



Old Kent Road Area Action Plan: New and Amended Policies

Consultation Report

June 2017

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1. Introduction

1.1 What is the Old Kent Road Area Action Plan?

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 2036. This includes delivering 20,000 new homes and 5,000 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.

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.

Between June and November 2016 we carried out the first stage of public consultation on the Old Kent Road AAP. While we have been engaging and consulting the local community and businesses groups over the past year, this was the first time people will be able to comment on the draft plan.

1.2 What is this consultation report?

The purpose of this report is to summarise the consultation responses the Council received and took into consideration when preparing our new policies and significant amendments to previously proposed policies. These policies have been prepared following consultation responses and in response to changes proposed in the New Southwark Plan to ensure consistency across the Council's planning framework.

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.

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 will involve writing to and where appropriate meeting and working with our neighbouring boroughs, the Greater London Authority and other prescribed bodies such as Historic England and Transport for London.

The Council seeks the views of the full range of statutory and non-statutory stakeholders at each formal stage of consultation.

2. Stages of Consultation

2.1 What stages of consultation have been completed so far?

This document explains the consultation that has been undertaken in preparation of the Old Kent Road Area Action Plan. To date the Council has undertaken the following stages of consultation to inform the formulation of the Area Action Plan document.

Timeline for the Old Kent Road Area Action Plan

CONSULTATION	TIMETABLE
Informal consultation on the draft Old Kent Road AAP	February 2015 – March 2016
Consultation on Integrated Impact Assessment Scoping Report	12 February 2016 - 18 March 2016
Consultation on the draft Old Kent Road Area Action Plan Preferred Option and supporting documents	June 2016 – November 2016
Consultation on the new and amended preferred options policies ((the current stage)	June – September 2017
Consultation on the submission version Old Kent Road Area Action Plan	Late 2017
Submission of the draft Old Kent Road Area Action Plan to the Planning Inspectorate	2018
Examination in Public	2018
Adoption of the Old Kent Road Area Action Plan	2019

This report identifies how the representations received by the Council during consultation of the draft Old Kent Road Area Action Plan have been taken into account and influenced the preparation of the new and amended policies proposed during this latest stage of consultation.

2.2 What happens next?

In advance of the submission version of the Old Kent Road Area Action Plan the Council is carrying out this interim stage of consultation to seek the views of the full range of statutory and non-statutory stakeholders on these new and amended draft policies. This will provide the Council with an opportunity to review comments and consider any further changes which will feed into the proposed submission version.

Stakeholders are requested to submit full and detailed comments, if necessary these should be backed up by evidence, to justify any support or opposition for the draft policy proposals. Additionally the Council welcomes participants to identify any policy areas which have been omitted or are otherwise absent.

We will then consult on a **submission version** of the Area Action Plan in Autumn/Winter 2017. The policies and site allocations and visions in this version of the Area Action Plan will be very close to the actual policies which will form the plan. It will only be changed if there are legal reasons as this is a formal stage of consultation. The Council will then make any final amendments in light of this consultation and submit the Area Action Plan to the Secretary of State for a public examination by a planning inspector. Participants of the final stage of consultation have the right to represent themselves at the public examination.

The inspector will prepare a report for the Council and may require changes to be made to the plan. The final Old Kent Road Area Action Plan will then be adopted by the Council. This is a decision taken by all Councillors at the Council Assembly.

3. Summary of the consultation

3.1 Who was consulted and how?

The draft version of the Old Kent Road Area Action Plan was consulted on between June 2016 and November 2016. The Council is in the process of reviewing all representations made during this consultation period and will publish a full consultation report document which comprehensively responds to these representations in due course. This report details only representations which relate to the Council's proposed policy amendments and outlines how these representations have been considered. In addition to these formal stages of consultation the Council has also carried out extensive informal consultation with stakeholders, including establishing the Old Kent Road business network to engage with local businesses to gain a clearer understanding of different business requirements in order to explore how the AAP can respond to deliver the best outcomes for all.

3.2 Methods of consultation

Consultation on the draft AAP is being carried out in accordance with the requirements of the Planning and Compulsory Purchase Act 2004 (as amended).

Over the past 12 months the council consulted extensively on the emerging OKR AAP. Through the community forum the council sought to raise awareness of what the plan might mean for the local community, consider the way the area has changed over time and explore the vision for the future. Using guest speakers, workshops and planning for real exercises the forum considered a range of themes including heritage and character, employment and businesses, retail and town centre uses, walking, cycling and buses (surface transport), open and green spaces and faith community spaces, the vision for the opportunity area and strategic options for regeneration. The outcomes and feedback have been invaluable in informing the plan.

Separate to the community forum, the council has maintained an on-going dialogue with a number of businesses in the opportunity area, initially through an Employment Study and a survey of over 800 businesses in the area and also through business-focused workshops designed to capture views from business owners. Recently we have established the Old Kent Road Business Network which will be used to collect further evidence on the future space that businesses require and to ensure businesses have up-to-date information about the Old Kent Road opportunity area.

As well as businesses the council has also targeted young people to find out their views about the Old Kent Road and their aspirations for the future. Some of these young people gave a presentation at the community forum to enable the wider community to hear their views.

Besides the informal consultation, the council consulted formally on the scope of the integrated impact assessment and the comments made have informed that document.

In accordance with Southwark's Statement of Community Involvement (SCI), the draft OKR AAP was made available for comment over a twelve week period from 17 June 2016. The draft OKR AAP was published on the council's website and made available at libraries and the council's Tooley Street office. An advert publicising the draft OKR AAP was put in the press and written notification was sent to around 1000

contacts on the Planning Policy mailing list and My Southwark.

