

Old Kent Road Area Action Plan

Proposed Submission Version

October 2024

Integrated Impact Assessment Appendices

Appendix 5: Assessment of the Strategy

Old Kent Road Area Action Plan 2024 Integrated Impact Assessment: Document Locator	
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Appendix 5: Assessment of the Strategy

The following tables set out the sustainability impacts of the Old Kent Road AAP Strategy (which comprises the ‘Vision’, the ‘Delivery’ and the ‘Plan Objectives’). These three strands of the Strategy are each appraised against 17 sustainability objectives (the “IIAOs”), encompassing economic, social and environmental aspects. Each objective is measured on a scoring scale (Key 1), with each grade assigned a numeric value, symbol and colour. Alongside the scoring, a detailed commentary on the item is provided.

Key 1: Individual scoring against each objective

Symbol and colour	Scoring Value (%)	Score	Description
✓✓	100	Major or direct positive	The proposed option/policy contributes significantly to the achievement of the objective.
✓	50	Minor or indirect positive	The proposed option/policy contributes to the achievement of the objective but not significantly or indirectly.
-	0	Neutral	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
x	-50	Minor or indirect negative	The proposed option/policy detracts from the achievement of the objective but not significantly.
xx	-100	Major or direct negative	The proposed option/policy detracts significantly from the achievement of the objective.
?	N/A	Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.

At the bottom of the table, there is an averaged scoring of the 17 objectives to indicate each element’s overall efficacy in meeting the sustainability objectives. The colour bar below (key 2) divides the overall scoring into three categories from positive, neutral to negative.

Key 2: Averaged IIA objectives scoring for each element of the Strategy

Negative	Neutral	Positive
< 10 %	10 - 49%	50 - 100%

Summary of the sustainability assessment for the Strategy

The Strategy comprises:

- the Vision;
- the Delivery and Funding; and
- the Plan Objectives.

The summary table is provided below. On the pages following the summary table is a series of three tables, one for each element of the Strategy, providing the detailed sustainability appraisal.

IIAO	Vision	Delivery and Funding	Plan Objectives
IIAO 1	✓✓	✓	✓✓
IIAO 2	✓✓	✓	✓✓
IIAO 3	✓✓	✓	✓✓
IIAO 4	✓	✓	-
IIAO 5	✓	✓	✓✓
IIAO 6	✓	✓✓	✓✓
IIAO 7	✓	✓✓	✓✓
IIAO 8	-	-	-
IIAO 9	-	-	-
IIAO 10	✓✓	-	-
IIAO 11	✓✓	-	✓✓
IIAO 12	✓✓	✓	✓✓
IIAO 13	✓✓	✓✓	✓✓
IIAO 14	-	-	-
IIAO 15	✓✓	✓✓	✓✓
IIAO 16	✓✓	✓✓	✓✓
IIAO 17	✓✓	✓	✓✓
Averaged Scoring	71	50	71
Efficacy Category	Positive	Positive	Positive

