

Consultation Report

Old Kent Road Area Action Plan: December 2020 Draft

No.	Title
Appendix A	Old Kent Road AAP December 2020 draft
Appendix B	Consultation Plan
Appendix C	Consultation Report
Appendix D	Integrated Impact Assessment
Appendix E	Habitat Regulations Assessment
Appendix F	Equalities Impact Assessment
Appendix G	Health Impact Assessment

December 2020

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1 INTRODUCTION

What is the Old Kent Road Area Action Plan?

- 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.
- 1.2** 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.

What is this consultation report?

- 1.3** 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.
- 1.4** 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.
- 1.5** 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.

2 STAGES OF CONSULTATION

Who was consulted and how?

- 2.1** 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.
- 2.2** 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.
- 2.3** 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 incorporated into this report under the relevant subject headings.
- 2.4** 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.
- 2.5** 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 this report. 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.
- 2.6** 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

2.7 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.

2.8 We posted a second questionnaire to all residents and businesses in the opportunity area (Appendix 3). We also advertised in the consultation in Southwark News, through mailouts (over 10,000 people sign up to receive updates) and through marketing e.g. on phone kiosks (Appendix 4). We started the OKR Community Forum again and consultation has been ongoing through 2018 and 2019 with local groups. The feedback and responses from the Forum is attached as Appendix 5. We also have detailed feedback from those businesses who have signed up to the Old Kent Road Business Network (Appendix 6).

2.9 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.

2.10 Table 1 shows a log of all consultation actions undertaken since the beginning of engagement in 2013.

Table 1 – 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.

Roughly every 4 to 8 weeks between February 2015 and September 2016.	Old Kent Road Community Forum	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 .
12 and 13 October 2015 were held for	Further business engagement through presentations and workshops with local business owners and operators	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.
14 June 2016	Meeting/presentation/Q&A/workshop	Future Steering Board at Bells Garden Community Centre.
16 & 23 June 2017	Press advertisements in Southwark News	
17 June 2016	Consultation hub page	Online platform for viewing and providing comments on the plan.
28 June 2016	Meeting/presentation/Q&A/workshop	Southwark Tenant Council meeting at Bells Garden Community Centre.
29 June 2016	Faith Open Day workshop and community outreach	Hosted at the Somali Relief and Welfare Association Mosque at 94 Old Kent Road.
29 June 2016	Announcement and stall at Borough, Bankside and Walworth Community Council	Hosted at Amigo Hall, St George's Cathedral, SE1

4 & 14 July, 22 August and 9 September 2016	Mailouts	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.
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 questions about the AAP.	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 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 2019	Secondary School workshop (Year 9 feedback session)	The Charter School, East Dulwich, SE22 (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

3 SUMMARY OF CONSULTATION

Key changes to the plan following consultation

Connecting Communities

- 3.1** The AAP has been reviewed and revised to more fully embed the Council's commitment to ensure the plan is more people focused and that local residents, communities and businesses are at the forefront of the regeneration. The vision, strategic policies and objectives have all been updated with this theme in mind. Each sub area now features a dedicated section on 'Connecting Communities'. Engagement with local residents and businesses features throughout the plan.

Climate Emergency

- 3.2** The AAP now includes a new policy at the forefront of the plan to address the Climate Emergency. The Climate Emergency policy introduces measures that help to achieve the council's commitment to be net zero carbon by 2030. A map of the District Heat Network has been added with additional information about how that will be delivered based on the business case and feasibility study worked up over the last two years.

Affordable housing

- 3.3** The plan remains committed to delivering at least 35% of new homes to be affordable (7,000 out of 20,000). The Old Kent Road Opportunity Area overall is achieving the highest average percentage delivery of affordable housing in London at 38% affordable homes with approvals to date. The AAP strengthens the council's commitments to deliver larger family homes (4 bedrooms) in social rented homes and provide smaller social rented homes for older people. 50 per cent of new council homes will be let to local residents.

Bakerloo Line Extension

- 3.4** The Council remains committed to ensuring the delivery of the Bakerloo Line Extension along the Old Kent Road. The phasing approach of 9,500 homes to be approved before the letting of the construction contract of the BLE and the remaining 10,500 to be approved with Grampian condition is still in place. The details of sites in Phase 1 and the inclusion of estate regeneration is still being negotiated with TFL and the GLA.

Youth

- 3.5** The AAP includes a bespoke new youth policy to address feedback to plan for the future of young people, and the importance of this is reflected through the vision and strategy. 231 Old Kent Road is being incorporated into the council's Youth Strategy as a key deliverable.

Heritage

- 3.6** The AAP includes the proposed 5 new conservation areas and identifies all the listed buildings and identifies all locally important buildings which will be retained

Parks

- 3.7** The AAP masterplan shows the increase the amount of park space specifically around the gasholder (Livesey Park) incorporating land from National Grid Gas and National Grid Electricity and created a new park at the council depot on Frensham Street. The masterplan also shows the closure of part of Verney Road to accommodate the Surrey Canal Park with

access and servicing moved to within the site. A new park space has been created at the car park to the rear of the Tesco petrol station. The AAP commits to doubling the open space in the area to 30ha by 2045. There is potential for a new 1ha park space at Bricklayers Arms, through conversion of the flyover to an elevated park space. The council has commissioned a specialist air quality study which is ongoing to inform the delivery and monitoring of the AAP objectives in relation to air pollution.

Page's Walk

- 3.8** The masterplan has been amended to show three-storey townhouses with back gardens, instead of commercial buildings behind the back gardens on Page's Walk. This change was made following resident's feedback.

Naylor House

- 3.9** This was removed from the Opportunity Area boundary following feedback from its residents.

Town Centre and businesses

- 3.10** The AAP commits to achieving double the number of jobs, no net loss of industrial floorspace and continues the commitment for specific mixed use industrial typologies and affordable workspace. The masterplan for South Bermondsey industrial intensification has been included at sub area 5. There are now two district town centres, and commitments in relation to the new green deal for jobs and achieving the 15 minute city concept. The AAP includes a new ground floor strategy policy (AAP6) and high street character section explaining the changes to the high street (see sub area 3)

Tall buildings

- 3.11** The AAP tall buildings strategy, " the stations and the crossings" has been amended so that "Tier One" (the tallest) buildings are categorised as over 20 storeys (revised from over 30 storeys), and "Tier Two" buildings are categorised as between 16 and 20 storeys (revised from between 16 and 25 storeys). "Tier Three" has been revised from up to 16 storeys to up to 15 storeys. The policy has been updated to ensure that the design of tall buildings that are over 20 storeys demonstrate that they make an exceptional contribution to the regeneration of the area and deliver our vision for a people centred and family friendly Old Kent Road.

Summary of key themes from consultation

- 3.12** Table 2 sets out the key issues which received the greatest number of responses and which have been identified as the most pressing concerns among respondents to the 2018 consultation. These have been summarised from over 2000 representations received. Table 2 also shows how the Council has taken into account the issues raised and how these have informed the 'December 2020 draft' of the AAP.
- 3.13** Please note Table 2 is a high level summary intended to provide a representative snapshot of the key issues raised in consultation. More detailed information on responses can be found in Appendix 1, 2 and 3.

Table 2 – Summary of representations

You Said	We Did
<p>Affordable housing is vital to meet local housing need and this should be genuinely affordable, including social rented homes</p>	<p>The plan will deliver 20,000 new homes including 7,000 affordable homes, of which 5,000 will be social rented homes. All developments on the Old Kent Road will have to deliver a minimum 35% affordable housing, including 25% social rent and 10% intermediate homes (such as shared ownership or London Living Rent). Over 4,000 homes are coming forward as planning applications which include at least 35% new homes, with some schemes exceeding 40% new affordable homes. The social rented housing is set at ‘target rent’ levels which are the same as council home rents.</p> <p>In order to deliver direct benefits to the existing Old Kent Road community, the Council has developed a Local Lettings Policy which prioritises the allocation of 50% new council homes to local residents.</p>
<p>It is important to plan for the need for additional school places with the growing population. The council should engage with schools and young people in the area, who represent the future population of Old Kent Road.</p>	<p>We have started a programme of workshops in primary and secondary schools in and around the Old Kent Road to gather new ideas which have positively contributed to the development of the plan.</p> <p>The plan includes a new secondary school and two new primary schools, as well as expanding nine primary schools in the area. Our plans will also improve air quality and the outside environment of schools. We have produced new guidance to ensure the schools are designed and built to the highest standards.</p> <p>As well as the new schools we are exploring opportunities for a further education college and University campus in the area.</p>
<p>The Old Kent Road has a long history and there are many buildings that have heritage and community value. These should be acknowledged and retained within any redevelopment plans.</p>	<p>We recognise that there a number of buildings in the Old Kent Road area which are of architectural or historic merit that should be protected. One example is the listed gasholder which is a key piece of history in the Old Kent Road – we want to continue to hear exciting new ideas for how the gasholder could be used in the future, including a new park space for the community. Some of the materials from the smaller gasholders that have been dismantled have been kept and will be used in the new park created in the “Ruby Triangle” development on Ruby Street.</p> <p>We have protected the Old Southern Railway stables and forge from demolition by making an Article 4 Direction and we plan to introduce further protections for other sites.</p> <p>We also plan to create five new conservation areas in and around the Old Kent Road area where there are collections of buildings that are of significant heritage merit. The proposed conservation areas are included in the Character and heritage policy.</p>

<p>When planning for 20,000 new homes it is vital to include new parks and green spaces to create a pleasant environment for existing and new residents.</p>	<p>Delivering new parks and open spaces are a fundamental part of our plan for Old Kent Road, to improve the environment and support the growing population. We have increased the amount of park space in the Opportunity area from 15 hectares to 25 hectare, rising to 30 hectares by 2045.</p> <p>We have taken forward an idea from the Old Kent Road community forum to create a new park which follows the alignment of the old Surrey Canal, travelling east across Old Kent Road from Burgess Park towards South Bermondsey. The new park will better connect green spaces across south London, and we will be holding a workshop with local people to develop detailed design and activities for the park.</p>
<p>The gas holders are a key piece of the history of Old Kent Road and these should be incorporated into a future park space and reused if possible. The park space should be larger.</p>	<p>Gas holder No 12, the largest on site has been listed and we would like to develop ideas for its reuse and incorporation into a larger park space with the local community. There are a number of ideas that have been suggested for the gas holder including use as an outdoor performance space, the greening of the structure with planting and its use as an outdoor lido for swimming. The unlisted gas holders have been demolished but we have salvaged parts for reuse in the new park spaces. We have enlarged the park and opened it onto Old Kent Road providing views of the gas holder.</p>
<p>The Surrey Canal linear park is too long and thin and doesn't offer enough open space.</p>	<p>We have provided additional park space off the linear park on our Frensham Street depot site, creating a south facing park space approximately 1.5hectares. We would like to develop ideas for the use of the park with the local community, which could include a multi-use games area and allotment space for growing food with the Council providing tools for gardening (one of the councils election manifesto commitments).</p>
<p>Residents of Page's Walk told us they were worried about the impact of commercial buildings close to their garden boundaries.</p>	<p>We have amended the masterplan to have three storey townhouses with back gardens, instead of commercial buildings, which would complement the existing residential terrace on Page's Walk.</p>
<p>You were concerned with the loss of industrial land as it is important for the borough's economy as well as supporting existing businesses. The businesses of the Old Jamaica Road business estate suggested that the site be designated as protected industrial land.</p>	<p>We recognise the value of the industrial businesses to the economy of the Old Kent Road. The plan involves ambitious changes; however it is a fundamental part of the plan to include all types of business space in the redevelopments. This will include a range of industrial units which will be built underneath and next to new homes. In some industrial only areas, we will build more industrial units and make best use of the space. We have proposed the Old Jamaica Road site as a new industrial site (SPIL) in the New Southwark Plan, along with the Bermondsey Trading Estate.</p> <p>Admiral Hyson Trading Estate would also become a protected industrial site. The amount of land solely in industrial use will decrease overall, however this will unlock the potential for significant growth in housing, leisure, parks, workspace, health, sport and education facilities in Old Kent Road, as well as the</p>

	<p>Bakerloo Line extension.</p> <p>There will be two designations for industrial land in Southwark. Strategic Protected Industrial Land is land that can only be used for industrial purposes and cannot be mixed with residential. Locally Significant Industrial Land (LSIS) can be mixed with residential as long as there is no loss of industrial floorspace.</p> <p>We propose to retain a total of 28 hectares of land for industrial use only(SPIL), where we want to grow and intensify industrial uses and make better use of railway arches for businesses. In addition we are proposing a further 20 hectares of land for a mix of industrial development and new homes (LSIS). In addition, in areas of Old Kent Road which will no longer be solely industrial uses, we require a range of workspaces to suit a variety of businesses.</p>
<p>The Old Kent Road is home to a diverse range of cultural and creative communities including many entrepreneurs and artists. How will the council keep this significant cluster of businesses and support them?</p>	<p>We have established ‘Creative Old Kent Road’ in partnership with local artists and businesses to ensure the Old Kent Road continues to be a vibrant and affordable place for artists and businesses. We want to develop this further with input and advice from existing businesses. In partnership with Southwark Council, William Austin of Southwark Studios has produced a guidance document for businesses to navigate the Section 106 process in planning.</p> <p>The Livesey Exchange, will provide a hub for the local community and the delivery of affordable workspace will be a key part of the delivery of the AAP. Over the last two years the Livesey Exchange has worked with the local community along the Old Kent Road and empowered many local groups to deliver projects themselves. It has received funding from a range of organisations including the GLA good growth fund and the local community through a crowd funding campaign. The success of this project will provide a model for the affordable workspace and community spaces being developed for the Old Kent Road.</p>
<p>The existing businesses of the Old Kent Road, particularly in the industrial and servicing sectors, are vital to the economy of the area. How will the plans include existing businesses and support the rich industrial economy of the area?</p>	<p>We are committed to supporting existing businesses on the Old Kent Road. We have ambitious plans to create mixed-use business and residential development, which has not been done on this scale elsewhere in London.</p> <p>A range of workspaces will be incorporated with new residential development and our priority will be for existing Old Kent Road businesses. We also want to grow sectors in industrial areas. We established the Old Kent Road Business Network to continue engagement with businesses who may be affected by change.</p> <p>We will be providing a match making service between developers and businesses to ensure existing businesses are included in redevelopment plans across the area.</p>
<p>The idea of making more of the shops and services available on Old Kent Road</p>	<p>We want to encourage a range of new shops to give residents more choice and to grow Old Kent Road as a high street. We are working with developers to ensure that the supermarkets</p>

<p>is generally supported. However you wanted to ensure some of the larger shops such as Pets at Home, B&Q and the supermarkets are still included in the plans as they are popular with local people.</p>	<p>including Tesco, Asda, Lidl and Aldi and shops like Pets at Home are able to continue to provide a much valued service and employment opportunity to the Old Kent Road residents. These stores will be changed to a high street format to make better use of space and allow homes to be built on the same site.</p>
<p>Some residents were concerned about estate regeneration and wanted specific council estates removed from the opportunity area boundary.</p>	<p>We have removed Naylor House from the plans as this estate is on the outer edge of the opportunity area. Our plans for Old Kent Road will directly benefit existing residents, which is why we have included existing residential areas and council estates in the opportunity area. Any development affecting council estates will be a separate process involving residents at an early stage.</p>
<p>There were mixed views on tall buildings in the consultation feedback, with 43% of respondents supporting the strategy, 20% partially supporting it, 20% against and 10% unsure. Concerns about tall buildings are wide ranging and include the visual impact of tall buildings and clustering, impacts on nearby parks and views, fire safety and affordability of new homes.</p>	<p>We need tall buildings in the Old Kent Road to deliver the ambitious target of 20,000 new homes (including 7,000 affordable homes) and to secure delivery of the Bakerloo Line extension. As well as new homes we are delivering new parks, new schools, replacement workspace and shops as well as community, health and leisure spaces. Some tall buildings are necessary to achieve all these benefits for the community.</p> <p>Tall buildings will be focused around new tube stations and new parks, preserving important views in Southwark and London. Safety is paramount in the construction of tall buildings and all new homes will be fitted with sprinklers.</p> <p>We have reviewed the heights of buildings on the boundaries of existing residential communities and assessed impacts on wind and sunlight to make sure that public areas around buildings feel pleasant and comfortable.</p> <p>The Tall buildings strategy tier system has been amended to reduce the number of storeys in each tier. Tier one (tallest) is buildings over 20 storeys (previously buildings over 30 storeys). Buildings between 16 and 20 storeys are now categorised as Tier 2 (previously 16-25 storeys). Tier 3 has been amended from up to 16 storeys to up to 15 storeys. All buildings in Tier 1 must demonstrate how they make a exceptional contribution to the opportunity area.</p> <p>After specific feedback from residents about tall buildings on Ossory Road, we will ensure these buildings are not over 8-10 storeys.</p>
<p>The Old Kent Road plans need to help reduce pollution and improve air quality, making a safe environment for pedestrians and cyclists.</p>	<p>We are committed to achieving high environmental standards on all new development. We have commissioned air quality and microclimate studies (ongoing) to look at the impacts of development and we will be designing proactively to improve the environment.</p>

<p>The infrastructure to support 20,000 new homes (such as the sewer system) needs to be robust. There should be more leisure and health facilities to support a growing population.</p>	<p>We have included a dedicated policy at the forefront of the plan to address the ongoing climate emergency and pro-actively carry out the Council's ambition to be net zero by 2030.</p> <p>We are proposing to close roads next to schools, to help improve safety and ease pollution. The Masterplan shows the closure of Marlborough Grove next to Phoenix Primary School to include more play space and landscaping.</p> <p>We are working on an Integrated Water Management Strategy for the entire area, one of the first of its kind in London, which will manage the flows of surface water through new raingardens and green roofs which will free up room in the sewers and contribute positively to a greener environment.</p> <p>We are also committed to improving the energy networks that serve new developments by making better use of harnessing wasted heat instead of individual gas boilers.</p> <p>We are delivering a new sports hall and community health hub to include GP and other health services.</p>
<p>Over 90% of respondents supported the Bakerloo Line Extension in our consultations and thousands of people have actively supported our campaign to Back the Bakerloo. However some people were concerned that without the Bakerloo Line extension, some early developments would put pressure on the already busy bus and cycle networks in the area. Most people who responded to the consultation supported the reduction to car traffic and air quality impacts on Old Kent Road; however some residents were concerned about lack of car parking.</p>	<p>We are working with Lewisham, TFL and the GLA to build a strong case for the Bakerloo Line extension, to bring real transport improvements for local residents and businesses and to support much-needed development. We are proposing two stations along the Old Kent Road at Burgess Park (Tesco) and Asylum (Toys R Us).</p> <p>We have agreed with the Greater London Authority and Transport for London that 9,500 homes will be delivered in the first phase of development, with a further 10,500 unlocked by the Bakerloo Line Extension. The second phase of development will only proceed once the Bakerloo Line Extension is confirmed.</p> <p>We require all development of new homes to contribute to improved bus services within the Opportunity Area. We also require all residential development to be car free to help ease traffic impacts and make use of public transport, walking and cycling.</p> <p>We are working with TfL to improve the road layout of Old Kent Road, including designated bus and cycle lanes where possible.</p>
<p>You wanted to have a permanent community space in the Old Kent Road so the regeneration plans are well publicised and there are opportunities for the community to stay involved and up to date.</p>	<p>We have acquired a shop unit at number 231 Old Kent Road which opened in June 2019. This is a flexible space that will be shared for exhibitions about the plans for Old Kent Road including a permanent 3D model. The space will also be shared with the community to hold exhibitions or events about the Old Kent Road and its businesses. The upper floors will also be a temporary home for Southwark Studios, who will be relocating back to Crimscott Street when the London Square, Bermondsey development is completed.</p>

<p>You wanted to continue the community conversation and receive regular updates on developments in the Old Kent Road.</p>	<p>We have set up a monthly OKR Forum which takes place on the Old Kent Road. Each forum includes presentations, workshops and discussions about key issues for local people like tall buildings, businesses and green spaces, and is attended by local representatives such as Cllr Johnson Situ, Cabinet Member for Growth, Development and Planning, and ward councillors Evelyn Akoto, Michael Situ and Richard Livingstone.</p>
<p>You wanted us to be clearer about the regeneration plans and planning applications in the Old Kent Road area.</p>	<p>We are continuing to update the website for the Old Kent Road with all the information about the regeneration plans, and the area to make plans easily accessible.</p> <p>The website includes an interactive planning map which makes it easier to see which new planning applications are in the system, and for you to comment.</p> <p>The December 2020 Draft will be available to view and comment on when consultation opens.</p>

4 NEXT STEPS

- 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.
- 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.
- 4.3** Table 3 shows the stages of preparation and consultation on the AAP.

Table 3 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	2021
Submit to the Secretary of State	2021
Examination in Public	2022
Adoption	2022



Appendix 1:

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

Old Kent Road Area Action Plan: Consultation Report

December 2020

Introduction:

This document is a summary of the consultation we conducted in 2018 with residents, businesses and others regarding our further preferred options for development on the Old Kent Road. In it is included a summary of this formal consultation from the Area Action Plan published in December 2017. This document is a more detailed companion to the consultation summary report published in January 2019.

A wide range of stakeholders have commented on the current and previous iterations of the plan, and this has been key to creating a more well-rounded Old Kent Road. This area action plan presents the opportunity for exciting new changes, which will deliver new homes, jobs and tube stations, as well as improving the environment and creating new open spaces.

Therefore this document represents the latest in a continuous series of engagement opportunities that we will continue to conduct with residents and businesses.

Question 1 - Do you support the proposals set out in the revised plan to deliver 7,000 new affordable homes, including social housing in the area, and a further 13,000 private homes which will help to pay for the affordable homes?

Yes	No	In Part	Don't Know	Not Answered
343	52	195	13	4

Comments

- New affordable homes are supported by most. They are needed in the area and would be good for the community and ethnic mix. Some representations suggest the percentage of affordable homes should be higher or homes will only be acceptable if they are affordable.
- Transport improvements, particularly the Bakerloo Line, are necessary for new homes and will improve the area. Some representations suggest public transport should be improved before new homes are delivered. Protected cycle paths and lanes are also suggested.
- Representations suggest homes would be preferable to the existing built environment or commercial uses in the area and they would be well located for commuting to central London.
- All or as many as possible of the affordable homes should be social rented. Priority should be given to particular groups when new affordable homes are allocated: local people, key workers working and living in London, the younger priced out generation or diverse ethnic groups. Some respondents felt that there should be more social housing in the plan and should be mixed throughout development.
- Others felt that there is too much social housing in the plan and should not be mixed with other residential developments. The plan is not clear how much social housing will be provided and how private housing will pay for it; there should be a firmer commitment. It was also suggested that conditions in existing council estates should be improved first. There should be more attention given to the future private homes, to leasehold arrangements for instance and private housing should not become buy-to-let homes and concerns are raised about build to rent
- Private homes are supported. Representations suggest they are necessary to fund affordable homes or would be beneficial for the area.
- Homes are supported as long as there are no or not too many tall buildings. The plan must include family homes with more bedrooms. Homes should be of high quality in terms of architecture, space standards and environmental sustainability. It is suggested the quality of affordable homes needs to improve. One respondent felt that not enough thought was given to the impact on neighbours.

- The demolition of existing homes and estates or the displacement of local people should be avoided.
- Private car parking should be provided with new homes.
- Some respondents felt that the number of new homes could be higher while others disagreed and raised concerns over the ability of infrastructure to cope with an increased population as well as noise, litter and health and safety concerns.
- Concerns over the increase in homes included the possibility of homes encroaching on open space, one respondent felt that the area is already too crowded, increase in traffic, increasing rents as a result of regeneration, tall buildings are not supported in residential areas, the devaluing of properties as a result of the new homes and it was suggested that new homes should help fight climate change.
- It was also stated that it is not clear what will happen to existing businesses and jobs. It is unrealistic to balance this much housing and jobs growth and disrupted businesses or homeowners should be compensated.
- There has been insufficient consideration of gypsy and traveller communities
- The plan should have a strategy to maintain a cohesive community
- It was suggested that Mandela Way industrial area should not be converted to housing
- The tube station locations could be changed and there should be new destinations for people arriving at tube stations
- It was stated that the plan is not clear, particularly about what is prescriptive and that there has been insufficient consultation. The plan is not based on sufficient evidence. Local people need to be involved in the process and the support of the local neighbourhood is important. There should be more information on the density and heights of buildings.

Question 2 – Do you support the extension of the Bakerloo line as a central part of the Old Kent Road regeneration?

Yes	No	In Part	Don't Know	Not Answered
533	18	39	15	5

Comments:

- The majority of people were in support of the BLE.
- Station preferences in order: Bricklayers Arms, Tesco, Toys R Us, Burgess Park, close to new areas of development, all four stations are necessary and Ilderton Road. Alternative locations were suggested at Camberwell and Peckham. It is also noted that three people felt the station at Bricklayers Arms is unnecessary.
- It was considered that the BLE is essential for the development of the area and would ease congestion and increase connectivity. It would also help reduce pollution and make cycling more viable.
- Concerns over the proposed BLE included the potential for an increase in business rents and house prices that would push communities out. Concerns were also raised over the cost and funding as well as the potential for CPOs to facilitate the project. It was also highlighted that access for those with disabilities should be considered as well as potential delays in road traffic. Other concerns included increased noise, pollution and congestion. Issue was also raised over the impact of tall buildings around stations and the possible impact on conservation, particularly in relation to Caroline Gardens.
- A tram was suggested that as an alternative to the BLE as well as improved cycle routes and bus provisions while focusing on reducing vehicle traffic.
- Further information was requested in regards to the location of the stations, the impact on parking and the possibility of construction apprenticeships for local people throughout the project.

Question 3 – Do you agree with the strategy to provide new space for existing and new businesses on OKR, by using innovative new ways to mix business space with new homes?

Yes	No	In Part	Don't Know	Not Answered
427	36	108	35	6

Comments:

- A number of respondents welcome new homes and businesses, as well as developing these together. Mixed use buildings are encouraged. New businesses and shops should complement the existing, not replace existing. This helps to maintain character of the area. Respondents support the ambition to mix uses but suggest that this needs to happen organically rather than being implemented.
- A number of respondents have recommended that consideration is given to the servicing and amenity of businesses and homes being developed together e.g. commercial waste, deliveries, noise. Careful design consideration is required for these uses to be developed alongside. Also, 35% affordable housing is considered too low by some.
- Other respondents feel homes and shops / commercial shouldn't be mixed. One respondent believed in preserving specific areas for dedicated light industrial/small business and creative use, including direct subsidising of creative work that forms the very fabric of what makes areas of London culturally enticing in the first place. Mixing this with a public space would not be viable for health and safety reasons. Industry and employment uses need heavy goods vehicles which require large yards which are incompatible with residential use. Respondents state that evidence needs to be provided on the success of this approach in the past. One respondent has concerns regarding overcrowding with the new housing to be provided.
- A respondent is concerned that a clearer plan needs to be provided. There were also queries as to the meaning of the term 'innovative new ways'.
- Respondents raised concern about small individual owners being displaced by redevelopment. Existing businesses / shops should be protected by redevelopment e.g. no rent increase. Respondents suggested support and incentives for businesses to base themselves in the area. The light industrial space around Hatcham Road is unique and should be protected.
- A number of residents have concerns whether these uses can be provided at an affordable rent and whether or not existing businesses can afford this rent. A respondent suggests providing temporary licenses or lease for temporary occupation of vacant buildings. Careful consideration required on a case-by-case basis should be taken towards the demolition and replacement of buildings that currently host small businesses due to the affordability of new spaces.
- A number of respondents encourage diverse and independent shops and want green spaces to be a priority and existing green areas retained. A respondent still wants to have pedestrianised shopping areas. There was also a request for a youth centre.
- A couple of respondents request a focus on a large car parking area. Respondents still want to be able to use cars. While several people were concerned about the traffic impacts in the area.
- A number of respondents state that the existing business / industrial space needs to be retained.
- Concern that a number of retail units are converted to flats at a later stage, should be managed to avoid this happening. A respondent requests no high rise towers.
- A respondent states that it would be good to push larger industry away from Willow Walk, as part of the unprotected quiet way. Another respondent states that there is not enough protection of existing industry.

- Some respondents would prefer more offices and affordable co-working hubs but not increasing industry as there are concerns regarding pollution caused by lorries supporting industrial uses. Some people don't think the industrial uses are being diluted enough in the plan when planning to build housing in the area.
- Respondents have stated that there is too much traffic and congestion in the area and not enough parking. A respondent does not support plans which force social housing users into estates built specifically to separate them from private housing. Concern regarding loss of social housing elsewhere. One respondent suggests that empty shops should be used for affordable housing. Other respondents state there is no need for 13,000 new unaffordable homes. Respondents also state there are not enough public services in the area to support the provision of more housing.
- Respondents have stated there is insufficient information to make a decision and there has not been sufficient consultation carried out with existing businesses. There is insufficient information on analysis of what jobs already exist, in terms of increasing the range of jobs and targets for housing and jobs. The policy fails to set out how it will achieve the intensification of activity that is required for any release of industrial land.
- Respondent states proposed height of buildings (including behind Pages Walk) will impact on streetscape and character and would have significant impact on the right to light, natural light and privacy for existing housing. Concerns were raised regarding structural integrity of homes at Pages Walk with large scale piling in the area. Concern regarding traffic management at Pages Walk and whether the southern entrance will be opened to traffic which would have a negative impact of residents due to noise. Respondent has concerns regarding the construction of a new road running parallel to Pages Walk as it will increase the traffic, noise and heavy goods vehicles, detrimental to our conservation street.
- A respondent also raised concerns over the site allocation at SPACE Studios.
- Respondent has concerns regarding the proposals for Mandela Way. The proposal for Mandela Way is for permanent less flexible buildings which would be much more expensive to build, especially if the roofs provide open space for the surrounding housing or the school. Housing as wrap around for warehouses, factories etc creates a lot of single aspect homes. Many will also be facing north so will never see the sun. Within the Mandela Way redevelopment there is nowhere suggested for people to interact. Respondent has concerns with the change in use of Mandela Way Road. It currently directs traffic away from the Old Kent Road to service businesses in Mandela Way and beyond. If you remove this through road it will lead to congestion in surrounding areas as deliveries are vital to most businesses.

