

All,

Our next meeting will take place on Monday 4th September at **12.30 at City Hall – room 3.6w.**
Please ask for me when you reach reception.

Attached you will find the papers for Monday with the focus being to agree an agenda for the September Growth Partnership Board. I also attach the integrated workplan which some of you fed into a while back and will require updating ahead of the 27th. If you can let me know your updates that would be great.

Best

■

■

REGENERATION TEAM
Greater London Authority
020 7983 ■

City Hall, The Queen's Walk, London, SE1 2AA
www.london.gov.uk

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Old Kent Road, New Cross and Lewisham Working Group
September 2017 – 12.30-2.00pm
City Hall – Meeting room 3.6w

Attendees

Southwark: [REDACTED] Juliet Seymour, Tim Cutts, Laura Hills

Lewisham: [REDACTED]
[REDACTED]

TfL: [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED]

GLA: [REDACTED], [REDACTED]
[REDACTED]

Apologies: Debbie Jackson, Juliemma McLoughlin

AGENDA

1	Actions from last meeting (5 mins)	ALL
2	Lewisham update (20 mins) [Not relevant to request] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	Lewisham
3	TfL update (15 mins) <ul style="list-style-type: none"> • Bakerloo line extension • Surface transport study • Old Kent Road – BLE study/station locations • Bricklayers Arms 	TfL
4	Old Kent Road AAP/OAPF update (20 mins) <ul style="list-style-type: none"> • Draft AAP – updates to policies • Timescales • Local Development Strategies • Development pipeline 	Southwark
5	GLA Housing update (10 mins)	GLA
6	Next Growth Partnership board – agenda discussion (15 mins) <i>Date 27th September – 10.00 – 11.30</i>	ALL
7	AOB (5 mins)	All/Chair

Old Kent Road, New Cross and Lewisham Working Group - July
169 Union Street - US meeting room D
Minutes and Actions

ATTENDEES

Southwark: Tim Cutts

Lewisham: [REDACTED]

TfL: [REDACTED], [REDACTED]

GLA: Debbie Jackson, [REDACTED], [REDACTED],

Apologies: [REDACTED], Juliemma McLoughlin, [REDACTED]

MINUTES

1. Lewisham Update

[Not relevant to request]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

2. TfL update

- Responses to consultation have been collated and a report is due to be completed shortly.
- [REDACTED]
- Quod/[REDACTED] study looking at station location options, development capacity and value capture. TfL aim for the study to provide information to allow a decision to be made on the number and location by September ahead of the final AAP going to Southwark cabinet and ahead of next planned Board meeting.
- Findings of report to be presented to next Board meeting.
- Surface Transport challenges continue and TfL looking to reconcile capacity, flows, trees, public realm, bus and cycling requirements, BLE construction, heritage and increased travel modes and feel that it will not prove possible to satisfy every interest. Surface Transport Study and an A2 Corridor Study continue.
- TfL to circulate list of studies that are underway and timescale for completion.

[Not relevant to request]

3. Southwark update

- Mixed use/business space consultation underway. Also continuing with area focused approach through dialogue with landowner consortiums.
- Final version of AAP to go to Cabinet in October
- Detailed work continuing on opportunity sites including Hatcham Road, Cantium, Verney Road and St James Road
- Hatcham Road meeting with developers organised.
- Current thinking on SIL retention – railway arches, Galleywall, Waste Recycling Site, Hatcham (Penarth), Osory Road and Ilderton Road.
- Town Centre work includes updating retail assessment and looking at relationship with Elephant and Castle and Canada Water
- Detail will be developed on open space strategy through Local Development Strategies and developer discussions

- Discussions are continuing with Lewisham and Network rail on dive under spaces.

4. GLA Housing

- Old Kent Road housing zone agreement has been signed and terms of reference agreed
- Southwark's Affordable housing and PRS being agreed
- [REDACTED] [Not relevant to request]
- 1621 programme open. Housing zone revenue funding also available

5. Growth Partnership – agenda for September.

- Agenda for next meeting to focus on a set of key questions:
 - BLE Consultation, scheme development and number of stations
 - Funding issues and development interest
 - Messaging about the 'And beyond'
 - Joined up policy position – GLA, Southwark and Lewisham.

ACTIONS

Ref	Item	Lead	Due
1	Prepare agenda and papers for next board meeting	Debbie [REDACTED]	September 27th
2	Master programme to be circulated	[REDACTED]	September 1st
3	[REDACTED] [Not relevant to request]	[REDACTED]	September

DRAFT Workplan - Old Kent Road, New Cross and Lewisham Growth partnership

[illegible]

[Not relevant to request]

Paul Robinson

From: [REDACTED]@southwark.gov.uk>
Sent: 08 September 2017 15:20
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Old Kent Road - GLA-Southwark meeting 4 Sep
Follow Up Flag: Follow up
Flag Status: Flagged

Thanks [REDACTED]

Yes happy to share draft plans.