Vision							
IIA Objective	Description	Averaged Grading	Sub Grading	Timescales			Commentary
				S	M	L	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	-	✓✓	✓✓	Doubling the number of jobs in the area would create more employment opportunities overall. Increasing the range of different types of employment spaces and jobs across retail, office, creative, life sciences and industrial sectors would enable more local people to be able to access these opportunities. Sustaining existing business networks in the area would underpin this diversity and reduce relocations from the area so travelling to existing jobs remains convenient for local people. Supporting delivery of the Bakerloo Line Upgrade and Extension would speed up the delivery of employment and wealth creation. Creating more accessible town centre would encourage people into these locations to spend money in businesses, helping support the local business ecosystem, while also make services more readily available to all sections of society not leas the socioeconomically disadvantaged.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	-	✓	✓✓	Creating an environment for people to fulfil their potential would encourage the uptake of education and training opportunities. Two new primary schools, the expansion of existing primary schools and a new secondary school would increase the educational options for local children and young people. A network of arts and cultural facilities for continuous learning would offer development opportunities amongst the adult population. Attract a higher education institution to the area would bring a range of direct or indirect educational and training opportunities closer to local people and support the citywide educational offer.
IIAO 3	To improve the health of the population	✓✓	✓✓	-	✓	✓✓	Promoting physical activity and social interaction would help deliver key health priorities of tackling obesity and associated diseases, poor mental health and social isolation. Creating mixed use, higher density, car free and walkable development would encourage both physical activity and social interaction, as would making sports, arts and leisure facilities in schools available to local people. A new town centre with leisure, entertainment, recreation and play facilities available at a range of time would improve the convenience of pursuing healthy behaviours. Co-location of schools and older people’s accommodation could benefit the health and wellbeing of children and older people in particular. A new community health hub focused on health improvement as well as essential primary care services would help prevent poor health and encourage wellbeing.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	-	✓	✓	Creating an environment where people feel safe to walk would help decrease the fear of crime and opportunities for crime. A new town centre and mixed use neighbourhoods would encourage development with more active frontages and overlooking of public spaces and walking routes.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	?	✓	✓	With an overarching goal to benefit existing communities, the Vision --and by extension the AAP as a whole-- would support inclusion of existing residents, the diversity of people among existing communities and cohesion between existing residents and newcomers to the area. 7,000 new affordable homes of a mix of home types and sizes would give more people the opportunity to live at the centre of the city and access all the amenities and opportunities that offers. The innovative mixing of land uses would support greater interaction between resident and business communities. A new major town centre with a greater variety of shops and leisure, entertainment, recreation and play facilities open at different times would allow greater and more equitable access. It would also make sports, arts and leisure facilities in schools open to the wider community. Co-location of schools and older people’s accommodation would support greater inclusion of older people. A network of arts and cultural facilities and a more diverse range of workplaces would increase work and training opportunities for all ages. In the short term residents may experience disturbance from high levels of construction, mitigated as far as possible through thorough engagement.
IIAO 6	To reduce contributions to climate change	✓	✓	?	✓✓	✓✓	Creating car free residential development, improved public transport and encouraging sustainable transport by mixing land uses at high density would contribute to carbon emission reductions. In the short term high levels of demolition and construction may contribute to emissions.
IIAO 7	To improve the air quality	✓	✓	?	✓	✓✓	The Old Kent Road area suffers from poor air quality and high levels of construction may constrain improvements to air quality in the short term. Car free residential development, electric vehicles for commercial development, consolidation of deliveries, promoting Last Mile Logistics and encouraging TfL to use a low emission bus fleet would contribute to reductions in air pollution. Locating schools away from main roads, greening the schools’ immediate surroundings and creating new green links would reduce the exposure of people to poor air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	The Vision does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	-	The Vision does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	✓✓	✓✓	✓	✓	✓✓	Redevelopment of land in the area at optimum densities would make more efficient use of land. Redevelopment presents the opportunity to remediate contaminated land and improve soil quality with green infrastructure.

IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	✓	✓	✓✓	Integrating and celebrating the industrial heritage of the area with new development and creating new parks as part of a greener belt would enhance the townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	✓	✓	✓✓	Increasing the profile of the Old Kent Road area as a cultural destination and attracting a major cultural venue would enhance the cultural assets of the area. Integrating and celebrating the area's industrial heritage with development, protecting heritage assets and finding new uses for old buildings would conserve and enhance the historic environment.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	-	✓	✓✓	Various new parks, other new green spaces and green links (which together will create the Greener Belt) would expand and enhance the green infrastructure network in the area, which will support biodiversity as well as benefitting residents. These enhancements are deliverable in the medium and long term.
IIAO 14	To reduce vulnerability to flooding	-	-	-	-	-	The Vision does not explicitly address the issue of flooding but it does not negatively impact on it.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓	✓✓	✓✓	20,000 new homes --including 7,000 affordable homes of a mix of types and sizes-- would give people from all backgrounds the opportunity to live in the area. High standards for new housing would mean that these would be decent homes. Support for the Bakerloo Line Extension would speed up the delivery of new homes.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	✓	✓✓	✓✓	Delivering car free homes would encourage sustainable transport by new residents. Encouraging walking and cycling more widely, improving surface level public transport, upgrading and extending the Bakerloo Line, and introducing the Bakerloop Bus in advance of the upgrade/extension would increase sustainable transport use more broadly and minimise the need to travel by car.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	-	✓✓	✓✓	The Vision would support infrastructure improvements including the Bakerloo Line Upgrade and Extension, enhanced surface-level public transport, the expansion and construction of new schools, a new community health hub, new parks, green spaces and green links for walking and cycling and new leisure facilities. These infrastructural improvements are deliverable in the medium and long term.

