to be applied flexibly to reflect different circumstances • It is considered that although it is appropriate for a range of land uses to be sought for redevelopment proposals across OKR13, the Typologies Plan is overly prescriptive • There is a need for flexibility and other appropriate town centre uses, for example student accommodation, should be able to come forward especially since the Council has recently resolved to grant planning permission for a student-led redevelopment of the site. • It is considered that unless requirements for site allocations are made more flexible, there is a risk of inhibiting the potential for student housing schemes to come forward. • Tribe would like to see specific reference to 'student accommodation' made within the site allocation OKR13. • Tribe questions the demotion of 671-679 Old Kent Road from Tier 3 in previous versions of the AAP to being excluded from the Tier system completely with no justification or evidence. • Tribe is concerned that AAP8 stipulates such prescriptive height threshold without sufficient evidence and therefore considers the policy to be unsound as this does not comply with planning legislation that applications should be determined on a site by site basis and on their own merits. • It is also considered by tribe that the policy as it is currently worded could result in unduly restraining development, contrary to the newly adopted London Plan, which says at paragraph 3.9.2 of the supporting text to Policy D9 ('Tall buildings') that boroughs should undertake a "sieving exercise" to determine and identify locations where tall buildings may be appropriate. • It is suggested that Policy AAP8 and the corresponding "building height guidance" relating to OKR13 (on page 168 of the AAP) should be amended to recognise instances where there may be opportunities for taller buildings which could deliver public benefits, including enhancements to townscape. 	

Trustees of the Tate Gallery

Represented by	The Planning Lab
Interest	Owner of the Tate Stores, 7-14 Mandela Way – OKR3
Written rep received	2018

- Tate supports the overall direction of the OKRAAP
- Tate notes the need for the OKRAAP and any future development of the site and neighbouring sites to accommodate the existing operational logistics of the Tate Store site as an existing stakeholder including 24-hour access, transport impacts, noise, and air impacts from the use of plant for climate control and 24-hour security presences.
- Tate wishes to reiterate again that new uses, including sensitive residential uses, will need to be designed to adapt to the existing environment without putting undue pressure on current operations of existing businesses.
- Tate considers that more explicit support for the retention of existing uses and business should be made in the OKRAAP, especially for those that are specialist such as Tate.
- Protection for such users during construction activity to avoid impacts from vibration, which could be very damaging for the Stores.
- Tate raises some concern with the indicative layout of the area and the location of the Park and the transport routes which may impact its day to day operations and requests that the diagrams be labelled as 'indicative' to ensure that sufficient flexibility is promoted in the plan.
- Whilst it remains necessary to protect the site's operational functions e.g., 24 hours access, servicing and the widescale use of plant, fundamentally, Tate considers it inappropriate and unviable to designate the site for 'standalone industrial use' only, as is proposed.
- Tate request that the designation of its Stores site within OKR3 is amended to cover a flexible range of employment uses, which would be consistent with the site's existing lawful use, align with the site allocation and 'required uses' for Mandela Way as set out in the Proposed Submission Version New Southwark Plan.
- Tate remains concerned by the layout of OKR3 and its impact on the stores, in particular the location of the Mandela Way Park and the transport routes.
- Tate supports the provision of new and improved open spaces for the community and recognises the benefits it will bring to them and to visitors/employees alike, the rationale for the layout of the park and its interaction with key routes for vehicles needs to be provided.
- It is suggested that the layout should be labelled indicative so that alternative forms of development are not necessarily discouraged but further explored.
- Tate requests that the Park boundaries be reconsidered with suitable commercial land given over to such uses, secured via appropriate s106 agreements.
- Further, no justification has been provided in townscape terms for the resultant layout and the placement of the park feels not only arbitrary but detrimental to the operations of the surrounding buildings.

City of London Corporation

Represented by	Stantec
Interest	Owner of the Avondale Square Estate
Written rep received	-

- AAP1 should be amended to clarify that the masterplan approach applies to

allocated sites only or to allocated site and major non-allocated sites of 100 units or more. More clarification on the requirements for a collaborative approach including working with other developers' risks extending the programme for bringing forward smaller and more deliverable sites.

- AAP2: Supports plans for the BLE and two new stations along OKR but concerns about the number of schemes, which can be approved and started within the next 5 years to 2026 as it is a disincentive to developers if schemes cannot be delivered before this time. The AAP needs to clearly outline the proposed annual review of planning permissions and the implementation of schemes. The process and timescales for when Phase 2 schemes may be moved to the Phase 1 (2021-2026) delivery period to provide more certainty to developers and the local community.
- AAP3: further clarification needed on how existing housing estates are expected to be connected to the DHN and timescales.
- AAP8 should be amended to make clear that tall buildings on non-allocated sites may be acceptable subject to a review of site-specific constraints and surrounding context e.g. 19 storey towers at Avondale Square Estate.
- AAP11: Table 3 present a significant challenge for smaller sites or infill developments on existing estates - it should be clarified whether the Table 3 standards will be sought for allocated sites or if it will apply to all new developments in the OA. Some flexibility on these minimum requirements on a site-by-site basis should also be incorporated within the policy wording.

Hadley Property Group

Represented by	Savills
Interest	Future developer of OKR12
Written rep received	-

- Overall, the preparation of an Area Action Plan by LB Southwark in seeking and guiding the regeneration of the wider Old Kent Road opportunity area is supported
- It is considered that the housing number is too low and believe the housing figures have been heavily constrained by the emphasis on retaining buildings on the site and incorporating them into the development.
- Based on capacity studies prepared with Maccreanor Lavington and the Density Matrix (no longer included in the London Plan), it is considered that the site could deliver around 161 units.
- HPG suggest that the capacity of 103 homes is removed and is replaced to read 161 homes; and this figure should be stated as an absolute minimum and no upper limit should be outlined.
- HPG supports the principle of providing employment opportunities at the site but do not support the number of jobs set out in the site allocation as they do not consider that these will be provided in the existing buildings.
- It is suggested that the job numbers be removed and replaced with employment floorspace quantum instead.
- HPG feel that the site vision for OKR12 needs to be less rigid and more high level and feel that the image included with the site allocation should be removed as it is prescriptive and could be used to 'benchmark' future design options.
- HPG agree that the site "must" provide commercial/employment floorspace and

provide public open space.

- It is strongly felt that retaining the Forge would significantly restrict the site's capability to create an uplift in new jobs and consider that there is no robust assessment in the draft AAP which sets out the significance and condition of stables, the forge, or the boundary wall, to justify the Council's safeguarding in policy.
- Site requirements are too inflexible and the reuse of the forge is too niche and unlikely to be deliverable or viable.
- It is considered that new housing is a significant public benefit and an enabling use; it should be a prerequisite for the site coming forward.
- It is proposed that the wording of the allocation is revised to set out that all or some of the buildings or wall could be retained subject to the findings of a Heritage Assessment and development viability assessment, which will be assessed during pre-application stage with officers and against the Development Plan policies.
- The allocation of the site in BLE Phase 1 is supported by HPG.
- HPG agree with the location of the taller building element and stepping down approach of the site but believe that an 11 storey building would be suitable at the site's western corner, stepping down to part 4 part 6 eastwards along Catlin Street and suggest an update to the heights to reflect this.
- HPG fully supports the proposal for the open space at the centre of the site to become publicly accessible and that there is the possibility for food growing space to the rear of the stables.
- HPG support the creation of a new pedestrian and cycle link to Quietway 1 adjacent to the old railway bridge.

Berkeley Homes

Represented by	Stantec
Interest	Developer for Malt Street Regeneration Site and Nye's Wharf – OKR10
Written rep received	2016, 2017 and 2018
<ul style="list-style-type: none"> • Broadly supportive of the draft policies contained within the latest draft version of the OKR AAP • OKR AAP's images (Figure 12 – pages 62 & 63, Figure 16 – pages 86 & 87, Figure 17 – pages 88 & 89 and 'Building Heights Guidance' accompanying image on page 142) are inconsistent with the approved plans/extent permissions for Malt Street & Nye's Wharf. 	

John Lyon's Charity

Represented by	Tetra Tech Planning
Interest	Landowners of the Parliamentary Press premises, Mandela Way – OKR3
Written rep received	2016 and 2018

- The Charity supports the Council's strategy on collaborative working to ensure neighbouring sites work together to maximise the development potential of each site to deliver outstanding design quality, optimise density and create inclusive and successful places that are socially integrated with existing communities.
- It is considered that the use of the wording 'development must' in AAP1 is overly prescriptive and does not allow for any flexibility in design and approach and it is suggested that the wording be changed to "The Council will expect planning applications to..."
- The Council's response to the Climate Emergency and its aspirations to achieve carbon neutrality by 2030 is supported.
- The Charity considers that the Council needs to reflect the position of the new London Plan (2021) and acknowledge that developments "should connect to existing heat networks wherever feasible" (London Plan 2021, Paragraph 9.3.4).
- It is noted that Figure 7 does not reflect the proposed London Heat Map as found on the GLA's website. It is not considered appropriate that "minor development schemes" should have the same expectations as major development schemes.
- The Council's objective of providing a range of unit sizes under AAP4 Quality Affordable Homes is supported but it is considered that flexibility will be required on a site-by-site basis.
- It is considered that AAP4 should reflect the importance of both one- and two-bedroom units in locations such as the Area Action Core.
- The Charity supports the Council's strategy to strengthen the business community, promote an innovative mix of uses and to create mixed use and sustainable neighbourhoods where business and housing co-exist, however the policy should recognise the difficulties often associated with "industrial uses" co-existing alongside residential uses.
- The Charity questions the effectiveness of the target of "no net loss of industrial floorspace capacity across the opportunity area" as the principle was heavily criticised at the London Plan examination and it is requested that the policy is amended to reflect the London Plan 2021 in this respect.
- It is felt that the requirement for "all workspace units are equipped with mechanical and electrical fit-out, heating and cooling provision and kitchen and WC facilities" is overly prescriptive for the planning application stage and should be dealt with using planning conditions.
- The Charity feels that the requirement for AAP7 for evidence of marketing materials for the development that demonstrate it is to be promoted as car free and sustainable is overly prescriptive for the planning application stage and should be dealt with via a planning condition.
- It is suggested more detail be provided for the percentage of electric charging points required and on the financial requirements required for the Delivery and Servicing Bond, the delivery of a new Cycle Hire Docking Station and bus service improvements.
- The reduction in heights in each tier of the Tall buildings strategy is questioned.
- It is felt that the provision of children's play space, particularly "wet play, sand play, space to grow plants and food and sufficient seating"; and "indoor/outdoor space for older children" is overly prescriptive and will not be feasible or appropriate on every development site.
- We note the requirement of "10sqm of private amenity space for 2 or less bedrooms where possible". This could be considered excessive on constrained sites and where public open space is also required. It is also contrary to the

London Plan requirements of 5sqm per 1 bedroom unit and 1sqm for each additional occupant. We therefore request that the London Plan (2021) requirements are applied instead.

- In relation to OKR3, the Charity recognises and respects the Council’s ambitions for the area, however, there remains serious concerns in relation to the co-location of industrial and residential uses, with amenity spaces and servicing requirements competing for space within these masterplan areas.