I will send over the latest.

Regards

From: [REDACTED]@london.gov.uk]
Sent: Tuesday, September 05, 2017 1:10 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Old Kent Road - GLA-Southwark meeting 4 Sep

Hi [REDACTED]

Many thanks again for our meeting yesterday.

As promised at the meeting please find attached an electronic version of our emerging (informal) officer views on the potential SIL boundaries in the OKR area. We still need to do a few cross-checks and we want to give further consideration to the dotted areas around Hatcham Road and the Gasworks and we will get back to you on this.

Could I ask if you would be able to share the useful draft maps that you tabled please in electronic format showing your emerging thinking on the typologies etc.

There was also an issue raised at the end of the meeting regarding implications of the draft AAP proposals for Southwark meeting its waste apportionment. Could I ask if you could drop us an email to set this out in more detail please so we can liaise with our waste colleagues here at the GLA.

Many thanks
[REDACTED]

[REDACTED] | Senior Strategic Planner | London Plan Team
Greater London Authority
City Hall | The Queen's Walk | London | SE1 2AA
DDI [REDACTED]
www.london.gov.uk

#LondonIsOpen

**OLD KENT ROAD
DRAFT AAP
INDUSTRIAL LAND
DESIGNATIONS**

- GLA COMMENTS
- Existing LSIS
- Existing SIL



Paul Robinson

From: planningpolicy <planningpolicy@southwark.gov.uk>
Sent: 14 September 2017 11:09
To: [REDACTED]; planningpolicy
Cc: [REDACTED]
Subject: RE: Re New Southwark Plan and Old Kent Road AAP: New and amended preferred option policies

Dear [REDACTED],

Thank you for your email. I can confirm receipt and that your have been logged and will be carefully considered in preparing the next draft of the Old Kent Road Area Action Plan and New Southwark Plan.

Kind regards,

[REDACTED]
Planning Policy Officer

www.southwark.gov.uk

Register for a [MySouthwark](#) account and opt-in to our planning policy email updates



From: [REDACTED]@tfl.gov.uk]
Sent: Wednesday, September 13, 2017 6:00 PM
To: planningpolicy
Cc: [REDACTED]
Subject: Re New Southwark Plan and Old Kent Road AAP: New and amended preferred option policies

Thank you for consulting TfL Borough Planning. Please find below our comments on this stage of the New Southwark Plan/Old Kent Road AAP consultations. I understand my colleagues in TfL Commercial Development will be responding separately as a 'land owner'.

We note that the current consultations are limited to new and amended policies only. As such, we intend to provide further comments on those policies that are not proposed to be amended at the next (submission version) stage, as we believe there are some outstanding comments from the previous (preferred options) version that may not have been addressed.

We are also currently undertaking further assessment of the optimum locations for the Bakerloo Line (BLE) stations within the Old Kent Road OA, working with stakeholders including LB Southwark. We intend to provide further comment regarding the station locations at the submission version stage to reflect the findings, which we hope can be reflected in the final Old Kent Road AAP. We would welcome the opportunity to discuss this and other aspects of the BLE project/OKR AAP, such as interim public transport capacity, land safeguarding and funding, prior to the next stage of consultation.

In the meantime, if you have any questions please feel free to contact me.

Regards

1) New Southwark Plan: Proposed New and Amended Preferred options policies

Amended Policy DM48 Car Parking

The restraint based residential car parking standards, particularly requiring 'car free' residential development in PTAL 5-6 areas, is strongly supported. It is in line with the draft Mayor's Transport Strategy (MTS) in this respect, and will help support the Mayor's ambitious mode shift target away from car travel.

The policy could go further and require lower car parking provision in Opportunity Areas (OAs) in the borough, including mandatory car-free/car-lite developments. This is in accordance with draft MTS policy, which seeks to lock in 'good growth' in OAs by restricting car parking and improving public transport, walking and cycling

There appears to be no guidance on non-residential standards. The NSP must provide this to avoid ambiguity when negotiating with developers. As such the policy should at least contain wording that 'defers' to the London Plan standards for non-residential uses and/or provide its own standards (if more restrictive). TfL would expect a baseline of 'car free' non-residential development i.e. zero non-operational car parking in the majority of the borough, particularly in the higher PTAL areas in the north, and in OAs.