Question 4 - Do you agree with the Greener Belt strategy to link parks, schools, health and leisure facilities?

Yes	No	In Part	Don't Know	Not Answered
519	15	63	7	6

Comments:

- Greener routes are generally supported because pollution, traffic and noise are concerns, they will affordably link people with local amenities and they will encourage walking, scooting and cycling, helping people to get fit and improve their wellbeing. The strategy is necessary as the area is already busy with a large and growing population. Greenery will encourage wildlife and spaces and links should be designed to deliver high levels of biodiversity
- Cycling should be supported, including segregated lanes on Old Kent Road, cycle hire facilities, cycle parking, safe routes for children, routes that do not stop and start in dangerous areas and stopping cars cutting through quiet streets.

- The more greenery and open space provided the better, it is essential to people living in flats. Greening will improve quality of life and health. Pollution from the number of cars, particularly on Old Kent Road, is a big problem and should be reduced.
- It was suggested that walking should be better supported and cyclists separated from pedestrians. Buildings such as new office blocks or housing should have living walls, roof gardens, street trees and green pedestrian spaces. Security should be improved, there has been crime in Burgess Park and vehicles should be kept out of spaces.
- Old Kent Road, Bricklayers Arms and New Kent Road need more greenery, such as street trees and planting. They should be made more pleasant to walk along.
- Respondents felt that more affordable health facilities, a swimming pool and gyms are needed, with space for squash, tennis and badminton.
- There should be more details of how greening will be achieved. Design standards for greening streets would be welcome and there is not enough detail on existing parks.
- In relation to green spaces it was considered that there are not enough green spaces and playgrounds in the area at the moment and green spaces should be public and not restricted to private estates. It was also suggested that the local community could have a role in maintaining these spaces and that landscape in parks should be improved.
- The Greener Belt could bring identity and visitors to the area similar to the High Line in New York or the Green Chain. There should be links east and west as well as north and south. One respondent requested that it is not called the 'Greener Belt' strategy.
- It was also suggested that allotments and drinking fountains are provided as well as better pedestrian crossings and areas accessible to people with disabilities
- Safety is a concern; road traffic could be reduced through the tube extension to make routes safe. Pedestrians and cyclists should not be pushed off their desire lines to make way for cars
- New greenery will help manage flood risk.
- Connecting the greener belt from Old Kent Road to Canada Water and the new Rotherhithe Bridge would encourage green commuting. It would be good if one of the tube stations were close to Burgess Park to access the Greener Belt. The plan is supported east of Burgess Park, where the alignment of existing roads is a barrier for travelling due east on foot or by cycle. The path between Hendre Road and Curtis Street through Mandela Park is supported. Caroline Gardens should not be used for public amenity. The Surrey Canal should be re-opened to transport cargo. Routes should link with parts of Bermondsey.
- One respondent felt that money would be better spent on improving the Old Kent Road itself. Others suggested roads should not be narrowed or public transport routes affected for cycle lanes and that fast cyclists are concern in shared spaces – emphasis is placed on pedestrian safety.

Question 5 – Do you support our plans to improve the area to benefit the local people, with better access to jobs, parks, education, healthcare, and a varied and vibrant high street?

Yes	No	In Part	Don't Know	Not Answered
459	21	84	13	30

Comments:

- This policy is generally supported by respondents but a number of respondents state that redevelopment should not sacrifice local amenities, businesses and residents.
- A number of respondents support the consideration of provision of parks (one respondent suggests a dog free park), green infrastructure, healthcare, education,

leisure, affordable housing and request a better variety of retail. One respondent has stated that they support the policy provided that noise and anti-social behaviour is managed.

- Respondents have stated that the transport infrastructure needs to be more accessible to pedestrians and less car dominated. A resident has concerns that there is a lot of pollution and cars need to be reduced. Another respondent states there is a big push for electric/hybrid vehicles, more charging points should be available. A couple of respondents' state that the council needs to consider crossing of Old Kent Road as it is difficult due to traffic. Respondents set out that encouraging cycling and walking is important, reducing space for cars and giving it to pedestrians and cyclists, to improve access to services which will benefit the economy and health.
- A respondent states that the area could do with a Further Education which would also provide jobs. There should be consideration of learners with disabilities. One respondent states that the method to facilitate the community's access to employment has not been adequately defined with particular consideration of the youth. Another respondent believes social mobility in the area has not been adequately researched in light of these proposals.
- Respondent states that there could be another health centre on the north side of Old Kent Road.
- Respondents support the small shops instead of a shopping centre style. Respondents have stated that the character and richness has to be preserved. A respondent states that locals should be incentivised and encouraged to participate in the new high street through reduced rent and rates in the initial years to help foster a vibrant leisure, hospitality and retail experience. Respondents have stated that more consideration needs to be given to the distinctiveness of the high street. A respondent has queried the notion of a 'varied and vibrant' high street, stating that regeneration brings in commercial chains rather than diversifying the high street. The cultural heritage of the Latin-American community and the diverse food and retail offering should also be preserved. However, one respondent states the Plan needs to bring modern high street with branded names, not protect the local cultures. It is also suggested that Peckham Rye Lane Market is cleaned up.
- A respondent states this should not result in an increase in council tax and another respondent strongly oppose the blanket removal of existing small businesses which provide up to 10000 jobs already and contribute to a heritage industrial identity.
- Respondent advises that it is important to preserve local amenities during the regeneration progress. For example, DIY Space For London provides great local support to minority groups and supports artists.
- A respondent requests that the Stables be retained and another one wants to ensure that there is no detrimental impact on the owners of Pages Walk.
- A number of respondents do not support the increase in housing and the potential of congestion. One respondent states that there is enough healthcare in the area and another states that there is enough parks while others feel there is not enough in the plan.
- Some respondents have concern that residents aren't the key consideration for the redevelopment and trust has not been built. A number of respondents have concerns that some people of the community and businesses will be forced out. There were concerns raised over the ambition of the plan and the funding required for the plan to be successful.
- The respondent states that extensive consultation needs to be carried out with people of the area through workshops, events and promotion. Some respondents have concerns regarding the way the above question was asked positively. More detail requested in terms of jobs to be provided.

Question 6 – Do you support the plans to reduce car use and congestion in the area, by creating new safe walking and cycling routes in the area and extending the Bakerloo line?

Yes	No	In Part	Don't Know	Not Answered
441	34	91	3	39

Comments:

- This proposal is supported as these measures will help to tackle air pollution and it is a healthy active travel alternative. It will help improve road layout for cyclists as the current layout is too dangerous and pedestrian routes should also be improved. Cyclists and pedestrians should be separated. It is also suggested that the speed limit should be reduced to 20mph. A tram is also suggested as an alternative mode of transport.
- It is suggested that there should be access to TfL docking stations and bikes and that parking along OKR needs to be removed as it is unsafe for cyclists. It is also considered that east-west connections should be improved.
- Three respondents felt that the Old Kent Road should remain a major route and that rerouting traffic should not increase traffic elsewhere. One person stated that car use should not be reduced.
- A number of respondents requested further information.

Question 7 – Do you support the strategy to enhance the positive local character and heritage of the Old Kent Road and bring back to life lost features such as the Surrey Canal through a new linear park?

Yes	No	In Part	Don't Know	Not Answered
473	18	53	27	37

Comments:

- There is support for this strategy as the area's rich history is often forgotten.
- It has been suggested that the old pubs (Lord Nelson and Thomas A Beckett) are brought back, that the light industrial area around Hatcham Road should be preserved and that African-Caribbean and Latin American heritage is preserved. A respondent is also willing to make a financial donation to support the restoration of Surrey Canal.
- Concerns were raised regarding whether or not funding has been secured for the preservation of heritage. Other concerns include the displacement of current communities and that the canal would be a waste of money. It was also suggested that the linear park be publically owned and that the Thomas A Beckett pub be used for boxing.
- It has been requested that the Peckham Civic Centre be protected and the rationale for a water feature has been questioned.
- A number of people were unaware of the area's history and further information was requested on increased park space.

Question 8 - Do you agree with the strategy to locate the tallest buildings around new tube stations and key road crossings?

Yes	No	In Part	Don't Know	Not Answered
261	122	120	61	44

Comments:

- Several respondents have commented in favour of the strategy and of higher densities near transport hubs but would like clarification on the definition of 'tall' and request that the council is strict to enforce the 35% affordable homes.
- The safeguarding of appropriate daylight/sunlight levels was an issue raised by many respondents as there is much concern regarding of the impact on daylight provisions of existing residents. One recommendation considers that if tall buildings will be restricting sunlight provisions it is important that these are well designed.
- Density was an issue raised by many respondents, one representation considers that density does not have to necessarily mean tall towers and that high densities will become an eye sore.
- Several comments have suggested that whilst in favour of the policy, the dispersion of tall buildings would be a more appropriate solution. One respondent considers that tall buildings are appropriate around tube stations but not around key road crossings. Another that the main central area of Old Kent Road at the tube stations should be a heritage centre/ cultural park rather than blocks of high rise building. Respondent considers that Tier 1 buildings should not be located beyond the immediate Elephant and Castle Area.
- Several respondents suggest tall buildings should be located around Bricklayers Arms. Other respondents agree with the strategy but consider that tall buildings should be more evenly distributed and that too many are proposed around the St James' Road Junction.
- Many respondents are concerned that number of houses will not result in good levels of residential amenity being created (including gardens). One representation argues that tall buildings designed for families should come with good sized balconies. Whilst one respondent is supportive of the policy as long as these do not create adverse conditions for pedestrians, there is some concern from respondents that tall buildings and strategy will create a 'canyon' effect. The policy should include a requirement for tall buildings to provide facilities that are accessible to all residents e.g. supermarkets, gyms, leisure facilities.
- A number of respondents consider that cycling provision was an important issue relating to tall buildings and that that the cycle routes need to be considered as important as the new tube stations. One respondent comments that high rise dwellings need to be fitted out with innovative cycle provision such as cargo bikes, adapted bikes, shared cycling facilities, loan bikes, bike maintenance equipment, community space.
- Concerns were raised regarding the impact of tall buildings on safety including impacts from microclimate.
- Questions were raised on why tall buildings are being proposed on Mandela Way when no stations or crossings are proposed. Other respondents suggested that Tall buildings should not be limited to the areas directly around tube stations; sharing these developments more widely may encourage further business development around Southwark.
- One respondent is against some of the tallest buildings Representor is concerned about the tallest tier and that the tallest buildings proposed are out of character. There is concern that the tall buildings will block views of Canary Wharf from Peckham and other local landscape views.

- A few respondents have questioned whether alternative built forms/options have been considered. One respondent questioned whether the provision of high rises was the only option as family homes require quality outdoor provision and suggests that the AAP should give focus on low rise high density.
- Many building heights must not exceed current building heights and development must be dependent on the height of current buildings. Representation is not clear of the location of tall buildings and is against the taller tier proposed in the AAP. One respondent is concerned that the building heights are too tall for a local centre. Respondent is supportive of the strategy but is concerned that layout could lead to a 'canyon-like' effect.
- One respondent is opposed to the naming of one of the stations 'Asylum' as this used to be an institute for disabled children and naming a station would be offensive to others with special need. Instead, proposes to name the station 'Astoria' which was a longstanding cinema and community hub just next door, on the Old Kent Road.
- Respondent is concerned that the redevelopment of the Toys R us site will be detrimental to the privacy and sunlight provision of existing residents.
- Many respondents commented as to the inclusion of well-designed tall buildings, with one suggested we should remove the reference to landmark buildings. More detailed information on architecture was requested to be able to make a decision on whether these would be considered appropriate. On the other hand, 'statement buildings' were encouraged to make the area more interesting.
- Recommendation to include a summary of the rationale behind each question. Some respondents have commented that the questionnaire lacks detail.

Question 9 – If you are an existing business in the Old Kent Road area, how do you feel the Area Action Plan addresses your needs or could provide further support?

Comments:

- Respondents are concerned that there has not been adequate consultation with existing businesses in the area. Respondent criticised the wording of the plan and advised it needs more detail.
- Respondents state that better traffic links and fewer cars are needed on OKR which will encourage businesses.
- Respondents are concerned that existing businesses will be forced out. Respondents are concerned they will lose their space and don't know if they'll be able to afford another space.
- A number of respondents believe the tube station at Bricklayers Arms would significantly improve the area's communications.
- Respondents' state there should be retained and improved infrastructure for both light industrial and desk or studio based businesses and new space for start-ups. This could accommodate both sensitive pedestrian areas as well as usable access for mid to heavy vehicles to relevant spaces. This should also include a vibrant and independent area for cafes, restaurants and recreation areas to make the zones of work enjoyable to access and work within.
- Respondent has concern regarding the workspace demand study as the conclusions have not been published and that the consultants have not visited them or the area to ask questions. They request an explanation of how the process going forward will be boldly opening up, how regular meetings with businesses in general will commence, how information sharing and general communication will improve, how proper sub-area focused dialogue will begin and the consultants you have employed will become part of an ongoing conversation.

- Respondent feels that the plan doesn't address business needs. They feel the area is not for business unless its retail as businesses should be in a gated industrial park you can drive into.
- Respondent states that the area's feel comes from existing businesses and communities. They state that we need businesses which support and are relevant to the existing community.
- Respondent has stated that the council and TfL need to decide the location of the Old Kent Road stations otherwise it's impossible to comment on the plans.
- Respondent advised that standards for signage and shopfronts are needed.
- Respondent states that artist studio space and room for small creative industries is essential to maintain a diverse and culturally vibrant Southwark but yet no targeted discussion is ever planned. Once the OKR area is redeveloped and studio space around Ilderton, Latona, Penarth and more disappears, the space in south London for artists will be almost non-existent. Many artists or studios feel vulnerable or powerless to claim any rights to areas that they in part are responsible for transforming into appealing prospects for future development.
- Respondent states with more people moving into the area and more demand for our service as such in need of subsidise permanent workspace because our current premises is going to be knocked down due to the massive on-going regeneration of Aylesbury Estate.
- Respondents states the area around major roads is badly congested with pollution. Asthma assessment should be made and openly presented especially regarding children of the area - they appear to be higher level i:5 in some schools than most areas in the UK, Europe - it could be in connection to the passing traffic, but it needs new assessment regarding up greening (to be more intensified around housing areas - replanting of rows of London plane trees (and clearance, the formal removal of the pollution by collecting the falling plane tree bark in an Ecological simple action manner) - this would get press and make people proud of the area again.
- Respondent works from home and has concern about how an increase in population will negatively affect broadband.
- Respondent has stated that while the plans are for car-free new homes, most businesses depend on deliveries as will most of the new homes that will be relying on online shopping. Therefore existing roads should be preserved as easy vehicle access to the south east has made it popular with industry and business.

Question 10 – Do you have any other comments on the plans that you would like to share?

Comments:

- Business:
 - Respondent hopes that the new development will attract creative businesses and that the plan provides more creative spaces and artist studios whilst another considers that the number of new jobs proposed seems unrealistic. Another respondent considers that the policy fails to set out how it will achieve intensification required for by release of industrial land and that employment (and residential) targets are unrealistic and undeliverable.
 - Council should maintain the commitment to affordable homes and affordable rents for smalls businesses.
 - One respondent has suggested that any redevelopment should be designed to cater for all types of businesses to ensure the vitality of the area. The retention of existing businesses was a key issue raised by several respondents, with many considering it to be the most important aspect to be addressed by the AAP. One issue that was raised was the failure of the plan

- to provide an analysis of the existing jobs and account for the workspace diversity in the floor-space targets.
- One respondent wishes to see the retention of Also, Lidl and B&Q amongst some of the other useful facilities present on the Old Kent Road. One other respondent is concerned about the loss of these uses which would be of great disadvantage to the local population. One other respondent is unclear about what will happen to the other retailers along the Old Kent Road but recommends that these are located away from the main roads.
 - Heritage/Design:
 - Many respondents have mentioned the safeguarding heritage as key aspect of the delivery of the plan. One respondent has argued that too much emphasis is being put on the protection of culture in the borough.
 - One respondent suggests that redevelopment should be concentrated on providing good architectural design.
 - One representation has commented that providing accommodation with gardens would reduce childhood obesity issues and lessen the burden on the NHS.
 - Transport and Accessibility:
 - Transportation was a key concern amongst respondents; many are expressed concern about the construction generated noise and air pollution. One respondent suggests that TFL must respect the needs of the local; another has suggested the earlier start of bus routes as a meanwhile and long term solution.
 - Two representations have raised the issues of car parking and that existing residents parking should not be affected, one of which has suggested the removal of car club schemes to have more parking spaces for residents.
 - Many respondents expressed their support for the Bakerloo line extension and for new tube stations along the Old Kent Road. Some respondents have suggested that the Bakerloo line extension should be delivered sooner, some suggesting it should be delivered before new homes are.
 - Further to that, a few respondents have commented that other public transport facilities such as bus services should be improved to address existing transport capacity issues on the Old Kent Road. This should include providing more crossways for elderly and disabled residents as the current crossing across the dual carriageway was recognised as being dangerous. One comment included the inclusion of a sky bridge or elevated walkway joining the Toys R Us station to Queens Road Overground station in Peckham to address safety issues.
 - There were numerous comments in favour of changes at the Bricklayers Arms roundabout, including the removal of the flyover and the location of the new station as this will benefit areas such as Bermondsey and Tower Bridge Road. One respondent was against the station in this particular location as it was argued that it will be disruptive to existing residents.
 - One respondent has requested a tube station at Bricklayers and another that the St James Stables is to be the best option for the BLE station.
 - Recommendation to provide for taxi ranks with rapid charge points at the new Bakerloo Line stations to support the Mayor's Safer Travel at Night Initiative.
 - Motor traffic and congestion has been a recognised issue amongst respondents, one recommendation received was to apply congestion charge on the Old Kent Road or make part of it a one way system. Pollution management is also an issue that has been raised; some of the measures suggested would be the implementation of a 20mph speed limit, a low emission bus only area, information sessions on use of public transport and traffic cameras. Other transport investments proposed also include traffic calming systems, bike repair stations, car charging points and

cycle/pedestrian shared lanes, bike locks/ bike parking racks. One respondent recommending the introduction of pay-as-you go bikes to this area of London and in Southwark generally. Another has criticised the “car free” proposal in vision for not including mitigation plans before the BLE is delivered.

- Many respondents have suggested the need to improve cycle and pedestrian paths in light of all the benefits those alternative modes of travel have, with one respondent suggesting that improvements should also be made along the smaller routes, not just on main Old Kent Road. Others have suggested extending cycle routes/plans to connect the Old Kent Road to other areas in Southwark such as Elephant & Castle Camberwell and even Canary Wharf.
- There is some concern about the reliance of the plan on the Bakerloo Line Extension/TFL and some questions as to what will happen if the plan for the BLE is not taken forward.
- Air quality was also a key area of concern amongst respondents who wish to see alternative forms of travel be a priority in the AAP.
- Respondent is concerned that the Cantium Retail Park as it is today is not accessible; another respondent is supportive of the proposals for the Cantium Retail Park site.
- Housing:
 - There was some concern regarding the 35% affordable housing target, which one person believes to be inadequate. One respondent was concerned that 35% affordable housing level is not met by developers. Another wishes to see that the 35% is maintained now and in the future.
 - Many respondents are concerned about overdevelopment especially in regard to the 20,000 new homes proposed; one suggesting focus should be made on improving the area for existing residents and another that the housing target should be reduced to 10,000. Another is concerned with the plans and considers that if the number of private homes proposed remains the same, there will be a 'push back' from the community concerned with keeping Peckham accessible to local people.
 - Some respondents are concerned about the retention of existing population in the Old Kent Road and ensuring that a good housing mix is obtained.
 - Housing was a key issue raised in this section of the questionnaire, many respondents asking for more social housing and more affordable housing to be delivered as well as a better mix of dwellings with more 4 bedroom properties. One respondent suggests that housing is designed to meet the needs of people with disabilities. There was also one suggestion that the affordable requirements for homes to rent and homes for sale set out in AAP5 should be the same.
 - One respondent requests that no luxury housing should be permitted and that investment from the private sector should be resisted.
 - Some recommendations for affordable housing products include pre-fabrication, self-build and Community Land Trusts.
 - The AAP does not provide and plan for hotels – this should be taken into consideration given the considerable changes proposed in the Old Kent Road.
 - There was some concern regarding the potential impacts of regeneration on the existing estates in and around the Old Kent Road. One respondent considers that the demolition of council estates must only happen on sound management ground and another that all estates be removed from within the boundaries of the AAP. Sites that are adjacent to council estates should introduce policies to mitigate impacts of development and provide new amenities to meet the needs of the existing communities.
- Infrastructure:

- Respondent suggests that the infrastructure in the old homes should be improved as part of the construction of new build properties.
- Suggests that more regard should be given to environmental and sustainable development and that higher standards should be imposed on developers
- Concerned as to how waste management will be treated in the Old Kent Road as two respondents are concerned that there is considerable waste left on the streets and no incentives to recycle. Particular mention was given by one respondent about the Toys R Us car park.
- Respondents suggest that there is a need for a good secondary school in the area. Another that a new FE college would be more favourable than a University.
- A few respondents have expressed their concerns regarding the lack of health care facilities and general amenities in the area. Some respondents have suggested the inclusion of A&E and dental care centres within the plan as well as homes for older people. We have had questions regarding how emergency services will be accommodated into the new plans. One other respondent has recommended that the provision of amenities and cultural assets must be enforced as these currently dealing with capacity issues. Other respondent has suggested that the civic centre be preserved and repurposed. Another respondent is concerned that “adequate infrastructure” is not enough to ensure that residents have access to social infrastructure and the existing inequalities. The respondent also comments on the text of AAP3 and that ensuring the needs of “occupants of development” implies that current residents do not require upgrading.
- Recommendation to include more community uses including, cafes, bookshops, art galleries, performance spaces, Lido and/or community cinema. Other suggestions included the need for community uses to be set within housing plans with youth group spaces to cater for older and disabled residents.
- There has been one suggestion to restore the canal and to look at creating squares to encourage outdoor activity and socialising within the community.
- Respondent is concerned that the additional education facilities will threaten the viability of established institutions and recommends that assessments needs are carried out for additional facilities.
- Greening/Open Space/Sustainability:
 - Respondent suggests that the council encourage locals to plant trees. Other recommendations relating to street greening includes more trees on the side of the road and more green pavements.
 - There was some concern regarding green public spaces. Two respondents have argued that parks and public spaces should not be privately owned and with 20,000 new homes a new public park should be provided. Another regarding accessibility in that, more green open spaces should be provided, not just communal spaces for new flats. Another has critiqued the green space strategy as the respondent considers that the strategy makes no attempt to address deficiencies in existing green space.
 - More detail on sustainability and encouraging low carbon development, the council should encourage carbon neutral developments and could look to include producing renewable energy (turbines, photovoltaic cells incorporated within the building).
 - Encourage good design and security measures to tackle crime and theft issues and ensure the vibrancy of the area
 - Respondent has suggested using Decentralised Energy Networks and modern methods of attenuation SUDS, to ensure prolonged sustainability.
 - Recommendation to include new street lighting on the road and in parks to ensure the safety of residents. Other recommendation for open spaces

- include, a dog free area, climbing frame, tennis courts, basketball parks and concrete areas for skating. Some facilities include benches and toilets in Burgess Park.
- Respondent requests that all green spaces are landscaped as self-seeding incentives has led to some green spaces becoming overgrown and derelict.
 - Tall Buildings:
 - Many respondents have commented objecting to the inclusion of tall buildings as there is some concern that an increased density will change the existing character of the Old Kent Road. There is also some concern regarding sunlight/daylight.
 - Suggestion to allow for existing home owners to purchase a home with the same view as they currently have at a discounted rate.
 - One respondent asked about compensation for daylight/sunlight issues.
 - General:
 - Many respondents have expressed support for the plan and have suggested that the regeneration of the Old Kent Road should go ahead as soon as possible due to the recognised poor city space and social issues/ anti-social behaviour that occur.
 - One respondent has suggested that the council should be concentrating on other areas of the borough needing regeneration.
 - Several respondents have commented that the council's priority should be the retention of the existing resident and local population.
 - One respondent is concerned that not enough detail and guidance has been included in the plan and should be made available. This includes uncertainty about which parts of the plan is prescriptive and which ones are recommendations. Another is concerned that the AAP is not based on sufficient evidence and will not deliver the housing, employment or open space needs.
 - Respondent criticised the introduction for failing to refer to existing residents and in the vision, does not reference the inequalities present in the OKR.
 - Several respondents have commented that at the moment the Old Kent Road has very little to offer in terms of entertainment and that the Old Kent Road should become a destination area
 - Other:
 - Plan should include statistics on local homelessness rates.
 - Respondent has asked for an Old Kent Road Monopoly Mural.
 - Respondent is concerned about the traffic and noise (smell) generated from the Veolia Recycling Centre.
 - More focus should be given to older residents in the area.
 - Respondent has asked that reputable contractors using skilled people are employed.
 - Two respondents have commented on the quality of existing retail facilities on the Old Kent Road, some comments have included the lack of diversity in the goods offered and too many specialised ethnic shops which don't cater for the needs of everyone. A number of comments included that there are too many fast food takeaway shops. Recommendation to plan for varied shop to ensure the needs of all ethnic and all income households and for more healthy food options.
 - Respondent is opposed to the proposed loss of the Mandela Way industrial area, especially given the redevelopment opportunity that the former gas works has.
 - Respondent is concerned that the arts uses on Ilderton Road will be lost as a result of the redevelopment plans for Ilderton Road/ South Bermondsey.
 - Architectural competition judged by local people.

- Two residents of Pages walk are concerned about the impacts of development of Mandela Way on their properties. The respondent also noted some errors which includes: Page 62 Photograph is of Grange Walk, not Pages walk; Marshall House is on Pages Walk, not Willow Walk.
- On respondent has asked that the plan is referred to as something other than the name of the road.
- Respondent questions to inclusion of the residential area at the western end of the Opportunity Area.
- Recommendation to include more details of the cultural building proposed.
- Suggestion to include road names to make the documents easier to understand.
- Concern was raised by two respondents as to the future of the St James' Stables.
- Two respondents have expressed concern that the Gypsy and Travellers needs have not been met by the AAP.
- Consultation:
 - Respondent asks that consultations are well publicised and held in the north of Southwark instead of outside the borough.
 - Respondent asks that residents are kept informed (regularly) on updates and feedback via email, especially about redevelopment in and around their homes.
 - One respondent has suggested including a timeline for the delivering the objectives of the AAP including estimates on timing and sequencing.
 - One resident is concerned that consultation is good but perhaps too much of it and that there is a general concern that there is small organised minority opposed to any changes that could hinder to objectives set out in the AAP. Respondent suggests that the council ensures that the views of all residents are taken into consideration. Other respondents are concerned as to the lack of consultation and information at and community/council meetings and that the consultation event was under publicised. One respondent suggests that a community based consultation group is established.
 - Respondent requests that the MAN mosque is retained.
- The Questionnaire:
 - Some respondents have expressed that the questionnaire lacks detail and has been drafted in a way which does not allow for fair commentary to be made. Further comments to the questionnaire includes that it does not ask for feedback on individual development sites.



Appendix 2:

Summary of email responses to the consultation

Old Kent Road Area Action Plan: Consultation Report

December 2020

Category	Agent	Organisation	Site	Policy #1	Policy #2	Policy #3	Summary of response	Written Rep received in 2017	Written Rep received in 2016
Community groups		Conservation Areas Advisory Group for Southwark		AAP 1	AAP 9		<p>Meeting to discuss the conservation areas and how they would be incorporated into the Old Kent Road development. There is agreement regarding the road is for London as well as being a site of historic national significance. The Group note that new housing development need not be delivered via tall towers but recognise the need to achieve housing density.</p> <p>The boundary of the Conservation Area should be extended both northward and southward to incorporate key buildings and historical architecture.</p> <p>The Group welcomed this allocation and suggested that it incorporate the 19th-century terraces along Madron Street.</p> <p>The Group welcomed this allocation and suggested that it include any surviving historic buildings of interest.</p> <p>The Group welcomed this allocation and suggested that it incorporate both sides of the north end of Peckham Park Road.</p> <p>The Group emphasised the importance of retaining the gas holders and believe that all of them should be retained. They could also be included in the creation of the Linear Park.</p> <p>The Group welcomed the use of Article 4 directions as a means of conservation.</p>		
Community Groups		Southwark Future Steering Board				Article 4 directions	<p>AAP 4</p> <p>The Board noted the impressive vision of this policy though expressed concerns regarding the impact of building work upon existing residents. They commented that employment space should be provided early in the life-cycle of the OKR, and that the timing and capacity of social infrastructure are critical new and existing residents.</p> <p>AAP 5</p> <p>The Board recognised the importance of this policy and would like to see how to achieve mixed communities in design. Existing residents should be prioritised in when and where community infrastructure is provided is key in allowing for the integration of new and existing residents. Management and phasing of development is key to creating a vibrant high street.</p> <p>AAP 8</p> <p>Concern is highlighted over the effect that many new high rise homes will have on social networks and community infrastructure in the area as well as if enough focus has been paid to the needs of existing residents. The Board would like more clarification on the how many of the tall buildings are office and residential blocks.</p>		Rep Received in 2016

AAP 10

More clarification is needed regarding the interaction between different space requirements and spatial uses. This is made more imperative when considering the Old Kent Road's function as an arterial route into London. Consideration also needs to be given to how green spaces will be impacted by the tall buildings (in terms of overshadowing).

Community Groups

Pages Walk residents Mandela Way

OKR 3

Terraced housing should be proposed to the rear of the Page's Walk properties, limited to two storeys to protect light and constructed of London stock yellow brick to be mindful of the conservation area.