Penarth Centre

Represented by	Montagu Evans
Interest	Long leaseholder of Units 29, 30, 31 and 14/15 of the Penarth Centre, Penarth Street – OKR16
Written rep received	

- Supportive of the general OKRAAP approach but has issues on policy wording
- The Reference to arts and cultural uses within the Penarth Centre is welcomed but it is not considered that the plan adequately reflects the importance of the Penarth Centre as a cultural and creative cluster.
- It is not considered that the site allocation properly reflects the special flexible circumstances reflected in the Emerging Policy Framework for arts and cultural uses generally.
- It is suggested that the AAP specifically identifies arts and cultural uses as:
 - Artist studios;
 - Performance space (specifically referenced and supported in previous drafts of the OKRAAP);
 - Outdoor public event space;
 - Art gallery;
 - Rehearsal and event space for hire;
 - Library space;
 - Co working space; and
 - Exhibition space
- The reference to ‘sensitive’ uses in OKR16 site allocation is not appropriate and should be removed as the Penarth Centre is in use class E which comprises uses that can only be carried out without detriment to residential amenity and various uses that would be permissible under Class E may be deemed sensitive.
- It is felt that site allocation OKR 16 should specifically identify the potential for increasing / intensifying employment generating floor space within the Penarth Centre by increasing floorspace.
- The identification of Ormside Street and Hatcham Road on the route shown in ‘connecting communities’ within the sub area 4 is welcomed
- It is suggested that the Penarth Centre is highlighted on the map / image shown on page 189 and the Penarth Centre be identified as a destination for artistic and cultural uses in the ‘walkthrough’ on page 190.
- The Penarth Centre welcomes that that Policy AAP 5 supports ‘creative makerspaces’ and identifies SPIL land as a priority for such a land use.
- It is considered that AAP 5 could be better phrased to refer to arts and cultural uses in a manner that is consistent with NSP67 and OKR16 and so suggest that

the wording be amended to refer to ‘creative maker spaces and arts and cultural uses...’

- It is suggested that the objective in AAP5 which refers to increasing the number and range of jobs in the creative sector, should also make explicit reference to the arts and culture sector for consistency.
- It is noted that Paragraph 4 of page 46 refers to SPIL ‘that will be kept solely in industrial use’ which is not consistent with NSP67 and the site allocation OKR16 so should be rephrased to reflect the flexibility and approach at the Penarth Centre.
- As the Penarth Centre is not in industrial use, it is suggested that the reference to ‘industrial use’ in the supporting text on page 46 should therefore be removed, as it is not consistent with the approach set out in P28, NSP67 and OKR16.

Barkwest Ltd

Represented by	Shaw Corporation
Interest	Developer of 747-759 Old Kent Road, 765-775 Old Kent Road, and land at Devonshire Grove – OKR18
Written rep received	2016, 2017 and 2018

- It is suggested that the OKR18 site vision text on page 180 relating to retaining existing tree be amended to read “where possible existing trees on Old Kent Road will be retained and enhanced with additional tree planting”.
- It is suggested that the site vision on page 180 relating to new pocket parks be updated as the Devonshire Square scheme will provide a significant new public square at the end of Devon Street on Devonshire Grove, rather than a pocket park.
- In respect of Devonshire Square site requirements, Barkwest would like to clarify that the scheme will provide up to 4,480 sqm total floorspace for a range of employment, retail, leisure, and community uses, including flexible workspace and ‘maker space’ designed to accommodate light industrial uses. 1,015 sqm GEA of this will be dedicated ‘light industrial’ and a further 1,000 sqm GEA of flexible commercial floorspace will be fitted out to a light industrial specification (i.e., capable of providing but not restricted to light industrial use).
- The Sub area 4 Typologies plan is incorrect as Building A is shown as ‘small office’ when it should be a mix of residential and café/retail space. The rear of Building B and Building D is shown as small industrial when it is flexible commercial floorspace.
- It is requested that the Sub area 4 Servicing and Road Network Plan removes reference to Devonshire Grove as a “New Public Highway” as it not new but rather enhanced and consolidated.
- The ground floor axonometric plan of the High Street Strategy is misleading in respect of Devonshire Square where residential entrances should be shown on Sylvan Grove.

William Say & Co Ltd and P Wilkinson Containers Ltd.

Represented by	Daniel Watney
----------------	---------------

Interest	Freehold owners of 20 Verney Road – OKR13
Written rep received	2016 and 2018
<ul style="list-style-type: none"> • It is felt that there is a disconnect between the schemes consented across the area and the development envisaged and planned for within the Plan and are concerned about the piecemeal approach to development in the AAP. • Policy AAP1, concerning the overall masterplan for the area, is insufficiently detailed in its delivery and phasing requirements, and its treatment of the area in the meantime while development comes forward. • It is suggested that to protect the operation of successful existing businesses there should be a requirement at application stage to produce a delivery and phasing statement which sets out how impacts on the operation of existing businesses/sites will be mitigated until such a time as they come forward for development. • It is felt that the Agent of Change principle should also be specifically applied to the operational requirements of existing businesses. • It is suggested that more consideration be given to the impact that development will have on the area as it functions now and throughout the delivery of the masterplan and how the delay of the BLE will compound phasing issues, with new development coming long before there is the necessary infrastructure. • It is considered that the Plan does not provide an appropriate business relocation strategy and it is suggested that phasing and business relocation be given its own chapter in the AAP developed in consultation with existing businesses who intend to remain operational, and based on a comprehensive understanding of their operational requirements including any potential to relocate. If this is not possible, the successful continuing operation of businesses must be safeguarded. • It is also stated that there has been a lack of engagement with local businesses and William Say & Co Ltd and P Wilkinson Containers Ltd are not aware of any engagement concerning the Old Kent Road Business Network. • It should be recognised in the Plan that demonstrating that a proposal will not impact existing employment land is essential to ensure that the future operation of employment/industrial land in the area is preserved. • The proposal for a new road in sub area 3 and how impacts on existing businesses will be managed, is not explored in the Plan. The complications involved in delivering such infrastructure are multitude and include existing leasing arrangements, legal ownership issues, easements and rights of way. • While it has been recognised that contingency is necessary, the Plan does not follow through with further commentary regarding the phasing of the BLE itself and the impact that delay would have on the area which raises concern over the impact on the continued operation of existing businesses. • It is also considered that the current draft of the OKRAAP is not underpinned by viability evidence nor have the viability considerations raised in our previous representation been addressed. Although difficult to quantify, the risks identified in the preceding sections are exacerbated still further by the economic impacts caused by the COVID-19 pandemic and the ongoing uncertainty resulting from a nascent Brexit. • William Say & Co Ltd and P Wilkinson Containers Ltd raised concerns previously over the prescriptive nature of the masterplan and its tendency to seek limits on development without sufficient justification and feel that this has not been remedied in this version of the AAP 	

- It is suggested that there needs to be more flexibility in terms of re-provision, relocation, scale and policy requirements; concerns over the lack of the BLE; typologies not matching existing local businesses; policy requirements of the OKRAAP is not being seen as a cost to development and there is a lack of local business network.

Landowner of Former Southern Railway Stables

Represented by	Boyer Planning
Interest	Landowner of Former Southern Railway Stables – OKR12
Written rep received	2016
<ul style="list-style-type: none"> • There are significant concerns about the Council's "Site Vision" for the site allocation OKR 12 and this letter provides our consultation response to the draft OKR AAP document (December 2020) concerning site allocation OKR 12. • It is noted that to be compliant with the requirements for new developments to provide 5sqm of public open space per dwelling, OKR12 would need to deliver 515sqm of open space which seems improbable for how the site is currently masterplanned. • Object to the Council's proposed plans that reduce the size and quality of open space, which conflicts with NSP P56 • The Council is urged to ensure the existing green space in OKR12 is protected. • Object to original Article 4 direction on OKR12. They state that English Heritage's 2010 report recommends that the buildings are not listed due to its late date, architectural interest, alteration and context. • The wording in the AAP is objected to on the basis that it does not take into account the views of English Heritage. 	

The Arch Company

Represented by	Turley
Interest	Landholdings with the Bermondsey Dive Under site – SA5
Written rep received	-
<ul style="list-style-type: none"> • The Arch Company support the general principles of the AAP and the core thrust and focus to optimise and intensify employment operations within the South Bermondsey Sub-Area. • The main concern is Bermondsey Dive Under, within Sub Area 5 (South Bermondsey). • There is concern that due to the multiple land ownerships, the AAP will undermine the ability to bring forward industrial and employment uses – there is an issue on viability and servicing. • It is considered key that there is a positively worded policy framework in place within the AAP to allow for the future redevelopment and reoccupation of the railway arches owned by the Arch Company to come forward on standalone basis if a comprehensive redevelopment scheme is not feasible at the point of time. • The Arch Company are fully supportive in principle of the overarching 'Site Vision' 	

for the sub area and the AAP's intention to increase industrial capacity.

- It is considered that their land holdings within Sub Area 5 can make a significant contribution to this vision through the planned future development of new commercial floorspace on land currently used for open storage.
- To provide sufficient flexibility should a comprehensive redevelopment not be achievable, particularly in the shorter term, it is commented that whilst the AAP should be aspirational in respect of the vision for a comprehensive redevelopment of this part of the SPIL and optimising industrial capacity, it should not undermine existing sub-plots coming forward in the short-medium term in a more traditional industrial typology as per the Arch Company's current intention.
- We agree with and would emphasise the importance of the vision in respect of the railway's arches and "bringing vacant arches into use".
- The Arch Company is supportive of the proposed uses and would emphasise that this list should not be seen as a definitive and/or prescriptive list of occupiers to ensure that the AAP is both flexible and responsive to ever changing market conditions over the plan period.
- It is proposed that the AAP should be amended in respect of the railway arches, particularly the run of arches fronting onto both Corbett's Lane and Silwood Street and permitted land use(s), for 'softer' Class E uses to be considered here.
- The Arch Company have concerns at the implications of the proposed servicing and road network as proposed within the AAP.
- Whilst Jarrow Road has two-way access rights, sufficient for access to and servicing of the arches it is viewed that the road is insufficient in width to allow for the intensification of use of this access/road to also be used as the only primary access route for HGVs for the servicing of the wider land parcels (i.e. an intensified use), whilst allowing for the planned reoccupation of the railway arches.
- It is suggested that Bolina Road must be retained as a further primary access for the land parcels in conjunction with the Jarrow Road access for the arches.
- The Arch Company request that the servicing strategy for Sites 1 and 2 for Sub Area 5 of the AAP be amended to allow for access and egress onto Bolina Road.
- Intensification of the use of Jarrow Road, to service the land parcels, is considered to be unsafe.

Royal London

Represented by	CBRE
Interest	Six Bridges Industrial Estate and Land to the East adjoining St James's Road – OKR11
Written rep received	2016 and 2018
<ul style="list-style-type: none"> • AAP2: The proposed restriction of the Six Bridges site is not supported as they believe it is a missed opportunity to bring regeneration benefits due to the scale and position of the site. • AAP4: 40% fast track route is above the London Plans 30%. As co-location is a new concept, it comes with increased challenges flexibility is needed. • APP5: Flexibility needed. To remove existing businesses as business relocation are provided through landlord and tenant systems and is subject to commercial negotiation. The requirement of sprinklers to be removed as it is not always that a tenant chooses to install this. There are also viability concerns of at least 10% 	

affordable workspaces together with the 40% fast track affordable housing requirement and no net loss of industrial policy.

- AAP8: Justification needed of the change of the reduction of building height. In relation to the location of Tier 2 and 3 buildings, they suggest the policy worded to support their location at key open spaces and not just on Surrey Canal Park and Mandela Way Park.
- AA11: Disagree with the repurposing Marlborough Grove into a new park space as this is needed to access the existing Six Bridges Estate.
- Sub Area 2 Cantium Retail Park and Marlborough Grove: as noted above, shared space to be provided only on the northern section; flexibility of range of employment uses and building heights reconsidered.