Similarly, the lack of clear guidance on the quantum of town centre parking could lead to ambiguity in negotiations with developers. The policy mentions 'appropriately sized' off-street town centre car parking which is obviously open to interpretation. So again, the NSP should contain wording that 'defers' to the London Plan standards/policy for town centre uses and/or provide its own standards (if more restrictive). A reference to the design of any parking provision could an opportunity to ensure the needs of people walking and cycling are considered and vehicle dominance is reduced in line with the Mayor's 'Healthy Streets' approach. A statement could also be included on the approach to charging for town centre car parking.

The policy requiring access to an electric vehicle (EV) charging point at every parking bay is strongly supported as this will be required to support the Mayor's aim of a switch to zero carbon transport by 2050. An addition of a reference to the London Plan requirement for 20 per cent of provision to be 'active' from the offset would be welcomed, with the remaining provision being 'passive.'

While car club provision can play a role in reducing the need to own a car, particularly when they can enable a lower provision of private parking, the location and promotion of these services should be carefully managed to prevent those who would not otherwise use a car to start driving. The approach to central London set out in the draft MTS has a strong focus on prioritising active travel and public transport over other modes, and as such these services are not appropriate within the CAZ. The contributions of developers towards the cost of car club membership could potentially be used for purposes that are better aligned with the Mayor's goals, such as cycle parking provision.

Crystal Palace and Gipsy Hill Area Vision

The statement that '*the area is less well served by public transport than many other parts of Southwark*' is not strictly true. Crystal Palace bus station is just over the borough boundary and is

one of the key bus interchanges in south London. As such, much of the area has a PTAL of 6a (excellent).

Parts of the area have a lower PTAL of 3 (occasionally 2), but this reflects the lower development density and limitation imposed by the local road/greenspace network, and overall it compares favourably to other places in the north of the borough such as Bermondsey and Old Kent Road. Given the relative importance of bus services in the area, development should improve public transport particularly by facilitating bus priority measures where possible, in order to help reduce bus journey times. This could be mentioned explicitly, for example in bullet point four or five in paragraph 1.1.2.

Amended site allocation NSP06: Land bounded by Southwark Street, Redcross Way and Crossbones Graveyard

This is a TfL owned site so comments will be provided by TfL Commercial Development team.

New site allocation NSP65: Camberwell Green Magistrates Court

This is a key town centre site, so the policy could give guidance on car parking i.e. should be car-free, given PTAL 5 town centre location. Development of the site should also facilitate cycle hire expansion, in line with the Council's ambition to expand the cycle hire scheme to Camberwell.

New site allocation NSP66: Discovery Business Park and Railway Arches

The site vision diagram could indicate opportunity for improved connectivity for walking/cycling under the railway lines (ie south west to north east), as well as alongside (Low Line). This would help overcome severance of the viaduct, for example by opening up railway arches as is being proposed for the Biscuit Factory site just to the east. In this respect, the 'design and accessibility guidance' should also mention improved cycle, as well as pedestrian access. Improved walking/cycling should also be considered alongside also improving bus south west to north east connectivity

Again, guidance on the approach to car parking could be given, noting that the pictures contain a relatively high number of parked cars.

Development of the site should also facilitate cycle hire expansion in line with the Council's ambition to expand the cycle hire scheme further into the borough.

New site allocation NSP67: Swan Street Cluster

Two of these sites front Great Dover Street, which is a TfL road (TLRN) and part of the strategic road network. As such, the development of the two sites must allow for all servicing to easily take place off the Great Dover Street frontage, and provide enough 'set back' to allow for tables and chairs associated with the active frontages to be placed off the public highway. The mature street trees on the western footway should also be protected.

TfL would need to consider the potential impact on public transport, given the potential scale of the development and location in a very busy part of central London; the adjacent Borough Underground station in particular is relatively constrained, the platforms being accessible by lift only.

Development would need to protect the existing docking station in Swan Street and provide for expansion of cycle hire, given the likely increased demand.

These above issues should be summarised in the 'site vision' and/or 'design and accessibility guidance' as appropriate.

New site allocation NSP69: Dulwich Telephone Exchange, 512 Lordship Lane

The 'design and accessibility guidance' should reference the fact that Lordship Lane is part of the strategic road network (SRN) and, as such, development of the site should not impact on traffic flow of that road, for example in design of the access junction, and providing off-street servicing.

New site allocation NSP70: Denmark Hill Campus East

The 'design and accessibility guidance' should reference the fact that Denmark Hill is part of the SRN and, as such, development of the site should not impact on traffic flow of that road, for example in avoiding new/consolidating exiting access junctions, and providing easily accessed off-street servicing (noting that bollards have been placed along both sides of Denmark Hill, suggesting that unlawful servicing is an issue). The approach to car parking should be set out, particularly given that health facilities can have unique issues in this respect, for example demand for visitor car parking.

Development of the site should also facilitate cycle hire expansion in line with the Council's ambition to expand the cycle hire scheme further into the borough.