In addition to the statutory consultation described above, other consultation channels included:

- Leaflet sent to all addresses in the opportunity area
- Presentations on the draft AAP at community council meetings
- Consideration of the draft AAP by Planning Committee
- Workshops held at the Old Kent Road community forum
- Events targeted at young people
- Targeted outreach with tenants and residents associations
- Continuing discussions with landowners and developers

3.3 Summary of representations made and how these have been taken into account

A high level summary of all responses received to the draft AAP in the consultation from June to November 2016 has been published on our website. The tables below provide summaries of the representations made towards each of the policies we are proposing to amend, specifically those representations which are related to each of the proposed policy amendments and have been taken into consideration when making our revisions. Responses are grouped into themes where respondents made similar points and these are responded to collectively. It is important to note that this does not represent an extensive list of all representations we received in relation to each the policies we are proposing to amend. As stated, only representations which relate to each of the Council's proposed amendment are detailed alongside an officer response which explains why we have agreed with the expressed position, or for some cases seeks to justify why we have taken a different approach. Where relevant the response provides details of how representations were taken into account in developing the proposed policy amendments.

AAP1 – Central London Context

Summary	Council response
<p>It is proposed to extend the Central Activities Zone to encompass the whole opportunity area. Although there is some rationale to extending the CAZ, the approach doesn't feel precise enough or have a strong enough employment narrative. Instead the policy should designate a more tightly defined town centre which builds on the principle identified in the AAP for reinvigorating the full length of the high street and better connect the areas towards Elephant Castle and New Cross.</p>	<p>The CAZ represents the centre of London, a world city and competitive business location driving the UK economy. The council will work with the Greater London Authority, Transport for London and other partners to promote the Old Kent Road as a location for strategic functions usually associated with the Central Activities Zone (CAZ), in order to help support London's sustainable growth, with a long term aspiration of extending the CAZ subject to the relevant London Plan criteria being met. Old Kent Road will provide a rich mix of land uses that responds positively to the expansion of central London.</p> <p>It is anticipated the Core Area will be the focus of the most significant change over the course of the plan period. This will set a clear ambition which distinguishes the core areas prominence to aide development and encourage investment as it strives to become a reinvigorated high street, as well as a closer part of Central London. This designation is due to be complemented by proposals in the New Southwark Plan to designate Old Kent Road as a major town centre.</p>
<p>Opposition to the notion of OKR becoming a closer part of central London, including the extension of the Central Activities Zone. This will lead to the potential loss of the existing character and communities of OKR.</p>	<p>The CAZ represents the hub of economic and employment activity in London. Development in Old Kent Road will provide a rich mix of land uses that responds positively to the expansion of central London. The many residential characters of OKR are retained and complemented by a more diverse employment base in mixed use neighbourhoods.</p>
<p>The extension of the CAZ to include the whole of the Old Kent Road Opportunity Area is not considered appropriate. Royal Mail Group will seek that some parts of the AAP area should remain as Primary Industrial Land and therefore would be unsuitable for inclusion in a CAZ.</p> <p>Many policies which relate to the CAZ are quite specifically aimed at central London locations. It is not considered that these relate well to parts of the Old Kent Road</p>	<p>The council has a clear ambition for the area which will benefit the surrounding AAP area to reach its wider development aspirations. The AAP will help to deliver a substantial uplift in employment generating uses and moving toward the character of a central London CAZ location.</p> <p>The CAZ represents the centre of London, a world city and competitive business location driving the UK</p>

<p>at the moment or for the foreseeable future. It is considered that the extension of the CAZ to all of the area is not appropriate.</p>	<p>economy. The Old Kent Road will provide a rich mix of land uses that responds positively to the expansion of central London, improving employment opportunities and bringing extensive social and economic benefits.</p>
<p>The two drivers of the AAP/OAPF are noted as the Bakerloo Line Extension (BLE) and the expansion of central London. We are concerned that the net result of this approach will be to displace many people from the local community, who will find that higher housing costs, higher business costs and higher living costs make the area unaffordable to them. Question whether inclusion in the Central Activities Zone is beneficial to the resident community.</p>	<p>The proposed CAZ boundary focusses on change anticipated in the mixed use core area and will maintain the quality of existing residential areas. This will mean the economic development is directed towards suitable areas, significantly expanding employment, service and leisure opportunities for existing and future residents. The new social regeneration policy outlines the council's commitment to improving the quality of life of existing residents.</p>
<p>Due to its proximity with Central London, the Old Kent Road plays an important role in serving for the needs of businesses located in the central activities zone and providing customers with a central location to gain access to services and goods. Some of these businesses include commercial printers, taxi repair garages and new forms of workspace serving the creative industries, as well as a large number of faith uses. At present no relocation strategy is in place and securing alternative industrial locations in the neighbouring area or within Southwark and the neighbouring boroughs is becoming increasingly difficult to achieve.</p>	<p>The AAP recognises the value in the existing business community and provides the opportunity to set a policy framework which anticipates changing requirements of businesses and plans proactively for the future.</p> <p>The Council recognises the important contribution of businesses along OKR by providing vital services which allow other businesses located within Central London to operate efficiently. A major part of the AAP's future planning is targeted towards supporting these businesses so that they can continue to thrive. Where it is considered a business will be unsuitable within the future development context, the Council and developer will support these businesses and provide a relocation strategy and wherever possible retain these businesses within the Opportunity Area.</p> <p>As part of our revised consultation and collaboration with businesses, the Council is in the process of developing a relocation strategy. We are also consulting with Lewisham and other Boroughs to identify further sites which have capacity to support this relocation strategy where it is not possible for businesses to relocate within the Opportunity Area.</p> <p>For those industries supplying support functions to central London businesses,</p>

	there may be opportunities for clustering and freight consolidation which would support the broader environmental aspirations of the AAP.
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AAP11 – Employment Clusters

AAP11 Employment Clusters has now been deleted and is proposed to be replaced by two new policies:

- **AAP 11a: Workspace and Business Development**
- **AAP 11b: Mixed Use Employment Areas**