Tesco

Represented by	Lichfields
Interest	Occupier of Tesco Superstore, 107 Dunton Road – OKR4
Written rep received	2016, 2017 and 2018

- Tesco welcomes and supports the principle of the Old Kent Road Area Action Plan.
- It is suggested that the Council should consider planning for regeneration of the OKR and its planned town centres on two basis: one without the BLE at all, and the other assuming an extended delay prior to its delivery.
- Tesco supports the proposed masterplan approach but think it is inappropriate to require planning applications to be in conformity with the masterplan. For greater flexibility the wording should be changed for planning applications to demonstrate how proposals respond to the masterplan principles.
- Masterplan consideration should be given in particular for the proposed 'Town Centres' in order to guide how growth will be supported by new town centre uses, supporting facilities, and sustainable transport connections.
- Tesco appreciates the rationale for Policy AAP2 but does not accept that the proposed siting of the station is in the optimum location nor that that the tunnelling and secondary worksite proposed as part of the BLE construction requires the whole of the Tesco Property.
- Tesco considers that there are better alternatives to TfL's proposals for the outright acquisition of the Property and the loss of the trading store whilst not affecting delivery of the BLE.
- It is suggested that the AAP should revisit the Phase 2 development trigger so as to allow for more development to come forward, so land can still be optimised to its full potential, in a scenario where (at best) the BLE is further delayed (in absence of secured funding).
- Tesco objects to the aspect of the Vision for the OKR3 site which indicates that the existing FW Conway industrial site on Mandela Way could accommodate the relocation of the Tesco supermarket
- Tesco supports the OKR4 masterplan and vision which seeks to replace the existing retail floorspace at the Tesco site, including provision of a new supermarket along with the underground station entrance, such 'replacement' being one the OKR4 site allocation requirements.
- Tesco particularly supports that the requirements for redevelopment of OKR4

recognise that the station, tunnelling and worksite requirements for a BLE underground station at OKR4 will need to be incorporated into the site design and phasing.

- Tesco is firmly of the view that a redevelopment of the Tesco store for provision of the first OKR underground station and tunnelling worksite, should only come forward if it is to be properly phased, so as to accommodate: in a first phase, Tesco’s aspirations for new replacement retail and residential development and, in a second phase, the OKR1 station on land reserved within the Property for that purpose.
- Tesco object to the proposal in the final line page 102 of the AAP which suggests that to ensure continuity of trading the Tesco supermarket could be relocated to Mandela way, for the following reasons:
 - Relocation is not required given it is feasible to provide a new fully accessible BLE station at OKR4 with the existing retail store being replaced by a new one through phased re-provision on site, in a manner which would allow Tesco to continue to trade at all times, consistent with AAP5.
 - The alternative site at Mandela way, which is currently occupied by FM Conway, is not a comparable or appropriate location for the store’s temporary or permanent relocation. The site does not have direct access from the OKR, nor any high street presence which is crucial to achieving required footfalls and the continued success of the store as well as the new town centre.
 - To be consistent with the ambition and successful transformation of this part of the high street into a vital and viable new OKR town centre, consistent with AAP6.
- It is requested that the last sentence on OKR4 allocation on Phasing be revised to read: “To ensure continuity of trading, the Tesco supermarket could be retained through phased temporary and then permanent re-provision on the existing Tesco site.
- Tesco supports the approach for OKR4 to be an appropriate location for taller buildings.
- Tesco supports the ambition within AAP6 to create a mixed-use high street along the OKR, which will build on the character of existing successful shops and services, including the establishment of two new major town centres, one including the Tesco Property.
- Tesco supports the reference in AAP6 (3) to the need for a “variety of shops and facilities including local independent shops meeting daily needs, as well as large stores such as supermarkets...on the high street”.
- Tesco appreciates the recognition of the importance the OKR Tesco store plays in providing affordable groceries for the wider area.
- Tesco welcomes that the Council intends to work with supermarkets to ensure these will be rebuilt long the high street, alongside smaller shops and new homes.

Greenspruce GP Limited

Represented by	Gerald Eve
Interest	Long Leaseholder of 107 Dunton Road – OKR4
Written rep received	2018

- Greenspruce continue their support for the overall objectives of the draft OKR AAP and commitment to deliver the BLE to help create two new town centres within the Old Kent Road district which promote a sense of community and provide a variety of shops, such as large supermarkets, and the ambitions to deliver 20,000 new homes and 10,000 new jobs in the area.
- The recognition that the Dunton Road and Southernwood Retail Park site (OKR 4) is also suitable for significantly taller buildings outside of the protected viewing corridors, reflecting its key location in the Stations and Crossings strategy is also welcomed.
- Greenspruce continue to object to:
 - the process undertaken by TfL when identifying their 'preferred locations / favoured worksite' for the Old Kent Road stations and BLE and the lack of consideration that has appeared to have been given to finding alternative and potentially more suitable construction sites.
 - Deficiencies in the 2017 TfL consultation process which considered two options for the Old Kent Road Station 1 from which it was not apparent that selection of the Tesco site option would lead to the closure of store, as is apparent from the consultation responses.
 - The lack of consideration that has been given to the social and economic impact that would be caused to the local community by the loss of Tesco from the Site during the construction phase of the BLE and the forced permanent closure of the store thereafter.
 - The lack of consideration that has been given to alternative means of delivering and constructing the BLE and potential for undertaking a phased approach which would allow for Tesco to be retained on Site during the construction process.
 - The suggested relocation of the Tesco store to the Mandela Way / FM Conway site (OKR 3).
- Greenspruce have concerns about the safeguarding of the Site (with directions issued by TfL on 1 March 2021) as a secondary construction worksite for the new BLE, especially considering the TFL announcement on 30 September 2020 that funding was not sought from Central Government and therefore the BLE project is being halted.
- It is suggested that a contingency plan should be put in place to ensure that the London Borough of Southwark policy position fully supports the intensification and strategic growth of the area with or without the delivery of the BLE.
- The emphasis on the Old Kent Road continuing to be hub for employment generation across a range of uses and target to double the number of jobs from 10,000 to 20,000 by 2036 and increase the range of jobs in the industrial, office, distribution, creative, retail, leisure, education and entertainment sectors is strongly supported.
- The closure of the Tesco site during the construction process would have a significant impact on the local community's choice of food stores, would result in the loss of 200 jobs and would have an impact on other local businesses for whom Tesco acts as an anchor
- It is suggested that to ensure Tesco is not permanently lost from the site, that alternative options for constructing the BLE be considered by TfL, either by finding an alternative site for the station, using an alternative site for the secondary worksite or by allowing a phased strategy that would see Tesco remaining on Site

during construction.

London Square Developments Ltd

Represented by DP9

Interest Owner of Rich Industrial Estate

Written rep received -

- The vision for the Old Kent Road Opportunity Area is welcomed.
- The objectives to deliver 20,000 new homes, including 7,000 affordable homes, along with the delivery of 10,000 new jobs is fully supported
- The objectives to make Old Kent Road cleaner, greener and safer, and ensuring that all residents can access the benefits of regeneration programmes, while acknowledging the identity and heritage of Old Kent Road and its context is supported.
- It is considered that there is no evidence for the required heights along Crimscott Street to be prescribed at eight storeys as it is considered that this would not be the best optimisation of the site, particularly in terms of the delivery of housing and therefore it is requested that the heights reconsidered.

Safestore

Represented by Own response

Interest Leaseholder of Safestore, 737 Old Kent Road – OKR18

Written rep received 2016, 2017 and 2018

- It is considered that there could have been more engagement with businesses at an earlier stage and more frequently.
- It is the view of Safestore that the level of prescription set out in AAP5 combined with the nature of the policies will serve to deter investment and re-development in the area.
- It is considered that such stringent requirements will not provide sufficient flexibility to existing businesses seeking to redevelop or indeed investor/developers and will lead to a poorer overall mix of products for the local population.
- Safestore questions how the Council intend to monitor the annual audit of gender pay gap and the London Living Wage neighbourhood, how much it will cost to monitor, who pays for monitoring and what authority the Council has to do so.
- Safestore do not agree that the requirement to provide 10% of new workspace as affordable as it is not necessary achievable for all workspace uses and would require Safestore to adapt its business model.
- It is proposed that point 1 under 'development must' of AAP5 be deleted as it is too prescriptive and will not allow for the overall jobs target to be met.
- Safestore question what is defined as industrial workspace as there is concern that other land uses defined in reference to the Use Classes Order will deter true industrial uses and therefore the target of no net loss of industrial floorspace.
- It is also requested that the policy wording under point 4 of AAP5 is reworded to be

less prescriptive as Safestore has a tested specification for building design and by designing a building to conform with the specification as required by AAP5 point 4 it would be at odds to provide both the specification of the intended occupiers and also to provide element outside our specification such as affordable workspace.

- The requirement in AAP5 for all planning applications to ensure all workspace units are equipped with mechanical and electrical fit out, heating and cooling provision and kitchen and WC facilities is considered highly prescriptive and would result in higher occupational costs and making low cost employment space less likely to come forward.
- Safestore are of the view that the relocation requirement of AAP5 (point 6) is in direct contradiction of existing Landlord and Tenant Law and places significant burden on redevelopment plans for landowners.
- Safestore is of the view that it will not be possible to provide affordable workspace within a new self-storage facility without adversely affecting the viability of development.
- It should not be appropriate for all forms of employment development to be required to make an affordable workspace contribution, either on site or offsite.
- Safestore is concerned about the change in designation of the site from Tier 2 to Tier 3 for Tall buildings and believe it could negatively affect the development potential of Safestore’s site.

Industrial Property Investment Fund (IPIF)

Represented by	Savills
Interest	Owners of Bermondsey Trading Estate – SA5
Written rep received	-

- The identification of Bermondsey Trading Estate for increased industrial capacity is strongly supported in principle, but there are concerns with the masterplan and associated detail.
- It is felt that the masterplan has the potential to prevent rather than support development and intensification and a far more flexible approach should be adopted in the next version of the OKR AAP.
- The identified quantum of additional industrial floorspace is welcomed.
- There are serious concerns over the requirement for the two sites Bermondsey Trading Estate and Bermondsey Dive Under, to be developed in conformity with the masterplan as this risks preventing development altogether as the masterplan for these sites is not realistic or feasible in many ways.
- It is suggested that the wording for requirements for planning applications be softened to be in *general* conformity with masterplan *principles*.
- It is considered that Target 4 of Policy AAP5 should be amended to ‘up to 80,000sqm’ to accommodate the quantum identified through the wider masterplan.
- There is concern over the identified building typologies for Bermondsey Trading Estate and Bermondsey Dive Under as it is felt that stringent application of these typologies and the associated specification as set out within the AAP risks preventing development altogether as it does not allow for alternative typologies and specifications which may be better suited to the sites and future occupiers.
- The draft OKR AAP currently fails to show how the remainder of Site 2 could be

developed if Option 1 is delivered first. It is in effect missing an 'Option 1b' that would follow on from Option 1. It is recommended that the draft OKR AAP be updated to include this situation (which by its own acknowledgment is highly likely).

- The OKR AAP should therefore make it clear that the layouts are illustrative only.
- The level of detail in relation to the industrial typologies and their specific requirements in sub area 5 is considered unreasonable for such a planning policy document as it has the potential to unnecessarily restrict development and does not give enough flexibility.
- It is respectfully requested that the next draft of the AAP does not include specific typologies to specific part of the wider site to allow for flexibility in the future.
- The AAP should also recognise there may be other typologies that are better suited to parts of the site which will still achieve industrial intensification across the wider site.
- The list of 'Suitable Uses' on page 206 is welcomed and the range of uses listed will help to futureproof both the existing Trading Estate and any future development but the list should not be applied as an all-encompassing list.
- It is welcomed that the draft OKR AAP advocates a phased approach in principle.
- There are concerns over the with the phasing of option 2 and it is felt that the relocation of businesses to various sites in different phases will prove problematic and disruptive for the existing businesses.
- It is considered that it should be made clear that the phasing strategy shown on page 208 is illustrative only, with a full phasing strategy to be discussed and agreed with the Council and the relevant stakeholders in the future at the appropriate time.
- It is pointed out that the axonometric for Phase 2 on page 209 does not reflect the Phase 2 phasing diagram on page 208. The building on the southern part of Site 2 is different on both.
- The approach in Option 1 to keep the access separate between the two sites is supported in principle.
- Clarification on the access for Option would be welcomed as it is unclear whether the Jarrow Road and Bolina Road accesses would also be utilised as well as the main access from Rotherhithe New Road.
- It is also considered that the draft OKR AAP should also include a plan to show the access arrangement as described for Option 1 (similar to that presented on page 211 for Option 2).