AAP 3

Concern was raised regarding the impact of population growth on the sewage system. Monies from s106 agreements should be used to ameliorate these concerns.

AAP 13

An accident and emergency ward should be included as part of the plans given the forecast population increase.

AAP 11

Renewable energy should be used to power the new buildings.

AAP 11

It should be ensured that green spaces are of a high quality.

AAP 11

Existing trees should be protected.

AAP 13

Accessible and low-cost facilities should be provided for all young people.

AAP 12

The Southwark Park running track should be cleaned up and put to good use.

Community Groups

Walworth East Area Forum

AAP 1

Can Naylor House, or other estates/parts of estates be removed from the OKR AAP red line?
Will the OKR AAP lead to demolitions of council estates?

Community Groups

Rodney Road TRA

AAP 1

The target number of homes to be provided represents unacceptable intensification of development and there is not sufficient accompanying infrastructure provided.

Rep Received in 2016

AAP 2

The site allocations do not acknowledge or protect the existing green spaces.

AAP 4

The AAP should explicitly state that there will be no demolitions of council housing to facilitate the tube stations.

AAP 5

The number of affordable homes provided should be significantly higher than 35%.

AAP 6

It should be explicitly stated that no residential units will be occupied on employment land until the previous use has been successfully relocated.

Community Groups

SCETRA

OKR12

AAP 1

The town centre should be more compact.

Rep received in 2016

We object that the Former Southern railway stables is included in the plan. We would like to note that the plan presents contradictions regarding the stables. The plan shows high intensity development and does not give sufficient consideration to the traffic issues. We are very concerns and object to the proposed building heights. Specifically, on page 98 you talk about 8 storeys building at the corner of St James's Rd and Rolls Rd we would like to see the Southwark Council to make a commitment to build at least 50% of housing as affordable.

AAP4

Need definition for 'targeted support' and 'disadvantaged'.

AAP5

The 35% affordable target is inadequate to meeting the housing need in Southwark.

Community
Groups

Creative OKR

(Meeting Summary) There is a need to secure affordable workspace/property:
The broadest issues to be addressed are how to secure property over a long term and how to ensure that creatives are not priced out of the area e.g. policy regarding subsidised space.
Free, publicly accessible spaces for creative therapeutic services that allow people to develop creatively should be secured e.g. Inspire at St Peter's Church
LBS should work with developers to find workspace providers and ensure that creatives do go into the spaces delivered.
It is just as important to deliver infrastructure and utilities e.g. Broadband Affordable housing for artists in proximity to their studios is also essential, possibly live-work.
Small Business Rates Relief offers no support to creative businesses that require a large floor space.
Monitoring and Mapping Project underway
Common signage or branding might be useful to link sites together to be easily identifiable.

There is a need to engage with local people/business:
Local people need access to relevant information at earliest stage possible and build links with local educational establishments to inform young people
A resource or space is needed for people to find information, ideally an ongoing presence on OKR
How can 'meantime' use for vacant buildings be secured
Strategies, e.g. requirement checklists/pathway for individuals to follow, need to be in place
Local business should be involved in the delivery of an action plan for Creative Old Kent Road i.e. local web designers.

Landowners or developers	SimpsonHaugh	KFC	671 OKR	OKR 13	The tall building strategy illustrates the site to be a Tier 3 tall building, we believe that it should be designated as Tier 2 tall building. This is because it will generate a comfortable transition in scale. The building also anchors the pocket park, acting as a sign-post and giving it more emphasis and distinction. The building will also act as a deflector to the larger Gasholder Park in regards to the change of direction, and provide a termination of the new green route. Finally the building can be used to give emphasis to the Hyndman Street route to Ruby Street by enabling way-finding.	
Landowners or developers	RPS Group	Folgate Estates Ltd.	711-717 OKR; 729-733 OKR; 2-20 Devon Street OKR 18	AAP 1 AAP 2 AAP 9	We believe that it is appropriate for a high density development in the form of a tower due to its proximity to the proposed Underground stations. Too much emphasis has been placed on preserving local views of gas holder 13. Greater emphasis should be placed on the long view south along OKR. When consideration is made of the towers in this area, relatively little of the listed gas holder can actually be seen from these positions.	Rep Received in 2017 Rep received in 2016

				AAP 2			The gas holders north of OKR 18 are subject to Hazardous Substances Consent and associated blast zones. This is having a significant detrimental effect on progressing redevelopment schemes, thus the consent and zones should be removed.
Landowners or developers	RPS Group	Royal Mail Group	Units C & D, 4 Mandela Way	AAP 1	OKR 3		We question whether mixing residential and large distribution is feasible and desirable in terms of seeking to attract high value uses to this area. We object to the loss of Strategic Industrial Location. Given the function of the Royal Mail Delivery Office special mention should be made to the need to retain key worker employment and reference should be made to the undesirability of locating residential uses above this particular building. The Central Activities Zone designation is inappropriate and should be removed.
Landowners or developers	CBRE Ltd	CBRE Global Investors	34-36 Verney Road, SE16 3DH	AAP 1	AAP 2	OKR 13	We strongly support the aspiration and ambition of the AAP and the non-prescriptive principles outlined. There are concerns, however, regarding the potential restriction of planning permissions due to transport capacity without the Bakerloo Line Extension being put in place. There is no acknowledgement within the AAP with regards to viability considerations.
				AAP 6			There are controls on relocation which are provided through the landlord and tenant system and any move will always have to be subject to separate commercial negotiation. We therefore request that policy requirements with regards to existing businesses be removed from planning policy.
				AAP 8			This policy is supported and there should be some flexibility with regards to the exact location of tall buildings within any masterplan/block. The policy refers to Tier Three tall buildings coming forward to the south side of the Surrey Canal Park whereas the Sub Area masterplan shows the buildings to the north of the park.
			Sub area masterplan 3				The concept of mixed-use redevelopment of the Site in line with it's release from its Strategic Industrial Land designation is strongly supported. The Sub Area masterplans should be marked as indicative to remain sufficiently flexible to adapt to changing requirements over time and to reflect the reality that different plots will come forward at different times.
				AAP 6			We consider that a more flexible range of employment uses should be allowed for to maximise the jobs potential, and the provision of employment and residential uses. We also request that it is made explicitly clear within the land use typologies that residential use will be acceptable on the Site.
Landowners or developers	Montagu Evans	Threadneedle Pensions Ltd	651 – 655 OLD KENT ROAD, SE15 1JU				We welcome the clarity provided by the document although the prescriptive nature of the policies should be noted.
				AAP 6			The wording of the policy is unclear and thus is open to interpretation.
			OKR 13	AAP 1	AAP 2	AAP 10	Some sites are identified as providing green infrastructure which impacts on the ability to provide such a diverse range of new uses.

AAP 7 This policy requires the retention of existing A1 floorspace within development proposals. We propose this is clarified to confirm that where certain sites cannot provide a like for like floorspace re-provision, an increase in employment generation on that site from a town centre use would be acceptable.

AAP 8 Figure 9 illustrates the proposed Ruby Triangle block of buildings. The Council have not released any evidence that supports how the masterplan heights of buildings have been arrived at. We understand that a Tall Buildings Study is being produced but this has not yet been published as part of the evidence base documents. The proposed composition of tall buildings within this block do not at present provide a logical distribution of massing that would deliver a positive contribution to townscape in this location. Further the rationale for providing taller buildings further away from transport hubs is currently missing and seems at odds with guidance in the draft London Plan.

Sub area masterplan 3 We support the allocation of OKR 13 to support the strategic policies set out in the AAP. The pocket park to be delivered within it will be enabled through the greater concentration of development on part of 651-655 OKR.

AAP 9 This policy sets out that new development must preserve or enhance locally important historic buildings. We consider this approach to be flawed and at odds with Policy 135 of the NPPF and does not reflect the test set out.

Landowners or developers Rolfe Judd ABC Selfstore 54-80 Ossory Road, SE1 5AN OKR 10

Generally we support the policies contained within the AAP. Rep Received in 2017

AAP 5 We consider the Council should continue to apply differential rates for tenure for development subject but would like clarification of the use of the term 'social rent' and a target number to achieve.

AAP 6 The general aspirations of the policy are supported with an intensification of jobs, range of employment, diversity of business sizes, local partnerships and mixed uses. The re-provision of employment accommodation on a site should not take into account the amount of yard areas or hardstanding which exists on a site. The requirement to provide a relocation strategy to the Council where small or independent businesses are displaced is considered onerous. It is a long held tenet that the planning system is not there to protect individual commercial interests and it is not clear from the policy what the role of the Council would be in the process and how it could seek to protect individual commercial interests. Furthermore, the imposition of obligations requiring developers to include affordable business space should be subject to viability.

Landowners or developers RPS Group Aitch Group 313-349 Ilderton Road AAP 1 We are supportive of this policy as it allows some flexibility built into the Masterplan and enables the delivery of much needed homes and jobs for Londoners. Rep received in 2016

OKR 16	AAP 3	Delivering development at the earliest stages of the Plan is vital to improving the business case for the implementation of the Bakerloo Line Extension. The policy further sets out that development must provide water supply and wastewater infrastructure capacity to deliver supporting infrastructure at an early stage to ensure impacts are effectively mitigated. This is generally supported but we encourage the Council to engage with the necessary utilities providers at the earliest opportunity to ensure that there is a strategic approach to utilities provision.
	AAP 5	We support the affordable housing requirement and threshold approach set out in the New Southwark Plan. It is considered, however, that the recognition of a prompt commencement of development and subsequent delivery of affordable housing at the policy-compliant level should therefore be unfettered by any review mechanism.
	AAP 6	This policy is supported but should be undertaken with respect to viability.
	AAP 8	Development must confirm to the tall buildings strategy which has been developed logically and in accordance with the GLA's viewing corridor policy. The policy has been positively-prepared and in accordance with the Strategic Development Plan as well as national guidance.
	AAP 9	This policy generally accords with Chapter 12 of National Planning Policy Framework. It is further considered that the policy should refer to the impact of development upon designated and non-designated heritage assets.
Sub Area Masterplan 4		The subject sites are allocated as Vertical Mix 'Small Office and Studio' Typology, which is to be used as workspace at ground and first floor levels. We support this allocation and note that the application comprises a mixed-use, employment-first development. It is important that the guidance in this policy should be enforced pragmatically as site specific circumstances restrict the off-site servicing.

Savills	Aviva Investors Ltd.	OKR 10	In general terms, the Draft AAP is considered to be consistent with the requirements of the NPPF and effective in terms of delivering the regeneration and growth objectives for the Old Kent Road and the wider Borough. It is felt that the Draft AAP policies and aspirations could be pushed further to proactively drive and support the ambition to boost the housing supply. This accords with the desire to optimise the use of land in the London Plan and in particular the NPPF. We support the principal objective of the Vision which seeks to transform the Old Kent Road and the area directly behind it and the flexibility that is provided by adopting minimum numbers of homes and jobs to be delivered in the area. The aspiration to evolve from single use areas to mixed use neighbourhoods, including the provision of tall buildings, is essential in order to deliver the wider objectives relating to growth.
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Rep received in 2016

Cantium Retail
Park

The parties strongly support the inclusion of the Cantium Retail Park within the first phase of development. The site is accessible and at a major junction point on the Old Kent Road and thus is not a site solely reliant upon the delivery of the BLE to support density.

AAP 5

If the Council is to adopt a minimum target of 35% affordable homes, there should be greater flexibility built into the Policy in respect of tenure splits and a range of affordable housing products. We support the desire to provide housing for all but request that greater flexibility is adopted in respect of minimum space requirements for wheelchair users.

AAP 6

We support the objectives of the policy however in order to ensure that it is not too onerous and ensure large scale redevelopment can be realised, it should include flexibility in terms of the requirement to accommodate existing businesses on site. The Masterplan identifies significant changes in density and typology of floorspace on various sites. Re-housing existing businesses on some of these sites would be inconsistent with the wider aspirations or simply not commercially realistic.

AAP 7

We support the proposed designation of OKR as a Major Town Centre, and the general principles and boundary for the new Town Centre as illustrated on Figure 8. We do not support the requirement to retain or increase the amount of retail floorspace, due to a belief that the nature of the redevelopment and reconfiguration in terms of the type of retail may result in an overall reduction in area on certain sites. The London Plan defines a 'Major Town Centre' as having more than 50,000 sq. m of retail, leisure and service floorspace and significant employment, leisure, service and civic functions. The Old Kent Road has approximately 95,000 sq. m of retail floorspace. The loss of some existing retail floorspace as part of the reconfiguration and reimagining of the area would not adversely impact on it and so the loss of existing retail floorspace should be permitted within AAP 7, in cases where a development delivers the wider aspirations of the Masterplan.

AAP 8

We support the strategy for the delivery of tall buildings at stations and crossings. We support the allocations of Tier One, Two and Three buildings on Figure 9.

AAP 10

The parties support the creation of 'The Greener Belt' and the network of new open spaces across the Masterplan area, on the condition that the policy includes some flexibility to enable other forms of public or private amenity provided within a development to be considered as part of an overall assessment of compliance. Any financial contribution required as part of AAP 10 would need to be included in an overall assessment of viability.

AAP 11

AAP 12

The parties support the policies which seek to deliver new development that has a positive impact on the local environment and local population.

Sub Area 2:
 Cantium Retail
 Park and
 Marlborough
 Grove

The parties support the proposals for OKR 10 (Land bounded by Glengall Road, Latona Road and Old Kent Road). In particular the parties support the indicative capacities for the area which have been increased from the last version of the Draft AAP. We strongly support the strategy which states that the greatest scale of development will be at the junction of Old Kent Road and Peckham Park Road, reducing towards Burgess Park and the residential estates. The parties request that clarity is provided in terms of the 'required land uses' such that all uses within Class A are suitable for the high street and not only 'retail' as currently drafted. We support the comments on 'Phasing' but believe more explicit reference should be made that sites within OKR10 form part of the first phase of the Plan and the initial capacity could be supported without the requirement for the BLE. The parties request a change in wording to make specific reference to the reconfiguration of floorspace to re-establish a high street frontage, the intensification of the Asda site, and to the opportunity to expand the offerings of food outlets to encourage greater activity in the evening.

Landowners or
 developers

Shaw Corporation /
 dp9 Ltd Barkwest Limited in
 partnership with the
 Regent Group AAP 1

Devon Street and
 Sylvan Grove
 (OKR 18) AAP 2

AAP 5

We support the reference to development proposals being in "general" conformity with the masterplan, which recognises that the masterplan is not intended to be prescriptive and literal but that it can be interpreted flexibly.

We believe this policy must be changed to acknowledge that a greater flexibility will be required to provide for issues of feasibility. We suggest that Policy AAP 2 is amended to read "the required land uses within the proposals sites must be included unless it can be demonstrated this is not feasible on a site by site basis or that these specific uses are best provided elsewhere within the AAP area".

We recognise that Policy AAP 5 accords with draft Policy P1 of the New Southwark Plan Proposed Submission Version, but consider that the 70/30 social rent / intermediate split should be considered aspirational over the period of the AAP to avoid a negative impact on the viability of short term sites with the result of delayed development. We ask that the Council consider a revised tenure split within the Opportunity Area with a greater proportion of intermediate housing, and suggest that flexibility be allowed on this policy in cases where a development proposal makes a significant contribution towards meeting affordable housing and other needs. We consider that a failure to apply a flexible approach to the split based upon site specific circumstances will impact on the delivery of affordable homes, particularly in large, mixed-used developments. With reference to Table 2, greater flexibility should be allowed with regards to the 20% minimum of three bed plus homes. This is because not all sites are appropriate for large families due to 'bad neighbours' such as intensive industrial uses or waste management facilities.

Rep Received in 2017 Rep received in 2016

AAP 6	<p>Supporting text should make clear that it will not be necessary to provide relocation options within the Old Kent Road for businesses that are relocating as part of their own business plan, rather than being relocated solely to facilitate development. It should be clarified that it is not an absolute requirement to provide office and light industrial uses on all sites – land uses are addressed within the sub-area policies and site allocations. A definition of a specialist provider should be included in the policy text. Whilst we support the principle of providing affordable workspace, it will not always be possible to identify a non-profit organisation or let affordable workspace specifically to an existing business from the Old Kent Road Opportunity Area. This could be an aspiration but not be an absolute requirement and the period for affordable workspace should be capped at 5 years to reduce the impact on scheme viability. As per the Draft London Plan, reference should also be made to affordable workspaces including space that support educational and health outcomes.</p>
AAP 8	<p>We request Policy AAP 8 is amended to state that Tier Two tall buildings will be located at “other locally important crossings and junctions on the Old Kent Road and other key open spaces proposed by Policy AAP 10”. The definitions of Tier One (30 plus storeys) and Tier Two (between 16 and 25 storeys) exclude buildings of 26 to 29 storeys. This must be amended to allow for these building heights. We agree with the statement that ‘Tier Three’ tall buildings (up to 16 storeys) will act as markers within the street scene. However, the current proposed locations are overly restrictive and the policy wording should be adjusted to lift the restrictions on where Tier Three buildings can be located. We request that Figure 9 is updated to reflect the massing parameters that have been discussed with Officers in pre-application meetings in respect of the Combined Sites.</p>
AAP 10	<p>The policy needs to be clear that the location and sizing of the “new parks and spaces” is indicative. The policy requirement for 5sqm public open space per dwelling is too mechanistic and ignores the qualitative benefits or strategic importance of public open space that may be delivered by developments, such as its useability and community benefit. “Devonshire Road Pocket Park” should be amended to read “Devonshire Grove” (there is no Devonshire Road). Figure 10 should read 'proposed open space' in place of 'proposed green space' to better reflect the flexible use plans for Devonshire Grove Pocket Park.</p>
AAP 11	<p>The requirement to deliver an energy centre or link to one of the OKR decentralised heat networks should be amended to clarify that this will only occur where "practically feasible and economically viable". It is clearly not practical to provide electric vehicle fleets for all commercial development, and so this requirement should be deleted.</p>

We consider the indicative capacity of 740 homes does not reflect an optimal density for OKR 18. The Combined Sites alone have the ability to accommodate over 500 homes. The indicative capacity should be increased to state “over 1,000 homes”. the indicative masterplan for Sub-Area 4 should be amended to reflect the emerging masterplan for the Combined Sites (Devonshire Square), which has benefitted from pre-application discussions with Officers. In particular, the tall building should be shown to the north east of the new quiet way, rather than forming part of the southern courtyard block.

SA4

We do not consider SA4.3 is necessary, but rather SA4 can make clear a range of building typologies providing a mix of employment uses will be supported. SA4.3 as shown is too prescriptive and should be deleted, or at the very least amended to reflect the emerging proposals at the Combined Sites by reference to “flexible employment space”, rather than rigid definitions of land uses. We support reference to “scope for ‘Tier Two’ and ‘Tier Three’ tall buildings within the northern parts of the site, adjacent to a commensurately sized open space at the centre of the area”. We request this text is updated to confirm that there is also scope for a Tier One building on the Combined Sites. The text at 3 states that (other than the Tier Two and Tier Three buildings) “buildings set back from Old Kent Road should rise to between 8 and 12 storeys”. These mid-storey buildings should not be limited to 12 storeys, as buildings of 8-16 storeys may provide a better transition to the taller Tier Three, Tier Two and Tier One buildings. The text should be amended accordingly.

Landowners or developers

Rolfe Judd

Berkeley Homes

Malt Street (OKR 10)

AAP 1

We support the objectives of the Council in seeking to ensure a consistent and comprehensive approach to the delivery of development across the Old Kent Road.

Rep Received in 2017

Received Rep in 2016

Sub Area 2:
Cantium Retail
Park and
Marlborough
Grove

AAP 2

We support the objectives of this policy.

AAP 3

Berkeley is supportive of the need to deliver infrastructure to support the regeneration of the Old Kent Road and in particular the delivery of the Bakerloo Line Extension (BLE).

AAP 5

Representations on earlier drafts of the OKR AAP have highlighted Berkeley's concern over the impact of the Council's policy on affordable homes on development viability. In order for development to proceed it must be viable. The sites and the scale of development identified in the DOKR AAP should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. We consider there is a good case for retaining differential rates in the Old Kent Road Opportunity Area and we note that Part 1 of Policy P1 of the New Southwark Plan allows a differential rate in the Aylesbury Area Action Plan Area. Similar flexibility should be introduced in Table 1 of the DOKR AAP to facilitate the delivery of new homes and infrastructure. This should allow 50% of all affordable homes being delivered to be intermediate homes in line with identified need. We would ask the Council amend the wording of Table 1 to reference 'social housing homes' rather than 'social rent homes'. Table 2 should be amended to reflect the Draft London Plan Policy H12 and not include a target for larger market and intermediate homes. There should be greater flexibility in the application of a target for the number of wheelchair use housing (accessible and adaptable) to be constructed in the Old Kent Road Opportunity Area.

AAP 6

Berkeley supports the delivery of mixed-use development within the DOKR AAP and the approach of the Council to intensify the density of uses close to major junctions and future tube stations; described as the 'Bow Tie'. In addition to retaining the amount of floorspace, emphasis should be on creating jobs, building businesses and opportunities and this can best be achieved through the delivery of a range of appropriately sized and flexible Class B1 accommodation; principally workspace, co-working space, studio, and SME type units. In addition to the provision of flexible commercial premises schemes should include where appropriate retail uses (within Classes A1 to A5). The types of employment use should not be limited to Class B1 uses and flexibility should be included in the policies of the DOKR AAP to deliver associated retail uses which deliver differing types of employment opportunities as well as other uses which generate jobs. The requirement to provide a relocation strategy to the Council where small or independent businesses are displaced is considered onerous. It is considered that rather than seek to try and obligate developers to assist relocation of existing businesses; encouragement should be given to working with Council operated initiatives to seek to support opportunities for new and existing businesses to flourish. The imposition of an obligation to require a specialist workplace provider be involved in the running of flexible workspaces is unnecessary and unduly restrictive. The obligations requiring developers to include affordable business space should be subject to viability.

AAP 7

There is broad support for this policy which strengthens the role of the Old Kent Road within Southwark as a Major Town Centre.

AAP 8 We support the three tier approach based on 'stations and crossings'. The delivery of taller Tier 1 buildings in locations which mark the positions of greatest importance is welcomed and supports the approach Berkeley and its designers have taken for the Malt Street scheme, locating height at the junction of important east/west and north/south routes. The approach to Tier 2 and Tier 3 buildings is also supported.

AAP 9 The objective of protecting the Old Kent Road's historic fabric is supported as is the reintroduction of historic features such as the Green Route reflecting the former Grand Surrey Canal. We consider a balance should be struck between protecting historic fabric and delivering the quantum of development required to meet the target of 20,000 new homes and 10,000 new jobs.

AAP 10 The need for publicly accessible spaces is an important consideration in the regeneration of the Old Kent Road. In order to provide successful places there needs to be flexibility to the provision of these spaces and it may not be appropriate in all circumstances to provide 5sqm of public open space with each unit as a scheme may deliver other relevant benefits and the cumulative impact of achieving extensive provision of amenity space within a scheme could be to the detriment of other objectives including the provision of affordable homes, new jobs and new retail and leisure uses.

We support the suggested land uses. We support the provision of a range of small office and studio uses located within the Malt Street scheme. The broad approach to heights across OKR10 is supported. We consider the Council should however be more definitive about a Tier 1 building being located at the junction of the Surrey Canal Park and Malt Street. It is agreed that the scale of buildings to the south of the Surrey Canal Park should be of a lower scale and this reflects Berkeley's own proposals for Malt Street which reduce the scale of buildings to 16 storeys or lower.

Landowners or developers

Pegasus Group
Bishopsgate Long
Term Property Fund
Unit
Sub Area 3:
Sandgate Street
and Verney Road
(OKR13)

AAP 6

It is suggested that an element of flexibility is introduced on the point of retaining or increasing the amount of employment floorspace on site. Further clarification is needed on the point regarding the relocation options for businesses which will be displaced by development. We believe that the point referring to the generation of employment and subsequent increase in the number of jobs should be removed, as this requirement is considered onerous. The requirement for a 'specialist provider' to manage an 'affordable workspace' must be considered against viability.

Rep Received in 2017

Wevco Wharf,
Sandgate Street,
London SE15 1LE

AAP 7

It is considered that the Wevco Wharf site should be reinstated within the town centre boundary.

AAP 8

Our client supports the general approach to providing tall buildings as part of the regeneration of the Old Kent Road Opportunity Area, particularly in close proximity to the intersections between Old Kent Road and key crossing points to the east and west. However, the identification of a hierarchy of locations with pre-determined limits to building heights, lacks sufficient flexibility and is thus too prescriptive as to the nature and extent of the built-form that should be delivered in these locations. On the basis that the impact of tall buildings can only properly be judged as part of the development management process, the maximum heights of buildings in any given location should not be set within the AAP, rather individual development proposals should be judged against criteria based policies for Tall Buildings within the London Plan and Southwark's existing and emerging Development Management policies.

AAP 10

The aspiration to provide a linear green link through the eastward extension of the 'Surrey Linear Canal Park' up to the junction of Credon Road and Varcoe Road is supported. The promotion of high-density development and tall buildings adjacent to open spaces is supported.

The aspiration to transform the Sandgate Street and Verney Road area into a mixed new neighbourhood with a diverse range of uses is supported. However, it is considered that the level of detail provided in the latest iteration of the AAP is too prescriptive, and that the building typologies and building heights can only be properly assessed through the development control process.

Landowners or developers

DP9 Ltd

British Land

Canada Water masterplan

AAP 4

There will be overlap in the catchment areas for local school and health provision. We would welcome more joined up working and planning across both these topics to ensure that the existing and future needs of the respective areas are met.

AAP 3

We support the Council's strong emphasis on the importance of delivering the Bakerloo Line Extension (BLE) to unlock the potential of the Old Kent Road Opportunity Area. We also welcome the aspiration to enhance bus services in the OKR Opportunity Area and will work with TfL and LBS to ensure there are enhanced links between the Canada Water Opportunity Area and the OKR Opportunity Area. We would also suggest that the plans for the Peckham to Rotherhithe cycle route, recently announced by the Mayor of London, be coordinated with the Canada Water Opportunity Area to ensure improved links to the new Town Centre at Canada Water. We would also welcome a joining up on strategies to improve air quality in the OKR Opportunity Area to Canada Water Opportunity Area belt.

AAP 6

We suggest that this policy could go further in creating conditions to encourage and support collaboration between developers and their contractors, with the benefit of enhancing one of the core positive impacts of regeneration – that of creating new employment and enabling residents to access these opportunities. We would ask Southwark to consider ways in which policy can encourage joint approaches and incentivise activities which deliver social regeneration. Policy in the OKR and CW Opportunity Areas should reflect the changing world of employment and training provision and be less prescriptive so as to permit innovative new ideas to be explored and delivered.

AAP 10

We welcome the proposals to link the Old Kent Road Opportunity Area to Canada Water through the creation of a “Greener Belt” which will accommodate nature and biodiversity as well as opportunities for play, sport and food growing. We strongly support this aspiration and would like to work with our partners at Southwark Council in helping to achieve this objective.

Landowners or developers

Lichfields

Capital Industrial Holdings BV.

AAP 1

Our client is supportive of the layout and arrangement of development specified by the AAP, however at present this policy is overly prescriptive and does not allow for site specific design considerations which may emerge during the detailed design process for individual sites. General conformity to the masterplan rather than strict observance should be allowed instead. It should be made clear that the masterplan is indicative only.

AAP 2

Our client is supportive of policy AAP 2 and the requirement for the development of the allocated sites to deliver the ‘required land uses’ but with the flexibility to deliver other land uses provided these priority uses are not compromised.

AAP 6

Capital Holdings is strongly supportive of draft policy AAP 6 including the principle of retaining or increasing the amount of employment floorspace on sites and providing a mix of uses that includes light industrial, offices, manufacturing, distribution and creative workspaces. Further detail and clarification should be provided in the AAP policy as to what the Council would expect in terms of providing “relocation options for businesses displaced by development”. The policy should also recognise that in some cases relocation will not always be possible for existing occupiers and there is a limit on what landowners may viably be able to achieve in this respect. Further clarity is also required in relation to the AAP 6 requirement to provide an element of affordable workspace. In addition, the quantum of affordable workspace required by the policy should be clarified. The policy should also recognise that its provision should be subject to financial viability testing and therefore will likely have implications on the level of affordable housing to be provided.

AAP 7	In addition to town centre policies, AAP 7 should also support small-scale retail uses outside of the town centre area. The policy should include reference to supporting such uses at an appropriate scale and in appropriate locations.
AAP 8	Our client supports the overall 'Station and Crossings' strategy in relation to tall buildings, including the use of them to help define key locations and junctions. However, it is also considered that greater flexibility should be allowed where the design and location of tall buildings is consistent with the design principles set out in the later part of draft policy AAP 8.
AAP 9	Capital Holdings supports the character and heritage principles outlined in draft policy AAP 9.
AAP 10	Overall, our client supports the aspirations set out in policy AAP 10.
Sandgate Street & Verney Road – OKR 13	Our initial design development work undertaken on the Capital Holdings site on Verney Road suggests that the layout suggested by the indicative diagrams included in the Sub Area 3 section may not introduce an acceptable arrangement between the stand-alone industrial storage and distribution units proposed on the south part of the site. This is mainly due to the servicing requirements for these larger units. The access route for these units should ideally be kept separate from any residential use to avoid a conflict between the two uses. Our client considers that a maximum ceiling height of 6 meters is sufficient throughout the build typology. It should be made clear that the Verney Road Capital Holdings building with a blue roof is not a 'Building of architectural or historical importance'.
Hatcham, Ilderton & Old Kent Road (South) – OKR 16	Diagram SA4.1 Site Allocations and Conservation refers to the building on the opposite side of Ilderton Road from the Canterbury Industrial Estate (19 Barnaby House) as being of 'architectural interest'. We consider this building does not particularly warrant this designation and it may even have been included in error. We suggest that the use of roller shutter doors along all frontages should be avoided and the text on page 132 should be amended in this respect. Depending on the site location then a minimum height requirement of 6-7m should be considered sufficient. Greater flexibility must be ensured with regards to the 'Vertical Mix: Small office and studio' typology. The client questions the use of the phrase 'commercial focus' with regards to the new park proposed on the site.