Summary	Council response
Creative Industries	
<p>The Council needs to support independent businesses by ensuring a diverse employment base is delivered, including the provision of affordable workspace and studios which will facilitate the concentration of creative industries and avoid a one-dimensional office-type economy.</p>	<p>Southwark is keen to work with all businesses in the area and ensure that our regeneration plans can help as many businesses as possible choose Southwark as a location for their business to grow. Business space around the Old Kent Road has a key role in helping service central London's economy and it is important that a range of workplaces are provided including offices and managed workspace, artists' studios, light industrial and makerspaces as well as trade counters and shops. The AAP also recognises the importance of good design to deliver meaningful new employment areas and new, flexible space that is suitable and affordable for a range of businesses. This diverse employment base, of which creative industries will play an important role, will deliver improved job opportunities for all.</p> <p>AAP 11a: Workspace and Business Development seeks to support independent businesses by ensuring proposals deliver adequate measures to retain existing businesses on site wherever possible, or provide a relocation strategy to support businesses that will be displaced by development. In addition, the commitment deliver workspace managed by a specialist provider will help form a strong basis for new business start-ups and small and medium sized enterprises to thrive.</p> <p>AAP 11b: Mixed Use Employment Areas stipulates the design and distribution of employment floorspace in mixed use development should respond positively to the Mixed Use Design Guidance document. This will ensure developers consider the business of a</p>
<p>Fit out and quality of spaces is vital to get right ventilation, sound proofing, light, windows, ease of access and privacy are all of the utmost importance especially for creative industries. New commercial buildings should be flexible and adaptable capable of accommodating a range of different activities.</p>	
<p>Old Kent Road should capitalise upon the growth of tech jobs - businesses will need fast broadband to facilitate this.</p>	
<p>Dedicated artists zones or creative enterprise zones would be encouraged. Support for arts and creative industries, artistic community, arts scene, creativity (music, writing, visual art) would create a buzz for the area – cultural, artistic and food industries should be given priority over industrial uses in these areas.</p>	

	<p>variety of different users to ensure design schemes enhance the urban environment and improve social harmony between different users.</p> <p>Hatcham Road creative and cultural cluster is a thriving location for small businesses, artists' studios and creative industries. New mixed use development proposals must provide small business space for creative industries and contribute to reinforcing a cluster of arts, cultural and creative industries, including light manufacturing, co-working space, artist's studios and flexible, affordable workspaces.</p> <p>Appendix 2: Mixed Use Design Guidance emphasises the importance of careful consideration of the distribution of uses, layouts, servicing and design to allow a greater variety of businesses and community uses to thrive on the Old Kent Road. We have also revised this guidance to provide further guidance of exactly will be expected of mixed-use development proposals.</p> <p>The AAP's advocacy for mixed use development is centred on allowing sufficient flexibility to attract a range of different businesses and create a diverse range of employment uses, including creative industries.</p>
Affordability	
<p>More guidance should be provided regarding affordable workspace and the mechanisms for securing it within the delivery of the AAP.</p> <p>Cheaper office space would be helpful for start-ups and SME's. Local, independent, established businesses and start-ups should be incentivised with lower rents/subsidies/low business rates.</p>	<p>The Council recognises there is a need to ensure a supply of business spaces which are affordable and the AAP requires that major developments will be required to deliver business space to support existing and new business start-ups and small and medium sized enterprises, including low cost or affordable workspace.</p> <p>AAP 11a: Workspace and Business Development requires that an element of low cost or affordable workspace must be provided by all major developments which provide over 1,000 sqm employment space. The policy explains, affordability differs depending on the specific requirements of each business and is not necessarily restricted to</p>

	<p>subsidised rents. Some examples of alternative low cost employment space would be the provision of lower specification space which would be more appropriate for certain sectors and by utilising space in railway arches, or units suitable for co-working and encouraging joint functions such as reception services.</p> <p>The delivery of this affordable workspace will be secured as part of a planning obligation for major schemes. This could include a clause to maintain rents which are comparable with existing rents by area or by sector, a percentage discount in rents for a preliminary period, requirements for full fit-out of units or flexible contracts (including flexible terms of lease and break clauses) depending on specific scheme requirements.</p>
<p>Existing businesses will be priced out of the area as a result of inflated rents and council tax rates. They will be replaced in preference of higher-value uses which do not provide for the needs of the existing communities. The diverse mix of small independent businesses is what makes Old Kent Road what it is, without these uses it will become a soulless exclusive destination.</p>	<p>The Old Kent Road Business Network has been established to help us engage with businesses as we continue to develop planning policies for the Old Kent Road opportunity area. We will use the network to ensure that businesses have up-to-date information about the Old Kent Road opportunity area. 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 in the area.</p> <p>AAP 11a: Workspace and Business Development states proposals must wherever possible accommodate existing businesses on site or in the Old Kent Road. Only after fully exploring these two first options then a relocation strategy will be provided for any business displaced by development.</p> <p>In the Old Kent Road there are over 9,500 jobs in a wide range of businesses. The business community is strong and provides key services to the central London economy. The AAP provides the opportunity to set a policy framework which anticipates changing requirements of business and working life and plans proactively for the future.</p>

	<p>The Mixed Use Design Guidance specifies the typologies of employment space that will be required, including a wide range of industrial buildings, co-working space and retail. Development is required to provide a range of workspaces in new development and other regeneration benefits such as affordable housing, which are outlined in the AAP.</p> <p>In cases where relocation would be required, railway arches and retained industrial areas in the Old Kent Road area should be utilised, particularly for businesses that need to temporarily relocate while redevelopment takes place. The Council will seek to provide support to businesses displaced by redevelopment, including assistance with finding sites that meet their business requirements.</p>
<p>Genuinely affordable housing is needed for people to live nearby to low cost work space and travel to their place of work via foot or cycle. A larger proportion of local jobs would ensure better use of active travel and fewer cars, reducing commuting times for local residents.</p>	<p>One of the primary concerns of the two new employment policies is to ensure the provision of a varied employment base. It is anticipated that this approach will generate a diverse range of employment opportunities which will be accessible to local residents as well as attracting others to work, live and visit Old Kent Road.</p> <p>The topic of affordable housing is not directly applicable to these new policy amendments; however the council acknowledges this representation and will provide a response within the full consultation report. The Council is consulting upon changes to the proposed affordable housing policy (DM1) put forward in the New Southwark Plan alongside this stage of interim consultation.</p>