Proprietor of Units 28-32 Ruby Street

Represented by	NTA Planning
Interest	28-32 Ruby Street – OKR13
Written rep received	-

- There is concern that the tall buildings strategy and the already approved tall buildings at Ruby Triangle development, will lead to a townscape that is disjointed to the smaller heights of the site.
- It is considered that there is no justification for why heights have been reduced on the western edge of Ruby Street.
- It is the view of the proprietors that the sites along Ruby Street should be allocated

as being suitable for Tier Three or Tier Two buildings of up to 20 storeys.

Avanton and Scotia Gas Network (SGN)

Represented by	Quod
Interest	Gasworks – OKR13
Written rep received	2016, 2017 and 2018

- Avanton and SGN welcome the Council's proposed increase in the number of homes that the OKR13 (Sandgate Street and Verney Road) allocation seeks to deliver.
- It is considered that the housing numbers in the AAP should be expressed as a minimum housing delivery figure.
- Avanton and SGN do not consider that the AAP yet recognises the extreme challenges of bringing forward a gas works site for development and specifically the cumulative constraints that will have an impact on deliverability, site capacity and viability.
- It is suggested that further consideration be given to the practical and economic implications of the proposed retention of listed gas holder no.13 within a public park.
- The current policy wording of AAP1 is absolute and fails to provide sufficient flexibility as required by national policy, and offer any guidance through its supporting text of an alternative where the policy requirements cannot be achieved (for example land use or building heights).
- Following TFL's and the Government's revised commitment to funding the Bakerloo Line to ensure sufficient flexibility and delivery of the residual policies of the plan, we suggest that Policy AAP 2 supporting text is revised to include reference to other transport improvements.
- To ensure sufficient flexibility and delivery of the plan, we suggest that Policy AAP 2 supporting text is revised as follows "These Grampians would fall away on the signing off the construction contract for the Bakerloo Line extension, or other transport improvements"
- Avanton and SGN support draft Policy AAP3 and Southwark's ambition for the Old Kent Road to be net-zero carbon by 2030 but suggest changes to include providing a future connection to the District Heat Network and any amendments to carbon offset overpayment secured through s106 is returned to the developer.
- Avanton and SGN support Policy AAP4's ambition to maximise the number and quality of new homes to be built but believe this should represent a minimum, rather than a maximum as may currently be implied in the draft AAP.
- It is considered that the policy targets set out in AAP 4 are absolute and there is no flexibility within the wording of the policy to adapt to rapid change. This rapid change has recently been experienced globally by the COVID pandemic, and the loss in values associated with the abeyance of the Bakerloo Line extension
- The policy requirements for planning applications are absolute and fail to provide for flexibility as required by national policy, and offer any guidance through supporting text of an alternative where these policy requirements cannot be achieved.
- Given the expected change in land values anticipated by the delay of the BLE,

flexibility needs to be afforded to affordable housing contributions, particularly for sites which also face significant remediation and infrastructure costs, such as the gas works site. It is suggested that the wording be amended to say Development should where appropriate and viable provide a minimum of 35% of all new homes as social rented and intermediate as set out in Table 2.

- It is noted that the affordable housing requirements are more restrictive than London Plan Policy H11.
- It is suggested that the footnote under Table 2 be removed to allow for greater flexibility within the policy requirements.
- Avanton and SGN assert that the housing mix stipulated in AAP4 does not conform with the London Plan, or provide the required level of flexibility.
- It is considered the delivery of 40% affordable housing for many sites across the OKR will be extremely challenging, particularly as the Bakerloo Line Extension has been put on hold and therefore achievable values will be impacted, especially sites with significant remediation costs.
- In recognition of the substantial costs of preparing surplus utilities sites for development, Footnote 59 of the London Plan (2021) endorses that gas work sites should be subject to the 35% affordable housing fast-track approach, conditioned upon evidence being provided of extraordinary costs and therefore it is suggested that a new footnote to Table 2 states: "Applicants must meet the minimum requirement unless subject to Footnote 59 of the London Plan (2021)".
- It is suggested that the targeted level at which a scheme may be progressed through the fast-track route should be reduced to 35%.
- Avanton and SGN consider that the policy requirement to deliver affordable housing or equivalent commuted sum should be removed as it is contrary to Paragraph 63 of the NPPF and will place a significant burden on small sites coming forward for development.
- It is suggested that the former gas holder no. 10 should be removed from SPIL designation as it has no industrial function and represents redundant utilities infrastructure. The site sustains no direct employment nor delivers any industrial floorspace capacity. It is also heavily contaminated.
- It is suggested that Figure 8 be updated to remove its inclusion and this piece of land should be incorporated within allocation OKR13.
- Changes to the wording of policy AAP5 are suggested where reference is made to achieving no net loss of industrial floorspace and retaining 48ha of Strategic Protected Industrial Land so that Gasholder No 10 is excluded.
- Avanton and SGN consider that there is a conflict within the policy AAP5 as the target seeks to provide 10% of new 'workspace' as affordable but the planning applications requires developments providing over 500sqm GIA to provide at least 10% affordable workspace at discount rents secured for at least 30 years.
- In view of the introduction of Class E, Policy AAP5 should define what uses are considered as 'employment'.
- Avanton and SGN consider the requirement for planning applications to set affordable workspace rent at an appropriate level and secured for at least 30 years to be unreasonable as developers could be prejudiced through the application of this policy long term.
- It is suggested that the discount be amended to be a percentage of market rent.
- It is also suggested that flexibility to the wording be added to allow for the workspace to revert to being a market unit for an agreed period of time (i.e. 1-3 years) post-practical completion, if an occupier that meets the above requirements

cannot be found during a 6-month marketing period.

- It is considered that the policy requirements are absolute and fail to provide for flexibility as required by national policy, and offer any guidance through supporting text of an alternative where these policy requirements cannot be achieved.
- Avanton and SGN support the identification of the gas works site as an appropriate location for tall buildings.
- It is asserted that the identified massing in Figure 12 for the Gasworks site is not reflective of the pre-application discussions which identified one Tier 1 building comprising two elements, both of which were above 20 storeys, as necessary to deliver the strategic planning policies of the AAP.
- The position to re-purpose gasholder no 13 is supported in principle, however the viability of remediating the site, retaining the listed gas holder no 13 and delivering the new Livesey Park will be a significant constraint on the final development and must be a key factor in the future determination of any planning application for the gas works site.
- Avanton and SGN support draft Policy AAP11 and its ambition to increase the level of greener across the Old Kent Road, however some changes to ensure flexibility and clarification are suggested.
- Figure 15 appears to allocate the core of the listed no.13 gas holder structure as a potential 'Option for a Health Hub'. This is not consistent with the intention of the policy and should revert to the key colour used at Figure 10 to clearly define the proposed health hub locations.
- It is considered that the AAP site allocations should provide an element of flexibility to affordable housing provision as set out previously.
- To the site allocation OKR13, it is requested some additional wording be included under a new sub-heading 'The Gas Works' to reflect the significant limitations of bringing forward the gas works site.
- Avanton oppose the typologies set out in Figure SA3.3 as the provision of industrial floorspace on a gas works site is not in conformity with the London Plan or national policy.
- It is also considered that the designation is not in conformity with Policy AAP 5 which seeks to retain or increase the amount of employment floorspace (GIA) on site or sui generis employment generating uses as the gas works site does not contain an employment or employment generating uses.
- From a practical point of view, it is also not considered the most appropriate typology for a ground floor use to a Tier 1 site (gasholder 12) fronting Livesey Park.
- It is requested that the site's primary allocation as an industrial unit is reviewed and a mixed-use development be promoted on this site.
- Avanton support the broad ambition for gas holder no.12, albeit the delivery of this ambition will need to be considered in line with the overall viability of the policies set out in the AAP, and the need to bring the gas works forward for development at an appropriate height and density to enable the delivery of high-quality placemaking.
- Additional wording is suggested to the Connecting Communities section of OKR13 to acknowledge the significant costs associated with the delivery of the gasworks site and that this may require the flexible application of policies on Planning Obligations and the use of 'In Kind' contributions and/or ringfencing of CIL contributions for the park's delivery.
- Under Building heights guidance, Avanton support the proposed building heights to

the north west of the gasholder as a 'Tier One' building but request that the adjacent building be reclassified as also forming part of the Tier One building.

- It is considered that the need for tall buildings on this site is paramount to the success of any development proposal, which will need to deliver a significant quantum of development in order to fund the substantial remediation costs, delivery of the new public park, provision of affordable housing and other planning obligations.

Avanton

Represented by	Quod
Interest	Gasworks – OKR13
Written rep received	

- Same representation submitted as above.

SG Smith Properties on behalf of the landowners of 812 Old Kent Road

Represented by	DWD
Interest	Landowners of 812 Old Kent Road – OKR17
Written rep received	2018

- The designation of the site as a worksite is objected
- The safeguarding of the site for logistics and welfare facilities by TFL is not supported in the absence of site-specific justification
- It is considered that consider that the site is ready for development in Phase 1 and that there is sufficient space for logistics and welfare support on the former Toys 'R' Us, which we note is now in the Council's ownership, without the need to acquire 812 Old Kent Road.
- SG Smith Properties feel that the requirement for a Grampian condition should be applied flexibly and, on a site-by-site basis taking into account of the status and timescale of the BLE project and the policy strategy should consider the whole quantum of development in the Old Kent Road if BLE is substantially delayed or cancelled.
- In light of the Housing Delivery Test, it is considered that additional flexibility should be included into the phasing to allow Phase 2 sites to be brought forward in Phase 1
- It is recommended that the supporting text should be amended to include commitment to annual reporting of the delivery of homes from the Phase 1 sites and where there is evidence that the Phase 1 Sites are not delivering sufficient housing to support Southwark's requirement to meet the housing delivery test it is considered that the policy should set out clearly a mechanism for allowing Phase 2 Sites to be delivered.
- The designation of the frontage of the 812 Old Kent Road site as proposed high street is supported.
- The masterplan and proposed uses for the site are supported.

- The designation of the 812 Old Kent Road Site for a Tier Two and Tier Three buildings is supported
- The range of uses and design requirements proposed for the OKR17 Site, which includes 812 Old Kent Road is supported.
- It is noted that the text at the bottom of page 179 appears to have been cut off so it is unclear whether further description of the proposals for OKR17 was due to be provided.

Ormside Projects

Late representation received 2 Feb 2022

Represented by	JWPC
Interest	The Penarth Centre, OKR16
Written rep received	-

- Ormside Projects supports artists of diverse ethnicities, LGBTQ+ & trans artists by acting as an inclusive, affordable & accommodating space.
- Ormside Projects should feel it should be seen as a significant asset to the cultural capital of South London.
- It is considered critical that Ormside Projects is recognised and protected through the OKRAAP and companion Design Code.
- The Site Vision for OKR16 is supported as it recognizes the need to strike a balance between the need to protect these recognised assets and to deliver sufficient development to meet the needs of the Development Plan.
- It is felt that the AAP should refer to the principle of the 'agent of change' to ensure that any noise sensitive development proposals are thoroughly assessed to ensure they can be integrated effectively with existing businesses and community facilities.
- It is felt that while the designation of the Penarth Centre as SPIL provides some protection, the site has the potential to create a degree of noise and disturbance on Ormside Street late at night and into the early hours and as such there should be a requirement in the AAP for any planning application for noise-sensitive uses such as residential within the vicinity, to undertake an acoustic assessment that considers the elevated background noise levels that occur within Ormside Street.
- It is also suggested that the broader night time environment in and around the Penarth Centre must also be more fully recognised in the AAP.
- The creative and cultural context needs to be better understood and reflected in the AAP in terms of protection of the Penarth Centre but also a recognition that regeneration proposals should account for these throughout the design process.
- Ormside Projects are agreeable to the changes in the Servicing section (Page 184) to Ormside Street to make it one-way, running south to north, presumably freeing up space within the street for additional servicing, parking or wider footpaths to improve the amenity of the area.
- Ormside Projects feels it is imperative that, along with the other creative industries and uses within the Penarth Centre, it is fully recognised within the

AAP.