Development would also need to consider additional demand on bus services, as Denmark Hill is a key bus corridor to the south of the borough.

2) Old Kent Road Draft AAP: Proposed New and Amended AAP Policies

Amended Policy AAP12: Town Centre

Old Kent Road is a historic key strategic movement corridor from south east London and Kent to central London. It is a TfL road (TLRN) and this makes the OA quite unique in that the TLRN forms the 'spine' of the OA at street level. As such, proposed policy could have fundamental implications for the operation of the road.

TfL is fully supportive of the Council's vision to transform the area to a 'town centre', thereby making Old Kent Road a 'high street', in line with the Mayor's 'Healthy Streets' vision. However, a key caveat is that the road will need to maintain its movement function, with particular emphasis on pedestrians, cyclists, buses but also for traffic/freight.

To this end, TfL is developing plans for the road that seek to optimise the balance between the modes, improving conditions for pedestrians and cyclists whilst maintaining bus reliability/speeds and minimising impact on general traffic flow, in line with the Mayor's 'Healthy Streets' policy. Given the space constraints in places, this is proving to be a complex design challenge. We are finding that on-street waiting and loading is a particular issue and constraint; it reduces space for 'sustainable transport' modes, and can, particularly when unlawful, create congestion which has adverse implications for air quality and bus reliability/patronage. New site accesses directly into Old Kent Road will also have adverse impacts on traffic flow, pedestrians and cyclists.

As such, and so as to balance the policy wording that encourages 'active frontages' – indeed seeks to make Old Kent Road the 'primary shopping frontage' - the APP policy (and reasoning) must set out a clear requirement for off-street or alternative provision for deliveries and servicing for sites fronting Old Kent Road, for example use of on-plot service areas, side roads and/or consolidated off-street loading areas. The policy/reasoning should also make it clear that development proposals that are not able to meet this requirement are likely to be refused planning permission. Certainly, there should be no need for additional car parking bays on Old Kent Road, and opportunities to reduce and minimise existing parking and loading bays will be explored as part of the on-going design process. Similarly, new site accesses directly onto Old Kent Road should be restricted, with opportunities to consolidate/remove existing accesses encouraged.

An additional issue that needs to be considered at an early stage is the approach to 'tables and chairs' associated with cafes and restaurants. Adequate space behind the 'back of footway' (or elsewhere) needs to be 'designed in' to development proposals from the outset. Subsequent 'tables and chairs' applications that encroach onto the footway of Old Kent Road will be contrary to the aims of the re-design of the corridor to increase space for pedestrians, and as such they are likely to be opposed by TfL as the Highway Authority. The policy framework to avoid this should be set out in the AAP. See also comments in support of policy AAP25 (air quality).

This policy could also be the appropriate place to re-emphasise the potential need for land safeguarding and/or set back/provision of land for sites fronting Old Kent Road to allow for the aforementioned highway improvements e.g. for footway widening, cycling facilities and/or junction improvements. TfL's on-going design work will inform this in practice.

Amended Policy AAP21: Car Parking

The highly restraint based car parking policy is strongly supported, and is fully in line with the draft MTS.

Amended Policy AAP25: Air Quality

The requirement to provide initial residents free membership of the cycle hire scheme, and possible 'bulk buy' business use membership, via s106 agreement, could be stated here (bullet point five), as per a similar requirement for car clubs as stated in policy AAP21.

Bullet point six should include mention of creating neighbourhoods 'easy to cycle around', as well as 'easy to walk around' (in line with the Mayor's Healthy Streets objectives).

Bullet point seven is supported, as it encourages 'retail/café' frontage off Old Kent Road, which would help overcome the issues raised in respect of policy AAP12 above i.e. that tables and chairs on the Old Kent Road frontage will not be appropriate unless adequate space is provided being the 'back of footway', designed into development proposals from the outset (TfL's experience is that cafes and restaurants often request tables and chairs fronting even the busiest stretches of the TLRN, for example Borough High Street).

Bullet point eight (street tree provision restricting air circulation) could be interpreted to be at odds with Mayoral policy to plant more street trees in order to absorb pollution. Obviously, TfL would want to work closely with the Council on the protection of existing and provision of new street trees on the TLRN to ensure an appropriate balance between appearance, pollution mitigation and street function.