Transition away from industrial uses

<p>Jobs generation over a smaller area of floorspace could be achieved by transitioning away from large industrial uses and considering alternative commercial uses. Attracting employment uses which occupy a smaller area of floorspace will create a more diverse employment base, improving job opportunities for any people who may suffer the job losses in the industrial sector.</p>	<p>AAP11a: Workspace and business development requires proposals must retain or increase the amount of employment floorspace on site, incorporating workspaces for a variety of businesses, potentially including small and medium sized, which result in an increase in the number of jobs provided.</p> <p>Our 2015 employment study found that there were around 9,500 jobs in the opportunity area. Our aim is to increase this by 5,000 additional jobs within new mixed use neighbourhoods. All major development proposals will be encouraged to work with a registered workspace provider to manage specialist space for small and medium enterprises from start-up stages and supporting future growth. The council has established a Workspace Provider List for Southwark which responds to the increased demand for small, flexible and well-managed workspace in the borough to facilitate the provision of a substantial uplift in job opportunities.</p>
<p>The proposed removal of the Protected Industrial Land designations and existing retail warehouses will spell the end of historic, light industrial activity in the Old Kent Road area. Existing local businesses should be supported to remain in the area as part of the regeneration plans. If these uses are lost to make way for the redevelopment proposals, existing residents will suffer from a loss of local job opportunities and driven out as a result.</p>	<p>The Councils proposal to remove the Protected Industrial Land designations will enable the delivery of a diverse range of employment spaces within mixed-use developments in appropriate areas. Some areas will be retained as Strategic Industrial Land, for industrial purposes only. Mixed use developments will substantially increase local employment opportunities providing for the needs of a range of different businesses as well as help the AAP to achieve its wider regeneration objectives associated to the delivery of affordable housing and the creation of healthier vibrant places. It is anticipated that industrial employment uses will continue to play a vital role in the economic profile of Old Kent Road and the AAP seeks to form a framework which will allow these businesses to thrive and operate in the most efficient manner.</p> <p>The Old Kent Road Business Network has been established to engage with businesses at the earliest opportunity to gain an understanding of their various</p>

needs and requirements in order to take a proactive approach to planning which will secure the most beneficial outcome for all existing and future stakeholders. We aim to retain existing businesses wherever possible and provisions proposed within **AAP11a: Workspace and business development** will require proposals must provide a relocation strategy to support any existing businesses which cannot be accommodated within the completed development.

AAP 11b: Mixed Use Employment Areas directly identifies the employment areas of Latona Road, Sandgate Street and St James's Road, and south-east Bermondsey for their suitability to accommodate industrial development. South-east Bermondsey in particular provides opportunity to relocate businesses from other parts of the Old Kent Road where they have been displaced to ensure that existing businesses can remain local and continue to provide local employment opportunities.

The nature of the space businesses require in the future will change, and already there are some external factors such as rising land values and lack of appropriate vehicular access limiting the types of businesses that can continue to thrive in central London. Releasing land from the preferred industrial location designation is contingent on securing a range of workspaces in new development and other regeneration benefits such as affordable housing, which are outlined in the AAP. Strategic Industrial Land will be retained in key locations.

In cases where relocation would be required, railway arches and retained industrial areas in the Old Kent Road area should be utilised, particularly for businesses that need to temporarily relocate while redevelopment takes place. The council will seek to provide support to businesses displaced by redevelopment, including assistance with

	finding sites that meet their business requirements.
<p>The large industrial premises are incompatible with residential areas. A transition away from this type of industry, or ensuring a separation as a minimum, would create healthier and safer residential neighbourhoods.</p>	<p>Over the next 20 years, the economic function of the Old Kent Road will evolve and the AAP aims to help manage this process, ensuring that new business space suits a range of occupiers and can coexist with residential development. Not all businesses will be compatible with residential neighbours in new mixed use areas, however the AAP requires developments to accommodate existing businesses on site or in the Old Kent Road area or provide a relocation strategy for businesses that may be displaced. The council is exploring what support can be provided to businesses that may be displaced by development.</p> <p>The Mixed Use Design Guidance specifies the innovative ways development will be expected to combine a range of uses to ensure industrial and residential uses can coexist.</p>
<p>It is important to retain some industry in the area which is central to the character and function of the existing area, particularly creative and independent businesses. There is a requirement to plan positively for uses that cannot easily or successfully integrate with a residential population.</p>	<p>AAP11a: Workspace and business development states proposals must retain or increase the amount of employment floorspace (GIA) on site (B class use or sui generis employment generating uses), incorporating workspaces for a variety of businesses, potentially including small and medium sized, light industrial premises, co-working and managed workspaces. Moreover, this policy includes a commitment to accommodate existing businesses on site or in the Old Kent Road area, or provide a relocation strategy for businesses that will be displaced by development.</p> <p>AAP11b: Mixed Use Employment Areas recognises there is a strong existing light industrial, manufacturing and creative business community in the area and future development presents the opportunity to cluster employment uses to maintain and grow jobs, resources, knowledge and innovation. The mixed use employment areas identified by this proposed policy aim to cluster complementary uses and build economic collaboration, allowing these mixed use areas to prosper.</p>