Reoccurring issues: viability, building height, further flexibility needed.

COMMUNITY GROUPS

Pages Conservation Residents Group	
Written rep received	2018
<ul style="list-style-type: none">• The Pages Walk Conservation Residents Alliance are gravely concerned with how the creation of the Mandela Way Park will 'change traffic management arrangements over the next 10 to 15 years.• There is concern over the new public highway looks as though it runs straight off Mandela Way and up Pages Walk.• It is considered that it is totally unacceptable to be reducing and stopping traffic on existing main roads and then redirecting that traffic down a residential street which is also a Conservation Area.• It is acknowledged that the proposed layout could be a printing mistake as assured by the Council at a consultation event.	

Ledbury Resident Project Group	
Written rep received	-
<ul style="list-style-type: none">• It is felt that the proposal for Livesey Park is interesting and will provide much needed new open space close to Ledbury• It is suggested that the crossing from Ledbury to the proposed Livesey Park should be simplified and improved to improve access to the park.• The proposal to recreate Arthur Street on p.162 is not supported as it is felt that this will have significant on what designs are possible for new homes on Ledbury and will have an effect on the security, safety and design of homes and open space when the towers are redeveloped.• It is felt that the health services will need to be considerably increased to accommodate more people living in the area.• There are concerns over accessing the Health Hub on Verney Road for those who less able to walk from Ledbury.• It is felt that phasing of the improvement to the public transport and the early opening up of routes through the proposed Livesey Park will be needed for people on Ledbury to be able to access the health hub on Verney Road.• The design to replace the Ledbury Towers, the best use of the ground floor onto the Old Kent Road will be discussed to ensure that there are not management problems and vacancies.• It is considered that there is a need to improve existing public transport before the BLE is built.• The Ledbury Resident Project Group welcome the Design Guide for the homes on the Old Kent Road.	

In My Community - Research Report

Written rep received

-

- Group focused on making a positive impact for the African Caribbean community
- Carried out citizen and stakeholder research - two workshops carried out
- Key concerns for locals include lack of employment and affordability, safety, pollution and visual neglect
- African and Caribbean community feel that they have less of an opportunity for their voices to be heard
- The A/C community feel positive about the regeneration and hope for affordable and available housing, affordable cultural activities, employment opportunities to keep them in the area, better transport links, build on smaller and industrial businesses with deep rooted histories in the OKR, and to safeguard mental health support for the youth
- Want to build the OKR's identity around the heritage and culture of the diverse mix of people who live there and want collaboration with all stakeholders (developers, council etc)

XR Southwark Lobbying Group

Written rep received

-

- XR feels that AAP was not designed to address the climate emergency, and any claim to do so is both greenwashing and deeply irresponsible given the gravity of the climate crisis.
- Proposed methods of carbon capture off-setting are not referenced in Climate Change Emergency (AAP3)
- XR considers that the target to achieve a net zero carbon Area Action Plan have no evidence-based targets and no monitoring structure so are rendered completely meaningless in the face of the level of development that the AAP is proposing.
- XR note that Southwark Council do not have Climate Strategy and if one is adopted it will unlikely be binding on all council departments, particularly planning.
- It is considered that the carbon off-set fund is not an effective option to address the climate emergency
- It is suggested that the commitment to the commitment dates for the Bakerloo Line Extension (2036) to be removed.
- XR believes that energy would be best spent investing in cycling infrastructure.
- It is also suggested that a sustainable freight strategy is needed which reduces driven freight deliveries and integrates the deliveries in and around the existing and new development into the local area.
- It is considered that cargo bikes should be integral to the AAP and a key part of the traffic reduction strategy.
- XR feels that a whole corridor freight strategy is needed
- XR feel that pedestrian and public realm improvements need to be far more front loaded with local people and visitors starting to see improvements early on rather than at the end of the regeneration.
- XR suggests that traffic free strategies could be delivered early on through the roll out of Low Traffic Neighbourhoods.
- It is considered that there is no clear strategy to deliver the commitment that

“Southwark aspires to maintaining 50% less driving than before lockdown” and how that relates to the OKR AAP.

- It is considered that road pricing is essential to deliver a quantum reduction in vehicle usage and this should be coupled with an area-wide programme of LTNs and increased parking charges that are emissions based.
- The Parks and Healthy Streets policy indicates a commitment which is too slow.
- XR feel that without the BLE there will be a real need for other approaches such as a rapid bus service/tram to be developed earlier in the regeneration.
- It is felt that OKR AAP completely ignores the fact that net-zero carbon emissions could not be achieved taking into account the huge carbon emissions expended in constructing developments such as those described in the OKR AAP and the planning applications which have already been approved.
- It is considered a huge omission that there is no mention of sustainable construction methods or materials given that the construction industry is responsible for approximately 40% of carbon emissions.
- XR suggests that it would be easier, more sustainable and achieve strong community support if the current buildings could be repurposed for the industrial uses they were built for, as industrial space is so desperately needed in the area.
- The District Heating Network and the SEHCLP is welcomed but it is noted that this is not enough to address the climate emergency.
- There are real concerns about the energy use in tall buildings as proposed for the Old Kent Road area action plan area.
- It is considered that the densities achieved by tall towers can be achieved with lower-rise slab or courtyard buildings. It is not always necessary to build tall to achieve high densities and energy use could, in many cases, be greatly reduced by building in different forms on fewer storeys.
- There is concern that households who require 3-4 bedrooms would not opt to live in tall buildings as it is often inappropriate for their needs.
- There is concern about the lower levels of affordable housing being achieved by taller buildings.
- XR Southwark Lobbying group think that the scale and massing of the development proposed in the OKR AAP is incompatible with Cleaner, Greener, Safer policies outlined in AAP12.
- XR do not consider the policy AAP12 effective because it makes demands that cannot realistically be met but provides no detail as to how to go about contributing to net gains in biodiversity and/or enhancing important sites and populations of protected species.
- XR Southwark also has significant concerns about this consultation process, in which there have been virtually no consultation events in order to engage residents and the period of consultation has mostly taken place in a strict third lockdown taking place during the COVID-19 pandemic.

INDIVIDUALS

Individual

- No specific comments on the AAP but expresses excitement about the upcoming developments in the area
- As a resident of Southwark, the respondent is keen to learn of any construction jobs available when the upcoming works commence

Individual

- Respondent is disappointed that the proposal to have an underground station at the Bricklayers Arms has apparently been abandoned.
- Concern is raised over the bus capacity of the area as it already stretched and the additional housing will put further pressure on this mode of public transport.
- The respondent feels that the main problem with the latest plans is the flyover and would like to see it removed completely.
- Concern is raised over OKR1 being a “no man's land” land as it is not part of Elephant and Castle development plans, cut off from Bermondsey and not getting any benefit from the latest OKR plans.

Individual

- Respondent states that there is a wider recognition that there is a limit to the number of blocks needed in this covid, post covid world and questions why so many blocks are being built along Old Kent Road with more being planned.
- Respondent states that Khan says not to build if people can't afford them.
- 1 in 26 homes in Southwark is empty
- Respondent mentions that homes which remain are those well built in brick, refers to concrete towers of Ledbury labelling them “horrible” and references the “outlandish” plans for B&Q and Aldi etc.
- Respondent states that they live in one of the most polluted areas in the borough and identifies the incinerator at Veolia plant as creating sour smells
- Respondent recognises that the Old Kent Road plan has zero carbon heating systems but asserts that the Veolia plan is polluting.

Individual

- Respondent requests that cycling provision be improved on and near OKR as it feels very unsafe to cycle.

Individual

- It is considered not effective for the Council to be completing the consultation on the OKRAAP before the changes to the NSP are known, as comments may not be relevant if elements of the AAP have changed.
- Respondent feels that the AAP has not been positively prepared as the Council has not thought through how to get the best and most useful input from the local community.
- It is felt that few people have had time to consider the AAP as community

members have been involved in the Examination in Public for the New Southwark Plan.

- Respondent believes that the OKR AAP is not consistent with a key strategic policy of the New Southwark Plan: Regeneration that meets the needs of all.
- It is felt that as currently drafted, the OKR AAP fails to provide fundamental resources and risks having a negative impact on the health and wellbeing of both existing and future residents and users, in light of the COVID-19 pandemic.
- Respondent does not consider the Plan Objectives to be sound because they are not justified and not effective.
- The Climate Emergency target to achieve net zero carbon Old Kent Road AAP by 2030 is considered meaningless as there is no definition of what a net zero carbon OKRAAP would look like and no targets against which the success of the plan could be measured.
- The Affordable Homes target is not considered justified as it will mean 13,000 homes will be unaffordable for the majority of Southwark residents, at a time when so many Southwark residents are in need of decent housing yet unaffordable new flats stand empty.
- The objective for 50% of new council homes to be let to local residents is considered too low a proportion when so many people are on the waiting list for council properties.
- Respondent considers the Plan has a laudable ambition to create new green space and parks but feels that the spaces proposed will be inadequate too small and are inadequate to meet the recreation and leisure needs of new residents.
- The scale of provision of green space is not justified and will be ineffective in connecting biodiversity across the borough.
- It is felt that the culture and heritage objectives are ineffective as Historic England has said that development already approved or proposed in the OKRAAP area would harm existing conservation areas, making a major visual impact on the historic rooflines of the Georgian and Victorian terraces north and south of the Old Kent Road.
- There is concern that the future residents of the OKR area will be condemned to living conditions characterised by poor air quality, limited access to green space or even quality open space and are likely to be worst affected by heat and extreme weather impacts of the climate emergency.
- In regards to AAP2, the Respondent feels that the OKR AAP is not positively prepared and not justified because it is posited on a transport project that has been indefinitely postponed and does not provide any alternative for this situation.
- Respondent considers the AAP continues the Council's flawed approach to regeneration based on demolition of existing buildings and rebuild.
- It is felt that the OKR AAP is not consistent with the London Plan which promotes the refurbishment of buildings wherever possible.
- Respondent considers that the Plan is not effective because it does not have clear and measurable targets, including baseline measurements, for addressing the climate emergency. It is essential that the plan should define net zero targets and that these must include the full lifecycle of building.
- It is felt that the approach to rely on District Heat Networks as a means to achieving zero carbon is ineffective as current experience of DHN in Southwark is that these fail frequently, leaving residents with inadequate heating and no alternative than to use high carbon gas or electric heaters.
- Respondent feels that the proposal that 20,000 residential units can be achieved in

the Old Kent Road is not compatible with meeting the needs of the industrial economy.

- The proposal to co-locate industrial with residential space is not justified by past experience or recent studies.
- It is considered that the plan is not positively prepared as in order to re-provide the amount of industrial floorspace that is being lost to residential uses, the new floorspace would have to be in basements or first floor accommodation which is unlikely to be suitable for the manufacturing activities that are losing their premises.
- Respondent considers that the Plan is not positively prepared as there is a lack of urgency and ambition for the provision of cycle routes.
- It is felt that the provision of cycle routes included in the AAP is inadequate for the existing population and totally fails to consider the huge proposed growth in population or allow for increased use of cycles for transporting goods.
- Respondent feels that the Plan is not positively prepared because it establishes no specific conditions for buildings up to this height, i.e. they could be built anywhere in the area.
- It is not considered justified to use tall buildings in a Climate Emergency as they trap heat in the city, compounding the 'urban heat island' effect and increasing heat-related health problems, especially for more vulnerable groups in the population.
- There is concern expressed over the impact of tall buildings overshadowing nearby areas and reducing the sunlight available, especially for green space and play areas.
- There is concern over the tall buildings planned for the woodland area by Burgess Park as it could impact on local wildlife and pollinators, reduction in sunlight could change the habitat.
- Respondent considers the Plan is not effective in protecting and enhancing conservation areas. Historic England has said that development already approved or proposed in the OKRAAP area would harm existing conservation areas, making a major visual impact on the historic rooflines of the Georgian and Victorian terraces north and south of the Old Kent Road.
- Respondent considers that the provision of open space as set out in Table 3 is not justified and is inadequate for healthy living.
- Respondent raises concern about the reliance on developers to provide new open space and suggests the plan state that this will be secured through legally enforceable means, and the land will be designated as open land.
- It is felt that the plan does not make sufficient provision for sports facilities.