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Paul Robinson

From: [REDACTED]
Sent: 18 September 2017 12:20
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Mayor's response to New Southwark Plan and Old Kent Road AAP consultation
Attachments: Mayor's response 13 September 2017.pdf
Categories: Very Important

Please see [REDACTED] email below

Plus our response to their latest consultation, attached

Thanks
[REDACTED]

From: [REDACTED]@southwark.gov.uk]
Sent: 13 September 2017 16:33
To: [REDACTED]@london.gov.uk>
Cc: [REDACTED]@southwark.gov.uk; planningpolicy <planningpolicy@southwark.gov.uk>; Wilson, Colin [REDACTED]@southwark.gov.uk>
Subject: Re: Mayor's response to New Southwark Plan and Old Kent Road AAP consultation

Hi [REDACTED]

Please could you have a think about the following before Tuesday

- 1 Southwark does not have an affordable rent policy now so why do we need one? Our performance is excellent
2. Why do we need to repeat the national guidance on the sequential test?

Thanks
[REDACTED]

Sent from my iPhone

On 13 Sep 2017, at 16:09, Brianne Stolper [REDACTED]@london.gov.uk> wrote:

Dear [REDACTED]

Please find attached the Mayor's response to the consultation on the New Southwark Plan and Old Kent Road AAP.

Kind regards

[REDACTED]
Senior Strategic Planner
London Plan Team
GREATERLONDONAUTHORITY
Phone: 020 7983 [REDACTED]
Email: [REDACTED]@london.gov.uk

Development, Enterprise and Environment

Simon Bevan

Director of Planning
Chief Executive's Department
5th Floor, Hub 4
Southwark Council
PO Box 64529
London, SE1P 5LX

Our ref: LDF28/LDD07/BS01

Date: 13 September 2017

Dear Simon,

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

**Re: New Southwark Plan Proposed New and Amended Policies & Draft Old
Kent Road Area Action Plan Proposed New and Amended Policies**

Thank you for consulting the Mayor of London on the proposed new and amended policies to the New Southwark Plan (NSP) and Draft Old Kent Road Area Action Plan (OKR AAP). As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has delegated authority to me to respond and his representations are set out below. Representations from Transport for London (TfL) are set out in Annex 1.

1. New Southwark Plan (NSP)

Development Management Policies

We commented on the previous draft version of the New Southwark Plan Part One: Strategic Policies and Development Management Policies in a letter dated 12 February 2016 and on Part Two: Area Visions and Site Allocations in a letter dated 2 May 2017. Both letters highlighted elements of the draft documents that could raise issues of non-conformity as well as providing more general comments.

Social Regeneration

This new policy is welcomed, especially in light of the large amount of development proposed for the Old Kent Road Area.

Affordable Housing

Our previous letter stated the definition of affordable rent in London Plan policy 3.10 includes affordable rented housing as well as social rented and intermediate housing. It is not clear whether the amended policy includes affordable rent as an affordable housing product even though the Fact

Box includes both affordable rent and London affordable rent as examples of social housing. No funding is available for social rent, which means that unless affordable rent or London affordable rent is included in the borough's policy, additional funding will be reliant on S106 contributions. The Mayor's funding supports affordable rent to ensure that affordable housing is genuinely affordable.

No mention is made regarding payments in lieu for the provision of affordable housing off site, other than for developments providing 10 homes or fewer. The policy should state clearly whether all affordable housing is to be provided on site or what arrangements are acceptable for the provision of affordable housing off site.

The figure £90,000 in paragraph three of 'Reasons' should be amended to £60,000 to reflect the Mayor's most recent view on the threshold for intermediate housing eligibility.

In the Fact Box table for Social Housing, the figure for a four bedroom home at London Affordable Rent is given as £417.02. This figure is queried as the Mayor's Affordable Homes Programme 2016 – 21 Funding Guidance document gives a figure of £169.70 for a four bedrooomed home.

The current London Plan AMR has revised the income cap for discount market rent to £60,000. The Fact Box should reflect this change.

Private Rented Homes

The table should reflect an affordable rent for household incomes up to £60,000 in line with the current London Plan AMR.

Borough Views

The Mayor welcomes the protection of important borough views.

Student Homes

As stated in the Mayor's previous letter, the approach for student accommodation outside regeneration areas was unclear. The amended policy continues to be unclear as to the approach for student accommodation outside these areas.

Office and Business Development

The inclusion of sui generis use classes is welcomed. However, it would be useful to list all the B use classes to avoid any doubt that they are all included in the policy.

Small Business Units

The Mayor supports the approach to expanding the retention of small business units throughout the borough. The inclusion of a clause requiring the reprovision of existing businesses and a relocation strategy for those that cannot be accommodated in a completed developed is welcomed.

Town and Local Centres

A number of town centres are proposed for promotion to a higher level in the town centre network and other areas for designation as new town centres. The current town centre network is set out in Table A2.1 in Annex Two of the London Plan which classifies town centres according to their existing role and function taking into account various criteria. London Plan policy 2.15 requires boroughs to co-ordinate the development of London's network of town centres in the context of Map 2.6 and

Annex 2 of the London Plan. London Plan paragraph 2.74 states that centres can be reclassified and where appropriate, new centres designated in the light of reviews or alterations to the London Plan and other development plan documents, and through testing of current centres through town centre 'health checks'. However, changes to upper tier centres (Major and above) should be co-ordinated first through the London Plan. The forthcoming London Plan will review the existing town centre network and set out the classification for all larger town centres in London.