Retail Parks	
<p>The existing retail parks are well-used assets which provide an important function and service for local residents and the surrounding area.</p>	<p>The policy position reflects the aspiration for Old Kent Road to become a revitalised high street with strong, active frontages. The layout and arrangement of retail parks would be incongruous with this ambition.</p>
<p>Retail parks and industrial areas are eyesores which have negative impacts upon the aesthetic appeal and air quality of OKR. A shift towards high quality residential and retail areas would be a welcome change to create a cleaner and healthier environment.</p>	<p>Large scale retail uses can be provided by reconfiguring to a scaled down high-street format, which could contribute the diverse retail offer of OKR, whilst promoting a click and collect services so that customers can access a similar variety of products.</p>
Mixed use development	
<p>The proposed transition will help improve the evening economy and attract visitors to the area. This mixing of uses can however cause problems, particularly associated to late night economy uses. Proposals should be mindful of this when it comes to implementation.</p>	<p>AAP11b: Mixed Use Employment Areas – This proposed new policy and the mixed-use cluster seeks to advocate the benefits of mixed use development. The Council anticipates that this will include the provision of an improved evening and night time economy for Old Kent Road which will add a sense of vibrancy. Nevertheless, development proposals will be subject to the same level of scrutiny and public consultation as all other planning applications and will be assessed on their own merit. For evening and night time uses this process will involve assessing and balancing the different needs and wishes of various stakeholders. An improved evening economy should increase footfall create a more vibrant environment in the evening which should improve the feeling of public safety however the Council will consider the potential negative impacts of any development proposals as they are assessed during the planning process.</p>
<p>Support for the mix of housing and businesses, especially SME's and avoiding quiet, 'ghost town' like industrial areas - keep areas populated and active at all times of the day and night, improve public realm, air pollution and lighting making vibrant neighbourhoods and improving the environment for businesses.</p>	<p>Noted. The AAP supports improving the vibrancy of the area for the day and night time.</p>

Types of businesses	
<p>Ground floor space zoned for businesses and retail is seen as an appropriate use of space, however there is concern that some of these units may be left empty. In addition there appears to be little appetite for chain stores in business or retail, instead favouring support for local independent businesses. The council should promote support for unique migrant and ethnic businesses operating in the area.</p>	<p>AAP11b: Mixed Use Employment Areas seeks to promote innovative design solutions to accommodate a diverse mix of uses within development proposals and vertical mix with ground floor employment uses will not always be appropriate for accommodating a wide range of businesses. The provision of space may include retention of independent businesses and the provision of smaller retail units to accommodate independent businesses and to support them to thrive as well as larger chain stores.</p>
<p>Many of the existing residents are dependent upon the existing employment mix for their jobs and livelihoods. These groups will be unable to access employment opportunities presented by uplift in office space.</p> <p>The AAP should seek to encourage employers who offer the London Living Wage.</p>	<p>The AAP supports the provision of a range of employment opportunities for the local community, including requiring development to provide training and jobs for local people in construction.</p>

AAP12 – Town Centre

Summary	Council response
Types of Uses	
<p>Supportive of the general mix of uses proposed but not with generic, characterless retail and restaurant chains. It needs an inclusive redevelopment process that retains the personality of the area with small, independent stores/boutiques and a multi-cultural offer that is affordable to local people e.g. through support for local small businesses (retail, cafes, etc) and maintaining small units at affordable rents.</p>	<p>The amended policy proposes a range of retail unit sizes along the primary frontage of Old Kent Road with smaller retail units established in streets connecting onto the Old Kent Road. This encouragement of a mix of retail unit sizes should cater for both independent stores, which typically occupy smaller retail units, and the larger anchor stores which require a larger floorplate. It is anticipated this approach will help attract a range of different types of retail and a vibrant mix of uses.</p>
<p>Proposals will change the nature of the area; the existing vibrant high street of local and independent businesses (valued for their economic and cultural contributions to the community) will be priced out and replaced by big chains.</p>	<p>The policy provides further support for other uses which would help strengthen the role of the Old Kent Road as a high street such as community, leisure, cultural and business uses.</p>
<p>OKR needs to attract a vibrant and more diverse mix of high-quality shops and retail intertwined with other mixed-use leisure uses (not just fast food, hair dressers and nail bars) to increase footfall and improve the feeling of safety.</p> <p>If the high street can attract recognised and respected retail brands these uses would create a more appealing high street offer and act as catalysts to attract further investment and instill confidence in the high street aspirations for OKR.</p> <p>Several respondents were of the opinion that the current mix of uses, particularly the abundance of fast-food takeaways, are an eyesore and a transition away from these type of uses and run-down premises is needed to revitalise the high street.</p>	
<p>Some retail parks and large supermarkets on the OKR (e.g. B&Q, Halfords, Asda, Tesco) are key resources for the local community and easy access brings visitors to the area – is there a way to incorporate these?</p>	<p>The proposed policy amendment aims to support a range of different sized retail units and provide opportunity to reprovide the popular existing retail offer (including furniture, DIY, electronics) within a reconfigured high street format which create a strong high street frontage along Old Kent Road with very limited, if any car parking provision. Old Kent Road frontage presents the</p>