Landowners or developers

CBRE Ltd

CBRE Global Investors

SANDGATE STREET AND VERNEY ROAD (OKR 13) Sub Area Masterplan 3

AAP 1

We strongly support the aspiration and ambition of the AAP which sets out ambitious regeneration plans to deliver significant residential and commercial uses, alongside improved transport connections including 20,000 new homes and 10,000 new jobs. We also support the intention for the masterplan sub areas to not be absolutely prescriptive and instead to provide the key principles that describe how the masterplans are expected to be delivered.

Rep Received in 2017

34-36 VERNEY ROAD, SE16 3DH

AAP 3

We have concerns regarding the potential restriction of planning permissions due to transport capacity without the Bakerloo Line Extension being put in place. It is important to ensure that investor confidence is maintained in the area and in order to maintain certainty for developers that their planning permissions can be delivered.

AAP 5

Policy needs to acknowledge that the provision of affordable housing will be influenced by viability. There should be flexibility with regard to affordable housing provision in order to ensure the viability and deliverability of these schemes. We suggest that the policy is flexible around current prescriptive requirements relating to unit mix, in order to take account of site specific circumstances

AAP 6

We have concerns regarding the requirements with regards to existing businesses, and affordable and managed workspace. There are controls on relocation which are provided through the landlord and tenant system and any move will always have been subject to separate commercial negotiation. We therefore request that policy requirements with regards to existing businesses be removed from planning policy. In relation to the requirements for managed workspace and affordable workspace, it is unclear whether these requirements would apply for all sites. These requirements are likely to be challenging to deliver on sites such as 34-36 Verney Road. The requirement for 30 years of subsidised rents is particularly onerous, this will impact on scheme viability and may unfairly give advantage to some businesses at the expense of others.

AAP 8

The principles of the Tall Buildings Strategy are supported. We suggest a rephrasing of the Surrey Canal Park plans to state Tier Three buildings will be built 'around the area' rather than to the 'south side' of the area. We support the arrangement of the Linear Park terminating to the west of the designated site, as continuing the park through the site would render much of the site undevelopable.

CBREGI strongly supports the mixed-use redevelopment of the Site in line with its release from its Strategic Industrial Land designation that is being progressed through the New Southwark Plan. The masterplans provided within the Sub Area masterplan should be clearly marked as indicative to reflect the reality of long term development. We consider a more flexible range of employment uses should be allowed for including all B1 uses in order to maximise the generation of jobs, and the provision of employment uses that are more compatible with the residential uses but also to allow flexibility to respond to changing employment demand. We also request that it is made explicitly clear within the land use typologies that residential use will be acceptable on the Site.

Landowners or developers	CHILD GRADDON LEWIS ARCHITECTS	The Penarth Street Consortium	Penarth Street, OKR 16	AAP 1	We are disappointed to see that the west side of Ormside Road has been removed from OKR 16: Hatcham Road and Ilderton Road. We understand the value in protecting Strategic Industrial Land however we believe that in this instance it will make it difficult to make to develop the right residential condition.	Received Rep in 2016
				AAP 3	We support the need to deliver infrastructure to support the regeneration of the Old Kent Road and in particular the delivery of the Bakerloo Line Extension. However the CIL charges that relate to this delivery place a huge strain on the financial delivery of schemes. We believe that these charges should be lowered.	
				AAP 5	The Council's overall target of a minimum of 35% of homes is supported but the consortium, however we consider there needs to be a reassessment of the tenure split indicated in Table 1 to allow greater flexibility in the application of the split between tenures in Area Action Plans/Opportunity Area Planning Frameworks. We consider the Council should continue to apply differential rates for tenure for development subject to Area Action Plan policies and Opportunity Area Planning Frameworks as the need for affordable homes can be balanced against the requirement to deliver major infrastructure improvements to an area. The Draft London Plan (Policy H12) states that the provision of smaller units supports the freeing up of larger family homes in the market and intermediate tenures and that on this basis Councils should not set prescriptive targets for market and intermediate homes. Table 2 should be amended to set a target for social housing (rent) and not include a target for market and intermediate homes.	
				AAP 6	We agree with all points of AAP 6, especially about accommodating existing businesses on site or in the Old Kent Road opportunity area or provide relocation options for businesses that will be displaced by development however we do not agree with the blanket policy to "retain or increase the amount of employment space (GIA) on site (B class use or sui generis) employment generating uses". We believe a qualitative approach is required on a case by case basis and on site servicing should be taken into consideration when meeting the replacement GIA where it was not provided before. The imposition of obligations requiring developers to include affordable business space should be subject to viability and be secondary to providing the opportunity for existing occupiers to return to site. The workplace provider principle should be relaxed especially at the early stage of the project.	
				AAP 10	Whilst we agree with most points of AAP 10, we ask that "all development must provide 5sqm of public open space per dwelling" should be expanded upon and could potentially include enhancement of public realm and improvements in street hierarchy outside of the site boundary.	

Sub Area 4:
Hatcham, Ilderton
and Old Kent
Road (South)

Welcome the exciting new mix, the co-location of residential with industrial. However, we think that SA4.3 – Sub Area 4 Typologies are overly prescriptive.

Landowners or
developers

Savills

Charities Property
Fund

B&M, 593 – 613
Old Kent Road

AAP 1

AAP 2

The Masterplan (Figure 5) provides a clear illustration of a well thought out vision. CPF supports the plan led approach and the requirement to deliver specific land uses on certain sites to ensure the strategic objectives and vision is met. The flexibility for ‘other’ and flexible uses in AAP 2 is essential given the long term nature of the Plan.

OKR 13

AAP 3

The proposed BLE will generate significant additionality in a short time frame as demonstrated by the Draft AAP.

AAP 4

CPF supports the desire to ensure existing business and residential communities benefit from the proposed regeneration and growth.

AAP 5

CPF support the principle that the plan area will accommodate high densities reflective of the location within Central London and that as many homes as possible will be delivered. The requirement for viability testing as part of negotiating the maximum reasonable amount of affordable homes is essential and in accordance with London Plan Policy 3.12. The parties support the desire to provide a mix of housing types. Critical to the successful implementation of the Policy will be a standard of accommodation test.

Provided that a scheme demonstrates a good standard of space and place then the vision and strategic objectives are likely to have been met.

AAP 6

CPF supports the objective to create 10,000 new jobs and the principle of ‘the bow tie’. Focusing density on central locations align with the wider policies of the Draft AAP relating to accessibility and tall buildings. To ensure that the Policy is not too onerous and ensure large scale redevelopment can be realised, it should include flexibility in terms of the requirement to accommodate existing businesses on site. The Policy should be amended to state ‘Accommodate existing business where possible....’ The Policy should also be explicit that, if affordable workspace is to be provided as part of any scheme it would be included within a formal assessment of viability.

AAP 7

CPF supports the proposed designation of the Old Kent Road as a Major Town Centre. CPF does not support the requirement to retain or increase the amount of retail floorspace. Whilst the intention of the Policy is correct, the nature of the redevelopment and reconfiguration in terms of the type of retail may result in an overall reduction in area on certain sites. The loss of existing retail floorspace should be permitted within AAP 7 where a development delivers the wider aspirations of the Masterplan

Rep Received in 2016

AAP 8

CPF supports the strategy for the delivery of tall buildings at stations and crossings. To ensure that development density can be optimised, a planned approach to the most appropriate locations is essential. The Property also sits within the knot of the 'bow tie' shown in Figure 64 and will be adjacent to a secondary green link to the main Surrey Canal Park. To reflect its location, at a primary crossing point, CPF requests that part of the site is identified as Tier 3 (up to 16 storeys) building on Figure 9.

Sub Area 3:
Sandgate Street,
Verney Road and
Old Kent Road

CPF supports the general Plan for the area. CPF's only comment is that flexibility should be included within the requirement to replace existing retail space.

Landowners or
developers

DP9 Ltd

Civic Centre Ltd and
Shaviram
Developments Ltd

Civic Centre and
Livesey Place

AAP 5

Although 35% is the strategic target across the AAP area, it should be recognised that affordable housing provision is subject to viability. This should be clarified in revised policy wording.

Rep Received in 2017 Rep received in 2016

OKR 10

AAP 6

This policy requires significantly greater flexibility and/or detail in respect of managed workspace and affordable workspace. In terms of managed workspace, we do not consider it appropriate for a specialist provider to manage all new office and light industrial uses. In our view it is unreasonable for planning policy to be overly prescriptive in terms of how employment space is managed or operated – there must be greater flexibility for land owners or developers to deliver, lease and manage employment space more freely. In our view it is not appropriate for 30 year affordable workspace terms, nor for the rents to be set at levels targeted at specific businesses. A 5 year period would be more appropriate.

AAP 8

We support the general approach to a coordinated tall building strategy across the area. However, in respect of the 'Tier Three' buildings, we consider their heights should be subject to detailed townscape and visual impact assessment to ascertain an appropriate height.. Taller buildings that 16 storeys should be permitted as there is a lack of evidence to justify this limit.

AAP 10

This draft policy adds further viability pressure by requiring the delivery of 5sqm of open public space per dwelling, or a financial contribution if delivery is not feasible. This aspect of the policy should be redrafted in a more flexible way, requiring delivery where possible or appropriate.

AAP 13

The first subsection of bullet points should be targeted at development where considered relevant or appropriate. A blanket 'Development' requirement, as currently drafted, would clearly be unreasonable.

OKR10 – Land Bounded by Glengall Road, Latona Road and Old Kent Road

We support the site allocation and its overarching approach to height. However, as referred to in respect of draft Policy AAP 8, we question whether the Tier 3 Livesey Place building should in fact be Tier 2. In terms of access and servicing, it is often not possible for employment uses to have their own individual access point where developed as part of mixed-use schemes which is advocated throughout the document. This should be allowed for.

Landowners or developers

MAF Planning Ltd

Constantine Group Limited

4 Verney Road, Wevco Wharf, Unit A 14 -16 Verney Road and 20-26 Sandgate Street
OKR 13

AAP 1

AAP 6

AAP 10

SA3.2 Sub Area 3 Masterplan

AAP 11

Whilst we note that the illustrative layout was amended to reject development following strict ownership boundaries, Constantine must express its concern that development of the master plan has substantially changed from the earlier draft, particularly in respect of its own freehold site and without any prior discussion.

Constantine supports this policy in its intention to strengthen the vibrant Old Kent Road business community with no net loss of employment space in a range of varying employment space in the mixed use developments proposed. It supports the intention to “accommodate existing businesses on site or in the OKR Opportunity Area” but considers that the policy and supporting text does not explicitly explain how this will be achieved.

The basic concept seems reasonable but there is a need to ensure that all developer/ owners contribute fairly to the provision of open space which will serve the whole development. Financial contributions are required where 5sqm POS per dwelling is not provided but the policy is weak on how this will be achieved.

We note that the development parcels, which in draft versions of the masterplan very much reflected the ownership pattern no longer do so and we understand this is a deliberate attempt to ensure that owners work together to bring forward their development proposals. Constantine supports this approach.

We note that policy AAP11: Cleaner, greener, safer seeks an Energy Centre, one of which Figure 10 shows to be located on the 4 Verney Road site. This is a further non-commercial requirement placed upon this particular site which potentially burdens this freehold ownership and potentially adversely affects site value.

Landowners or developers	Rolfe Judd	Joseph Homes	Daisy Business Park at 19-25 Sylvan Grove, SE15 1PD	AAP 5	The Council's overall target of a minimum of 35% of homes is supported as it reflects the Mayor's target in his Affordable Housing and Viability SPG. Table 2 should be amended to set a target for social housing (rent) and not include a target for market and intermediate homes. The policy should also allow for flexibility in the provision of family housing for private rented schemes. It is considered that the provision of 10% of units as wheelchair use housing would lead to a significant surplus of wheelchair use homes and this would affect viability of schemes across the area.
			OKR 18	AAP 8	There is strong support for the three tier approach based on 'stations and crossings'. We recommend the Council further engage with landowners in the Old Kent Road on specific sites in order to determine the most appropriate 'tier' categories
			OKR 18 - Devon Street and Sylvan Grove		We support the suggested land uses for OKR 18 including the provision of replacement employment floorspace suitable for offices, studios and managed workspaces, with residential or other town centre uses above. The subject site is currently identified for a Tier 3 building which suggests a height of up to 16 storeys. We consider there to be scope for a building of potentially up to 32 storeys in the western part of the site with a smaller building of up to 8 storeys fronting Sylvan Grove. Of all the sites within the OKR Opportunity Area, it is considered that this site would have one of the least impacts on surrounding properties and as such the site would be capable of accommodating a significantly larger building without detrimentally affecting the immediate surrounding area. We support the provision of a new access road into the IWFM which will free up space to enable the provision of new public realm to the west of the subject site.
				AAP 6	Joseph Homes broadly supports the delivery of mixed-use development and the approach of the Council to intensify the density of uses close to major junctions and future tube stations. The retention or enhancement of employment use based on gross internal floorspace will significantly impact on the ability for many sites to come forward in the future. Greater emphasis should be placed on the number of jobs (employment density) and the type of employment floorspace being delivered rather than a crude quantitative assessment of floorspace. The requirement to provide a relocation strategy to the Council where businesses are displaced is considered onerous and has the potential to significantly hold up the development process.

Landowners or developers	GL Hearn Limited	Danescroft Land Limited	236-237 Record Street, Southwark, SE15 1TL		The preparation of the OKRAAP is welcomed and the Inclusion of the client's site within the site allocation OKR16 is supported. The aspiration to maintain and introduce activity and vibrancy to frontages along Record Street and Ilderton Road is supported. The specific requirement for the site to provide workspace/ small industrial units at ground floor is recognised. However, of particular concern is the proposed location of the Primary School Extension (and noted access) within the existing boundary of Danescroft's interests which could ultimately undermine the development potential and viability of the site coming forward for comprehensive redevelopment in its entirety. There is a lack of evidence to justify the need of a school on this site. This matter must be clarified as soon as possible as the site will be available to be developed shortly. If the Primary School Expansion is maintained within the next version of the AAP in this location, due detailed consideration must be given to the remaining developable part of this site (and air rights above any school floorspace) in terms of acceptable land uses (and quantum) at ground/first floor levels and importantly how the considerable cost associated with the delivery of the school floorspace would be offset to ensure that a viable scheme can be delivered.
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Landowners or developers	DaviesMurch	Aitch Group	62 Hatcham Road	AAP 1	We fully support the Council's approach to deliver a masterplan and the need for stakeholders to work together to help deliver this objective. We also fully support the Council's recognition about the fragmented land ownerships meaning that sites may need to come forward on a phased basis. The policy should be expanded to support a case by case review where developers who have been unsuccessful in their attempts to cooperate with neighbours.	Rep received in 2016
			and 140 Ilderton Road			
			OKR 16	AAP 6	My client supports the broad thrust of this policy to increase jobs within the area. However, it requires development to retain or increase the amount of employment floorspace on site. The client is of the view is that it would be counterproductive to the success of the area to require the provision of significant amounts of floorspace that cannot be let. We would request that the Council reconsider the absolute requirement to retain or increase employment floorspace and allow some flexibility to consider applications on a site by site basis with the overarching objective to increasing job density.	

Sub Area 4 –
Hatcham, Ilderton
& Old Kent Road
(South)

Whilst my client fully supports the provision of good quality and attractive commercial accommodation, it is their experience that 4m isn't required and it could be delivered at a lower height (such as 3.8m). We continue to be confused by the Council's approach to require servicing to take place on site, particularly given that the intention will be to deliver car free development, which will ease congestion on the road network. It is our view that a servicing strategy/ plan could be put in place, using on-street servicing bays that would allow my clients site to be used more efficiently.

Gerald Eve LLP	The Duchy of Lancaster	Sub Area 1 - Mandela Way, Crimscott Street and Old Kent Road (North)		Overall support is given for the OKR AAP. However, the client has some reservations. Regarding the successful co-existence of uses, the client contends that the commercial success of the integration of uses, particularly stacking distribution uses with residential, is largely unproven in London. With regards to the distribution of social / transport infrastructure, the client believes that it should be made clear that other landowners, in addition to the client, will be required to contribute to the cost of delivery and the Council must be clear on how infrastructure will be funded through CIL and S106 planning obligations. With regards to public open space, the client contends that there is no evidence to demonstrate the need for a new park of the planned size within this site. This need must be justified to account for the associated loss of buildable land. Finally, the need for a new primary school on this site has not been fully justified or evidenced and may be inappropriate due to the presence of delivery vehicles and other related activity. It is considered that the school should be located off site or in a standalone building.	Rep received in 2016
JLL	Firmdale Holdings Ltd.	Former car pound site, Mandela Way	AAP 5	Significant concern is expressed that the blanket minimum requirement of 35% affordable housing provision is not likely to be achievable. This policy is likely to have an impact on the client's ability to make development of their site viable. It is considered that reference should be made to allow for other affordable tenures, such as discount market sale and discount market rent, to contribute to securing the "minimum 35%" affordable housing target, as well as allowance for some flexibility on the proportionate split of the affordable tenures. It is also considered that draft Table 2 should make it clear that the requirement for the minimum level of 2 bed and 3 bed+ homes only applies to social housing provision and not intermediate or private units. It is also requested that the minimum level of studio units should be increased to 10% for residential schemes in the Central Zone and Action Area cores	Rep Received in 2017 Rep received in 2016
			OKR 3 AAP 7	Objection is raised to the requirements for development to 'provide residential development and offices above shops' as being unduly restrictive, with the potential to adversely impact redevelopment of sites as a consequence. Policy phrasing should allow flexibility on this requirement.	

AAP 8 Significant concern is raised to the requirement of the Policy to “pay due regard” to the protected borough view from Nunhead Cemetery to St Pauls Cathedral. A shift of the viewpoint from Nunhead Cemetery to St Paul’s Cathedral slightly Westwards would remove Guy’s Cancer Centre from the view and increase the development potential of a number of sites by reducing the area of development sites subject to height restriction.

AAP 11 Significant concern is concern is expressed that the approach of the policy is too inflexible and the requirement of a payment in lieu achieving 100% green field run off rates on site is unreasonable, particularly where development will reduce run-off compared to existing. It is considered that draft Policy AAP 11 should be amended to take into account feasibility, and the final bullet point be removed.

CBRE Ltd	FM Conway Ltd	25 Mandela Way	AAP 5	To be consistent with national planning policy, there needs to be acknowledgement that site specific viability is a consideration in determining the provision of affordable housing. In order to ensure consistency with the Draft London Plan Policy H13 and to encourage the development of this sector we consider that the requirements for Build to Rent should be consistent with the requirements of the Draft London Plan in terms of affordable housing and the length of covenant. The prescriptive approach to housing mix does not allow for flexibility to respond to site specific circumstances as currently worded, despite the Draft London Plan Policy H12 stating that Boroughs should not set prescriptive dwelling size requirements for market and intermediate homes.
		OKR 3	AAP 6	Whilst the general intensification of employment activities is welcomed, given FM Conway’s long term aspiration to retain an interest in the Mandela Way, Crimscott Street and Old Kent Road (North) site for storage and distribution uses, this diagram and policy should be reconsidered to enable greater flexibility for existing businesses and occupiers.
			AAP 7	Whilst the proposal to increase and diversify the retail offer of the town centre is welcomed, it is considered there should be greater flexibility to allow provision of a range of A class uses in order to provide a mix of units and active frontages.
			AAP 8	FM Conway would welcome a more detailed conversation with LBS regarding the potential massing achievable on the site given the “Linear View of St Pauls Cathedral from Nunhead Cemetery” Landmark Viewing Corridor that runs to the south of the site.

Rep received in 2016

Sub Area 1
Masterplan for
OKR 3

FM Conway welcomes the principle of increased retail frontages along Dunton Road. It is considered that storage and distribution facilities are achievable within the reprovided Conway Hub proposal, where a basement level is allowed to host residential-related infrastructure and services, alongside storage and industrial accommodation as part of the wider facility, if practicable. We support the general guidance around building materials and features reflecting the industrial nature of Mandela Way, but would encourage LB Southwark to consider allowing some flexibility within this to respond to the GLA's need for exceptional design quality for taller elements, where appropriate.

RPS Group	Folgate Estates Limited	711-717 and 729-733 Old Kent Road and 2-20 Devon Street, London SE15 1JL (OKR 18)	Too great an emphasis has been placed on preserving local views of the now listed gas holder no.13. Greater emphasis should be placed on the long view south along Old Kent Road. We agree that tall buildings are appropriate in this general location, given the proposed Underground station on the former Toys R Us site. With respect to the proposed 'courtyard' arrangement of buildings for this part of OKR 18, we believe this does not make best use of the site, and does not facilitate preservation of the four storey building fronting OKR which is identified as being of Townscape Merit in the AAP. Although not referred to in the AAP, the gas holders to the north of OKR 18 are subject to Hazardous Substances Consent and associated blast zones. This is having a significant detrimental effect on progressing redevelopment schemes in these areas and could undermine achieving the redevelopment promoted by the AAP. The consent and zones should be removed as soon as possible. Note the inclusion for hotel accommodation in the western block of OKR 18.
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Landowners or developers

Savills	U+I Group Plc	The Galleywall Trading Estate (currently not designated as a site within the AAP).	The Galleywall Trading Estate site has the potential for a significant mixed-use residential development, in which Camgate and the Church Commissioners are in agreement. Redevelopment of the site for residential development could help to "boost significantly the supply of housing" as sought by Paragraph 47 of the NPPF and is considered to make the best use of this highly accessible brownfield location. In our view, the Galleywall Trading Estate site is isolated from the other sites and is surrounded by existing residential properties, which make it unsuitable for industrial uses and would fail to attract occupiers that could provide significant industrial employment. Our client continues to reaffirm by retaining the SPIL designation of the site, this would not maximise the many benefits of the site for the Borough or for London.
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Rep Received in 2017

Landowners or developers

Gerald Eve LLP	Greenspruce GP Limited	Tesco (OKR 4)	AAP 2	It is not clear how the Site Allocations will be prioritised by the LB Southwark in the event that the BLE is not delivered. This should be addressed. The housing priorities are not clear if the BLE is not delivered and it is suggested that "LBS could prioritise the delivery of the identified Site Allocations, such that specific strategic sites will be identified for development irrespective of BLE delivery".
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AAP3	The delivery of the BLE is supported but some acknowledgement should be made in regards to a no BLE scenario
AAP5	The total anticipated new homes should be nuanced to account for a no BLE scenario. Suggests support for the BtR development is incorporated into the wording of the policy and the proposed family housing mix should be more flexible. It is suggested that 'recognition of the distinct economics of this housing sector should be included in Table 1'.
AAP6	AAP6 is supported but further clarity needed on Policy AA6 which states that 'development must deliver'. The requirement to identify a workspace provider at an early stage will be a disincentive to speculative development. The requirement to provide affordable workspace is overly onerous. The requirement to provide a financial contribution is too vague.
AAP7	Policy is supported but for sites such as OKR4 it might be appropriate to for a range of unit sizes to be provided away from OKR contingent upon future demand.
AAP8	Fully supported but confirmation needed that this will still apply without the BLE
AAP9	Nuance is recommended to ensure the scale and nature of the proposed reinstated high street is befitting of the scale of development anticipated. It is inevitable that there will be some harm caused to archaeological assets given the site is the potential location of the BLE
AAP11	Policy supported but it is not within the control of developers to provide electric vehicle fleets for commercial development
AAP13	Clarification is required on the mechanisms by which development must contribute to the provision of new schools and childcare facilities

OKR 4: Dunton Road and Southernwood Retail Park

Sub Area 1

The phasing section of this draft Site Allocation should be revised. Tesco lease the site and so CPO would be required but if the proposed station was to be partially on the Tesco site and partially on the Southerwood site, Tesco could construct a superstore and TfL costs would be reduced. Redevelopment should be located centrally on the OKR frontage of the site.

Given the scale of OKR4 there is capacity to accommodate some onstreet servicing and there is potential for more than two Tier One buildings to be accommodated

Landowners or developers	JLL	HC-Oner Ltd	1 Tower Bridge Road	The site is unallocated but identified within the Core Area and presents an excellent opportunity for intensification.
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			Bricklayers Arms Roundabout, Salisbury Estate Garages, 96-120 OKR, 233-247 OKR, Kinglake Street Garages, 4/12 Albany Road		4 out of 6 of these are only 0.1ha and so have limited potential to contribute to the 20000 new homes sought. 1 Tower Bridge would provide a better opportunity and so should be included as an additional allocation.
				AAP7	Policy AAP7 for development to provide 'residential development and offices above shops' is too restrictive and be 'provide residential development and/or offices above shops'
				AAP11	Policy is inflexible and should be subject to the feasibility of the project.
Landowners or developers	Troy Planning and Design	Helix Internal Limited	328 St James Road OKR11/ Sub Area 2		Although the property is included in the emerging Southwark Local Plan, the AAP identified it and the surrounding properties as being of townscape merit and there is no evidence to support that the site is of townscape merit. The development of this site with the adjoining properties is desirable and is included in the Proposed Submission of the NSP. The site as the potential to be developed in isolation or in conjunction with 328-334 St James Road
Landowners or developers		Henfield Storage	236-237 Record Street (OKR 16)		Concerned with the proposal to extend Ilderton Primary School onto the land currently occupied by the business and is not aware of any detailed justification for this. Having researched alternative locations, I believe I would be unable to find an alternative suitable premises resulting in loss of employment.
Landowners or developers	Rolfe Judd Planning	Hoxton Investments	38-40 Verney Road OKR13	AAP1	We support the objectives but support the addition of wording into the reasons for this policy which emphasises the flexible nature of this policy with regards to the definition of general conformity.
				AAP2	We support this policy
				AAP3	We support the policy, particularly the delivery of BLE
				AAP5	Policy supported but a reassessment needed of the tenure split in Table 1. The council should apply differential rates of tenure for residential development. A flexible approach should be applied that is tied to viability. Councils should not set prescriptive targets for market and intermediate homes in regards to housing mix. There should be greater flexibility in the target of the number of wheelchair use housing.

AAP6 Policies in the AAP relating to land use needs to be flexible in line with the NPPF. The wording of the site allocation should be amended to allow flexibility. Greater emphasis should be placed on the number of jobs and employment density rather than a quantitative assessment of floor space. The requirement to provide a relocation strategy to the council where small or independent are displaced is onerous. The imposition of obligations requiring sites to include affordable business space should be subject to financial viability on a site by site basis

AAP11 A balance needs to be drawn with regards to the deliverability of schemes and the contribution towards an appropriate and proportionate provision of public space. Part of the southern section of the 38-40 Verney Road is to be given to public realm but it is considered it should be taken into consideration in the context of the expected re-provision of employment floorspace as set out in AAP6.

OKR13 We consider the indicative capacity for new homes and jobs achievable. It is expected that the building typology for the site will be horizontal mix of medium-large storage and distribution with residential above. We consider greater flexibility in the application of prescriptive land uses at lower levels should be advocated and in the range of uses. The use to the immediate south of the site should be recategorised to a Horizontal Mix of medium-large storage and the distribution in mixed use developments commensurate with the proposed prevailing mix in the area. We consider building heights and access appropriate.

Landowners or developers

WYG Environment, Transport and Plannong	John Lyon's Charity	Parliamentary Press Premises, Mandela Way - OKR3 Sub Area 1	AAP1	Individual plots would need to be developed with some independence. It would be helpful if in the evidence base the council outlined its assumptions for indicative residential development capacity.
			AAP2	Support AAP2 but policy wording within OKR3 does not align with AAP2.
			AAP6	AAP6 does not clarify the amount of employment floorspace across the site allocation. Larger sites require flexibility. The site has a significant role in meeting housing targets and placemaking but clarification needed on the precise nature of the site provision.
		OKR3	AAP8	The site allocation has the capacity for tall buildings. Whilst OKR3 includes an indicative residential capacity, it would be helpful if in the evidence base the Council set out its assumptions for the housing capacity and other infrastructure requirements.