The proposed designation of Old Kent Road and Canada Water as Major centres and Herne Hill as a District centre in the NSP raises concerns and could give rise to conformity issues. The emerging evidence that will support the new London Plan indicates that these centres are currently not performing at this level.

Canada Water may have potential to function as a Major centre in the longer term, however this needs to be supported by robust evidence considering the impact on other nearby centres and the wider town centre network, evidence of demand and capacity, and significant evolution of the centre to create a welcoming and identifiable town centre that gives access to a broad range of goods and services by walking, cycling and public transport. The classification of Old Kent Road as a Major Town Centre is discussed in detail below under comments on the Old Kent Road Area Action Plan.

The requirement for large schemes in town centres to provide public toilets, public drinking fountains and public seating is welcomed.

Small Shops

This policy is supported and is in line with London Plan policy 4.9.

Area Visions and Site Allocations

Several comments were made previously addressing concerns relating to industrial and office uses, town centres, density and surface water flood risk. The new and revised policies do not include any suggested changes and Mayor hopes these will be addressed in the submission version of the document.

NPS 38 Dulwich Hamlet Champion Hill Stadium

The required retention of the football ground's associated facilities is welcomed. However it is disappointing that previous comments regarding density and number of homes have not been taken into consideration. Similarly the removal of the reference to including taller buildings is disappointing.

NSP65: Camberwell Green Magistrates Court

The redevelopment of the site could include affordable workspace.

2. Old Kent Road Area Action Plan (OKR AAP)

Detailed comments on the previous OKR AAP consultation were provided in our letter dated 23 November 2016 and a further letter dated 15 June 2017 was sent to Colin Wilson following discussions between GLA and LB Southwark officers to provide clarity regarding the GLA's position regarding the OKR AAP.

Following the concerns we raised regarding certain elements of the OKR AAP and conformity with the London Plan, GLA and LB Southwark officers have had several meetings to discuss these issues and take the AAP forward. Whilst LB Southwark officers sought to address our concerns there are still outstanding issues that need addressing, which are detailed below.

Central Activities Zone (CAZ)

Following discussions with LB Southwark officers, we understand that Southwark is no longer pursuing an extension of the CAZ. This approach is welcomed and should be reflected in the AAP by realigning the CAZ boundary to match that in the adopted London Plan and changing the first sentence of paragraph 2.2.1 to avoid raising conformity issues. This positive decision has been underpinned by a welcomed effort to look at innovative ways of mixing and intensifying uses that are appropriate to the Old Kent Road area.

New Policy: Social Regeneration

The inclusion of this new policy is welcomed.

AAP 11a: Business and Workspace

The June 2016 draft AAP approach to sites released from SIL and LSIS adopted a principle of no net loss of employment (B class) floorspace. This principle has been brought through into the new policy AAP 11a: Businesses and Workspace of the June 2017 draft AAP. However the GLA is concerned that this approach would lead to the loss of B1c, B2 and B8 industrial, storage and distribution functions in the OKR area because applications would be likely to favour higher value B1a office uses. The policy should make specific reference to employment space in retained SIL and list appropriate B use classes (B1c, B2 and B8) and other industrial uses.

The GLA will be seeking no overall net loss of industrial and warehousing floorspace capacity from sites released from designated SIL and LSIS.

Table 1: Mandela Way

The GLA supports any commentary which flags the role of Mandela Way in serving and supporting the Central Activities Zone (CAZ).

The policy should reflect the most current masterplan and thinking for this area. We understand Southwark are exploring an approach to combine office and residential development alongside warehousing, distribution and logistics uses. In considering these options, it would be helpful to understand whether a portion of LSIS will be retained and the strategy for its intensification. The GLA expects no net loss of industrial floor space with consolidation of existing uses to make best use of land. An approach which explores some careful consolidation and intensifications of B1c and B8 uses would be fully supported by the GLA.

It would be useful to include a breakdown of how a minimum of 4,000 jobs will be achieved across the sectors. The current approach of stating 'Estimated capacity for employment (B class) jobs (gross)' is considered too general to be useful.

Table 1: Hatcham Road

We understand LB Southwark is now proposing to retain the industrial uses which run alongside the waste recycling centre along Ormside Street. The GLA welcomes this decision as the area would benefit from industrial intensification.