	<p>opportunity to accommodate the larger floorplate stores including supermarkets whilst a network of streets and squares beyond the Old Kent Road will help to accommodate additional smaller shops, cafés and restaurants.</p>
Character and Heritage	
<p>Support for the revitalisation of OKR but fear the density, height and quality of building will be detrimental to the areas character. It is important that the heritage and history of OKR is reflected in the plans.</p>	<p>This policy endorses development which supports the revival of the high street and reflects the historical importance of an area which was once a destination with shops, civic amenities, cinemas and entertainment venues.</p>
<p>The plans should seek to revitalise OKR, promoting interaction with the streetscape by activating frontages and encouraging more outside dining on reconfigured wide pavements.</p>	<p>The proposed policy amendment seeks to establish a street frontage hierarchy which recognises Old Kent Road as the primary shopping frontage with secondary frontages with smaller retail units established in streets connecting onto the Old Kent Road within a legible network of streets and squares.</p>
Movement and Function of OKR	
<p>The road is a main arterial route into and out of London (needs to be fast and convenient). In order to create a people friendly high-street measures must be put in place to restrict traffic along OKR; achieving both a successful high-street and maintaining the strategic function of OKR in tandem is unrealistic.</p> <p>Heavy traffic and associated noise and air pollution on OKR is a big problem which cannot be overlooked. The AAP needs make provisions for quieter spaces away from the OKR for lingering e.g. a street running behind the first block of buildings to provide a nice environment for sitting outside a café or restaurant; or enhance the offer on existing adjoining streets.</p>	<p>The proposed policy amendment places a strong emphasis on promoting the Council's Healthy Streets Initiative to create a safer and healthier environment which will balance the needs of different users. A key element of this is providing additional guidance for reducing air quality. The AAP includes a number of measures to support this, including; promoting car free development to limit the amount of journeys made by private car, securing electric vehicle charging points to support a shift towards greener means of transport, encouraging car clubs, significantly improving public transport connections, including the Bakerloo Line Extension. It is anticipated that these measures will restrict the number of vehicles travelling along Old Kent Road which will mitigate air pollution as well as limit congestion so that Old Kent Road retains its strategic function as a key route into central London.</p> <p>The proposal to reconfigure retail parks in preference of a strong high street frontage along Old Kent Road will release areas of land along parallel streets to support secondary shopping frontages with high quality public spaces</p>

	which encourage social interaction.
Social Infrastructure	
OKR needs more informal community meeting places, for example cafes, bars and public houses. These uses should be coupled with good cultural and civic amenities (e.g. libraries) and spaces for local entertainment to encourage social interaction and promote a sense of community.	The policy amendment provides support for secondary shopping frontages with smaller retail units on the streets connecting onto Old Kent Road within a network of streets and squares which will help accommodate additional smaller shops, cafés and restaurants acting as informal places of social interaction.

AAP21 – Car Parking

Summary of representation	Council response
Car parking provision in proposal schemes	
<p>New housing should be car free to promote sustainable transport modes and improve air quality.</p>	<p>The policy states residential development in areas with a PTAL of 5 or 6 should be car free to promote sustainable transport modes. The proposed amendment allows for minor provision of car parking at up to 0.1 spaces per unit. This is intended to allow schemes to provide for the needs of family households and blue badge users. The Council considers this very limited provision of car parking will have a positive impact on the AAP's air quality and sustainability aspirations.</p>
<p>Support for the Bakerloo Line Extension but proposals will still need to deliver more parking as a result of the growing population.</p>	<p>The Bakerloo Line Extension will reduce reliance on the private car, taking traffic off the roads which will relieve pollution and improve air quality. Car club provision promoted by the policy allows access to a vehicle where required, without the need for car ownership. The proposed amendment allows for a limited amount of necessary car parking in schemes, prioritised for family sized residential units and blue badge holders.</p>
<p>Ensure that there is sufficient parking for cars so that drivers are not overly penalised and the car remains a practical transport choice.</p>	
Car parking provision for businesses	
<p>Successful regeneration requires consideration to protecting the needs of existing businesses (e.g. parking, servicing) so that they can continue to operate successfully. Concern that high density of development proposed could conflict with the needs for off-street servicing.</p>	<p>The servicing requirements of businesses is an important component of the AAP and Mixed Use Design Guidance to ensure that they can continue to operate efficiently.</p>
Electric vehicle charging	
<p>Private car use should be discouraged in favour of public transport. Where provision is allowed for private car parking spaces, these should include electric vehicle charging points.</p>	<p>The proposed policy amendment introduces a requirement for development to provide electric vehicle charging points for all parking spaces. This will support a shift towards greener forms of transport and ensure that development is future-proof as electric vehicles increasingly become an increasingly popular choice.</p>
<p>Policies should do more to address reducing emissions from traffic generated by new development in the AAP area, for example requiring 100% provision for electric vehicle (EV) charging infrastructure for on-site car parking, seeking funding for on-street EV charging infrastructure and/or encouraging/requiring delivery and service vehicles to be ultra-low/zero emission.</p>	

AAP22 – Green Infrastructure

Summary	Council response
Access to open space	
<p>Burgess Park is great but new small to medium open spaces are needed along with improvements to existing spaces.</p>	<p>The policy amendment seeks to ensure that new development contributes to the creation of new open spaces to cater for the increase in population in the area. The amended policy will deliver more open space (than with no policy amendment) which will be accessible to all. Where it is not feasible to deliver this requirement on site, the policy states the Council will secure a section 106 contribution to deliver improvements to the existing spaces in the locality. It is anticipated that together these measures will deliver a substantially improved open space network for Old Kent Road.</p>
<p>People should have access to green space for wellbeing, recreation and a sense of belonging. More places should encourage food growing and learning how to improve the environment. Spaces should also have habitats for wildlife.</p>	
Open space and flood mitigation	
<p>Flood mitigation should be an important consideration in open space design. Soft landscaping should be incorporated into design principles, for example providing front gardens rather than car parking for drainage. Sustainable drainage, rain water capture and grey water re-use should all be considered.</p>	<p>The proposed policy amendment seeks to deliver an uplift in open space within residential developments and consequently significantly more opportunities for flood mitigation through soft landscaping and green water attenuation measures. The Old Kent Road Integrated Water Management Strategy will provide detailed evidence and guidance on use of sustainable drainage and water recycling measures.</p>
Implementation of open space and environmental improvements	
<p>The AAP needs to be more explicit in detailing how all environmental improvements and open space aspirations will be achieved, and how to ensure developers are held to account. Improvements should be enforced and appreciated from the outset.</p>	<p>The proposed amendment specifies a requirement to include 5 sqm of open space per dwelling within residential developments or, where it is not feasible to deliver the required publicly accessible open space on site, the council will secure a section 106 contribution to deliver improvements to existing spaces in the locality. On-site contributions will be secured by way of a planning obligation.</p> <p>Other important mechanisms for securing open space and environmental improvements include policies AAP8, AAP22 and the area policies and site allocations in the AAP.</p>