Delivery and Funding							
IIA Objective	Description	Averaged Grading	Sub Grading	Timescales			Commentary
				S	M	L	
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	?	✓	✓	The phased delivery of housing, employment and community uses will improve accessibility to housing and employment for all, which will tackle poverty and encourage wealth creation, as these interventions will create more vibrant town centres and support a stronger local economy.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	?	✓	✓✓	The strategy sets out the delivery of: new and improved FE and HE institutions; one potential new secondary school; and up to the equivalent of nine new forms of entry at local primary schools (including where necessary expansions to existing schools). All of this will improve the education and skills of the population across a wide range of age groups. This will have a long term positive benefit as the delivery of these educational places are phased.
IIAO 3	To improve the health of the population	✓	✓	?	✓	✓	The delivery of affordable homes and education addresses issues of overcrowding which can impact negatively on mental health and wellbeing. The Greener Belt strategy will also deliver various new and improved green spaces and active travel links that will promote outdoor recreation, exercise and socialising – all of which has positive mental and physical health benefits. This has longer term impacts for people's health and wellbeing as people feel a greater sense of security and community through safe and decent homes and access to education.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	?	✓	✓	The 'Delivery and Funding' section of the Strategy does not directly reference the incidence of crime but the cumulative benefits of new homes, employment and community facilities may reduce crime and the perception and fear of crime for local residents.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	?	✓	✓	The delivery of new schools and education facilities, health centres and community facilities provide more opportunity for local people to engage with their local community and this promotes greater community cohesion. This benefit is a result of cumulative benefits from a number of interventions and therefore the benefits are long term, but also long lasting.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	?	✓	✓✓	The delivery of the Bakerloo Line Upgrade and Extension, as well as bus improvements, will reduce reliance on private vehicles ; in turn, this will reduce combustion and the emission of carbon dioxide that contributes to climate change. This a long-term project and will therefore have long term benefits to reducing climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	?	✓	✓✓	The delivery of the Bakerloo Line Upgrade and Extension and bus improvements will reduce reliance on private vehicles and therefore reduce combustion and the emission of carbon dioxide that contributes to poor air quality. The interventions proposed to reduce climate change.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	The 'Delivery and Funding' section of the Strategy does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	-	The 'Delivery and Funding' section of the Strategy does not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	-	The 'Delivery and Funding' section of the Strategy does not explicitly address the issue of land soils but it does not negatively impact on it.
IIAO 11	To protect and enhance quality of landscape and townscape	-	-	-	-	-	The 'Delivery and Funding' section of the Strategy does not explicitly address the issue of landscape and townscape but it does not negatively impact on it.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	?	✓	✓	The 'Delivery and Funding' section of the Strategy does not directly reference the historic environment and cultural assets. However, the deliverables it sets out (homes, facilities, infrastructure etc.) will have direct interrelationships with the historic environment and cultural assets. In the short-term, when construction projects are underway (including construction projects that affect heritage and cultural assets (including the settings of these assets)) there will potentially be a temporary negative change to the surroundings of these assets, but otherwise the impacts (medium and long-term) will be positive.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	-	✓	✓✓	The 'Delivery and Funding' section of the Strategy refers to the delivery of three new parks as part of the wider Greener Belt Strategy. This would expand and enhance the green infrastructure network in the area, which will support biodiversity as well as benefitting residents.
IIAO 14	To reduce vulnerability to flooding	-	-	-	-	-	The 'Delivery and Funding' section of the Strategy does not explicitly address the issue of flooding but it does not negatively impact on it.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	✓✓	The 'Delivery and Funding' section of the Strategy sets out the aim to deliver 20,000 new homes of which 7,000 will be affordable homes to meet local housing demand. This is phased and will have positive impacts in the short, medium and long term.

IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	?	✓	✓✓	The 'Delivery and Funding' section of the Strategy sets out costs for bus and cycle improvements which will minimise the need for local residents to use the car by incentivising active travel modes of walking and cycling and public transport. It also attributes a figure of £8billion to the BLE, which will principally require Central Government funding. These investments will take some time to implement so the benefits will improve over time. There will be a long-term lasting benefit from the delivery of bus and cycle improvements.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓	✓	?	✓	✓	The 'Delivery and Funding' section of the Strategy explains how the Area Action Plan will deliver its objectives and support social regeneration through the delivery of homes, employment, transport infrastructure and social infrastructure that are necessary to support future sustainable development within the Old Kent Road Opportunity Area. It attributes a cost of £50 million to the education, leisure centre and health centre investments. The major new green infrastructure will be delivered through the equalisation mechanism, which forms part of the viability review underpinning the AAP. The delivery of all this new infrastructure will be phased over a long period of time and therefore have medium and long term benefits.