The GLA supports the commentary on Hatcham Road as a light industrial and creative cluster, however the release of the whole of Hatcham Road from its existing SIL designation is not supported. Given the amount of release across the entire opportunity area, the GLA will only support a partial release of the Hatcham Road along Manor Grove. A small amount of SIL release up to 94 Ormside Street would be supported, however the detail of this should be agreed with the GLA.

The approach for Hatcham Road should allow for a small amount of SIL to be released. The released SIL at the southern end of Hatcham Road would provide a skin of residential development up to the line with the existing church along Manor Grove. Next to this residential area would be an area of mixed employment and residential uses, carefully designed to sit between the residential section and retained SIL. This graded approach will ensure Hatcham Road stitches into the future development of the wider areas but also remains as a strategic industrial location, retaining important SIL functions. The Hatcham Road area must adhere to the principle of no net loss of industrial floor space.

The GLA understands the issues businesses in Hatcham Road experience such as the odour from the waste recycling centre and the constraints of the servicing and parking provision. We are sympathetic to an approach which supports the wider regeneration of the Tustin Estate and the potential mixed use models being developed on Ilderton Road with the co-location of residential and yard based builders' merchants uses.

It would be useful to include a breakdown of how a minimum of 600 jobs will be achieved across the sectors. The current approach of stating 'Estimated capacity for employment (B class) jobs (gross)' is considered too general to be useful and should reflect the SIL designation of the majority of the site.

Table 1: Latona Road

The GLA supports the ambitions stated in the policy for Latona Road for light industrial workspaces and small businesses but advise the policy should be supplemented with no net loss of industrial floorspace. The GLA also supports the approach to employment uses on a single plot which may include separate buildings for business and residential use.

The GLA are encouraged to hear Southwark are considering retaining a portion of SIL off Ossory Road. The GLA recommends Southwark the area of heritage buildings behind the Peugeot garage and 52 Ossory Road be included within the SIL boundary.

Table 1: South-east Bermondsey, IWMF and New Cross electricity substation

The GLA supports the retention of this area as SIL. However, the GLA also recognises that no industrial intensification is possible in this area. LB Southwark should consider maintaining the Industrial Estates north of the gasworks site (bounded by Verney Road and Sandgate Street) as SIL to provide genuine industrial land that can be intensified as well as support any industrial relocation from other sites.

It would be useful to include a breakdown of how a minimum of 1,300 jobs will be achieved across the sectors. The current approach of stating 'Estimated capacity for employment (B class) jobs (gross)' is considered too general to be useful.

SIL, LSIS and Industrial Policy Approach

The GLA's Industrial Land Demand study (CAG, 2017) highlights increasing overall demand for industrial and warehousing floorspace to support growth in London's economy and population. It also points to the importance of locations in inner London (including Southwark) in providing sustainable last mile distribution functions to service the Central Activities Zone. The strategic evidence recommends that Southwark should adopt a policy approach to 'retain' industrial and warehousing floorspace capacity.

SILs within the OKR AAP area provide important capacity for sustainable last mile distribution functions, as well as supporting a variety of industrial, logistics and related functions including waste management and utilities. It is recognised that there exists potential for the intensification of these

functions to make more efficient use of land. Some of these functions will need to remain within protected SILs and intensified, whilst some functions could be intensified and co-located with residential and other uses. This type of mixed use would need to ensure that industrial activities can continue to operate effectively (noting that many businesses may operate on a 24/7 basis) whilst providing a safe and attractive environment for residents with a good standard of amenity and public realm. Furthermore, in accordance with existing and emerging policy, the Mayor will expect released industrial sites to include significantly higher levels of affordable housing as well and contributing to social infrastructure given their generally low existing use values, and it would be helpful if this can be made clear in both documents.

The GLA considers that the extent of SIL set out in the June 2017 draft AAP is insufficient to ensure that sufficient provision could be made for industrial and warehousing functions and as presented could raise conformity issues. However, further discussions have been held between GLA and LB Southwark officers to consider revisions to the areas of land to remain within SIL (including Hatcham Road) and areas that could be released. The GLA welcomes the progress made through these discussions which are ongoing.

Following discussions with GLA officers, LB Southwark officers have suggested taking a typologies approach to sites within the OKR area, where some sites (including those currently designated as SIL or LSIS) would be retained for storage and distribution functions and light industry; and sites outside of existing SIL and located close to the Old Kent Road and potential future tube stations could also include a mix of SME/B1a workspace (see also town centres below). This approach is welcomed and discussions between GLA and LB Southwark officers on this matter are ongoing.

AAP 12: Town Centre

In the June 2017 draft AAP, we support the principle of new town centres in the Old Kent Road AAP area but are concerned that the proposed town centre boundary has been drawn too widely and includes areas that would not be considered as town centre functions such as areas designated as SIL including the waste treatment centre.