Individual

- Respondent feels that the AAP does not plan positively for the situation on the ground regarding the Bakerloo Line Extension and the announcement that it has been put on hold.
- Respondent notes inconsistencies in the dates presented for the delivery of the BLE: AAP7 states "we will... deliver the Bakerloo Line extension and at least two new underground stations by 2036". On page 36 it says 2031.
- It is felt that there is no recognition in the AAP of the unprecedented financial difficulties TFL is in.

- Jargon is used on page 37 (Grampians) and it is not explained how housing can be delivered so far ahead of the BLE in an acceptable way, or how the risk of developers waiting for BLE and therefore delaying housing delivery is mitigated.
- There is concern that funding for the BLE will be raised at the detriment of residents such as through increased Council tax or higher business rates.
- Respondent feels that the AAP does not consider the main alternatives that are reasonable to consider in light of the TfL commissioner's announcement.
- It is felt that the AAP also needs to plan for greater reliance on walking and cycling routes in the absence of major mass transit improvements and ensure that housing delivery is not accompanied by growth in private car use.
- It is felt that the AAP should plan positively for the opportunities that come from 'waiting' for BLE such as developing 'meanwhile' uses, recording and re-using more heritage, assisted moves of existing employment and community uses, bringing forward certain sites without BLE to allow environmental improvements and avoid blight, or supporting temporary creative industries (eg artists' studios) or limited temporary development.
- It is felt that the failure to consider reasonable alternatives to BLE is not sound.
- Respondent encloses a photograph of litter which has accumulated on the Tesco boundary and suggests that the AAP sets clear guidance for developers and landowners to maintain and incrementally improve safeguarded sites during the 10–15-year interim period before BLE.
- Respondent objects to the misapplication of the 'fifteen-minute city' concept referenced in page 36: the published concept is not about using mass transit to travel to "central and west London in less than 15 minutes" - it is about a neighbourhood with all daily needs met within 15 minutes' walk or cycle.
- Respondent also criticises the level of community facility provision and the new centres and questions where the swimming pools, and town squares are.
- Respondent feels that the OKR is a series of locations like E&C in terms of its scale and complexity, so it cannot be left to the hope of BLE and a well-intended but flawed AAP to deliver the housing required by the London Plan *and* the economic and environmental improvements.

Individual

- Responding to the written questionnaire
- Respondent does not agree that the AAP will address the climate emergency
 - Feels that the council is determined to pursue large scale developments which do not use the existing built resources in the Borough.
 - It is considered that the focus is on traffic reduction which although welcomed ignores all other factors of climate change, particularly emissions from whole scale construction activity
 - It is considered that gas and electric consumption from high-rise buildings are twice as high as in can be achieved with lower-rise slab or courtyard buildings.
 - Respondent feels that Construction has been overlooked in the Climate Emergency Strategy even though it is 2nd only to transport in terms of carbon emissions.
 - Respondent feels that the commitment to the climate emergency has been poorly thought out and appears to be nothing more than a tick box

exercise.

- Bakerloo Line Extension
 - Respondent feels that the Bakerloo Line Extension at present is wishful thinking and feels that the reliance on what is clearly not happening for at least 20-30 years, if at all, suggests an inflexibility and lack of innovativeness on the part of the Council.
 - There is concern that the infrastructure will not sustain the increase in population.
- Youth
 - Respondent feels that providing for the young is essential but what is proposed only replaces the many libraries and town halls, schools and hostels that the Council has sold off in the last many years.
- Housing
 - Respondent considers that 13,000 homes will be unaffordable to Southwark and London residents and feels that the building strategy is worsening the housing crisis.
 - Respondent feels that regeneration causes property developers to actively drive up housing costs through direct marketing to overseas investors
 - 1 in 24 homes lie empty in Southwark
 - Respondent feels that the AAP fails to mention the social housing which is being lost in the face of redevelopment.
 - It is considered that the number of homes should not be raised from 14,500 to 34,500 without the BLE.
 - Respondent considers retrofitting existing social housing as the most cost effective and least damaging to both the environment and social cohesion.
- Respondent does not agree with the new tall buildings plan and does not like the emphasis of tall buildings in the plan.
 - Respondent feels they are being planned indiscriminately.
 - It is considered that tall buildings are out of scale and context with existing streets and buildings and will not integrate with the buildings around.
 - The increases in height set a precedent so within a couple of years that local areas character is completely lost and overshadowed by ugly new developments.
 - It is felt that they overshadow and vandalise heritage assets and Conservation Areas which need to be preserved and settings conserved and enhanced.
 - There is concern over the notoriously high wind speeds particularly at their base which subsequently suffer from a volatile microclimate.
 - Groups of towers cast shadow and create dark alleyways where concentrations of stagnant air and pollution can be found.
 - They shut out the sky and the light and darken the existing homes and area at large.
 - Lack of outside space and being able to relate to the scale of the people in the street lead to feelings of separation, isolation, and depression.
 - Tall buildings already completed across Southwark are ugly, homogenous, and completely indistinctive.
 - The higher you go, the more inefficient the building becomes in terms of the net area measured against carbon emissions from operation, construction, and maintenance.

- Movement
 - Respondent feels that the policy to divert all vehicles on to side roads has just served to displace traffic rather than reduce it creating more traffic on main roads adding to pollution.
 - Respondent feels that the focus on being car free will negatively affect many local people especially the working-class community as well as the less able bodied and elderly.
 - Respondent considers that with such an intensified plan for populating the area one may have to assume that even actually reducing the amount of traffic will finally result in traffic maintaining current levels as the population grows, because of the reliance on deliveries and servicing.
 - Respondent feels that there is a total failure on behalf of the council to understand the nature of traffic and essential journeys in the area purely because of wanting to achieve targets.
 - Businesses suffer when easy access is not permitted to their establishments by car.
- Economy and Town Centres
 - Respondent does not agree with the policy.
 - Respondent feels that the Council is underplaying the tension between industrial uses and residential capacity and it is not workable.
 - It is considered that by allocating B use to the site allocations that the traditional industrial uses will be lost.
 - It is felt that there is a focus on offices rather than protecting existing industries which will lead to the loss of OKR's unique industrial heritage.
 - It is felt that residential and employment uses should be kept separate as no one will want to live on top or next to an industrial unit with the noise, traffic and pollution at all times of day.
 - Respondent feels that there will be a loss of affordable workspace as currently it is all affordable and the requirement for redevelopment is to provide only 10% affordable.
 - Respondent feels that the quiet residential streets and areas will see the introduction of shops, cafes, drinking establishments which cause public nuisance and harm to the wellbeing of the residents.
- High Streets
 - Respondent feels that mixed messages are being given in the plan as almost all site allocations have a provision for retail uses, meaning that high street activity will be dispersed within the large developments of the plan.
- Design and Heritage
 - Respondent feels that the OKR and the site allocations pay lip service to protection of high-quality design and preservation of heritage but lists several examples of heritage assets which have been destroyed.
- Parks and Open Spaces
 - Respondent feels that there is no accounting for mature trees which are being felled.
 - It is considered that the provision of green space would have to be more than doubled for Southwark to remain the 5th worst borough for access to open space.
 - Concern over the infill of green space and play areas on council estates
 - There is concern over the impact of Mandela Way Park on the existing road

layout and accessibility.

- It is felt that Tier 1 building at the edges of Mandela Way Park are not appropriate.
- Consented Development
 - Respondent feels that the ongoing and completed developments demonstrate quite clearly that the present planning system and Rules and the indeed the Council have failed the present residents.
- Any other comments
 - Respondent does not understand why OKR2 and OKR3 have been designated as town centre and Opportunity area
 - Respondent feels that the plans for development is not how the community want to live and see the area developed
 - Respondent considers that planning applications in the pipeline should be assessed in the context of the emerging AAP and not on the basis of what has already been granted permission on Crimscott Street and Willow Walk.
 - Respondent considers the height plans for Crimscott Street/ Pages Walk / Mandela Way out of scale with the existing streets and buildings, and asserts that development bears no relation to the existing character of Pages Walk and Willow Walk: openness, low rise, historic urban form, interesting townscape, quality of neighbourhood.
 - It is considered that 6 storeys is too tall for a little street and the maximum height allowed on Pages Walk should be 3 storeys.
 - Respondent feels that the guidance on conservation areas must be more strictly observed.
 - Respondent considers the buildings fronting onto Crimscott Street should be no more than 3 storeys and the 6-8 storeys set out in the plan is inappropriate.
 - Respondent feels that there should be a height restriction on the entire site allocation OKR2 of 3 storeys, rising to 4 storeys.
 - Respondent considers a patchy approach and heights have been set on the basis of the site and the very maximum possible rather than what is suitable and sympathetic to the area and- a uniform approach to planning.
 - Respondent feels that the site allocation and the plans for Mandela Way are unrealistic and unachievable because they are not supported by a deliverable infrastructure plan due to the delay in the BLE delivery.
 - Respondent does not consider that OKR3 can deliver 1955-2200 and that these are not needed for Southwark Council to meet its housing targets as set out in the March 2021 Southwark Housing Land Supply Report.
 - Respondent suggests that OKR3 be retained as Locally Significant Local Land with use class B8 for storage and distribution rather than more general use B class.
 - Respondent feels that office space is not needed and there is a need for usable class B8 industrial space.
 - There is concern that the Mandela Way site boundary will have a large impact on Pages Walk and the threat to the conservation areas is immediate.
 - Respondent considers that a height restriction should be placed on OKR3, restricted to 2 storeys behind the Conservation area rising to 3 moving further east.

- There is concern that the Conservation would be engulfed and the views into and out of the area are maintained nor enhanced by the buildings.
- It is considered that the green space on OKR3 should be open and not built up around to be truly accessible to all.
- It is considered that Mandela Way Park is inadequate provision of green space for the number of homes and additionally businesses that are planned on these two sites.
- Respondent is supportive of Mandela Way Park but would like to see the layout from the 2017 AAP used as it showed the park without cutting Mandela Way short.
- Respondent feels that the site allocation for homes must be reduced to viable levels which would accommodate lower building heights and still meet housing targets.
- Respondent feels that the houses directly behind Pages Walk Conservation Area terraced houses should be 2 stories mirroring the Pages Walk Houses.
- It is felt that having tall buildings dodging the various view trajectories (site lies within the Background Assessment View of London View Management Framework and the Borough Views) cannot be a basis for well planned development and cannot be deemed sound in reference to the NPPF particularly part 12 on achieving well-designed places.
- Respondent requests assurances that existing trees along Mandela Way and the 30 year oaks behind the Pages Walk terraced houses will be preserved as the trees reduce carbon emissions and support a range of biodiversity.