Existing natural assets	
<p>Provision of additional open space is important but this must not come at the expense of the protection of OKR's existing natural assets. The plans must deliver a net gain in greenspace and biodiversity.</p>	<p>The Old Kent Road AAP fits into a wider planning policy framework, including environmental designations related to the protection of open space and biodiversity e.g. many existing open spaces in the OKR area are protected as sites of importance for nature conservation or as Metropolitan Open Land, Borough Open Land or Other Open Space. Moreover the proposed policy amendment provides a mechanism to secure a net gain in greenspace across the area that, combined with wider requirements to incorporate green roofs and urban greening measures as part of new development, will support biodiversity enhancement.</p>
<p>Open spaces should be well-maintained and accessible to all; some existing spaces are not well looked after. They need sunlight. Community maintained open space or allotments can boost community cohesion and there are experienced groups locally.</p>	<p>We recognise the important role that open spaces, including food growing spaces, can play in supporting health and wellbeing and community cohesion. Policy AAP22 requires new or improved open spaces to provide for a range of uses and the supporting text references community food growing. This proposed green infrastructure policy will secure an uplift in publically accessible greenspace and ensures that where it is not feasible for a proposal to deliver the required open space on site, the Council will secure a section 106 contribution to deliver improvements to existing spaces in the locality. These measures will deliver an extended open space network alongside the improvement and maintenance of existing spaces. Developments will need to assess impacts on sunlight/daylight to buildings and open spaces and mitigate any impacts.</p>
Open space and industry	
<p>Not enough green space is proposed and the community should be more involved in its planning.</p>	<p>The proposed amendment will secure 5sqm of open space per dwelling to deliver a substantial uplift in green space across the opportunity area. The local community are able to comment upon plans for the provision of greenspace by responding to public consultations on planning policy documents, including the AAP and Supplementary Planning Documents that will provide area-specific design guidance. The public can also</p>

	<p>provide comments on individual development proposals as they come forward. The Council will make every effort to ensure all viewpoints are taken into account to bring about positive change which benefits everyone.</p>
<p>Open space should not be delivered at the expense of vibrant industry which represents a key employer of local people around the OKR area.</p>	<p>The plan seeks to create 5000 additional jobs across the area and to recognise and enhance the existing business clusters in the area. Open space provision will complement this, helping to create an improved environment that attracts customers and workers to the area. The proposed amended policy 22 states that open spaces should complement and support active frontages and uses, including workspace clusters.</p>

AAP23 – Flood Risk and Sustainable Urban Drainage Systems

Summary of representation	Council response
SuDS opportunities and recommendations	
<p>Flood mitigation should be an important consideration. Soft landscaping should be incorporated into design principles, for example providing front gardens rather than car parking for drainage. Sustainable drainage, rain water capture and grey water re-use should all be considered.</p>	<p>The policy amendment recognises that for some proposals a greenfield runoff rate is not feasible. For all development proposals, runoff rates should be minimised as far as possible, however in cases where this is not possible the policy amendment will secure a section 106 offset payment to mitigate the residual runoff. This will ensure development will not increase the risk of flooding elsewhere and provide off-site solutions to achieve this. The OKR Integrated Water Management Strategy provides guidance and the evidence base for the SUDs offset charge for the OKR opportunity area. The existing policy and the OKR Integrated Water Management Strategy provides guidance on water management and attenuation measures such as rain water capture, grey water recycling and green walls/roofs.</p>
<p>Development landscaping should consider how to improve quality of life for users and how higher levels of development could make the area greener as well as improving flood mitigation, for example by introducing green walls and roofs.</p>	<p>The existing policy and the OKR Integrated Water Management Strategy provides guidance on water management and attenuation measures such as rain water capture, grey water recycling and green walls/roofs.</p>
<p>SuDS can be combined with healthy, active street design, including cycle infrastructure.</p>	<p>Noted. The council is working with Transport for London on healthy streets.</p>
<p>Green roofs, grey water recycling and SuDS should all be implemented around new development to reduce the pressure on the sewerage system and promote climate and flood resilience.</p>	<p>The existing policy states that schemes should maximise the areas of permeable surfaces, which includes provision for green roofs, and that applications for major developments creating new floorspace should evaluate the feasibility of providing greywater reuse systems to supply non-potable water demand. The OKR Integrated Water Management Strategy will provide guidance on water management and attenuation measures.</p>
<p>The route of the Surrey Canal could be reinstated to form part of an area-wide and integrated Sustainable Urban Drainage (SuDS) strategy and the feasibility of this option should be explored further.</p>	<p>The AAP recognises the potential for flood attenuation measures along the route of the former Surrey Canal and seeks to facilitate the delivery of a green route on the alignment of the former Surrey Canal. Further guidance will be provided within the OKR Integrated Water Management Strategy.</p>
Implementation of SuDS	
<p>There needs to be an integrated, area-wide, SuDs strategy: leaving developers to respond to urban drainage on a site-by-site basis will lead to sub-optimal solutions, and opportunities for integrated land use (eg</p>	<p>An Integrated Water Management Strategy (IWMS) for the Old Kent Road area is currently being prepared which reviews the evidence on water resources and flood risk in the opportunity area and identifies combinations of water</p>

<p>Blue-Green Grid) will be lost. The Blue-Green Grid and strategic SuDs strategy should also be integrated with neighbouring Action and Opportunity Areas.</p>	<p>managements measures applicable to the Old Kent Road area. This work has informed the proposed change to the flood risk policy and will also inform guidance provided in Supplementary Planning Documents on specific areas. Development proposals will be required to collaborate in planning development and infrastructure delivery, including delivery of SUDS, to ensure a coordinated and joined up approach. Further details will be included in the next version of AAP.</p>
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AAP25 – Air Quality