Rep received in 2016

Landowners or developers		Jon Watson-Miller	330-334 St James Rd		My property has been classified as a Building of Townscape Merit but no reason given why. The result of a recent meeting was that where possible property owners would work with Southwark to produce a plan for the whole much larger site.
Landowners or developers	Planning Potential	Kent Park, Ruby's Street	OKR13		Support the principle of regeneration and the inclusion of the site as part of Site Allocation OKR13 but concerned that the integration of large warehouses into mixed use buildings will not be practical in terms of the conflict between large delivery vehicles and any impact on residential amenity. It is overly prescriptive to require the development to meet the typologies of figure SA3.3. It would be more appropriate to have small office use on both sides of Ruby Street instead of office on one side and distribution on the other. It would also be appropriate to extend the town centre boundary to the back of Kent Park. The building heights for the Site Allocation is not consistent with Policy AAP8.
Landowners or developers	CBRE	L&G Assurance Society Ltd	585-589 Old Kent Road		Support the plans and ambition of the AAP but have concerns regarding the potential restriction of planning permissions due to transport capacity without the BLE
				AAP5	There is no reference to viability considerations in the policy. The affordable housing requirements for Homes to Rent are more onerous than the draft London Plan. The housing mix prescriptive requirements does not allow for flexibility. We request that policies on housing mix be consistent with the Draft London Plan.
				AAP6	Requirements for development are not clear
				AAP7	There should be some flexibility in the provision of a range of A class uses
				AAP8	AAP8 is strongly supported and suggests Figure 9 is ambiguous.
				AAP10	AAP10 is supported but concern over width of Linear Park in Figure 10.
			OKR13 Sub Area 3		Masterplan principles are supported. Minimum width on Linear Park will reduce building footprints impacting the scheme and result in unusual retail units. The requirements for off street servicing would result in basements. The complexity of phasing and land ownerships requires flexibility.
Landowners or developers/local business		DPD Group, La Poste	Mandela Way	AAP3	Support the plan if good design and an integration of logistics facilities is implemented. DPD believe in environmentally friendly vehicles but B8 space must be factored into the AAP therefore AAP3 is vital.
			OKR 3		The intensification of industrial space would be hugely beneficial. Shared space premises and logistics hotels should be considered as does the conversion of existing buildings e.g. underground parking. The CEP sector should be recognised as a natural consolidator

Landowners or developers/local business	HGH Consulting	Leathams Ltd	227-255 Ilderton Road - OKR16 Sub Area 4		Supported the proposed release of SIL and mixed use approach to development. OKR16 covers a large and diverse area and so flexibility should be applied to development requirements. It is questionable that the east side of Ilderton Road is suitable for depot and industrial uses. There is scope for taller buildings on the east side of Ilderton Road. There should be flexibility in development of floorspace if justified
Landowners or developers	Savills	L&G Property	Bermondsey Trading Estate		The site is currently designated as SPIL but it would be appropriate for redevelopment of alternative uses and in line with the NPPF policies should provide flexibility and the SPIL designation does not allow for that. The delivery of homes is a priority and this site has the capacity to do that.
Landowners or developers	DP9 Ltd	Lendlease Ltd	Elephant Park	AAP5 AAP6 AAP7	This site is in a location suited to support this policy Lendlease support the objective Lendlease would recommend some further consideration into breaking down the retail provision into multiple locations along Old Kent Road, each with the potential for distinct identities, uses and purposes. It is also noted that there will remain a need for bulky goods and larger supermarkets and locations for these uses should be identified and accounted for in the AAP, on peripheral locations away from the core public transport hubs. Customer car parking is likely to remain a requirement before the proposed tube stations are operational and should also be considered as part of the AAP proposals.
				AAP10	Consideration should also be made to calming the street using alternative means to traffic lights, which at present are overprovided and exacerbate pollution issues. Lendlease support the desire to deliver the Greener Belt strategy, linking parks across the Borough and beyond. It should also be considered whether there is an opportunity to identify a new and possibly more significant civic space/square to further strengthen the sense of place
Landowners or developers	JLL Ltd	LGIM Ltd	The Admiral Hyson Trading Estate		The site is identified as a SPIL but is in a predominately residential area. Concern that the site is not suitable for industrial intensification as it is small and isolated from other employment hubs, has poor access, would impact on residential amenity. A scheme for mixed use residential has been proposed and site should be allocated for such use.
Landowners or developers	Rolfe Judd Planning	Linton Group	2-10 Ossory Road - ORK10	AAP1 AAP2 AAP3 APP4	We support the objectives We support the objectives We support the objectives, particularly the BLE Increasing resident population will ensure businesses remain viable

AAP5 Needs to be a reassessment of the tenure split in Table 1 to allow flexibility. The council should apply differential rates for tenure for development. Delivery of projects is tied to viability and so flexibility is necessary. Council should not apply prescriptive targets for market and intermediate homes.

AAP6 Businesses will need to adapt to technological, political and economic changes as the plan is 20 years
Retention of floorspace quantity is too rigid. Requiring developers to include affordable business space should be subject to viability

AAP8 We would like reassurance that schemes can demonstrate greater density than that indicated by the AAP

AAP11 The need for publicly accessible spaces is an important consideration but there needs to be flexibility in the provision of these spaces

Landowners or developers	RPS	PGIM Real Estate	789-799 Old Kent Road - OKR18	AAP2	Supportive of site allocations but flexibility in land uses required
				AAP5	Target mixes should allow for flexibility across individual sites together with viability testing if required
				AAP7	Supportive of policy
				AAP8	Surprised that Figure 9 shows no massing or built form
			ORK18	AAP10	No comments but further information is required on proposed energy centre in Figure 10 New green route proposed to the north of the site. Such a link may open up opportunities for a range of smaller, commercial uses overlooking the route with residential above, however, we consider that this route is likely to only be successful if it is delivered in conjunction with wider proposed routes to the north-west and this will require coordination with adjoining land owners. Plan SA4 also appears to show a servicing route along the northern edge of the above green route. Although we understand the possible requirement for an emergency route along this boundary we do not consider it necessary or appropriate to have a servicing route here which could hamper the ability to deliver the aspirations of the green route.

Landowners or developers	JLL	Possfund Custodian Trustee Ltd	Bricklayers Arms Distribution Centre, Mandela Way -OKR3	AAP5	The blanket minimum requirement of 35% affordable housing provision is not likely to be achievable for schemes coming forward early in the plan period unless there is flexibility provided in the tenures and tenure split. Whilst regeneration of the area will create a new residential community, the increase in residential values will not be fully realised until retail, schools, public open space and community uses have been created and the Bakerloo line extension. It is considered that reference should be made to allow for other affordable tenures, such as discount market sale and discount market rent, to contribute to securing the "minimum 35%" affordable housing target. Applying restriction on the mix of residential units within developments will limit the ability for developers to tailor their private housing offer to meet identified needs and requirements.
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AAP6
 Objection is raised to the requirement of draft Policy AAP 6 that all developments must 'deliver workspace managed by a specialist provider for office and light industrial uses to support existing and new small businesses' and the requirement to 'Provide an element of affordable workspace on site that is either managed by a non-profit organisation or let to existing businesses from the Old Kent Road opportunity area'. Accordingly, it is considered that developments creating over 2500sqm GIA, should ensure that the employment space includes a range of unit sizes including units of 500sqm-2,500sqm capable of occupation by local small businesses.

AAP7
 Objection is raised to the requirements of draft Policy AAP 7 for development to 'provide residential development and offices above shops' as being unduly restrictive

AAP8
 Significant concern is raised to the requirement of the Policy to "pay due regard" to the protected borough view from Nunhead Cemetery to St Pauls Cathedral.

AAP11
 significant concern is expressed that the approach of the policy is too inflexible and the requirement of a payment in lieu achieving 100% green field run off rates on site is unreasonable,

Landowners or developers	CBRE	Royal London Asset Management	Six Bridges Estate - OKR11 and Sub Area 2		We have concerns regarding the potential restriction of planning permissions due to transport capacity without the Bakerloo Line Extension being put in place.	Rep received in 2016
				AAP5	The AAP does not acknowledge viability considerations. The affordable housing requirements for Homes to Rent are also more onerous than the draft LondonPlan requirements for Build to Rent. Unit mix should be flexible	
				AAP6	Figure 7 needs to reflect the high street and retail potential closer to the Old Kent Road frontage. We request that policy requirements with regards to existing businesses be removed. The requirement for 30 years of subsidised rents is particularly onerous.	
				AAP8	It is unclear from Figure 9 whether this second tall building is a Tier One or Tier Two tall building. the provision of two Tier One tall buildings on the Site will be critical to support the viability and deliverability of the wider redevelopment of the Site.	
				AAP10	Currently Marlborough Grove forms a key access point for the Six Bridges Estate and will need to continue to do so as the Site is redeveloped	
					Figures SA2.2, SA2.3 and SA3.4 should be clearly marked as indicative as the masterplans will need to remain sufficiently flexible to adapt to changing requirements over time. We request that a more flexible range of employment uses is provided to include all B1 uses under Fig SA2.3. Vertical Mix is supported	
					Sub Area 2	

Landowners or developers/local business	Savills	Safestore PLC	ORK18		Whilst not specifically identified, we are led to understand that the bowtie diagram can be interpreted as the inclusion of storage facilities (Use Class B8) as part of a mixed use re-development would be acceptable in principle. We suggest the current plan does not clearly identify the new 'pocket park' in ORK18 and therefore greater clarity is requested in terms of location, size, design etc.	Rep Received in 2017	Rep received in 2016
			Sub Area4		Safestore relies heavily on their visibility and presence on the Old Kent Road for their client base. As such, visual entrances on Old Kent Road plays a significant role in their business strategy. The urban diagram proposed in terms of footprint introduces a north-west south-east route through the site. Such a route is incompatible with Safestore's existing business. We propose that Tier One buildings are additionally encouraged towards the north end of Devon Street to create a landmark cluster, both at a local level along Old Kent Road and as a wider masterplan.		
Landowners or developers	Quod	Scotia Gas Networks	OKR13 Sub Area 3		SGN consider the OKR AAP to be unsound because of the following reasons: Impact of listed gas holder no. 13 and contrary to S.66 of Planning and List Building Act 1990; Site allocation OKR 13 and the proposed location of a B8 warehouse on the Site of Gasholder no.12 adjacent to listed holder no.13; and Gasholder no. 10 de-designation from SPIL.	Rep Received in 2017	Rep received in 2016
Landowners or developers	DWD Planning	SG Smith Properties	812 Old Kent Road	AAP2	We support the inclusion of confirmation that a temporary planning permission may be granted to allow good use to be made of a vacant site prior to the commencement of a permanent scheme.		
			OKR 17	AAP3 AAP8	Supports development that facilitates BLE It is considered that given the sustainable location of this area in close proximity to the new station the diagram should be amended to incorporate more Tier 2 and 3 buildings		
				AAP9	Supports the principle of transforming existing areas of large warehouses, car parks and industrial buildings into new residential and employment neighbourhoods.		
			Sub Area 4		The AAP should confirm that the exact locations of the proposed station and required worksite		
Landowners or developers	Torner Architects	Skillbeck Ltd	32 Verney Road - OKR 16	AAP1	Supports the introduction of residential alongside the co-location of commercial/employment generating floorspace in respect of 32 Verney Road, but, considers greater flexibility in the application of prescriptive land uses at lower levels should be advocated through a range of compatible land use options.		
			Sub Area 3	AAP6	Sub Area 3 Masterplan indicates that part of the southern section of Verney Road site would be given over to public realm whilst the integration of this part of the site to public realm is acknowledged, it is considered it should be taken into consideration in the context of the expected re-provision of employment floorspace as set out in policy AAP6.		

AAP9

It is considered that given the emerging townscape and masterplan that there exists the opportunity to add a Tier Three building to the southern end of 32 Verney Road adjacent

Landowners or developers/local business

SPACE Studios

90 Haymerle Road

OKR 10

AAP

The current draft AAP has incorporated a large amount of specific policy that was not in previous versions and has emerged without wider consultation.

There should also be greater clarity about a requirement for replacement floorspace to be suitable for the mix of activities in need of space. We agree that external servicing for business uses should be separate to residential servicing but don't believe the access management plan is suitable. We object to the building heights surrounding our premises and the impact on light for our tenants. We advocate continuation of industrial use designation for the areas north and west of 90 Haymerle Road. We object to the inclusion of our yard and car park as green space. We agree that the servicing plan in the AAP requires adequate off street servicing provision, such as loading and unloading for commercial tenants, however the current proposal is not workable for us. We could potentially offer a use for the proposed new institutional cultural use. We would like to see reference to a mechanism for long-term, sustainable affordable rents otherwise there is a risk that they will be short-term and the principles will not be adhered to

Rep Received in 2017 Rep Received in 2016

Landowners or developers

JLL

DTZ Investors, Strathclyde Regional Pension Fund

Southernwood Retail Park and 361-363 Old Kent Road

OKR4

AAP7

AAP5

The leases of the existing buildings are likely to necessitate phased development. Approval of a hybrid application for the entire site would allow the delivery of development early in the plan period for the Old Kent Road Area Action Plan on a key allocated site to help 'kick-start' regeneration of the area.

Objection is raised that the requirement of the policy that redevelopment must replace existing retail floorspace. Policy should reflect the changing trends in retail, the increased use of online shopping, retail as a leisure activity and competition from a number of modern, indoor shopping centres across London (where parking and public transport is plentiful).

In order to ensure viable development can be delivered, it is requested that draft allocation AAP 7 be amended to allow adequate flexibility for retail floorspace to be less than existing, if it is not viable to replace the existing amount of floorspace on site

The blanket minimum requirement of affordable housing provision is not likely to be achievable for schemes coming forward early in the plan period unless there is flexibility provided in the tenures and tenure split of the affordable housing component.

Rep Received in 2017 Rep received in 2016

AAP6

Objection is raised to the requirement of draft Policy AAP 6 that all developments must 'deliver workspace managed by a specialist provider for office and light industrial uses to support existing and new small businesses' and the requirement to 'Provide an element of affordable workspace on site that is either managed by a non-profit organisation or let to existing businesses from the Old Kent Road opportunity area'. In respect of provision of affordable business space, although reference is made to a "quota" of development, the policy is extremely vague in not defining what comprises "affordable workspace";

AAP11

Significant concern is expressed that the approach of the policy is too inflexible and the requirement of a payment in lieu achieving 100% green field run off rates on site is unreasonable

Landowners or developers

GL Hearn

Tailored Living Solutions

301-303 Ilderton Road
ORK16

TLS strongly supports the principles of proposed site allocation for Sub Area 4
TLS has interest in land in ORK16 and proposes a mixed use development. TLS request the site allocation for OKR16 'Hatcham Road and Ilderton Road' be amended as follows: Sub Area 4 Masterplan (Ref: SA4.2) should be updated to make a specific reference to the proposal; Sub Area 4 Typologies Plan (Ref: SA4.3) should be updated to include the 'Vertical Mix: Small office and studio' building typology applied to the site; and; The Indicative Building Heights diagram of Page 139 should be updated to include a building of up to 12 storeys in height as per Pre-Application discussions

Landowners or developers

Deloitte

Trustees of the Tate Gallery

7-14 Mandela Way

Tate is fully supportive of the plan. Tate recognises that redevelopment of the site would allow for a purpose built facility to be provided alongside the benefits of additional employment space and other compatible uses. Tate is concerned that residential uses in this location may not be compatible with a facility of this type, even with mitigation measures. Tate considers that transformative change needs to be managed effectively to ensure that the needs of existing businesses and occupiers are considered foremost

ORK3

In order for Tate to maintain operations and to stay in the area, which it is committed to doing, adequate access and egress must be provided for HGV's and employees.

Landowners or developers

Transport for London Commercial Development

OKR1

TfL CD continues to welcome the allocation of the Bricklayers Arms roundabout for residential development. We note that the form of acceptable development on this site will largely be guided by Policy AAP 8 but suggest development should occur when BLE works are complete

Rep Received in 2017

ORK17

The text under 'phasing' should be edited to allow for the potential new station and residential development to be constructed in tandem. It may not be necessary to wait until the station has opened.

AAP8

Whilst TfL CD agrees that Figure 9 provides a helpful illustration of the three tier strategy, AAP 8 should make clear that Figure 9 is not intended to provide a firm indication of permissible building heights on individual sites. Figure 9 should be amended to accurately represent view corridors within the AAP area. We also suggest that Figure 9 is updated to show the potential for 'tier three' and 'tier two' buildings at the Bricklayers Arms site, reflecting its status as a potential Bakerloo Line station site

Landowners or developers	Rolfe Judd Planning	Thamesmead Business Services Ltd	14-16 & 18 Verney Road	AAP1	We would support the addition of wording into the reasons for this policy which emphasises the flexible nature of this policy with regards to the definition of 'general conformity'
			OKR 16	AAP2	Although supportive of the proposed uses for 14-16 Verney Road, we propose a change to the proposed building typology and land use of 18 Verney Road as we believe this site also has the potential and is in an appropriate location to provide similar uses to that of the prevailing surrounding context in particular its neighbour 14-16 Verney Road.
				AAP3	Support the policy and the BLE
				AAP5	Need for greater flexibility in the application of the split between tenure within development schemes. we would seek clarification on the use of the term 'social rent' within the policy. It is considered the Council should apply differential rates of tenure for residential development subject to Area Action Plan policies and Opportunity Area Planning Frameworks
				AAP6	Policies contained within the AAP which relate to land use needs to be flexible in their approach and allow for the consideration of other complimentary uses. In contrast to prescriptive land uses, greater emphasis should be placed on the number of jobs and employment density; and the type of employment floorspace being delivered rather than a crude quantitative assessment of floorspace. We consider the requirement to provide a relocation strategy to the Council where small or independent businesses are displaced is onerous. We consider the imposition of obligations requiring sites to include affordable business space should be subject to financial viability which should be considered on a site by site basis
				AAP8	Given its close proximity to the building fronting Verney Road which have also been identified as 'Tier Three buildings', we consider 18 Verney Road also has the potential to accommodate a higher density than that which is proposed
				AAP8	In order to provide successful places there needs to be flexibility in the provision of these spaces and it may not be appropriate in all circumstances to provide 5sqm of public open space with each unit as a scheme may deliver other relevant material benefits.

OKR13

We support the introduction of residential alongside the co-location of commercial/employment generating floorspace and/or allowing the space to be used for educational purposes in respect of 14-16 Verney Road, however, we are not in agreement with the approach for a standalone industrial use on 18 Verney Road. We consider greater flexibility in the application of prescriptive land uses at lower levels should be advocated through a range of compatible land use options. Part of the southern section of Verney Road site would be given over to public realm through the delivery of planned new street which follows on from the green link. Whilst the integration of this part of the site to public realm is acknowledged, it is considered it should be taken into consideration in the context of the expected re-provision of employment floorspace as set out in policy AAP6.

Landowners or developers	GVA		OKR13 and Sub Area 3		It states that the Phasing for the OKR13 will be incremental and “Developments on the Ruby Triangle, Varcoe Road, Murdoch Street and at 6-12 Verney Road are expected to start in the next five years.” We agree with this and it aligns with discussions in recent meetings. However, the phasing strategy on the earlier pages appears incorrect and does not appear to show the whole Site Allocation OKR13 within the “short term” phasing plan.
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Landowners or developers/local business	Daniel Watney LLP	P Wilkinson Containers Ltd	20 Verney Road (OKR 13)		Proper consideration is needed for appropriate co-location of residential and industry and design guidance must address this. Failure to secure the BLE renders the remainder of the plan and plan period futile, and therefore it is essential that development and investment is encouraged at the outset. The OKRAAP applies unnecessary financial and non-financial burdens to development, through obligations and prescriptive building typologies and heights, which we have demonstrated in the case of our client’s site to lead to an unviable development that would not be progressed.
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Rep received in 2016

Landowners or developers	WYG	John Lyon's Charity	Parliamentary Press building, Mandela Way	AAP1	Individual plots would need to be developed with some independence. It would be helpful if in the evidence base the council outlined its assumptions for indicative residential development capacity.
			ORK 3 Sub Area 1	AAP2	Support AAP2 but policy wording within OKR3 does not align with AAP2
				AAP6	AAP6 does not clarify the amount of employment floorspace across the site allocation. Larger sites require flexibility. The site has a significant role in meeting housing targets and placemaking but clarification needed on the precise nature of the site provision.
				AAP8	The site allocation has the capacity for tall buildings. Whilst OKR3 includes an indicative residential capacity, it would be helpful if in the evidence base the Council set out its assumptions for the housing capacity and other infrastructure requirements.

Landowners or developers/local business	Gerald Eve	Yodel	1-2 Bricklayers Arms Distribution Centre	AAP6	We support AAP6
			ORK3		We support the designation and Option B for the BLE
Landowners or developers/local business	Pielle Consulting	Yodel	1-2 Bricklayers Arms Distribution Centre, Mandela Way (OKR 3)		Uncertainty over the future of our site has meant that we cannot invest with certainty and we have had to put our plan for electric vehicles on hold. The acquisition of our site would mean Yodel would have to stop operating in the OKR.
Landowners or developers	Rolfe Judd Planning	Hollybrook Homes	OKR10	AAP1	We support the objectives
				AAP2	We support the objectives of this policy but seek the recognition of the addition of student homes and higher educational learning space and SME space allied with Higher Education Institutions (HEI's) as part of the acceptable mix of uses across the Old Kent Road and in particular in OKR10.
				AAP3	Hollybrook is supportive of the need to deliver infrastructure to support the regeneration of the Old Kent Road and in particular the delivery of the Bakerloo Line Extension
				AAP4	There is a positive relationship between the opportunity to deliver significant development and the social benefits it can bring to the area and the people of Southwark.
				AAP5	In addition to the wording on affordable homes we consider the policy should include reference to the delivery of new student homes as part of the range of mix of housing across the OKR AAP area. There should be greater flexibility in the application of a target for the number of wheelchair use housing
				AAP6	Hollybrook considers the OKR AAP should allow for situations where the University want to sponsor low cost business units to promote the work of their institution, alumni and undergraduates. The retention or enhancement of employment use based on gross internal floorspace will significantly impact on the ability for these sites to come forward in the future. Greater emphasis should be placed on the number of jobs (employment density) and the type of employment floorspace being delivered rather than a crude quantitative assessment of floorspace. The current low density employment uses across the Old Kent Road Opportunity Area should be replaced with higher density employment uses across a wide range of use classes. The requirement to provide a relocation strategy to the Council where small or independent businesses are displaced is considered onerous. It seems unduly restrictive to require involvement of a workplace provider on medium sized projects in the area. The imposition of obligations requiring developers to include affordable business space should be subject to viability.

AAP7	The introduction of up to 20,000 new homes will give greater opportunity for new town centre uses to flourish. This should be supported by the quality of new buildings and public realm being delivered that will reinforce the character and function of the Old Kent Road.
AAP8	There is strong support for the three tier approach based on 'stations and crossings'.
AAP9	We consider a balance should be struck between protecting historic fabric (and its setting) and delivering the quantum of development required to meet the target of 20,000 new homes and 10,000 new jobs.
AAP10	The delivery of the Green Route is essential to the successful delivery of the Old Kent Regeneration and should allow opportunities to have active uses along its length and provide the maximum permeability to pedestrians and cyclists The OKR AAP does not include reference to student homes and this is considered an error.
AAP11	In order to provide successful places there needs to be flexibility to the provision of these spaces and it may not be appropriate in all circumstances to provide 5sqm of public open space with each unit as a scheme may deliver other relevant benefits
OKR10	We support the suggested land uses which comprise small industrial space and offices integrated into mixed use residential development. Hollybrook believes that a comprehensive redevelopment of the land at Glengall Road and Bianca Road for student homes with lower floor commercial accommodation linked to an HEI is complementary to OKR 10 and the emerging development proposals.



Retailers	Aldi Stores Ltd	840 Old Kent Road - OKR 17	Supportive of inclusion in OKR17 but considers the requirement for parking to be provided underground or wrapped with other uses to be too restrictive. The building heights strategy is not consistent with AAP8.
		AAP5	The policy title 'Quality Affordable Homes' places too much emphasis on the affordable requirement which detract from the other policies in AAP5
Retailers	Walsingham Planning	Lidl UK 96-120 Old Kent Road ORK 6	<p style="margin-left: 20px;">AAP7</p> <p style="margin-left: 20px;">We support the policy</p> <hr/> <p style="margin-left: 20px;">AAP7</p> <p style="margin-left: 20px;">The proposed site specific policy covers the store and excludes any of the surrounding uses. The redevelopment of the store with a new retail frontage onto Old Kent Road, fails to understand the nature of food retailing within this area and fails to understand the design requirements for a new store. Policy OKR 6 should reflect both the relationship of the proposed store to the wider area but also design requirements for a new store</p> <p style="margin-left: 20px;">Policy AA7 is overly prescriptive and fails to follow the Council's own SRS</p>

Retailers	GL Hearn	Tesco Stores Ltd	107 Dunton Road		Welcomes the plan. Any proposals that would disrupt our continuity of trade would have severe adverse impacts on our client's operations. Concerns regarding the ambiguity associated with the delivery of the Bakerloo Line Extension and in particular the indicative location of new stations	Rep received in 2017	Rep Received in 2016
			Tesco, OKR 4	AAP2	The restrictions placed on land uses within site allocations under the provision of Policy AAP2 provides insufficient flexibility.		
				AAP3	OKRAAP should include sufficient flexibility to address potential delays to/ or the cancellation BLE		
				AAP4	Welcomes the policy		
				AAP5	The Council must adequately reflect the costs associated with the redevelopment of the site within any viability assessments associated with affordable housing provision.		
				AAP6	Concerned that Policy AAP6 does not acknowledge the important economic and employment benefits provided by retail uses such as the existing Tesco Superstore.		
				AAP7	Supports the objective to resist the loss of retail uses within the Opportunity Area, in particular those on the Old Kent Road, our client requests further clarification as to the definition of 'amount of retail uses'.		
				AAP8	Supportive of policy		
				AAP10	Seeks further clarification in relation to the requirement for development to provide 5sq.m of public open space per dwelling		
			Sub OKR4		Would like 'The redevelopment of the site will ensure the continuity of trade of the existing supermarket' included. Concerned that considering the site and the Southerwood Retail Park in combination.		

Public Bodies and
Community
Groups

Education and Skills
Funding Agency

The ESFA supports the aim to deliver 2x new primary schools, 1x new secondary school and 9x primary school expansions. The ESFA welcomes and supports the Council's inclusion of site specific requirements for new schools in Figure 5: The Masterplan, AAP13: Best start in life and within site allocations OKR3, OKR10 and OKR11. The ESFA recommends that the three site allocation policies define the anticipated number of forms of entry required at each site. It is also not clear where the proposed 9x school expansions are planned and the size of these expansions. The ESFA considers it is important that developers fund the additional school places needed to meet the need generated by new development.

Public Bodies and
Community

AAP13

This policy could allow flexibility for use of design or mitigation measures

It would be useful if the evidence in the strategy update and the latest Infrastructure Delivery Plan could be expanded on further

Public Bodies and
Community
Groups

Cllr Leo Pollak on
behalf of Southwark
Labour Councillors

We propose that a Land Value Calculator is submitted to the Planning Inspector as part of the OKR AAP, asserting a live land value maximum for each allocated site and made publicly available.

Rep received in 2017 Rep Received in 2016

		AAP9	<p>We are not convinced that the tall buildings strategy appears to be sufficiently based on principles of good growth in town planning, but rather seems to have followed the line of land speculation and negotiation in pre-app for a number of strategic sites. Two issues in 'stations and crossings' are visual justification and viability justification.</p> <p>The OKR AAP could benefit from a section detailing a rich ground floor strategy</p> <p>The Old Kent Rd area action plan in its current form is lacking a significant civic gesture, a so-called 'outdoor room' for people to enjoy</p>		
		AAP10	<p>We would be proposing a compact city model for the OKR based on a vision of fitting thousands more people into the area who can only more readily be shuttled in and out of the more liveable parts of the city via the Bakerloo line</p>		
Public Bodies and Community Groups	Environment Agency		<p>We acknowledge that the borough benefits from flood defences. However, there remains a residual risk of failure of these defences, and therefore it's essential that planning decisions are taken with due consideration to the scale of this risk. We strongly advise there to be a policy of no loss of waste capacity in the Opportunity Area without compensatory provision. We support the plan proposal to link together the area's existing open spaces, including Burgess Park to Canada Water, with new park spaces. We agree with the council that new development should have SUDS to alleviate surface water runoff and flooding problems</p>	Rep received in 2017	Rep Received in 2016
	Friends of Burgess Park	AAP8	<p>We support investment in a high quality green link. Putting in place the new green link should be sympathetic to existing buildings whilst achieve the aim of increasing green space. .</p> <p>The position of tall buildings and their impact on the park is a top concern. The modelling of sunlight and shadow of each development and the cumulative impact of proposed, planned and existing must be modelled.</p>		Rep Received in 2016
Public Bodies and Community	Highways England		No comment on the proposal		
Public Bodies and Community Groups	Historic England	AAP8	<p>Our principal concern is in respect to the proposed tall buildings strategy and the impact on heritage assets and local character. It's not clear how the heights proposed within sub areas have been determined and must be resolved. AAP8 does not demonstrate an understanding of impact on character. Tier One Tall Buildings does not define a maximum height and width of streets needs consideration.</p>	Rep received in 2017	Rep Received in 2016
		AAP9	AAP9 is welcomed.		
		AAP12	<p>Visual impacts of new builds are needed. Recommend working with GLA/TFL for holistic approach to AAP12.</p> <p>Sub Area 1 needs greater analysis of building height.</p> <p>Sub Area 2 is opportunity of strenghten character.</p> <p>Sub Area 3 needs a vision to better reflect historic high street.</p>		

		Sub Area 4		Sub Area 4 needs clarification on building heights due to proximity to heritage assets.	
		Sub Area 5		No comments on Sub Area 5	
Public Bodies and Community Groups	London Borough of Lewisham		AAP3	We specifically support AAP3 as it recognises the need to work with neighbours and that developments need to facilitate the BLE and provide adequate infrastructure. However, there is a need for joint funding and further partnership working in order to ensure the safeguarding of the BLE route and its timely delivery.	
			AAP8	We would seek assurances that the level of growth planned for can be appropriately supported by infrastructure, including community infrastructure and services. We approve of the references in AAP9, AAP10 and AAP12 to improving existing walking and cycling links Some of the development proposals running along the borough boundary cater for tall buildings (up to and above 30 storeys). The Plan should acknowledge that adjacent neighbourhoods beyond the borough boundary have an established character that differs	
		Sub Area 4		Support policy in relation to Sub Area 4	
		Sub Area 5		We support Sub Area 5 South Bermondsey which seeks intensification of industrial uses	
Public Bodies and Community Groups	Liberal Democrat Group Southwark Council			The Old Kent Road Area Action Plan has been ad-hoc, top-down and developer-led. On the key tests of affordable homes, mixed communities and new infrastructure the plan still isn't good enough. The stand-out claim that this plan hits 35% affordable housing is a sad reflection of low expectations. One of the biggest criticisms of the OKR Area Action Plan is the displacement of small businesses – especially local manufacturers. The council has to be much more pro-active about securing the tube station. It is essential to build cycle and pedestrian infrastructure as part of the plan.	
Public Bodies and Community Groups	GLA - Mayor's Response			Supports ambition of the Plan but there is not a coherent evidence-based strategy to achieve objectives. The masterplans don't address the strategic issues of the overall area. One way to ensure GLA and TfL are content with the AAP would be to restart the design review process. The AAP proposes a significant loss of designated industrial land which is a concern. It is not clear what the capacity for development is pre and post BLE and the possibility that the BLE will not be delivered needs to be addressed. There must also be a policy that controls development to 8000 homes until construction of the BLE has started. AAP should support investment in bus priority.	Rep received in 2017 Rep Received in 2016
			AAP5	Policy should be amended to ensure at least 10% of new build dwellings meet Building Regulation requirement M4(3).	