Appendix C:

Summary of key issues raised in consultation responses to the survey questions from community groups

Old Kent Road Area Action Plan: Consultation Report

November 2021

Friends of Galleywall Nature Reserve

Written rep received

-

- Supportive of redevelopment
- Wants to see more links between small open spaces and pocket parks
- Would like to see mention of Galleywall Nature Reserve

Theatres Trust

Written rep received

2018

- Supportive of the approach to district town centres and the borough's support for cultural and leisure activities
- Suggest that part 4 of AAP6 might also reference performance space in addition to cinema or museum

Southwark Travellers' Action Group (STAG)

Written rep received

2018

- Do not support the Bakerloo Line Extension
- Want to see Gypsy and Traveller sites included in the housing provision and for the plan to recognise the specific needs of G&T accommodation
- Support the commitment for the established high street to remain
- Object to the tall buildings strategy as there is concern about tall buildings overlooking sites
- G&T do not feel they have been consulted or engaged properly about redevelopment

Founder: Pages Walk Conservation Residents Alliance. Founder: Save Southwark

Written rep received

2018

- Opposed to new schools, the hotel and the removal/repurposing of the flyover
- Would like to see a Lido in Livesey Park
- Does not believe the BLE will happen for 20-30 years and the existing public transport infrastructure cannot support the huge increase in pop'n
- Object to the AAP3: Climate Emergency as demolition and construction generate a massive amount of carbon and tall buildings produce way more emissions than low-rise
- Support the retrofitting of heritage assets
- Object to the provision of affordable housing as it should be more and actually affordable
- Object to co-location and the requirement for only 10% affordable workspace
- Wants more mention of pubs and the existing diversity in terms of cafes and restaurants to remain
- Oppose the movement strategy and the tall building strategy
- Road layout and accessibility concerns on the proposed location of Mandela Way

Park

Old Kent Road Community Campaign /Save Southwark

Written rep received	-
----------------------	---

- 13,000/20,000 homes unaffordable – only 8% of the existing Southwark residents can afford this and 1 in 24 homes already lie empty
- AAP fails to note the number of social homes lost
- Housing - 80% of inflated price is unaffordable to 92% of Southwark’s populations – should be capped at London Living Rent.
- Questions on the suitability of co-location
- More detail on pubs
- Disagrees with tall buildings – create unsuitable microclimates, are homogenous and carbon heavy during the construction phase
- Does not like the demolition-led development – should be retrofitting and retaining
- Replacement of what has been lost should be provided. Ball courts are targeted therefore in need of protection.
- The rest is the same as “Founder: Pages Walk Conservation Residents Alliance. Founder: Save Southwark” (above)

Southwark Unified Network Black Ethnic Minority
--

Written rep received	-
----------------------	---

- Living wage should be included in reaching the affordable housing figure.
- Agree with AAP 6 but concerns in the increase of business rates and rents.
- AAP 14 – intergenerational provisions needed.

Action Vision Zero

Written rep received	-
----------------------	---

- Strongly support the removal of the Dunton Road Gyratory
- Want to see more done for traffic reduction and segregation of cycle lanes and pedestrians
- Want to see a more developed freight strategy

London Living Streets

Written rep received	-
----------------------	---

- Strongly support creating a high street in Sub Area 3
- Want more LTNs
- Want faster progress on the OKR to become a Healthy Street
- Would like to see an alternative to the BLE in the form of a rapid bus service or tram which can be delivered by the mid-2020s
- Wants to see a sustainable freight strategy

- The Climate Change Strategy is inadequate

Save Southwark, Pembroke House, St Christopher's Church Walworth

Written rep received

-

- Failure to understand the socio-economic factors of lower income areas – small independent existing shops rented by diverse communities of ethnic minorities rely on the low rental premiums
- OKK 6 (Lidl store) -- questions why Tescos have been given site allocation but Lidl has not.
- Questions plans for new hospitals, police stations and fire stations
- Lack of transport infrastructure to support the development, given the BLE is at risk.
- Not helping the climate emergency - Carbon emissions from construction industry, the building materials used, high-rises, based on demolition rather than retrofitting existing buildings and encroachment of buildings onto green spaces such as Burgess Park.
- 13,000/20,000 homes unaffordable – 80% of market rate is not affordable and should be through the Community Land Trust so one generation does not benefit all
- Affordable rent should be capped at London Living Rent
- Careful planning needed for co-location to ensure people can live healthy and without significant noise.
- 10% affordable is not enough – many current jobs will be lost especially representing UK Minority Ethnic communities.
- Highlights diversity in faith, ethnic groups must not be lost.
- Car-free is good but there is still a needed for trades and service vehicles
- Disagrees with tall buildings – pollution collects, overshadow greenspaces and negative impact on the environment
- More retrofitting and retaining heritage needed
- Proposed Mandela Way Park exact location is a concern as the existing layout and accessibility may be affected.
- Closure of schools has huge effect on locality
- Ball courts and greenspaces used by young people are targeted.

Northfield House Tenants and Resident's Association

Written rep received

2018

- Same as Pages Walk Conservation Residents Alliance PW representation

Friends of Burgess Park

Written rep received

2016 and 2018

- Alternatives to the BLE as it will not be delivered until into the 2030s
- Policy isn't doing enough on Climate change

- Do not support the 20,00 homes – more needs to be done to deliver social housing and needs a big increase in transport and associated social infrastructure
- Would like to see a Burgess Park orbital route along Albany Road and St George's Way

Southwark Law Centre	
Written rep received	2018
<ul style="list-style-type: none"> • AAP3 and AAP8 – no mention of sustainable construction methods or materials and concerns on the energy use of tall buildings. • More effort needed for the provision of social housing • Support VitalOKR • AAP14 – would be useful to create a map of current and proposed youth provision 	

Reoccurring themes: lack of affordable housing, greenspaces, lower building height, loss of socio-economic and ethnic diversity, transport issues.



Appendix D: Consultation Hub Questionnaire data

Old Kent Road Area Action Plan: Consultation Report

November 2021

The Consultation Hub questionnaire asked respondents to state if they agreed, disagreed, agreed in part or didn't know with the strategy in the AAP for each of the themes listed below. The table shows this data in raw form and relates to the bar chart in section 2.3 Headline figures.

	Yes	No	In Part	Don't know	Not Answered
Climate Emergency	22	74	25	10	5
District Heat Network	49	43	17	19	8
Bakerloo Line Extension	89	19	20	3	5
Child and Youth Provision	63	14	38	15	5
Quality, Affordable & Family Homes	41	48	38	2	7
Tall Buildings	26	84	20	3	3
Movement	73	24	36		3
Co-location (industrial and residential)	53	44	27	5	7
Town Centres, Leisure and Entertainment	65	23	42	2	4
Quality Design and Heritage	72	24	30	5	5
Parks and Open Spaces	83	15	30	3	5



Appendix E:

Notification emails for start and extension of consultation

Old Kent Road Area Action Plan: Consultation Report

November 2021

From:Southwark Council <Southwark-Council@public.govdelivery.com>Subject:Consultations Open - Old Kent Road, Conservation Areas and Heritage

Southwark Council is currently consulting on the following planning and heritage documents for your information and comment:

1. **Old Kent Road Area Action Plan: December 2020 draft**
2. **Old Kent Road 5x new Conservation Areas**
3. **Heritage SPD**

Old Kent Road Area Action Plan

Download the plan [here](#).

Have your say by submitting comments on the [Consultation Hub](#) or emailing planningpolicy@southwark.gov.uk by 5 April 2021.

We are arranging a series of virtual round table consultation events about the plan. If you would like to attend a session, please email OldKentRoad@southwark.gov.uk to register your interest. If you are a member of a residents, business or interest group and would like us to attend your meeting to discuss the AAP please also email us to arrange this.

3 March (Youth event for ages 13-25) 5pm-7pm

11 March (Businesses) 11.30am-12.30pm

18 March (Faith groups) time tbc

18 March (Residents groups) 3pm-4.30pm

Other sessions to be confirmed, please email to register your interest.

Old Kent Road Conservation Areas

We are also consulting on five new conservation areas in the Old Kent Road Opportunity Area. For more information and to comment on the proposals by **30 April 2021**, please visit the pages below:

1. [Kentish Drovers and Bird in Bush Conservation Area](#)
2. [Mission Conservation Area](#)
3. [Thomas A'Becket and High Street Conservation Area](#)
4. [Livesey Conservation Area](#)
5. [Yates Estate and Victory Conservation Area](#)

If you are part of a local group and would like to discuss the proposals for new conservation areas, a virtual meeting can be arranged by appointment by emailing: designconservation@southwark.gov.uk

Heritage Supplementary Planning Document

The plan can be viewed [here](#).

Have your say by submitting comments on the [Consultation Hub](#) or emailing planningpolicy@southwark.gov.uk by **5 April 2021**.

Southwark Council

[Unsubscribe](#) from any further emails from Southwark Council.
You may also choose to [modify your subscriber preferences](#).

www.southwark.gov.uk

From: Southwark Council <Southwark-Council@public.govdelivery.com>

Subject: Extension of Consultation on Old Kent Road Area Action Plan, Heritage SPD and Old Kent Road Conservation Areas

Southwark Council is currently consulting on the following planning and heritage documents:

- 1. Old Kent Road Area Action Plan: December 2020 draft**
- 2. Old Kent Road 5x new Conservation Area**
- 3. Heritage SPD**

This deadline for comments for these consultations has now been extended to 10th May 2021.

Old Kent Road Area Action Plan

Download the plan [here](#).

Have your say by submitting comments on the [Consultation Hub](#) or emailing planningpolicy@southwark.gov.uk

Old Kent Road Conservation Areas

We are also consulting on five new conservation areas in the Old Kent Road Opportunity Area. For more information and to comment on the proposals, please visit the pages below:

- [1. Kentish Drovers and Bird in Bush Conservation Area](#)
- [2. Mission Conservation Area](#)
- [3. Thomas A'Becket and High Street Conservation Area](#)
- [4. Livesey Conservation Area](#)
- [5. Yates Estate and Victory Conservation Area](#)

Heritage Supplementary Planning Document

The plan can be viewed [here](#).

Have your say by submitting comments on the [Consultation Hub](#) or emailing planningpolicy@southwark.gov.uk.

Southwark Council

[Unsubscribe](#) from any further emails from Southwark Council.
You may also choose to [modify your subscriber preferences](#).

www.southwark.gov.uk



Appendix F:

Press notice

Old Kent Road Area Action Plan: Consultation Report

November 2021

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

NOTICE OF CONSULTATION FOR:

**OLD KENT ROAD AREA ACTION PLAN
AND
HERITAGE SUPPLEMENTARY PLANNING DOCUMENT**

Southwark Council is consulting on the draft Old Kent Road Area Action Plan December 2020 and Heritage Supplementary Planning Document from 11th January 2021 to 5th April 2021.

OLD KENT ROAD AREA ACTION PLAN

The Old Kent Road AAP will guide and manage new development and growth in the area over the next 20 years. The plan aims to create a new high street environment for the Old Kent Road, with significant public transport improvements supported by mixed use development behind the road. This will incorporate around 20,000 new homes, including affordable homes, new jobs, community facilities and green spaces. The plan includes the potential for extending the Bakerloo Line from Elephant and Castle towards Lewisham with two new stations along the Old Kent Road. The plan will be used to make planning decisions in the area and to co-ordinate the deliver the regeneration strategy.

HERITAGE SUPPLEMENTARY PLANNING DOCUMENT

The Heritage SPD provided detailed guidance on how to apply the relevant policies of the Southwark Plan and the emerging New Southwark Plan concerning our historic environment.

The Heritage SPD also sets out further advice on how we expect development to be consistent with wider national and local legislation and policy, within which the council must operate.

It has been written to provide better understanding of heritage matters and provides clear advice on the conservation, preservation and enhancement of our historic environment. It is designed for a wide readership, including applicants, building owners, residents, planners, community groups and developers.

How to view documents and comment:

Old Kent Road Area Action Plan

- The Old Kent Road Area Action Plan and supporting documents are available on our website for review: www.oldkentroad.org.uk/documents
- www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/area-action-plans-section/old-kent-road-aap

Heritage SPD

- The Heritage SPD along with associated supporting documents are available on our website for review: <https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/supplementary-planning-documents-spd/spd-by-planning-topic>

How to comment

Visiting our consultation hub:
consultations.southwark.gov.uk

Sending an email to:
planningpolicy@southwark.gov.uk

Alternatively you can post your response to:
Planning Policy
Southwark Council
FREEPOST SE1919/14
London SE1P 5LX

All comments must be received by 23:59 on Monday 5th April 2021.