Plan Objectives							
IIA Objective	Description	Averaged Grading	Sub Grading	Timescale			Commentary
				S	M	L	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' cumulatively will deliver employment opportunities and upskill the local population to access employment opportunities through the delivery of schools which will tackle poverty and wealth creation, by creating more opportunities for all within the Old Kent Road Opportunity Area.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	?	✓✓	✓✓	The 'Plan Objectives' for <i>Schools, Community and Youth</i> set out the aim to provide improved access to social and physical infrastructure including cultural activities, parks and open spaces. This aims to provide opportunities for young people to be involved in their community and recreation. This will have long term benefits for education and skill of the population as it aims to engage with youth throughout their adolescence to ensure local residents receive maximum benefit from improved quality of opportunity to training, education and cultural attractions.
			✓✓	?	✓✓	✓✓	The 'Plan Objectives' for <i>Schools, Community and Youth</i> ensures that the whole community can benefit from the delivery of educational facilities and can benefit from the facilities. The delivery of these uses is phased and therefore has medium and long term benefits.
IIAO 3	To improve the health of the population	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' will cumulatively deliver community facilities that will support the local population in regards to health, housing, employment and education, as well as recreation and leading healthier active lives as local residents will benefit from sports facilities, improved access to green and open space and improved walking and cycling routes. The 'Plan Objectives' for Health and Wellbeing also sets out the need to reduce air pollution. This cumulatively will have a beneficial impact on local residents physical and mental health and wellbeing long term because the delivery of these interventions is phased.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	-	-	-	The 'Plan Objectives' does not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' cumulatively will deliver equality of opportunity for all because the Old Kent Road AAP aims to deliver improved housing, employment, green and open space and community facilities for all. It aims to ensure that design is sensitive to existing character, and that new development is accessible and has good connectivity with existing development to ensure greater cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	?	✓	✓	The 'Plan Objectives' for <i>Energy and Climate Change</i> set out aim to achieve carbon neutrality in the Old Kent Road by 2030. This includes creating low carbon jobs and businesses and supporting existing individuals to move towards zero carbon.
IIAO 7	To improve the air quality	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' for <i>Health and Wellbeing</i> set out objectives to improve air quality around the Old Kent Road and tackle associated inequality. This will have medium- and long-term benefits because it will create behavioural change for local people to use more public transport, and reduce combustion. Increased urban greening will also have long term benefits by creating cleaner air.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	The 'Plan Objectives' do not explicitly address the issue of waste but it does not negatively impact on it.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	-	The 'Plan Objectives' do not explicitly address the issue of water resources but it does not negatively impact on it.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	-	The 'Plan Objectives' do not explicitly address the issue of land and soils but it does not negatively impact on it.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' for <i>Culture and Heritage</i> set out that the identity of the Old Kent Road should be strengthened and integrated and that historic value and character should be integrated into design. This will ensure that the quality of landscape and townscape is protected and enhanced medium and long term as new development will protect and enhance existing assets and character.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' for <i>Culture and Heritage</i> aim to conserve and enhance the historic environment and cultural assets by protecting and enhancing listed and non-listed heritage assets and buildings and spaces of townscape value. It aims to preserve and enhance the industrial character of the Old Kent Road area and find new uses for existing buildings.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	?	✓	✓✓	The 'Plan Objectives' for <i>Parks and Open Space</i> set out objectives to ensure residents lead more healthy and active lives which is delivered by the improvement of new and existing open and green spaces and by improving the environmental quality through urban greening incentivising more active recreation and travel.

			✓✓	?	✓	✓✓	The 'Plan Objectives' cumulatively address the biodiversity crisis by promoting planting, food growing and greening which will improve the local green and open spaces and provide secondary benefits like improved air quality and incentivise walking and cycling as the pedestrian experience is improved.
IIAO 14	To reduce vulnerability to flooding			-	-	-	The 'Plan Objectives' do not explicitly address the issue of flooding but it does not negatively impact on it.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	✓✓	The 'Plan Objectives' for <i>New Homes</i> sets out that a range sizes and tenures of homes should be delivered to meet local housing need. The delivery of homes is phased and will therefore have short, medium- and long-term benefits.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	?	✓	✓✓	Extension of the Bakerloo Line and creation of transport interchanges at stations would encourage the use of public transport, as will the delivery of the Bakerloop Bus.
			✓✓	?	✓	✓✓	The 'Plan Objectives' for <i>Movement</i> set out that Old Kent Road high street will be a Healthy Street with safe walking and cycling routes that will minimise the need to travel by car for all as sustainable travel modes will be more accessible for local residents.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	✓✓	✓✓	✓✓	Ensuring development is in conformity with masterplans and site allocations would coordinate the delivery of the land uses and their supporting infrastructure anticipated by the plan. Working with infrastructure, digital infrastructure and utility companies and neighbouring boroughs would help ensure that sufficient physical and social infrastructure for largescale development is in place.
			✓✓	✓✓	✓✓	✓✓	The 'Plan Objectives' for <i>Energy and Climate Change</i> set out aim to provide infrastructure and work with infrastructure providers of transport, energy and other utilities to enable reduction in carbon.