		AAP7	Importance of OKR as a high street is diluted in comparison to previous draft. Support for reinvigorating the thoroughfare to become a thriving high street. A major Town Centre of the proposed size is a concern		
		AAP10	The ambition should be to mend existing public realm issues and that the design is user friendly. Concerned if the Linear park provides sufficient space and the green link should be reconsidered.		
Public Bodies and Community Groups	Southwark Law Centre		The drafting of the AAP has not included sufficient involvement of the local community. The AAP does not comply with the Statement of Community Involvement. The council failed to comply with legal principles on consultation. The council failed to comply with PSED and there is a lack of baseline data. There has been no analysis of the impact of the policies and sub-areas allocations on groups which share protected characteristics, or consideration of whether the policies will promote the interests of those with protected characteristics, who might find it harder to access the benefits of redevelopment than others. No consideration given to living near site allocations or to businesses who will be relocated. No policies or site allocations for Gypsy and Traveller accommodation have been included.		
Public Bodies and Community Groups	Sport England	AAP10	Support policy but the Council should consider how informal recreation can be encouraged. Additional outdoor spaces for sport could be provided on the roof of the proposed buildings.	Rep received in 2017	Rep Received in 2016
		AAP12	This Policy will help encourage and support new residents in being physically active. In addition to this, Sport England considers that further work should be undertaken to consider what further built indoor sports facilities are required to support the new community.		
		AAP13	The co-location of the new sports hall at the school is welcome, however, the Council should undertake further work to ensure that the facility provided is the right one for the new community		
		Evidence base	Sport England objects to the evidence base provided with the document and would like to work with the Council to help determine what indoor sports facilities are required to support the new population.		
Public Bodies and Community Groups	Savills Thames Water		Thames Water object to the proposed Area Action Plan which makes no reference to the IWMS. In order to realise the opportunities identified within the IWMS it will be necessary for policy support to be provided within the AAP. A list of site specific comments are also referenced.	Rep received in 2017	Rep Received in 2016
Public Bodies and Community Groups	Theatres Trust		The transformation of the Heartlands sub-area to include a new heart for the Cultural Quarter outlined in part 1.4Ciii is supported.		
	Mandela Way OKR3	AAP7	Support the policy The Trust supports a major new cultural offer coming forward in this area.		

Hatcham Road
and Ilderton Road
(OKR16)

By stating "in D use class" the scope is unnecessarily restrictive, as some arts and cultural uses such as theatres are classed as Sui Generis. There are also compatible arts and cultural uses within the B use classes



Individuals and groups



The BLE will come at a steep price. Unless Southwark Planning Department is extremely tough on the issues of Social Housing and Workplace provision, ordinary residents will be squeezed out of the area. Business costs are likely to soar to pay for the BLE. I think that the concepts of Town Centre, High Street, Stations and Crossing policies are very artificial and non-organic

AAP5

Does not support the proposal that 13000 private homes will manage to help pay for 7000 affordable homes and feels strongly that Social Homes to rent or buy should be much higher than the suggested minima within the 35% proportion of Affordable Homes

Individuals and groups



Partially supports proposals to deliver housing. Supports BLE, strategy for providing business space, the Greener Belt strategy, reduction of car use and enhancing local character. Does not support tall building strategy

Individuals and groups



Overall finds the Plan difficult to follow. There are many generalisations and claims that are unsupported by evidence. An examination of the Plan's site proposals appears to show that the quantities of facilities and infrastructure planned could not be sufficient for any larger population than the incoming residents of the proposed 20,000 new homes. The Plan does not explain how the BLE in its entirety is to be funded and what will happen if the necessary funding is not achieved.

AAP3
AAP4

This policy outline, (p 26), appears to deliberately mislead. It is claimed here that the plan is designed to systematically approach social regeneration so that '...the wellbeing of existing and new residents and workers becomes the most important outcome of our regeneration efforts'. Yet without a comprehensive study of need in the area affected, these claims are meaningless.

AAP5

Southwark's main need is for social rented properties. There is no attempt in the plan to prioritise this category to acknowledge this need.

AAP10

Most of the 'new parks' listed on page 47 are not parks at all, hence the strange reference to 'streets' in this policy title.

Individuals and groups



AAP1

Unclear, map too small

Rep received in 2017 Rep received in 2016

AAP2

Without clear targets, the most difficult parts of the plan – such as attaining a mix of residential and industrial – will be impossible to achieve

AAP3

adequate' infrastructure is not enough

		AAP4	defintitions are required for 'targeted support' and 'disadvantaged'.
		AAP5	The 35% minimum affordable housing requirement is inadequate.
		AAP6	The policy fails to set out how it will achieve the intensification of activity that is required for any release of industrial land.
Individuals and groups	[REDACTED]	AAP1	Unclear, map too small
		AAP2	Without clear targets, the most difficult parts of the plan – such as attaining a mix of residential and industrial – will be impossible to achieve
		AAP3	adequate' infrastructure is not enough
		AAP4	defintitions are required for 'targeted support' and 'disadvantaged'.
		AAP5	The 35% minimum affordable housing requirement is inadequate.
		AAP6	The policy fails to set out how it will achieve the intensification of activity that is required for any release of industrial land.
Individuals and groups	[REDACTED] Collective Response by business and residents groups		The group overall found that the new AAP is being preceded by nearly a dozen large-scale planning applications in the OKR area, putting the plan's role as a guidance document in question. It fails to identify and consider the needs of the existing residential and business communities. It remains built on insufficient consultation. It fails to consider the needs of the Gypsy and Traveller communities and does not base its "strategic" considerations on sufficient evidence and analysis
		Introduction	Should mention existing residents. We find that the OKR's unique character – especially its interplay of identities and activities – is poorly represented in the AAP.
		Vision	The policies in the AAP also do not make clear how existing residents will be able to access all the benefits of redevelopment
		Strategy	The strategy fails to model for the absence of a BLE
		AAP1	Unclear, map too small
		AAP2	Without clear targets, the most difficult parts of the plan – such as attaining a mix of residential and industrial – will be impossible to achieve
		AAP3	adequate' infrastructure is not enough. Mention of a third Bakerloo Line station in this policy and elsewhere in the plan reinforces the fact that the plan is unfeasible, considering that there is not even adequate funding set out for two stations.
		AAP4	defintitions are required for 'targeted support' and 'disadvantaged'.
		AAP5	The 35% minimum affordable housing requirement is inadequate.
		AAP6	The policy fails to set out how it will achieve the intensification of activity that is required for any release of industrial land.

Rep received in 2016

AAP7	It is unclear what role the town centre is to fulfil in relation to other local town centres. The A class offer proposed along the OKR is too limiting and B class uses should be provided as part of the town centre. The Peckham Civic Centre should remain part of the high street
AAP8	The tall building buildings strategy Fig. 9 does not provide clear guidance and generally the strategy seems loose. The OKR has an identity but this has not been presented or audited sufficiently. Tall buildings should complement the existing character, not replace it.
AAP9	AAP 9 should draw on a definition of heritage that is both broader and more detailed. The proposed scale of developments is out proportion to the existing urban fabric. A finer grain should be adopted that integrates with adjoining neighbourhoods.
AAP10	The AAP makes no attempt to make up for the current Open Space deficiency in the area and consider that the “Greener Belt” is a marketing concept that has no planning value.
AAP11	Deliverables outlined under ‘developments must’ don’t correspond to a key ambitions of the policy to improve walking, cycling and public transport
Sub Areas	The detail for each sub area represents a substantial departure from previous versions of the AAP. It is unlikely that all developments will follow the exact descriptions in the site allocations. Building typologies appear unresolved and don’t provide solutions of how high housing densities can be combined with industrial and other commercial uses. The design guidance provided is too prescriptive and limiting.

Individuals and groups



With the BLE station at Bricklayes Arms, it would not be necessary for further two stops due to costs. The Sandgate site is essential industrial and logical being on the New Cross Gate side of the Road. But objects to the AAP extending across the frontage to the other side of the railway to where the pub is . The Aldi supermarket should be retained. The Toys R Us site shouldn’t be a station. I would like to see council properties built , not the deceptive so called affordable



Expresses support for the action plan but concerned that the majority of housing built will be unaffordable and at the expense of social housing. Does not support the redevelopment of existing housing if it means people are pushed out.

Individuals and groups



The proposed height of the new surrounding buildings is likely to impact negatively on many of the studios as the sun moves round the studio building in the course of the day . Our building is accessed by a secure yard where it is possible to assemble projects and load vehicles safely. The proposal now outlined differs from the original plans. The loss of space in the yard will bring about changes which will severely impact the use and function of the building. The proposed loss of existent studio space on the ground floor is also of major concern and seems totally unnecessary and not in keeping with the spirit or vision articulated for the proposed scheme.

Individuals and groups



In the plans developers talk of generating a green belt linear park along the route of the Grand Surrey Canal. However, it was my former understanding that areas of this canal would actually be regenerated as waterways in this redevelopment. I feel reinstating the waterway would be paramount in this redevelopment's success.

Individuals and groups



I was unable to attend the drop in sessions for this round of consultations but having read the full document it is inconsiderate to areas of the current community of residents and many small to medium sized businesses, not to mention its valuable heritage. The Masterplan appears to have been formed behind closed doors with no attempt to meaningfully engage with residents and businesses in the area. The economic model that the masterplan is based on will not be relevant in 20 years. As the various Historic Area and Conservation Area Assessments will take up until the end of 2018, it is vital that no planning application decisions are made on contentious land or buildings until these are completed.

Individuals and groups



Concerns over resident displacement to facilitate new development. More homes need to be affordable

Individuals and groups [REDACTED]

I support the proposal to retain or increase floorspace, that external servicing for business is separate to residential but the access management plan is not an acceptable alternative, that major developments provide workspace and this should include affordable workspace and I support the retention of SPACE Studios as employment. I object to building heights surrounding SPACE Studios due to loss of light and this was referenced in an objection to application 16/AP/3603. I object to the inclusion of the yard of 90 Haymerle Road as a green space as it is required for servicing. The Access, Servicing and Frontages plan of OKR10 does not show a service route to the north of SPACE Studios. Recommendations for Internal Courtyard (p.96) spaces in contradiction with Shared Courtyard Spaces (p.92). Shared Courtyard Space to east of our building is not possible as proposed and proposed plans would require reorganisation of the internal layout of our building. SPACE interested in the proposed new institutional and cultural use as proposed on p.96. I would like reference to be made to a mechanism for long-term, sustainable affordable rents.

Individuals and groups [REDACTED]

The current draft AAP has incorporated a large amount of fine-grain area specific policy that was not in previous versions and has emerged without full involvement of affected parties and without wider consultation.

AAP11
Overall supportive of the policy. We agree that external servicing for business uses should be separate to residential servicing. We are not convinced that an access management plan is an acceptable alternative to this.

AAP8
We object to the building heights surrounding our premises and the impact on light for our tenants
We object to the inclusion of our yard and car park as green space.

We object to the plan on p.95 not showing a service route to the North of our building on Haymerle Road to our existing yard. The proposed plans are not possible without a fundamental re-organisation of the internal layout of our building. We are interested to know what the new institutional cultural use proposed. We would like to see reference to a mechanism for long-term, sustainable affordable rents.

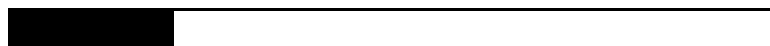
Individuals and groups [REDACTED]

Southwark Council is the cause of the housing crisis and has a poor record of regeneration

Individuals and groups [REDACTED]

Concerned where cars will go if a second tube stop is located as Toys R Us site.

Individuals and groups



Whilst I understand the need for affordable housing across London, the concentration of so much affordable housing (35% of that proposed) within the Old Kent Road area is a concern, especially as it appears that much of this will be provided within high density high rise accommodation. I am concerned that the Bakerloo Line extension is being presented as a trade off for acceptance of the huge influx of people into this area of existing high population density. The plans show outlines of various tiers of mixed use accommodation, but are not clear on how existing businesses will be retained or attracted back to a radically reconfigured commercial property landscape. The plans make considerable mention of primary schools and the cultural identity of the area, but there is little detail concerning culture, theatre, arts, music and the range of opportunities for activities that appeal to the post school-age demographic who would be seeking accommodation and working in this area.

Individuals and groups



I'm very pleased to know your plans about renovation Old Kent Road. Suggests the area should contain a more mixed demographic. Elephant and Castle should be improved as it is dangerous and dirty. Would like comfortable places such as coffee shops and libraries on OKR and need for more and bigger GP surgeries

Individuals and groups

Northfield House

The intro does not refer to existing residents. The strategy fails to model for the absence of a BLE. The Green Spaces strategy makes no attempt to remedy the massive deficiency in green space that already characterises the OKR.

- AAP1
- AAP2
- AAP3
- AAP4

Unclear, map too small
No clear targets
adequate' infrastructure is not enough
definitions are required for 'targeted support' and 'disadvantaged'.

AAP5

The 35% minimum affordable housing requirement is inadequate

AAP6

The policy proposes strategy without a proper assessment of existing businesses, their job range and floor space needs. The policy fails to set out how it will achieve the intensification of activity that is required for any release of industrial land

Individuals and groups



The vision is fundamentally unsound because OKR is not Central London and because the vision is completely dependent on the Bakerloo Line Extension `

Rep received in 2017

- AAP1
- AAP2

This is the key diagram of the AAP, but lacks legibility
Clear benchmarks are essential for the different use categories and these should be developed in consultation with local communities

AAP3

It is unacceptable that all other infrastructure is only required to be "adequate". There is no policy on funding (surely this is essential)`


AAP4 Need to provide stronger support and real power to Neighbourhood Plans, value and resource community-centred knowledge and there should be mechanisms in place to give voice and involvement in decision making such as a Community Panel. In terms of the deliverability of this policy, it is unsound that no planning mechanisms are proposed to ensure that regeneration benefits existing residents


AAP5 The 35% minimum affordable housing requirement is inadequate.

AAP6 A comprehensive understanding of the local economy must be at the core of this policy


AAP9 AAP 9 understands the character of the area solely from an industrial and commercial perspective. Preserving the industrial heritage is important, but so also is the “social” heritage

Sub Areas There has been no consideration of the demographics of those living or working on and around the site allocations.

Individuals and groups  I have been surprised by the lack of change in the area. The potential for additional transport links, extra jobs and housing is welcome in the area. The OKR would benefit from a 'facelift' with more places such as cafes and restuarants

Individuals and groups  The current draft contains a large amount of policy that was not in previous versions without consultation. We are pleased with the proposal to increase floorspace, servicing for business is separate to residential, that major developments are required to provide workspace by a specialist workspace provider, increase in range of jobs and space and the inclusion of artists studios in the mix and consideration in terms of height (p.92). We object to the buidling heights surrounding 90 Haymerle Rd and recommend a reduction in heights in the blocks to the north and west of Haymerle Rd and that the block to the east is staggered. We object to the inclusion of our service yard as green space and the lack of a service route to the north of our building. The proposed plans are not possible without reorganistation of the internal layout of our building. We are interested om the new institutional cultural use and would like a mechanism for long term affordable rents.

Individuals and groups  Surprised that the plan may be to chamnge or demolish the buildings on Mandela Way. We get housing from developments at the Rich Industrial Estate but we still need business. I feel that when you try to look to build homes on top of existing work buildings it does not lead to a good mix as people will be affected by traffic and consideration must be given to the sewer systems. There needs to be a seperation between housing and business

Individuals and groups  The map shows in areas such as Ilderton Rd that existing good estates and housing are likiely to remain. If done without hammering leaseholders or adding too many tall buildings which could create problems along the quite narrow road, this is potentially a good thing, and shows maybe people were listened to

AAP2

A brief summary of this response includes: We ask for it be noted that a vital and expanding economy, in the OKR area, is currently under threat, indeed is already being denuded, propelled toward destruction, as a result of the plans put forward by Southwark, the AAP drafts and the NSP policies relating to the OKR area. Big development can happen in the OKR area, but it will only be good if the process is sophisticated and inclusive. There should be no net loss of industrial floorspace from the Opportunity Area

We object to the lack of clearly defined and quantified requirements for allocated sites
 The plan is too vague on several key matters, while inappropriately specific and micro-detailed on other matters
 There is an unclear relationship between allocations, in AAP and NSP, and other policies in the AAP.
 We object to the lack of policy to guide development in areas beyond designated site allocations and general policy designations. We urge you to delete the Core Area designation and all reference to it in the AAP. It has failed to make adequate allowance for the area's full accommodation needs for non-residential use. We are concerned that in the Plan Objectives section reference to a new major town centre does not mention high street. We were interested to see prominent mention of an Old Kent Road Business Network in the plan. We object to the emphasis given to temporary relocation of businesses while redevelopment takes place. We ask for it to be noted that our area's industrial economy, employing some four and a half thousand people is threatened by the current AAP. We object to failure to identify and protect, through the AAP as well as the NSP, sufficient capacity for industry and logistics within or close to the CAZ to support the needs of businesses and activities within that area. We object to suggestion of the possibility of removing SIL / SPIL designation from the Integrated Waste Management Facility. We object to the removal of Productive Hatcha, and the Glengall Edge from SIL as proposed in the NSP and OKR AAP.

We support the proposal, as set out in the AAP introduction, to mix residential and commercial uses, so that new and existing businesses like warehouses, shops, creative workspaces and offices are designed to co-exist with new homes. However, we challenge and object to the over reliance on un-tested development types and scenarios

The reference to horizontal mixed-use design implies it is the favoured development type, whereas vertical mixed-use types can be a more realistic way to achieve significant quantities of deep industrial accommodation with level access without relying on goods lifts

AAP6

Without a requirement to retain or increase floorspace of the same type there will very likely be a significant loss of industrial, workshop, studio and workroom accommodation. We object to reference to specialist providers of workspace / registered workspace providers in AAP 6 without also mentioning the role of less specialist / unregistered owners who lease premises

We object to indication of ground floor residential within the designated sites and Town Centres, within the areas covered by the Masterplan. We object to inclusion of extensive Vertical Mix: Small Office / Studio designation on the Masterplan / sub-area drawings

We object to inclusion of unrealistic (and un-evidenced) housing quantum aspirations. We object to the 20,000 dwelling figure, and urge you to reduce the housing target to 10,000 - 15,000 dwellings

We object to the insufficient protection afforded by the AAP of accommodation used by creative enterprises.

We object to failure to designate District Town Centres at Old Kent Road West and Old Kent Road East as recommended by the GLA. Town Centre policy needs to define limits on residential development in these areas and to make clear protective intent. There needs to be greater clarity about frontage facing use expectations within the Town Centre

We object to the Bow Tie conceit and associated drawing as it does not accurately reflect suggested policy, and is likely to cause confusion and ambiguity

We are concerned that the AAP places over reliance on un-tested development types and scenarios.

We object to the proposed secondary school location, indicative primary school and health hub locations, and the indication of a location for a sports hall, because all but one of these are indicated as on land currently in industrial use.

We object to failure to require larger predominantly residential developments in the OKR area to include smaller scale workspace for which there is strong demand and that can realistically be combined with residential, including office, workshop, light industrial, studio, workroom and storage

We object to failure to adequately identify and protect assets of heritage value, building, structures and trees

We object to the insufficiency of work carried out on a suitable green space and amenity space strategy for the area, and the inadequate recognition (and protection) of existing green and amenity spaces. We object to the indication on the Masterplan / sub-area drawings of extensive (excessive) areas of public space. We urge removal of reference to the Greener Belt, in text and drawings, as it is confusing and not of strategic significance.

AAP8

We urge you to review the tall buildings strategy and indicate proposals for height limitations on a simple map as part of the AAP, with the extent of limitations indicated. We object to policy AAP 8 because it is overly complex and its justification relies too heavily on vague thoughts about visual experience.

Individuals and
groups



The AAP would be a great way to rectify the lack of squash courts



Appendix 3: Postal questionnaire

Old Kent Road Area Action Plan: Consultation Report

December 2020

OLD KENT ROAD

While much of London has undergone rapid change over the last decade – not least in a bid to help meet the huge demand for housing – the Old Kent Road has remained relatively unchanged.

But as that demand continues to increase, particularly for affordable and social housing, Southwark Council is working closely with the Greater London Authority, Lewisham Council and Transport for London to take forward plans for a major redevelopment of the area supported by the extension of the Bakerloo Line from Elephant and Castle to Lewisham.

You can comment on the proposed changes to Old Kent Road by completing this questionnaire.

**HAVE
YOUR
SAY**

You can also attend drop-in sessions to find out more:

Tuesday 6 February (4.30pm – 8.30pm)

The Drawing Room, Unit 8 Rich
Estate 46 Willow Walk, SE1 5SF

Wednesday 7 March (4.30pm – 8.30pm)

Christ Church Peckham
676– 680 Old Kent Road, SE15 1JF

 @lb_southwark

 facebook.com/southwarkcouncil

 @southwarkcouncil

OLD KENT ROAD

What is the Old Kent Road Area Action Plan?

The purpose of the Old Kent Road Area Action Plan (AAP) is to set out how the best of the Old Kent Road, including its thriving businesses and arts and cultural communities, can be nurtured and developed over the next 20 years.

It is an innovative plan, with policies that will guide new development to provide urgently needed housing and jobs, while providing new opportunities and improving the lives of people who live and work there now.

To achieve this, the plan proposes mixing residential and commercial uses, so that new and existing businesses like warehouses, shops, creative workspaces and offices are designed to co-exist with new homes. This is the second formal public consultation that we have carried out about plans for the Old Kent Road.

In response to the first consultation in 2016, hundreds of local residents and businesses told us that they wanted to see a mix of new homes, existing businesses and new affordable workspace, as well as an increased focus on improving traffic congestion and pollution. There are opportunities for creative and innovative mixed use developments on retail sites, industrial land and car parks. This will include new homes, jobs, parks and facilities that will support both new and existing communities and businesses.

We have made significant changes to the original plan and are now consulting for a second time on a revised plan.

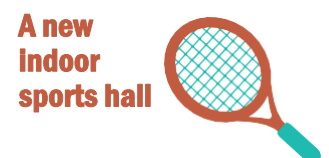
What are the main changes?



A new Secondary school



A new further education college or university



HAVE YOUR SAY

**All responses
must be
received by
21 March 2018**

This questionnaire has been prepared to help you comment on the changes proposed in the Old Kent Road draft Area Action Plan. All documents can be found on the council's website:
www.southwark.gov.uk/oldkentroadaap

It's important that we hear as many views as possible from local residents and businesses, and other interested parties, on the future plans for Old Kent Road.

Consultation is open until to 21 March 2018. Please feel free to contact us if you have any questions about this consultation or the proposed plans.

Visit southwark.gov.uk/OldKentRoad-consultation to complete this questionnaire online.

You can email planningpolicy@southwark.gov.uk or post your form to **FREEPOST SE1919/14 Planning Policy, Chief Executive's Department, London SE1P 5EX**

Your details

Name	<input type="text"/>	Email	<input type="text"/>
Address	<input type="text"/>		
	<input type="text"/>	Postcode	<input type="text"/>
Organisation (if applicable):	<input type="text"/>		
Representations on behalf of (if applicable):	<input type="text"/>		

My Southwark is the one-stop shop of Southwark council's online services. Please register for a My Southwark account at southwark.gov.uk/mysouthwark and opt-in to stay up to date with planning policy consultations.

1 The Old Kent Road offers a unique opportunity to build many new homes to help tackle London's housing crisis. We have listened to feedback from the previous consultation, where respondents said they wanted the regeneration of the Old Kent Road to deliver as much affordable housing as possible.

Do you support the proposals set out in the revised plan to deliver 7,000 new affordable homes, including social housing in the area, and a further 13,000 private homes which will help to pay for the affordable homes?

Yes In part No Don't know

THE MASTERPLAN

Southwark Park

Burgess Park

LEWISHAM

4,200 Homes
3,100 Jobs
1 Primary School
1 Health Hub

HATCHAM, ILBERTON &
OLD KENT ROAD
(SOUTH)
3,900 Homes
2,196 Jobs

KEY

- High street
- Sports hall
- Proposed primary school options
- Proposed secondary school
- Options for health hubs
- Bakerloo Line Extension station options x 4
- Proposed New Bermondsey station

A legend box containing a vertical list of color-coded lines and symbols. From top to bottom: a solid red line; a blue square; a yellow square; an orange square; a red circle with a white 'E' inside; and a blue circle with a white 'E' inside.

2 The extension of the Bakerloo Line is central to the plans for the Old Kent Road and the delivery of new housing.

Do you support the extension of the Bakerloo Line as a central part of the Old Kent Road regeneration?

Yes In part No Don't know

3 The council recognises the importance of existing businesses and industry in the Old Kent Road, including affordable and flexible space. Following feedback from the previous consultation, the revised plan accommodates all kinds of business space from laptops to forklifts with innovative new ways of mixing this space with new homes which has not been done on such a large scale elsewhere in London.

Do you agree with the strategy to provide new space for existing and new businesses on the Old Kent Road, by using innovative new ways to mix business space with new homes?

Yes In part No Don't know

4 The plan promotes the idea of a greener Central London, with new parks and routes for walking and cycling between workplaces, schools, homes and new leisure facilities.

Do you agree with the Greener Belt strategy to link parks, schools, health and leisure facilities?

Yes In part No Don't know

5 The council believes that regeneration, as well as improving places, should also create opportunities for people to live healthier and more fulfilling lives.

Do you support our plans to improve the area to benefit local people, with better access to jobs, parks, education, healthcare, and a varied and vibrant high street?

Yes In part No Don't know

6 In line with feedback from the previous consultation, the plan includes safe and attractive routes for people walking and cycling, and to restrict the number of vehicles travelling along Old Kent Road, which will reduce air pollution and limit congestion.

Do you support the plans to reduce car use and congestion in the area, by creating new safe walking and cycling routes in the area and extending the Bakerloo Line?

Yes In part No Don't know

7 The Old Kent Road is an historic and renowned part of London, and we want to protect its unique character and key historic features as part of our plans.

Do you support the strategy to enhance the positive local character and heritage of the Old Kent Road and bring back to life lost features such as the Surrey Canal through a new linear park?

Yes In part No Don't know

8 To deliver the ambitious number of homes set out in the plan, including 35% affordable homes, the proposals for the Old Kent Road will include some tall buildings. Following feedback in the previous consultation, the revised plan provides more clarity about the location and heights of new buildings.

Do you agree with the strategy to locate the tallest buildings around new tube stations and key road crossings?

Yes In part No Don't know

9 The plan recognises the value of existing businesses in the Old Kent Road and the vibrant and creative business community. We want to continue to work closely with businesses to ensure new space is provided or relocation options are fully explored.

If you are an existing business in the Old Kent Road area, how do you feel the Area Action Plan addresses your needs or could provide further support?

10 Old Kent Road area

Do you have any other comments on the plans that you would like to share?

How did you hear about this consultation?

- | | |
|---|---|
| <input type="checkbox"/> My Southwark email notification | <input type="checkbox"/> Poster or advertisement |
| <input type="checkbox"/> Southwark Council website | <input type="checkbox"/> In the press |
| <input type="checkbox"/> Community Council meeting | <input type="checkbox"/> Leaflet through the post |
| <input type="checkbox"/> Other local community meeting or event | <input type="checkbox"/> Other (please specify) |
| <input type="checkbox"/> My Tenant Residents Association (TRA) | |

MONITORING FORM

Equality and engagement with our diverse communities is central to the day to day delivery of our Southwark Council services. To deliver on our commitment to a fairer future we need to collect some equality information about you. This also forms part of our legal responsibilities under the Public Sector Equality Duty of the Equality Act (2010).

We would therefore appreciate it if you could spend a few minutes filling in the details below. This information helps us to measure and analyse how well we are engaging with all those who live and work in the borough. So for example knowing that people from a certain age group are not attending the meetings, can help us adapt our meetings accordingly.

Please do remember that whilst this information is very useful for our work, you are not obliged to answer or complete any or all of the information. Southwark Council is the data controller for the purposes of the Data Protection Act.

1 What is your gender?

2 Do you consider yourself to have a disability or long term illness? (Please tick) Yes No

3 What is your age group (Please tick)

- 0 to 15 16 to 24 25 to 29 30 to 34 35 to 39 40 to 44
 45 to 49 50 to 54 55 to 59 60 to 64 65+

4 What is your ethnic group? (Please tick)

- | | | | | |
|---|---|---|---|---|
| <input type="checkbox"/> White | <input type="checkbox"/> Black or Black British | <input type="checkbox"/> Mixed | <input type="checkbox"/> Asian | <input type="checkbox"/> Other ethnic group |
| <input type="checkbox"/> British | <input type="checkbox"/> Caribbean | <input type="checkbox"/> White/Black Caribbean | <input type="checkbox"/> Indian | <input type="checkbox"/> Chinese |
| <input type="checkbox"/> Irish | <input type="checkbox"/> African | <input type="checkbox"/> White/Black African | <input type="checkbox"/> Pakistani | <input type="checkbox"/> Latin American |
| <input type="checkbox"/> Other white background | <input type="checkbox"/> Any other black background | <input type="checkbox"/> White/Asian | <input type="checkbox"/> Bangladeshi | <input type="checkbox"/> Traveller |
| | | <input type="checkbox"/> Any other mixed background | <input type="checkbox"/> Any other Asian background | <input type="checkbox"/> Other ethnic group |

5 What is your religion or belief if any?

6 Sexual orientation (Please tick the box that best describes you)

- Heterosexual Bisexual Gay Lesbian Prefer not to say

7 Are you a... (Please tick the box that best describes you)

- council tenant housing association tenant homeowner
 renting privately business other

Data Protection: All information is confidential and will only be used under the strict controls of the Data Protection Act 1998.