QUERIES

For any queries or assistance, please contact:
planningpolicy@southwark.gov.uk
Tel: 0207 525 54929 or 07731 325511

Register for a My Southwark account and opt-in to our planning policy email updates on your profile at <https://www.southwark.gov.uk/mysouthwark>



Appendix G: Consultation Event Summary

Old Kent Road Area Action Plan: Consultation Report

November 2021

22 March 2021	OKR Community Review Panel
23 March 2021	OKR Developers and Landowners Roundtable meeting
22 April 2021	Retail Roundtable
27 April 2021	Tenants Resident Association Roundtable
	Ledbury RPG

OKR Business Roundtable meeting			
Date	11 March 2021		
Location	Zoom	Number of attendees	18
<ul style="list-style-type: none"> • It was raised that there is not enough engagement with businesses • Questions about what has happened to the OKR Business Network • Queries on how no net loss of industrial could be achieved • There is concern that the design of light industrial is more about ticking boxes than good design • It was felt that no net loss is not achievable with the types of small spaces that have been proposed in mixed use, servicing ramps, big service lifts etc. the type isn't the same • Concerns over the credibility of the industrial land uses • Concerns over bed and shed concept • The plan looks like 100% site coverage so there is no servicing or yard space • Concerns raised about living above dirty industrial uses e.g. metal working wouldn't work with residential uses • There is a need to think about operational servicing hour • Respondent suggested using specialist architects with experience on sheds and beds working in a positive and true concept of genuine industrial uses and no amenity issues with residents above • Another respondent suggested finding examples that already work and use as a precedent • Concerns over business relocation and that uses in the plan do not accommodate warehousing businesses like Safestore • Questions raised about affordable workspace and how this works for light industrial • Questions over whether any work has been done to look at number of jobs in business space – not short term employment – when businesses get bigger they move to Kent, Essex, Dartford • James Glancy runs affordable workspace at discount market rents • Space Studios is affordable by nature – it is not subsidized • There should be accreditations and jobs for young people • Only 19% of young people with autism are employed full time – they are able and this figure should be higher and there should be opportunities for training and access to employment 			

OKR Residents/Communities Roundtable

Date	18 March 2021		
Location	Zoom	Number of attendees	8
<ul style="list-style-type: none">• Questions over why the number of homes in the London Plan (12,000) was increased (given constraints of sites that would not be deliverable).• Whilst changes have been made to the part about exceptional design and part of the skyline, new tiers irrelevant.• Bakerloo Line Extension was raised• Concerns over the child play space being on podiums• It was felt that consultation was a waste of time• Issues were raised specific to the Southernwood Retail Park planning application• It was felt that there is no point amending the tall buildings policies when towers of over 48 storeys have already been approved• Opaque screen being imposed because of how close development are, frosted because of proximity - not good floor lighting and mental health.• Issues were raised about the Elephant• It was felt that the Council is demolishing more council homes• Question over whether there is more specific criteria which needs to be met for exceptional design• Concerns raised over mental health of residents, particularly families• Questions over what affordable housing is and how much it costs• Request for an understandable note on affordable housing produced in coordination with residents so that it is clear• Where are the 348 affordable units under construction and how does that respond to the need?• Issues raised over the affordability for families – they cannot afford to buy• 3 beds and 3 bath homes are for young professionals not families• Concerns over the marketing documents going up as no one is moving in and residents do not want it.• Concern over social rented homes being delivered in phase 2 of developments (specific reference to Southernwood) – concern over the involvement of DRP when they don't live in the borough.• Concern over the youth and the possibility that they will not be able to stay in the area.• Concern over the developers for Ruby Triangle acquiring planning permission on one of the largest sites but they don't have any background/credibility.• It was noted that public engagement was better through these discussions.• Concerns over the fact that the AAP is not adopted policy but a large amount of applications are being approved with big question marks.• It is suggested that the BLE situation and post-covid that the Council put a temporary prohibition on planning applications coming forward.• It is felt that the Opportunity Area policy promoted by the GLA is not good.• Issues raised about the infrastructure to support all of the development• Thoughts around the social value of the development• Questions around where the s106 money is being spent• Question about what is happening with Council owned land – it is felt that council homes should be built on Council land.			

- Concerns over the amenity disappearing
- The use of language used is raised which makes things harder to understand and is not so transparent.
- There is concern over communities not being able to stay in the area (particularly BAME)
- Question raised over how the plan was prepared without a strategic needs assessment and how it was addressed without those specific needs
- It is felt that due diligence in regards to agents and developers must be done – it is felt they do not have the credentials.
- There is questions raised over the use of high rise buildings, why and how they are needed and how they can be family friendly.
- It is felt that high rise are expensive and more discussion needs to be had about their necessity.
- There is a suggestion that people be notified about the AAP though their council tax as everyone has to pay a council tax bill – missed opportunity to publicise the consultation.
- It was felt that the timing of the meeting was not right as it is during working hours.
- It was felt that the consultation process leaves out residents.
- Suggestion to advertise and publicise consultation events through the Tustin TRA and Ledbury newsletter.
- The GLA report on tall buildings was raised.
- There is concern that many residents don't know about the consultation and that the Council is not pro-actively engaging with new members.

Walworth Society Meeting

Date	18 March 2021		
Location	Zoom	Number of attendees	Unknown
<ul style="list-style-type: none"> • Issues raised over the Bricklayer's Arms Flyover - severance of the road, traffic too high, goes from two lanes to 7/8 lanes. • Questions over when local people will start to get the benefits from TFL investment on the OKR. • Northern town centre – would like to see the Walworth Road section up to East Street have more of a high street feel. • Fantastic to hear about the plans works in 3rd sector building in Walworth. • Concern over how Low Traffic Neighbourhoods impact on businesses as it is difficult to access premises and there needs to be services for disabled people and essential services need to be supported. • Concerns raised over where the lorries and coaches go from Dover when development happens – will they go to Camberwell Green? • Suggestion to have the pub signs from the Kentish Drivers reinstated along the length of OKR as navigational aids and to help with historic identity. • Concern over the Climate Emergency policy – reuse of existing buildings. • Positive reactions to funds for restoring valuing elements and giving sense of pride to small scale shops. • Questions raised over how the new high street will be delivered when it is such a change from the large retail sheds of the 1990s and very car focused. 			

- Would like to see heritage put into something physical.

OKR Youth Roundtable meeting

Date 13 April 2021

Location Zoom Number of attendees Unknown

- Participants raised the concern that OKR231 will not solve all issues that young people are facing at this moment in time.
- Issue raised about how to avoid gentrification with the new regeneration.
- Issue raised about avoiding increases to the cost of housing.
- Peckham regeneration raised
- There needs to be affordable spaces for young people
- Better transport links (while lowering pollution) – increase in bikes
- Architect proposals should be from young people's views, points and opinions
- Not many young people talk to the Council.
- More resources should be given out for the youth to get involved.
- Some things need to be kept for the people to still recognise the area (be able to reminisce)/ somewhere that is familiar to home.
- Allow for somewhere so that once students finish schools they can get jobs or work experience somewhere (internships).
- There needs to be a space that brings youths together allowing them to have more resources (social infrastructure)
- There needs to be somewhere to distress (because of housing, schools, lifestyle)
- It is important to use young people's opinions and make them more aware
- Sports can make benefits and skills that can be transferred into real life
- 73% cut in youth services means a lack of opportunities.
- How to draw in/interact with young people?
 - Go to where the young crowd and entice them through bright and educated conversations.
 - Council can link in with young organisations to communicate ideas.
 - Council needs to approach young people - easing the pressure between their relationships (can't expect young people to talk council).
 - Establish the next step in order to communicate efficiently with young people.
 - Pay young people to consult and get involved (Increased incentives).
- Waiting list of housing for young people
 - Council is committed to build more council homes along OKR - aims to reduce the cost of social housing so it's more affordable for young people to maintain.
 - The Current Draft Housing Allocation Scheme for consultation has failed in its equalities assessments impact especially those young people on the council waiting list (adult comment)
 - Consider Mental Health of young people in council housing - due to bad conditions (Organisation comment)
 - Question about race in call - majority attendees were people of colour, is it because white people are in a safer position with council? (adult comment)

- Young White people are not included in statistics + Housing should be $\frac{3}{4}$ bedrooms not $\frac{2}{3}$ bedrooms (Organisation comment).



Appendix H: Roundtable Meeting Agendas

Old Kent Road Area Action Plan: Consultation Report

November 2021

Old Kent Road Business Roundtable meeting 11.3.21
--

Location: Zoom

Date: 11th March 2021

Time: 11:00 – 12:30

Attendees
<ul style="list-style-type: none">• Louise Ferguson - DPD• Kieran Mccallum – P Wilkinson Containers• Julie Mc Laughlin - Tetrattech• Mark Beaver – Event Concept• Michael Burman – FE Burman• Paul Regan - FE Burman• Ade Onabanjo - FE Burman• James Glancy – James Glancy• Terrence Faulkner - Leathams• William Austen – Southwark Studios• Anna Harding - Space Studios• David Pennistone - Safestore• Simon McKee - Veolia• Leke Osi - Gadmon Industries• Mark Brearly - Kaymet• Martin Tiffin• Jeremy Tudor – Capital Industrial • Cllr Johnson Situ - LBS• Colin Wilson – LBS• Liz Awoyemi – LBS• Alicia Chaumard – LBS

Item	Agenda
1	Introduction to revised December 2020 AAP - Cllr Situ
2.	Suggested topics for discussion. <ul style="list-style-type: none">• The overall approach of the plan, mixed residential and industrial/commercial. Stacked industrial/distribution.• Phasing and disruption during development. Business relocation strategies.

	<ul style="list-style-type: none">• Practical issues, Servicing and car parking for staff and customers.• Fit with residential use, impact on residents/impact on business uses.• Design of work space and fitness for purpose.• Affordable workspace. Securing its delivery.• Training and apprenticeships. Relationships to schools, FE Colleges, universities.
--	---

Old Kent Road Developers Roundtable meeting

Date: Tuesday 23rd March 2021

Time: 11:00 – 12:30 (1hr 30mins)

Location: Zoom

Topic: OKR Developers/Landowners Roundtable

Time: Mar 23, 2021 11:00 AM Universal Time UTC

Join Zoom Meeting

<https://us02web.zoom.us/j/88939091658?pwd=VUtyaXdZc0Q0T1JNaDFwT3k2SG9Odz09>

Meeting ID: 889 3909 1658

Passcode: 231878

Attendees

Name	Site / organisation
Michael Watson	Aviva Galliard – Cantium Retail Park
Nick Hopkinson	PPR Estates
Bhavesh Amin	2020 Capital
David Hill	2020 Capital
Emma Prichard – Selby	The Vesta Group
Nick Lawrence	Tribe Student Housing
Justin Tibaldi	Berkeley homes
Andrew Maunder	Berkeley Homes
Chris Horn	CHA limited – Civic & Livesey
Omer Weinberger	Avanton – Ruby Triangle.
Mark Smith	London Square
David Godden	HollyBrook
Justin Elcombe	HollyBrook
Gerard Maccreano	MaccreeanorLavington
John Steventon	MaccreeanorLavington
Chris Horn	Chris Horn Associates
Don Messenger	DPD

- Cllr Johnson Situ - LBS
- Tim Cutts– LBS
- Liz Awoyemi – LBS
- Alicia Chaumard – LBS

Item	Agenda
1	Introduction to revised December 2020 AAP - Cllr Situ
2.	Presentation on OKR update – Where are we?
3.	Suggested topics for discussion: <ul style="list-style-type: none">• Housing delivery• Phasing and Bakerloo Line extension update• Climate change and associated issues, embodied energy as well as operational• SELCHLP and Carbon Offset Charges• Changes to the NSP Policy• Training and apprenticeships• Community involvement/ consultation