Summary of representation	Council response
Need more trees, particularly on streets, improving air quality e.g. Boulevard of trees on the Old Kent Road	The policy amendment states that proposals should maximise greening of public realm and buildings, while ensuring that street tree provision is designed so that it does not reduce air circulation on busy roads and thereby exacerbate poor air quality. This, along with policy AAP 22 on green infrastructure, will ensure that development schemes secure a considered approach to urban greening which creates a healthier and more attractive urban environment.
The AAP fails to explain how very poor air quality and noise will be addressed and measures enforced. E.g. Will high emission HGVs be limited? Will this only be achieved if the underground stations are in place first?	The revised policy seeks to set out more clearly how air quality will be managed as part of new development through a range of measures. The draft supporting text also highlights wider work to address poor air quality including by seeking the support of TfL for creating a Low Emission Bus Zone on Old Kent Road and delivering a Healthy Streets pilot.
New development should have limited car parking to promote other sustainable transport modes.	The revised policy highlights that development will be car-free in highly accessible areas, with the exception of parking for disabled people and to meet business operational needs; and that car club bays will be supported in appropriate locations where they are reserved for electric vehicles.
OKR is a major arterial road into Central London. There are concerns that improvements to OKR for cyclists and pedestrians would displace traffic onto other roads and cause negative impacts for other areas in terms of congestion and air quality, especially given the space constraints of OKR.	The amended policy promotes and supports air quality mitigation measures including Mayoral initiatives such as the emissions surcharge from October 2017 (which will mostly affect vehicles registered in 2005 and older) and the proposed introduction of the Ultra-Low Emission Zone with a wider boundary that include all of the OKR opportunity area by 2019. The Council, in collaboration with TfL and other stakeholders, is assessing options for improvements to the Old Kent Road itself; the strategic functionality of this important route and impacts on traffic flows on the wider network are key considerations in this work.
Improvements should not be at the expense of traffic flows on OKR or commercial servicing.	
The plan should discourage the use of the OKR as a busy route into London for HGVs.	
Need to encourage electric vehicles to improve air quality, including low-emission buses.	The amended proposed policy states that proposals must provide electric vehicle charging points for all parking spaces and that car club bays will be supported in appropriate locations where they are reserved for electric vehicles. The council

	is also using wider mechanisms to improve local air quality in the opportunity area, including by seeking the support of TfL for creating a Low Emission Bus Zone on Old Kent Road and delivering a Healthy Streets pilot.
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OKR11 – Galleywall Trading Estate

Summary of representation	Council response
<p>We are concerned about the scale of industrial land release and whether the mechanisms for securing these uses in new development will work. Our recommendations would be to retain a greater amount of SIL/PIL in the north eastern section of the opportunity area – this includes the Galleywall Trading Estate.</p>	<p>The Council has considered representations received and reevaluated the site allocation. Following this review the Council has considered that the site should continue to make a contribution towards the economic composition of Old Kent Road over the course of the plan period. Accordingly, the Galleywall Trading Estate will be retained as SIL and propose it be allocated for employment uses by this policy amendment.</p>
<p>Galleywall Road and land within OKR11 does not sit within the South Bermondsey Employment Cluster. It is not an appropriate location for industrial and warehouse uses, particularly given the extensive residential community that lives close to the site. The employment cluster for heavy industries should be focussed on the land to the east where there is no residential context.</p>	<p>The site is functioning as an existing industrial estate. Any new development for industrial or employment uses on the site will need to consider any impacts on surrounding residents.</p>
<p>Given the proximity to the Ilderton Road Traveller site which is currently under imminent threat and residents would need to be relocated, the site allocation should be considered for potential to meet the need from Gypsy and Traveller families in case their current site cannot be restored to safety standards, alongside other uses such as employment and residential. The sites should also be considered for meeting any current and future accommodation needs in the form of additional pitch provision.</p>	<p>We are currently preparing a Gypsy and Travellers Needs Assessment which will identify future pitch requirements. After this work is completed and based on the findings of the needs assessment the Council would then complete an assessment of site and pitch provision across the borough..</p>

OKR18 - Gasworks and Southwark integrated waste management facility (IWMMF)

Summary of representation	Council response
<p>We support the reference to the significant remediation costs associated with the redevelopment of the Gasworks site which reflects London Plan policy 5.22. However, we recommend that it is expanded to explain that “the Council will take into account the need to incentivise and fund decommissioning as part of any redevelopment proposal through higher value land uses”. We have fundamental concerns with some of the other elements of the allocation and we believe these are not in accordance with London Plan policies which seek to encourage the decommissioning of obsolete Gas Holder sites.</p>	<p>The Council has amended the site allocation and retained the SIL designation to reflect the longevity of the waste management site and electricity substation which will not come forward for the foreseeable future. The policy recognises the gasworks will not be used again for gas storage and as such the site is proposed for residential and mixed use development.</p>

4. Monitoring our Consultation

4.1 Why we monitor our consultation

Our statement of community involvement indicates that the success of consultation can be measured by the numbers and diversity of consultees and respondents. As a result we have tried to engage with as many different groups as possible.

We monitor our consultation at every stage so that we can see where we need to engage more with certain groups at the next stage of consultation.

4.2 How we monitor our consultation

After each stage of consultation we will carry out a review of the consultation to see how we could improve the next stage of consultation. This includes reviewing the consultation against the requirements of our statement of community involvement.

Where possible we try to monitor event attendance (e.g. at Old Kent Road community forums) and monitor attendees' age range, gender and ethnicity by including a monitoring form within our consultation questionnaires so that we can monitor the range of people from our communities that responded to the consultation. However, in many cases respondents do not provide this information.