8 Old Kent Road: Area Action Plan Consultation



Appendix 4:

Copies of mail outs, press advertisement and marketing

Old Kent Road Area Action Plan: Consultation Report

December 2020

From: Southwark Council [mailto:Southwark-Council@public.govdelivery.com]
Sent: Monday, December 18, 2017 5:15 PM
Subject: Old Kent Road Area Action Plan consultation notification

CONSULTATION ON THE OLD KENT ROAD AREA ACTION PLAN: FURTHER PREFERRED OPTION

We have prepared a further draft of the Old Kent Road Area Action Plan which we are consulting on until 21 March 2018. The documents are available to view on our [website here](#).

The plan explains our strategy for the regeneration of the Old Kent Road, including the extension of the Bakerloo Line, to accommodate new homes, provide new jobs, leisure, shopping, parks and transport improvements in a new town centre over the next 20 years.

How to respond

Please email planningpolicy@southwark.gov.uk

Please check our [website here](#) to find out more about our consultation including other ways to respond.

If you would like us to attend your meeting or event please let us know by phone or email.

We look forward to hearing from you.

Southwark Council
planningpolicy@southwark.gov.uk
020 7525 5471

You are receiving this email because you have opted in to receive planning policy updates on your [MySouthwark](#) profile. To stop receiving these updates, please opt out by untick ing the tick box on your profile settings page

This email was sent to laura.hills@southwark.gov.uk using GovDelivery Communications Cloud on behalf of: Southwark Council · PO BOX 64529 · London SE1P 5LX

From: Southwark Council [mailto:Southwark-Council@public.govdelivery.com]
Sent: Friday, January 12, 2018 5:26 PM
Subject: Consultation update: Old Kent Road Area Action Plan

CONSULTATION ON THE OLD KENT ROAD AREA ACTION PLAN: SUBMIT YOUR COMMENTS ONLINE

We have prepared a further draft of the Old Kent Road Area Action Plan which we are consulting on until 21 March 2018. The documents are available to view on our [website here](#).

The plan explains our strategy for the regeneration of the Old Kent Road, including the extension of the Bakerloo Line, to accommodate new homes, provide new jobs, leisure, shopping, parks and transport improvements in a new town centre over the next 20 years.

How to respond online

Please visit our [consultation hub](#) to fill out our online questionnaire.

To keep up to date and find out about events please check our website or the consultation hub.

If you would like us to attend your meeting or event please let us know by phone or email.

We look forward to hearing from you.

Southwark Council
planningpolicy@southwark.gov.uk
020 7525 5471

You are receiving this email because you have opted in to receive planning policy updates on your [MySouthwark](#) profile. To stop receiving these updates, please opt out by unticking the tick box on your profile settings

From: Southwark Council [mailto:Southwark-Council@public.govdelivery.com]
Sent: Thursday, February 01, 2018 4:46 PM
Subject: Old Kent Road Area Action Plan consultation notification

CONSULTATION ON THE OLD KENT ROAD AREA ACTION PLAN: DROP IN SESSIONS

We have prepared a further draft of the Old Kent Road Area Action Plan which we are consulting on until 21 March 2018. The documents are available to view on our [website here](#).

The plan explains our strategy for the regeneration of the Old Kent Road, including the extension of the Bakerloo Line, to accommodate new homes, provide new jobs, leisure, shopping, parks and transport improvements in a new town centre over the next 20 years.

Come along to a drop-in session to find out more about the plan:

Tuesday 6 February 2018	4.30pm – 8.30pm	Drawing Room, Unit 8 Rich Estate, 46 Willow Walk, London SE1 5SF Christ Church Peckham, 676-680
Wednesday 7 March 2018	4.30pm – 8.30pm	Old Kent Road, London SE15 1JF

Fill out our online questionnaire on our [consultation hub](#) to give your views on the plan.

We look forward to hearing from you.

Southwark Council
planningpolicy@southwark.gov.uk
020 7525 5471

You are receiving this email because you have opted in to receive planning policy updates on your [MySouthwark](#) profile. To stop receiving these updates, please opt out by unticking the tick box on your profile settings page

From: Southwark Council [mailto:Southwark-Council@public.govdelivery.com]
Sent: Monday, March 05, 2018 4:41 PM
Subject: REMINDER: CONSULTATION ON THE OLD KENT ROAD AREA ACTION PLAN DROP IN SESSIONS

From: Southwark Council [mailto:Southwark-Council@public.govdelivery.com]
Sent: Monday, March 05, 2018 4:45 PM
Subject: REMINDER: CONSULTATION ON THE OLD KENT ROAD AREA ACTION PLAN DROP IN SESSION

This is a courtesy copy of an email bulletin sent by Thomas Weaver.

This bulletin was sent to the following groups of people:

Subscribers of OKR Business Network, OKR Business updated, OKR Creative, Stat. consultees not on ms, or TRAs & TMOs June 2017, (453 recipients)

REMINDER: CONSULTATION ON THE OLD KENT ROAD AREA ACTION PLAN DROP IN SESSION

We have prepared a further draft of the Old Kent Road Area Action Plan which we are consulting on until 21 March 2018. The documents are available to view on our [website here](#).

The plan explains our strategy for the regeneration of the Old Kent Road, including the extension of the Bakerloo Line, to accommodate new homes, provide new jobs, leisure, shopping, parks and transport improvements in a new town centre over the next 20 years.

Come along to a drop-in session to find out more about the plan:

Wednesday 7 March 2018	4.30pm – 8.30pm	Christ Church Peckham, 676-680 Old Kent Road, London SE15 1JF
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Fill out our online questionnaire on our [consultation hub](#) to give your views on the plan.

We look forward to hearing from you.

Southwark Council

planningpolicy@southwark.gov.uk

020 7525 5471

Phone Kiosk Marketing







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

NOTICE OF FORMAL CONSULTATION FOR:

**THE OLD KENT ROAD AREA ACTION PLAN: FURTHER PREFERRED OPTION
NOTIFICATION OF PUBLIC CONSULTATION (REGULATION 18 CONSULTATION)**

Southwark Council is preparing a new plan for the Old Kent Road and surrounding area. The plan 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, 10,000 new jobs, community facilities and new parks. The plan includes the potential for extending the Bakerloo Line from Elephant and Castle towards Lewisham with new stations along the Old Kent Road. The Area Action Plan (AAP) will be used to make planning decisions in the area and to coordinate and deliver the regeneration strategy.

The document sets out our proposals for the Old Kent Road and is now out for a further formal stage of public consultation.

Where to view the documents

The Old Kent Road AAP: Further Preferred Option and its supporting documents are available to view on the council's website at:

<http://www.southwark.gov.uk/oldkentroadaap>

You can find hard copies of the plan and supporting documents at the locations listed below.

How to get involved

Consultation on the plan will take place between **13 December 2017 and 21 March 2018**. All comments must be received by **5pm on Wednesday 21 March 2018**.

You can comment by:

Visiting our consultation hub and filling in our online questionnaire:

Consultation hub: <https://consultations.southwark.gov.uk>

E-mail to planningpolicy@southwark.gov.uk or post to: FREEPOST SE1919/14 Planning Policy, Old Kent Road Consultation, Chief Executive's Department, London SE1P 5EX

You can email the address above or call the planning policy team on 0207 525 5471 if you would like to discuss the plan or the consultation. If you are part of a community group and would like us to attend your meeting or event between December and March please let us know by phone or email.

LOCATIONS TO VIEW DOCUMENTS

You can request to view hard copies of our consultation documents at the Southwark Council offices, located at 160 Tooley Street, London, SE1 2QH.

You can also view our consultation documents at the following libraries and MySouthwark Service Points from 22 December 2017.

Libraries (Opening times listed individually below)

- **Blue Anchor Library:** Market Place, Southwark Park Road, SE16 3UQ
(Monday; Tuesday & Thursday 09:00 – 19:00, Friday 10:00 – 18:00, Saturday 09:00 – 17:00)
- **Brandon Library:** Maddock Way, Cooks Road, SE17 3NH
(Monday, Tuesday & Thursday 14:00 – 19:00, Friday 10:00 – 15:00, Saturday 10:00 – 17:00)
- **Camberwell Library:** 48 Camberwell Green, SE5 7AL
(Monday – Friday 09:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **Canada Water Library:** 21 Surrey Quays Road, SE16 7AR
(Monday – Friday 08:00 – 20:00, Saturday 09:00 – 17:00, Sunday 10:00 – 16:00)
- **Dulwich Library:** 368 Lordship Lane, SE22 8NB
(Monday, Wednesday, Thursday & Friday 09:00 – 20:00, Tuesday 10:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **East Street Library:** 168-170 Old Kent Road, SE1 5TY
(Monday, Tuesday & Friday 14:00 – 19:00, Saturday 10:00 – 17:00)
- **Grove Vale Library:** 25-27 Grove Vale, SE22 8EQ
(Monday, Tuesday & Thursday 14:00 – 19:00, Friday 10:00 – 15:00, Saturday 10:00 – 17:00)
- **John Harvard Library:** 211 Borough High Street, SE1 1JA
(Monday – Friday 09:00 – 19:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **Kingswood Library:** Seeley Drive, SE21 8QR
(Monday & Thursday 10:00 – 14:00, Tuesday & Friday 14:00 – 18:00, Saturday 13:00 – 17:00)
- **Newington Temporary Library:** Elephant Artworks – Second Floor, Elephant Road, SE17 1LB
(Monday - Friday 09:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **Nunhead Library:** Gordon Road, SE15 3RW
(Monday, Tuesday & Thursday 14:00 – 19:00, Wednesday 10:00 – 15:00, Friday 10:00 – 15:00, Saturday 10:00 – 17:00)
- **Peckham Library:** 122 Peckham Hill Street, SE15 5JR
(Monday, Tuesday, Thursday & Friday 09:00 – 20:00, Wednesday 10:00 – 20:00, Saturday 10:00 – 17:00, Sunday 12:00 – 16:00)

MySouthwark Service Points (Open Monday – Friday 09:00 – 17:00)

- Peckham MySouthwark Service Point – 122 Peckham Hill Street, SE15 5JR
- Walworth MySouthwark Service Point – 376 Walworth Road, SE17 2NG

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



Appendix 5:

OKR Forums Consultation Summary You Said/We Did

Old Kent Road Area Action Plan: Consultation Report

December 2020

Old Kent Road

Southwark Council would like to invite you to the next Old Kent Road Forum. It is an opportunity for local people to discuss questions, comments and concerns around plans for the Old Kent Road.

Date: Saturday 20th October

Time: 11am to 1pm

Address: Christ Church Peckham, 676 - 680 Old Kent Road, SE15 1JF

Theme: Transport

Agenda:

11am - 12pm:

- Drop-in session with proposed developments at Tesco and Southernwood Retail Park on display and developers present
- [Action Old Kent Road](#) will be displaying their ideas for a crowd funded 'Urban Room' and will give a presentation at 11.45am

12pm – 1pm:

- Presentation from TfL about the Bakerloo Line Extension, the A2 Project, the Healthy Streets initiative and bus services, followed by Q&A
- Workshops led by Cabinet Member Johnson Situ and ward councillors Evelyn Akoto, Michael Situ and Richard Livingstone to discuss transport issues in Old Kent Road

Follow up from Old Kent Road Forum: September 2018

The Old Kent Road Forum is an opportunity for local people to discuss questions, comments and concerns around the plans for the Old Kent Road.

We are committed to ongoing engagement and regular communication with local communities. Around 70 residents attended the first Old Kent Road forum and a number of issues were raised including:

- Making information about proposals for the Old Kent Road more easily accessible, consulting local people on decisions and ensuring their voices are heard
- Bringing developers together so proposals are considered holistically
- Definitions of affordable housing and concerns about overcrowding
- Fire safety concerns, particularly for tall buildings after the Grenfell tragedy
- Risk of overdevelopment and losing Old Kent Road's unique character
- Concerns about creating community, not being developer-led
- How much open space will be provided
- Tall buildings, including appropriate building heights and the impact on Old Kent Road's landscape
- What will happen to existing shops/businesses
- Release of industrial land and protecting important businesses and skilled workers who live locally
- Young people, community spaces and tackling knife crime

We are creating a website to bring together lots of information about the plans for the area and make it easily accessible for local residents and businesses.

We will develop more detailed responses to the issues raised above and publish them on the website when it launches later this month.

There were a number of actions coming out of the previous meetings which we have followed up:

You said...	We did...
Residents raised concerns about building heights	We are reviewing the heights of buildings on the boundaries of existing residential communities and assessing impacts on wind and sunlight to make sure that public areas around buildings feel pleasant and comfortable.
Request for meeting between local business and developers in respect of Glengall Road development sites	Meeting booked for 4 October (This was subsequently cancelled but discussions continuing between all parties)
Request to meet with Glengall Road residents regarding the type and scale of development proposed in OKR10	Meeting booked for 10 October
Request to meet with Stevenson Tenants and Residents Association (TRA) regarding the Old Southern Railway Stables and Forge to discuss the Article 4 Direction and proposed site allocation OKR12	Meeting booked at TRA on 17 October
Complaint about rats from local residents	Pest control have been put into contact
Request to see daylight sunlight reports	Daylight and sunlight reports submitted with planning applications are available to view online via the Southwark Planning Register
Request for confirmation regarding Pages 4 Walk plan amendments	Masterplan amendments made changing business units on garden boundary edge to 3 storey terraced housing. Information has been sent to residents and will be made available at the Forum and on the website
Request to remove Naylor House from AAP area	Opportunity area boundary amendments were made to exclude Naylor House. These will be made available at the Forum and on the website

Old Kent Road

Southwark Council would like to invite you to the next Old Kent Road Forum. It is an opportunity for local people to discuss questions, comments and concerns around plans for the Old Kent Road.

Date: Saturday 17th November

Time: 11am to 1pm

Address: Christ Church Peckham, 676 - 680 Old Kent Road, SE15 1JF

Theme: Employment and workspace

Agenda:

11am - 12pm:

- Drop-in session on workspace and employment in Old Kent Road including Area Action Plan proposals and workspace survey.

12pm – 1pm:

- Presentation on employment strategy and update of business survey by We Made That, followed by Q&A.
- Workshops led by ward councillors Evelyn Akoto and Richard Livingstone on creative economy, workspaces and employment for local people.

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Follow up from Old Kent Road Forum: October 2018

The Old Kent Road Forum is an opportunity for local people to discuss questions, comments and concerns around the plans for the Old Kent Road.

We are very keen to engage and communicate regularly with local people.

Approximately 60 residents attended the second Old Kent Road forum and a number of issues were raised including:

- Concerns about the loss of No.53 and No.172 bus routes and the introduction of additional routes (being proposed in Transport for London (TfL) bus consultation).
- Bakerloo line extension:
 - Ensuring that funding sources for the extension are transparent;
 - How the new stations will affect residents close to proposed stations in terms of noise and vibrations;
 - The extent of disruption to local business owners during the delivery of proposals;
 - How the delivery of the Bakerloo line extension will affect existing large retailers.
- Open space and air quality – need to ensure new developments address pollution.
- Improvements to public realm, air quality and highway at Bricklayers Arms.
- Bringing residents together to discuss how the public realm can be improved for cyclists and pedestrians.
- The need to improve communications between TfL and adjoining boroughs.
- The need for high speed broadband to improve connectivity.

There were a number of actions coming out of the previous meetings which we have followed up:

You said...	We did...
<p>It is unclear what support is provided for local small business owners.</p>	<p>We have set up an Old Kent Road Business Network which is an online survey. We will use the network to ensure that businesses have up-to-date information about the Old Kent Road opportunity area.</p> <p>Feedback from the Network will be used to better understand the requirements and aspirations of existing businesses in the area and inform the types of new business space that are built. It will be used to help create a database of businesses that would be interested in occupying new space in existing or new developments.</p>
<p>There will be a number of changes to bus routes. How do we find out more and have our say?</p>	<p>‘Save the date’ email sent to subscribers on 2nd November 2018 provided links to TfL’s consultation and proposal pages.</p> <p>The Council has specifically raised the issues relating to the proposed changes on Old Kent Road as part of its response to the TfL bus route change consultation.</p> <p>Further information is available here: https://consultations.tfl.gov.uk/buses/central-london/</p>
<p>We want to be involved in public/open space development.</p>	<p>We are aiming to deliver a forum that will provide the opportunities to discuss things that local people would like to see in their open spaces and in the public realm.</p>
<p>We need an accurate phasing plan so people can prepare for transport related works.</p>	<p>We have provided this information in the Bakerloo line extension document (pages 8 – 9). This gives a predicted timeline for phasing and delivery.</p> <p>As per the TfL consultation website, if it is decided the proposed changes to buses are to go ahead, then they will be introduced in Spring 2019.</p> <p>With regards to highway works both TfL and Southwark Council are in the early stages of working towards a strategy.</p>

Old Kent Road

Southwark Council would like to invite you to the next Old Kent Road Forum. It is an opportunity for local people to discuss questions, comments and concerns around plans for the Old Kent Road.

Date: Saturday 15th December 2018

Time: 11am to 1pm

Address: Christ Church Peckham, 676 - 680 Old Kent Road, SE15 1JF

Theme: Tall buildings: design, location and how they can help deliver affordable homes

Agenda:

11am – 11.45am:

- Coffee and networking
- Exhibitions on the Old Kent Road AAP and Bakerloo Line Extension
- Developer exhibitions (tbc)

11.45pm – 1pm:

- Chair welcome
- Introduction – Councillor Situ - Cabinet Member for Development, Growth and Planning
- Presentations
- Discussion workshops

Future dates:

19th January 2019 - Theme: Open Space

16th February 2019 - Theme: How developer contributions and the Community Infrastructure Levy (CIL) can address local needs

16th March 2019 - Theme: Building for the Future - Design Quality

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Follow up from Old Kent Road Forum: November 2018

(Theme: Workspace and business)

The Old Kent Road Forum is an opportunity for local people to discuss questions, comments and concerns around the plans for the Old Kent Road.

We are committed to ongoing engagement and regular communication with local communities. Around 30 residents attended the third Old Kent Road forum. Some of the issues discussed are included below.

You said...	We did...
<p>Concerns about the level of engagement with businesses and whether this has been sufficient for the number of years the AAP has been prepared. There needs to be more notice for businesses to attend meetings.</p>	<p>We have been talking to businesses from the start of the AAP process. It was recognised from the forum that it can be difficult to engage with business owners. We surveyed all the businesses in OKR in 2015 and all commercial businesses in the area have been invited to join the OKR Business Network. We are now updating this survey to get an up to date contact list.</p> <p>We are committed to continuing the conversation with businesses. We will set up a separate consultative forum with local businesses on an area basis to discuss the plans at a convenient time to suit business hours. Starting with the Cantium Retail Park and Marlborough Grove Area and we will use local groups such as Vital OKR to ensure we reach as many businesses as possible.</p>
<p>There should be more affordable space for small businesses and to encourage more to the area and to grow.</p>	<p>We require affordable workspace to be delivered as part of new development. This may include managed workspace and/or discount rents. We will continue to secure new business space and support new businesses to thrive, for example through the new Pioneer Grant Innovation Fund.</p>

You said...	We did...
<p>Concern about lack of consultation with residents and how the council is responding to what local's say</p>	<p>We have launched the Old Kent Road website www.oldkentroad.org.uk and we will shortly be publishing a consultation summary document with more detail on how we have responded to residents. We have met with a number of residents groups in the area including Glengall Road residents, Canal Grove residents, Stevenson Crescent TRA and Page's Walk residents. Proposed changes to the plan will be published on the web site.</p>
<p>Concern about the loss of industrial space in redevelopment plans leading to a loss of the economy of the Old Kent Road.</p>	<p>We are committed to ensuring the Old Kent Road economy continues to thrive. The plan requires different types of workspace in different areas, from depots and distribution centres to offices and light industrial manufacturing and creative space. We ensure planning applications are delivering workspace that meets the requirements of the plan, including proper servicing for businesses. It is not always possible to share emerging proposals for new workspace, but we will encourage businesses and land owners to do so.</p>
<p>Concern that businesses will be pushed out of the area, due to the changes planned and which pushes up rents and leases shortening.</p>	<p>The plan requires the inclusion of existing businesses in redevelopment plans where possible. A wider relocation strategy is being prepared to accommodate businesses as different phases of the Old Kent Road complete.</p>
<p>Feedback from the forums and notes should be published well in advance and on the website to give people enough notice of events and to keep the conversation going.</p>	<p>We have published the next forum dates on the website and sent out an email reminder with these feedback notes.</p>

Old Kent Road

Southwark Council would like to invite you to the next Old Kent Road Forum. It is an opportunity for local people to discuss questions, comments and concerns around plans for the Old Kent Road.

Date: Saturday 19th January 2019

Time: 11am to 1pm

Address: Christ Church Peckham, 676 - 680 Old Kent Road, SE15 1JF

Theme: Open Space

Agenda:

11am – 11.45pm:

- Coffee and networking with stalls:
 - Patel Taylor Architects: Livesey park model
 - Fabrik Landscape Architects: Canal park model

11.45pm – 12.00pm

- Presentation from Patel Taylor and Fabrik Architects on new parks

12.00pm – 12.30pm:

- Workshops – parks and open spaces

12.30pm – 1pm:

- Q & A session

Future dates:

16th February 2019 - Theme: How developer contributions and the Community Infrastructure Levy (CIL) can address local needs

16th March 2019 - Theme: Building for the Future - Design Quality

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Follow up from Old Kent Road Forum: December 2018 (Theme: Tall Buildings)

The Old Kent Road Forum is an opportunity for local people to discuss questions, comments and concerns around the plans for the Old Kent Road.

We are committed to ongoing engagement and regular communication with local communities. Around 60 residents attended the fourth Old Kent Road forum. Some of the issues discussed are included below.

You said...	We did...
<p>Public consultation methods should be reviewed. The Saturday sessions are too short. Residents would like additional meetings in the week.</p>	<p>We are in continuous consultation with local community groups and residents in various ways. We have met with a number of resident groups in the area on weekdays and evenings. We encourage residents and local community groups who would prefer a meeting on a week day to get in touch, as we are open to answer questions at a suitable time for you.</p> <p>We will be adding a map to our website that will show all the additional public consultation events we have attended or will be attending. This map will be interactive and will include a short summary of who we are seeing or have seen. It will also confirm which groups and developers were present at meetings</p> <p>We are reviewing the way in which we conduct the Saturday forums. This may include providing sufficient time for both Q&A sessions and workshops.</p>
<p>With the proposal of tall buildings, the council should consider the impact on the micro-climate and ecology.</p>	<p>We have commissioned a specialist to look into the impact of tall buildings on the micro-climate.</p>

You said...	We did...
<p>The Design Review Panel (DRP) is welcomed; however we would like to conduct a community review panel to look at the impact of proposals on residents and amenity space standards.</p>	<p>We are looking at examples of best practice elsewhere in London in respect of community review panels. We will consider those and then present options for a panel for the Old Kent Road.</p>
<p>Residents were not aware of the DRP; there should be more transparency with regards to the outcomes of these discussions.</p>	<p>The panel considers a wide range of schemes within Southwark and follow procedures and guidelines established by CABE. The views expressed and recorded by members of the panel are for Council use only.</p> <p>However, we are looking at the possibility of providing summaries updates on the outcomes of discussions and publishing elements publically.</p>
<p>There are concerns that the quality of the proposed housing is unfit for families and some individuals, failing to considered mental health and wellbeing.</p>	<p>The Council understands the importance of mental health and wellbeing, as it is a key topic addressed in the Council wide Fairer Future Commitments (Theme 5 – A healthier life).</p> <p>The Old Kent Road Area Action Plan (AAP) plan has a number of polices that aim to ensure developments considered mental health and wellbeing, such as, ensuring 10% of homes in large scale developments are accessible for those with physical and mental health needs, ensuring homes meet national and local space internal and external standards, improving access to more as well as better green spaces and ensuring that new developments have sufficient good quality external amenity space to name a few. These provisions are discussed with the applicant at pre-application stage.</p>

Old Kent Road

Southwark Council would like to invite you to the next Old Kent Road Forum. It is an opportunity for local people to discuss questions, comments and concerns around plans for the Old Kent Road.

Date: Saturday 16 February 2019

Time: 11am to 1pm

Address: Christ Church Peckham, 676 - 680 Old Kent Road, SE15 1JF

Theme: How developer contributions (S106) and the Community Infrastructure Levy (CIL) can address local needs.

Agenda:

11:00am – 11.30am:

- Networking and information about recent investment around the Old Kent Road.

11.30am – 11.35am:

- Welcome from Cllr Johnson Situ and ward councillors.

11.35am – 11.50pm

- Presentations from Southwark Council and Southwark Law Centre.

11.50pm – 12.40pm:

- Workshops – Developer contributions and Community Infrastructure Levy.

12.40pm – 1pm:

- Round up and Q&A

Future dates:

16th March 2019 - Theme: Building for the Future - Design Quality

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Follow up from Old Kent Road Forum: January 2019 (Theme: Open Space)

The Old Kent Road Forum is an opportunity for local people to discuss questions, comments and concerns around the plans for the Old Kent Road.

We are committed to ongoing engagement and regular communication with local communities. Around 40 residents attended the fifth Old Kent Road forum. Some of the issues discussed are included below.

You said...	We did...
What percentage of the Linear Park is publically owned?	Approximately 30% of the linear park will be publically owned.
<p>How will the park be managed?</p> <p>How have we factored in maintenance and management of the park through periods of development and once the development is completed?</p>	<p>It will be important that the linear park is managed as one space to make sure that it is well maintained throughout and so that it feels like one park.</p> <p>We are considering possible management arrangements. As a landowner, Southwark will be represented in the management arrangement.</p>
Burgess Park is becoming a busy cycle route presenting risks to pedestrians. How will the linear park be different?	<p>We recognise that potential conflicts between people cycling and walking need to be considered very carefully. Since the last forum meeting, we have met with Friends of Burgess Park and are keen to learn from Burgess Park and other places.</p> <p>Cyclist will also have the option of using the new cycle lanes proposed on the highway of Old Kent Road or on quieter routes around the OKR including the parallel route to north of OKR linking the cycle Quietway 1.</p>

You said...	We did...
<p>There is a lot of hard landscaping in the park.</p> <p>A lot of land in the park appears to be identified for events, rather than informal recreation.</p>	<p>The park will have a balance of hard and soft landscaping. The council owned areas of the park in particular should be as green as possible. We are committed to ensuring that local people have opportunities to contribute to the design and character of the park.</p>
<p>Is there the potential for sports facilities to be provided in the park?</p>	<p>The main sports facilities in the area are provided in Burgess Park, which is also due to be upgraded. Provision in the linear park would be more locally focussed around different types of play space.</p>
<p>Have the council taken into account the impact of future developments on the linear park.</p>	<p>When submitting planning applications, developers are required to model wind and sunlight impacts and where necessary make changes to ensure that parks and streets feel pleasant and comfortable.</p> <p>We are also commissioning a microclimate study to assess wind comfort, sunlight and daylight on parks and public spaces to provide assurance on the quality of public spaces.</p>
<p>The park needs to be accessible to people with disabilities.</p>	<p>It is important that we ensure our new parks are designed for all ages and people with disabilities. This includes ensuring that new public realm is accessible by wheelchair users and by mobility scooters.</p>
<p>People need to feel safe in the park at different times of the day and evening.</p>	<p>The council and developers will work with the local community and with the Metropolitan Police to ensure that spaces are “secured by design”. They should be well lit, overlooked by homes, shops and workspaces and with opportunities for anti-social behaviour minimised.</p>
<p>The “You Said, We did” flyer needs more detail.</p>	<p>Moving forward, we are looking at new ways we could represent the “you said, we did” flyer to include details such as council contacts and other useful information related to particular projects. More information has been included in this flyer.</p>

Old Kent Road

Southwark Council would like to invite you to the next Old Kent Road Forum. It is an opportunity for local people to discuss questions, comments and concerns around plans for the Old Kent Road.

Date: Saturday 16 March 2019

Time: 11am to 1pm

Address: Christ Church Peckham, 676 - 680 Old Kent Road, SE15 1JF

Theme: Building for the Future – Design Quality

Agenda:

11am to 11.55am:

- Networking and information

11:55am – 12pm:

- Welcome from Cllr Johnson Situ and introduction to 231 Old Kent Road: Museum of Us

12.00pm – 12:15pm

- Presentation from Diana Cochrane (Walworth Society): Old Kent Road and its heritage and how its historic development and social history that can inform and shape new development

12:15pm – 12:30pm:

- Southwark Young Advisers: Ideas for the future of Old Kent Road

12:30pm – 1pm:

- Roundtable discussion workshops. Achieving design quality in Old Kent Road
- Feedback

Future dates: Southwark Council will be opening 231 Old Kent Road on 5 April 2019. This space is for local residents, businesses, community groups and everyone that would like to be involved in shaping the area to come together, share ideas and engage in discussions about the neighbourhood and its future. Keep up to date on events via our website www.oldkentroad.org.uk

Follow up from Old Kent Road Forum: February 2019

Theme: How developer contributions (S106) and the Community Infrastructure Levy (CIL) can address local needs.

The Old Kent Road Forum is an opportunity for local people to discuss questions, comments and concerns around the plans for the Old Kent Road.

We are committed to ongoing engagement and regular communication with local communities. Around 50 residents attended the sixth Old Kent Road forum. This forum had a different format where we asked the community what their priority was for Community Infrastructure Levy (CIL) and S106 contributions spending.

Each workshop table was then tasked to narrow this down to two projects. The feedback from the four tables has been included in the table below:

You said	We did
<p>CIL & S106 should be spent on ...</p>	
<p>Spaces for youth. These are important both for community and recreational purposes but also as a place to provide non-formal education spaces, music spaces, business progression spaces and/or facilities that can benefit upskilling and empowerment.</p> <p>Promote Young Advisers. Stray against single use infrastructure and promote dual use such as events in schools on Saturdays and youth clubs within school facilities.</p> <p>Places for young people (and the elderly) to go to improve their computer knowledge.</p> <p>Gangs and antisocial behaviour is an issue so there should be a youth programme and funding for activities and support.</p> <p>Playspace for older children. Football clubs and football pitches were suggested.</p> <p>Temporary parking for people who are not disabled but need to load / unload – parking schemes.</p>	<p>We received some great ideas outlining the themes and potential projects for spend, and we want to continue to develop these ideas in consultation with local groups.</p> <p>Youth Advisers came to the Old Kent Forum and contributed to the table discussions.</p> <p>We are working on designating some potential new conservation areas in the Old Kent Road area and undertaking historic area assessments including industrial buildings. We are also restoring the Kentish Drivers mural.</p> <p>We are continuing to refine design guidance and management of the park spaces and promoting affordable workspace and play space in new developments as requirements of the Old Kent Road AAP.</p>

<p style="text-align: center;">You said</p> <p>CIL & S106 should be spent on ...</p>	<p style="text-align: center;">We did</p>
<p>Public green space. The new parks must be green, not hard landscaped or public realm. Somewhere that children can play and places to sit on grass. Long term maintenance funding of parks.</p> <p>Security and lighting. Sensor lights could be used in parks and quiet streets which would save energy and also promote safety, for example halogen lights.</p> <p>Pavements were also considered to need more lighting, as the roads are often well lit but not the pavements. Ways to do this included suggestions of adding lights that face on to the pavement from the existing lamp posts, or to add lighting features to new buildings.</p> <p>Industrial heritage buildings such as the Caroline Gardens chapel, Canal cottages, general heritage enhancement and protection of these buildings with heritage and historic value. Restoring the Kentish Drovers mural.</p> <p>A gym specialising in gymnastics – and a place for families, youth, children and adults with disabilities could go and play sport.</p> <p>Resource hubs. For example, the Livesey Exchange and Action OKR.</p> <p>Pubs. These are an important part of heritage. The Green Man and the Thomas A. Becket were two that were named.</p> <p>Supporting businesses - this can be done through the funding for an industrial space strategy for the opportunity area and create opportunities for businesses to learn and grow.</p> <p>Affordable workspace and apprenticeships for young people.</p> <p>Museum space and attractions that are free – public destination.</p> <p>Street furniture, pedestrian bridges, improving roads, interesting crossings. Work with local schools/ artists to design the crossing.</p>	<p>We are opening 231 Old Kent Road on the theme of: Museum of Us on 5 April 2019. This will be a free exhibition with series of events celebrating the Old Kent Road’s rich and diverse history and population, past and present. Hosted at 231 Old Kent Road to launch this new community space.</p> <p>The Livesey Exchange will be opening on the corner of St James’ Road as a space for workshops, training and cultural programmes on Old Kent Road.</p> <p>Vital OKR will be doing a walking tour of businesses in the area (dates to be confirmed).</p> <p>Diana Cochrane will be running a walking tour of the Old Kent Road historic pubs (dates to be confirmed).</p> <p>We continue to meet with individual residents groups, businesses and workshops with schools. Our consultation summary and map of consultation events is on our website.</p> <p>These meetings and events will help cultivate further ideas for projects for the spend associated with CIL and S106 funding in the Old Kent Road area.</p>

The Southwark Law Centre also asked the workshop tables: How would be the best way to engage with the community about future spend?

You Said	We Did
<p>Digital questionnaires are good but they should not have leading questions</p> <p>Neighbourhood plans and forums were suggested as another platform for engagement</p> <p>More specific groups in the community should be targeted for project ideas e.g. church groups, friends of parks groups, interest groups, TRA's, Southwark Pensioners Centre</p> <p>Target engagement with local schools, school children and parents</p> <p>Leaflets and posters</p>	<p>We are committed to continuing engagement with local groups using a variety of methods. We are meeting smaller groups of residents associations and friends of parks groups in the Old Kent Road to ensure ongoing communication.</p> <p>We have also been running workshops with primary and secondary schools. We have published our Consultation Summary and an interactive map of consultation now features on our website www.oldkentroad.org.uk</p>

Finally, we asked everyone to vote for their top priorities for spend in the Old Kent Road area. The top 3 were:

- Parks, trees and green spaces
- Safety and security
- Youth facilities





Appendix 6:

Consultation responses from the Business Network

Old Kent Road Area Action Plan: Consultation Report

December 2020

Old Kent Road Business Network responses summary (as reported February 2018)

- Vehicular access, yard and loading space is important for businesses to function
- Business rates need to be reasonable
- Workspace providers are not suitable for all types of businesses
- The plan should consider there is a range of leasehold and freehold businesses in the Old Kent Road are with different needs
- Affordable rents for creative businesses and artists and recognise these as important thriving community
- Mixed use development is often not designed with businesses in mind
- Better consultation and communication with businesses is needed
- Improve partnerships with workspace providers and make use of Section 106 agreements to secure affordable space
- The council could have a role in match-making developers with businesses
- Make alternative business uses for first floors
- Help businesses to secure new premises and help with expansion
- Recognise industrial type businesses are still in demand
- Consider Article 4 Directions to protect against the loss of employment use to permitted development
- Recognise the importance of the economical and industrial function of Old Kent Road across the opportunity area
- Consider business relocation options both in the Old Kent Road area and further afield



Appendix 7: Schools workshops and feedback

Old Kent Road Area Action Plan: Consultation Report

December 2020

Schools Consultation Summary

Phoenix Primary School Workshops on 8 March 2018

2 classes of 30 pupils each aged 8-9

Pupil's stickers from part 3 of the exercise setting out positive statements about OKR in 2035 are recorded below as well as notes from facilitators

Streets, Parks and Buildings

Would like more games, cafes, restaurants and shops

Emphasis on space for recreational activities e.g. swimming pool, gym, more free clubs

Would like to have big parks, open spaces for play

Concern for fire safety post Grenfell

Transport

Would like more buses, tubes and trains

Wider roads with lanes for runners and wheelchair users

Cars with less pollution

School

Would like schools with more space and facilities

Schools with secondary schools

Would like gardens and bike surgery

Leisure

More shops, houses and community centres

More security

More cinemas and things to do when you're bored

Overall

1. Lots of pupils seems concerned about safety and security.
2. A number of pupils described the benefit of having play and park facilities well mixed with residential, with lots of "exciting things to do".
3. Pollution and cars was definitely seen as a problem to be overcome.
4. A number of pupils described how cramped the balconies are in new flats and there was no room to "run around". A lot of pupils perceived how limiting the single storey retail parks were and how they would prefer multi storey retail opportunities mixed with open space and leisure facilities,
5. Some wanted all through schools.
6. Pupils were very aware of fire safety, post Grenfell, including the need for multiple cores and means of escape.

Charter School Workshop June 2018

The consultation at Charter School East Dulwich was held in June 2018 for Year 9 pupils and a follow up presentation was given by the students to Years 7-9 students, Council officers and Councillor Johnson Situ and Councillor Jasmine Ali in February 2019.

The visioning workshop plan is attached along with the feedback presentation given by the students based on their OKR research project *'Is the Old Kent Road regeneration a sustainable development?'*

We received the following feedback during the workshop:

- Environmentally friendly work offices
- More trees
- Improved transport and town centre/ shopping centre
- Fitness parks for young people
- Safer routes for young people
- More bike racks
- Introducing an Art programme
- Outdoor water fountains
- Easy access routes to transportation
- Sports facilities
- Cycle friendly areas
- Recycling facilities
- Mixed-use schemes providing more workspace
- Outdoor art / Communal art work

All students created their own masterplan map. An example is included below:



Lesson Plan
Old Kent Road Planning Workshop

The Charter School East Dulwich, Year 8, 60 minute

Introduction:

The council is consulting on the Old Kent Road Area Action Plan. The plan sets out how the best of the Old Kent Road, including its thriving businesses and arts and cultural communities, can be nurtured and developed over the next 20 years. It is an innovative plan, with policies that will guide new development to provide **20,000 new homes** and an increase of **10,000 jobs**, while providing new opportunities and improving the lives of people who live and work there now. We consulted with the public on the second draft of the plan until 21 March 2018 and are continuing engaging with the community as we work towards a final version of the plan.

The plan seeks to deliver a new secondary school, 2 new primary schools and to expand some of the existing schools in the area. We are discussing potential expansions with schools and preparing new design guidance to ensure new or expanded schools create an excellent teaching environment. We are keen to hear from teachers working in the area.

We also want to learn from pupils studying in the area now about how they see the future of their neighbourhoods. The following exercise will be undertaken with groups of 30 pupils with the aim of exploring their ideas of what would make a good environment to live, work and learn, in the future.

Learning objectives:

- To reflect on my personal likes and dislikes of familiar urban environments
- To design my ideal Old Kent Road (OKR) built environment
- To contribute to the local authority planning consultation process
- Thinking about the past, present and future of Old Kent Road

Starter (5 minutes)

RESOURCES: photographs on PowerPoint of the current OKR urban environment

- Students shown photographs of urban environments they are familiar with, including photographs of current OKR urban environment.
- 60 seconds of partner discussion on their likes and dislikes. Try to develop their reasoning and explanations of their preferences.
- Children chosen at random to share and explain their preferences with whole class.

Teaching (10 minutes)

RESOURCES: presentation, [OKR Area Action Plan](#) hard copy, Vu City 3D model Explain the Old Kent Road Area Action Plan and regeneration including design guidance to guide future development.

- Information on the current OKR context. Explanation of the consultation process
- Explanation of proposed plans, including visuals from Vu City to visualise the massing and location of future development.
- Explain next steps - develop further design guidance on urban environment, and design of schools.

Lesson Plan
Old Kent Road Planning Workshop

Main activity (25 minutes)

RESOURCES: A3 print outs of the current Old Kent Road urban environment, A3 sheets of paper, example of master plan brochures, photocopies of pages from master plans.

- Explain that town planners, urban designers, architects, landscape architects, etc. work together to vision their urban environments. They share their ideas through a range of forms – from brochures, with CGI images, to explanations of their visions in descriptive writing.
- Student are split up into 5 groups to focus on specific themes and areas from the OKR, each area has it's own challenges and issues:
 1. Transport and town centre.
 - i. Current Argos site as case study
 - ii. New Bakerloo Line underground stations, pedestrian safety, shops and town centre environment
 2. Linear Park
 - i. Better crossing – pedestrian safety, cycle paths, nature, water management, play space
 3. Jobs and housing
 - i. Employment & housing , jobs in the area, future jobs, mixed development including industry and offices
 - ii. Types of housing, tall buildings, outside space
 4. Gasworks Park
 - i. History and heritage
 - ii. Ideas for the park space and use of the gasholder
 5. New Secondary School
 - i. Design guidance
 - ii. Feedback on the importance of design of schools from children as the users of the school – classrooms, outside space, canteens, multiple uses for schools
- 'Your plan' - Working in small groups, students design their ideal urban environment and use whichever method they are most comfortable with:
 - Concept drawings and plans of the area
 - Street scene drawings on large sheets of paper with labels and explanations
 - Text to go alongside their plans
- Each group decides on their 3 key design guidelines.

Conclusion – group presentations & discussion (20 minutes)

- Students present their plan to the whole class – providing explanations of their top 3 design guidelines.
- Explain next steps on OKR AAP, how their families and community group can get involved and what developments to look out for in the near future.

Web link for more information: www.southwark.gov.uk/oldkentroad

O K R P R E S E N T A T I O N



The Charter School
East Dulwich

Contents :

1. Introduction - why we chose OKR as a sustainability case study
2. Risk assessment
3. Methodology - How did we collect data? Why did we choose those methods?
4. Secondary data - what else did we look at and what did it tell us about the area?
5. Analyses - What did the data tell us? Is OKR in need of regeneration? How can it be sustainable?
6. Conclusion - Overall do we think the regeneration of OKR will be a sustainable development?
7. Evaluation - What would we do differently next time?

Introduction

Enquiry question: Is the **Old Kent road** regeneration a sustainable development?



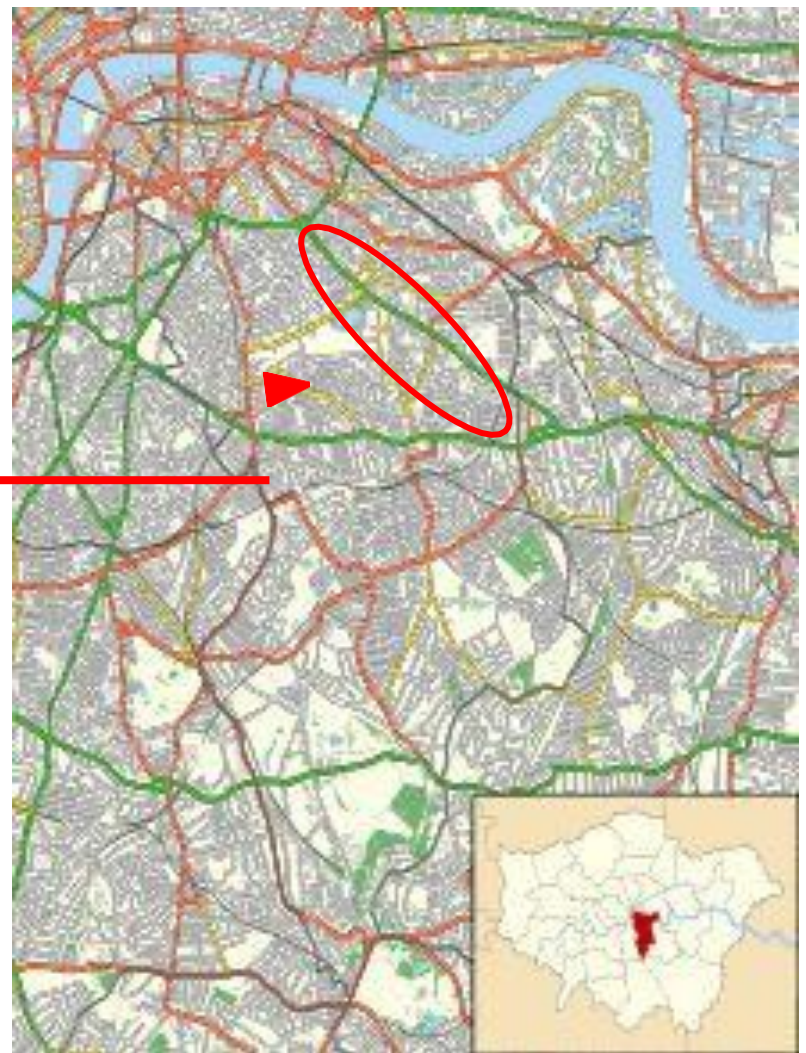
Why was the OKR regeneration was a good case study for our school?

Topic: Urban issues - deprivation & regeneration

Locality: 20 mins walk

Relevance: We live here!

Future: ?



Aims and hypothesis

Aim:

Our task was to collect data through observations and questionnaires to see if the regeneration is needed, and if so, if it will meet future generations needs.

Hypothesis:

- OKR is in need of regeneration
- Local people will have strong views about regeneration
- Local people might feel threatened by gentrification
- The regeneration will meet the needs of future generations

Risk Assessment



(Risk - L - Low - unlikely to occur M - Medium - could occur H - High - could well occur if inadequate caution taken)

Hazard	Risk	Description	Action
Busy roads	H	OKR has 4 lanes of busy traffic therefore a high risk of accidents occurring whilst crossing the road	Always use crossing. Cross in small groups and wait for everyone else Don't minto road for any reason
People and other pedestrians	M	Hazards from pedestrians could occur if when collecting data we take up too much room on the pavement. Some people might not want to talk or answer questions	Make sure we are in single file and not taking up too much room.
Weather	L	Rain could make path slippery could affect ability to collect data Cold weather could make it uncomfortable	Check weather and wear appropriate footwear and a coat

- methodology -

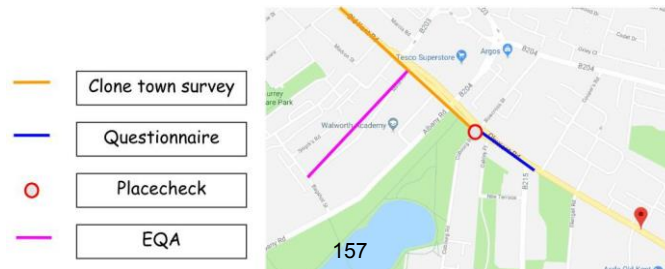
How did we collect data?

Clone town survey - from Burgess park to Surrey Square to collect a tally of independent and chain shops to measure diversity in the types of businesses. Survey - the park to collect data on how local people felt about the sustainability of development in the area.

Placecheck - answered the questions at the entrance to Burgess Park as we had a 360 view from there. EQA - walked down Mina Rd and stopped every 50 metres to collect data as we moved away from OKR.

Why did we choose those methods?

Placecheck is a method of taking the first steps in deciding how to improve an area. Clone town - It's good to find out how diverse the area is and how this benefits local people. EQA - It will tell us if environmental quality increases or decreases as we move away from OKR. Survey - we collect the personal views of those living in the area.

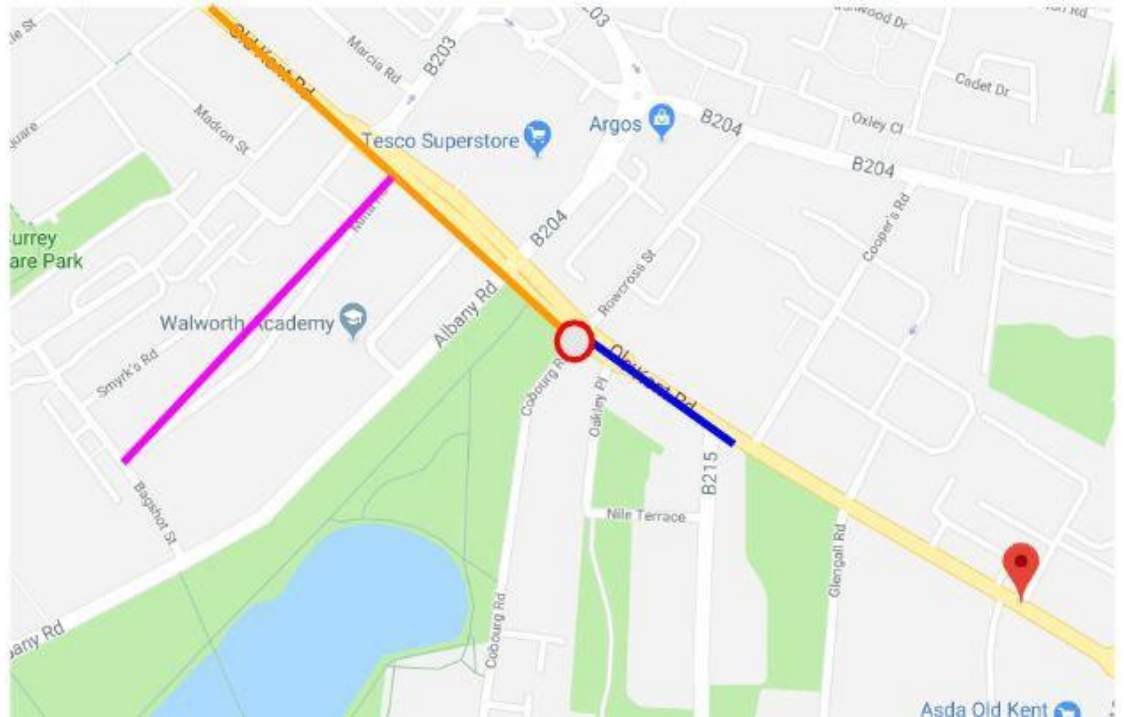
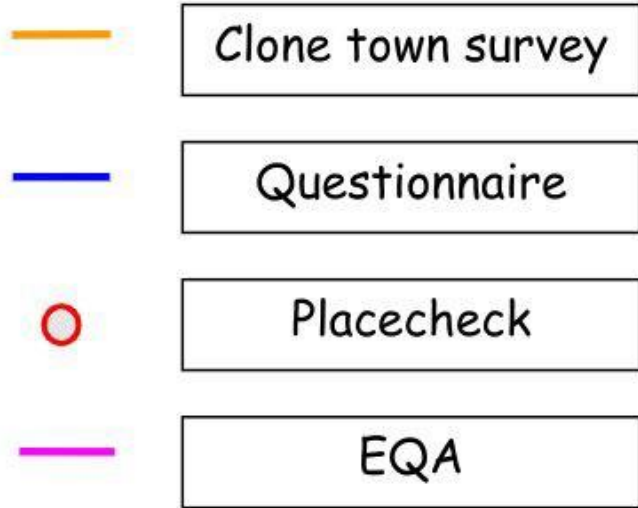


What did we discover?

Clone town survey - there were many more independent shops than there were chains. Survey - the majority of young people thought that OKR could be majorly improved, but the elderly had a higher view of the area.

Placecheck - classmates said that the place had a good community and personality but wasn't in the best quality. EQA - generally got better as we walked away.

Data collection and analyses



Placecheck

Placecheck is a simple way of finding out what a place and its people can tell us, and starting the process of making change happen.

Questions on a Placecheck helped us to work out whether OKR was...

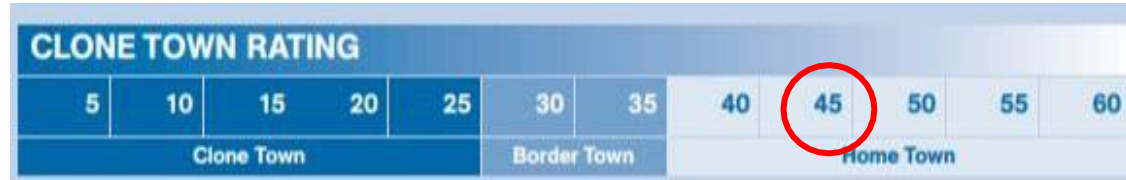
A special place

A well-connected, accessible and welcoming place

A safe and pleasant place ...

A planet-friendly place ...

Clone Town Survey



The Clone Town Survey is designed to determine whether your town is a Clone Town indistinguishable from dozens of others around the country; or a genuine Home Town that is distinctive and recognisable as a unique place.

We started at the place we considered to be the high street, which was just opposite the business and retail park and a street where most of the shops are concentrated. We walked along the high street and recorded the



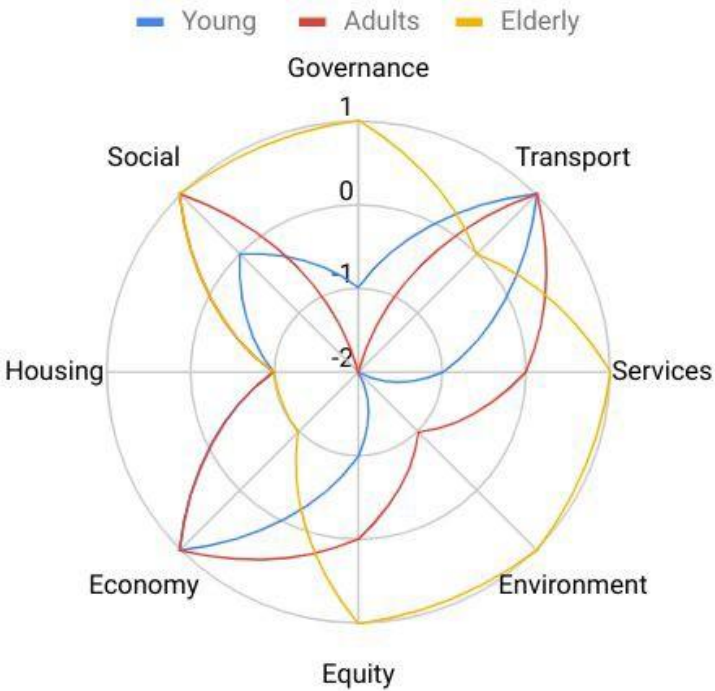
first 50 shops we passed.

Sustainability Questionnaire

The sustainability questionnaire was to determine whether local people felt they were being properly consulted on the main issues of the regeneration.

It had 8 different statements about the area, which volunteers could choose on a scale from -2 to +2 on how much they agreed or disagreed with the statements.

People feel...	Included in the decision making, feel responsible and proud of neighbourhood.				
Young	-2	-1	0	1	2
Adults	-2	-1	0	1	2
Elderly	-2	-1	0	1	2



How sustainable is the community already?

Ring a score for each of the following:

-2 = Strongly disagree

-1 = Disagree

0 = Neither agree nor disagree 1 = Agree
2 = Strongly agree

Environmental Quality

Data was collected based on 4 different factors with several sub factors.

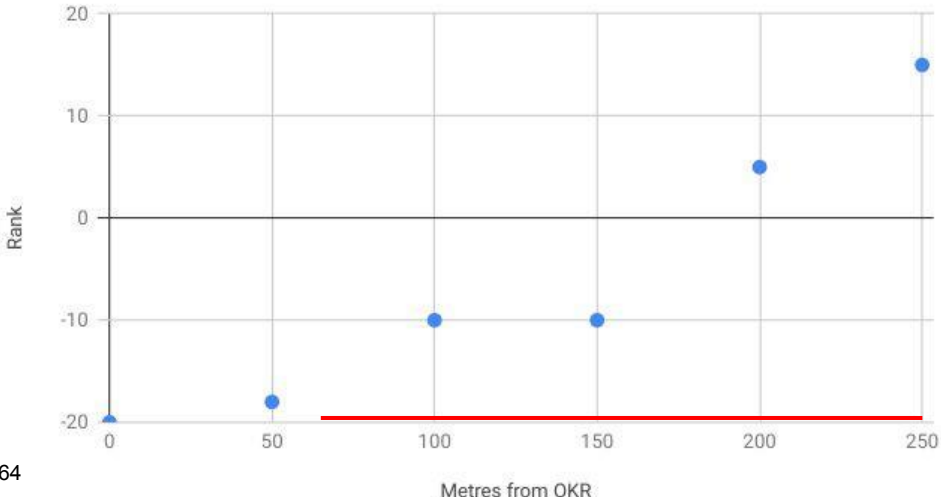
We collected data every 50 metres as we moved away from OKR

Once plotted on a scatter graph this this would inform us of what happened to environmental quality as we moved away from Old Kent Rd

The data was then plotted on a graph

Qualities being assessed		Very High +2	High +1	Average 0	Poor -1	Very Poor -2	Qualities being assessed
Buildings	Well designed / pleasing to the eye			✗			Poorly designed / ugly
	In good condition		✗				In poor condition
	Evidence of maintenance / improvement						Poorly maintained / no improvement
	Outside – land, gardens or open space are in good condition		✗				Outside – no gardens, or land / open space in poor condition
	No vandalism evident	✗					Extensive vandalism

Rank vs. Metres from OKR

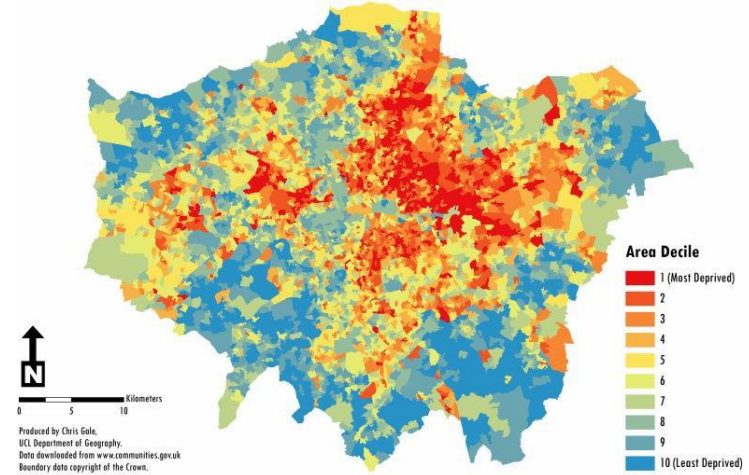


Secondary Research

We also used secondary data from research. We looked at the conditions of the area and how there was some resentment from the residents of the OKR for the regeneration of the road.

On social media we found out that some of the independent businesses of the local area were not getting looked after enough and that they might not survive when the OKR gets regenerated.

The Overall Index of Multiple Deprivation for London in 2007



We've prepared a further draft of the plan since our consultation last summer. The final plan will help provide the planning framework for new development in the area including new homes, jobs, open space and infrastructure.

VITAL Vital Old Kent Road
OKR @VitalOKR

Follow



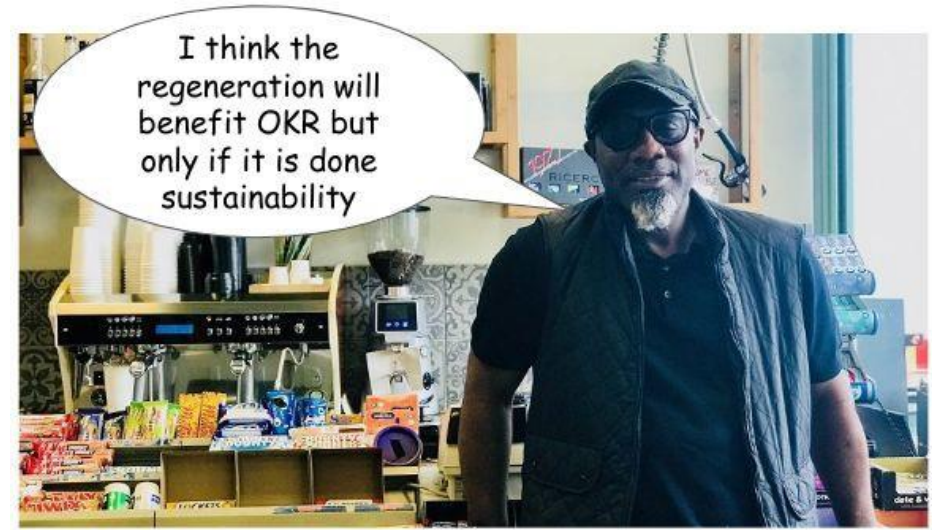
If the OKR AAP is not re-worked then local
business will be undermined, thousands of
jobs will be wiped out and opportunities lost



#VitalOKR

Conclusion and evaluation

- OKR is in need of regeneration ✓
- Local people will have strong views about regeneration ✓
- Local people might feel threatened by gentrification
- The regeneration will meet the needs of future generations ✓



Thank you for listening !

Next steps? Questions?