Current and emerging strategic evidence for the GLA (undertaken by Experian) suggests that the need for additional comparison goods retail floorspace will be focussed on the larger and more established centres. The additional residential population and businesses in the OKR are likely to generate additional demand for convenience goods retail and leisure uses, although the area is already very well served by convenience retail and leisure. It seems unlikely that there would be capacity to deliver town centre uses across the wider area defined in the June 2017 draft AAP. The GLA understands that LB Southwark is undertaking a retail capacity assessment to inform the AAP and would welcome further discussions on this.

Taking into account the existing high street, the proposed tube stations and proposed new development it seems likely that two centres (of at least District scale) might emerge along the Old Kent Road – one focussed on the north western end between Bricklayers and Albany Road, and the other focussed at the south eastern end between Glengall Road and the Aldi supermarket, depending on where the proposed tube stations are finally located.

In the longer term, there may be capacity for these centres to merge to form a more extended high street along the length of the Old Kent Road,

The GLA notes LB Southwark's aspiration for this integrated centre to function in the future as a Major town centre. Further work is required to support the designation of a Major centre at Old Kent Road, in particular:

- Robust evidence showing the impact on other nearby centres (including Peckham, Elephant & Castle, Canada Water, New Cross/New Cross Gate and Lewisham) and the suitability of this location for designating a Major centre in the town centre network;
- Evidence of capacity and demand for a broad range of functions and a mix of uses and sizes of premises, including small, medium and larger format stores, civic and community uses, and employment, culture and leisure;
- Evolution of the centre away from large format car-based retail (particularly the south eastern section) and the creation of an integrated high street with an identifiable town centre character that promotes walking, cycling and public transport, and provides access to goods and services at both a local and sub-regional level;

In collaboration with LB Southwark, the GLA will keep the role of the Old Kent Road town centre(s) under review as part of the strategic London Plan town centre network.

The evening and night-time economy is an important town centre use that will play an important role in the regeneration of the Old Kent Road as a flourishing, vibrant and attractive place to live, work and visit. It would be useful to highlight the role and importance of the evening and night-time economy in the supporting text. Similarly, the role of culture in the development of the town centre(s) could be expanded on in the supporting text, particularly its links to the thriving creative industries sector operating within the wider Old Kent Road area.

With regard to the boundaries of the town centre(s) the GLA recommends that these are drawn tightly along the Old Kent Road high street and around the potential new tube stations and incorporating areas that might accommodate retail, leisure and B1a/SME workspace. The areas designated as SIL or identified for mixed use with light industrial and warehousing should lie outside the town centre boundary. In the GLA's view the area around Ilderton Road and Hatcham Road should not form part of the town centre as the area will continue to be more industrial in nature. GLA and LB Southwark officers are holding ongoing discussions on this matter which is welcomed.

AAP 22: Green Infrastructure

The draft AAP envisages 20,000 new homes coming forward in the next 20 years. The areas within the AAP that are likely to see the most change are currently predominantly industrial and retail and the wider AAP area contains very few areas of publicly accessible open space other than Burgess Park and parts of the former Surrey Canal. London Plan policy 7.18 Protecting Open Space and Addressing Deficiency requires boroughs to assess open space needs using the categories set out in London Plan Table 7.1 and to then ensure that future publicly accessible space needs are planned for in areas with potential for substantial change such as the OKR.

Such a study should therefore be undertaken or shared if already carried out and the AAP should identify the broad locations of new public open spaces at a variety of scales to address current and future open space needs in light of the changes the area will undergo.

OKR 11 Galleywall Trading Estate

The retention of this site as SIL is welcomed and as its designation is now not changing, it could be removed from the Plan as a site allocation. However, if LB Southwark considers it necessary to include this site, the required land uses should be more specific than Employment (B use class) and state all appropriate B use classes (B1c, B2 and B8) to ensure that industrial uses will be protected on this site. Furthermore, D use classes are not acceptable in SIL and reference to them as acceptable

land uses should be removed. Some industrial Sui Generis uses are acceptable such as scrap yards, concrete batching and waste disposal installations. This should be made clear in the text should the site allocation be retained in the Plan.

OKR 13 Rotherhithe Business Estate, Bermondsey Estate and rail viaducts

The retention of this site as SIL is welcomed and as its designation is now not changing, it could be removed from the Plan as a site allocation. However, if LB Southwark considers it necessary to include this site, the required land uses should be more specific than Employment (B use class) and state all the appropriate B use classes (B1c, B2 and B8) to ensure that industrial uses will be protected on this site. Furthermore, D use classes are not acceptable in SIL and reference to them as acceptable land uses should be removed. Some industrial Sui Generis uses are acceptable such as scrap yards, concrete batching and waste disposal installations. This should be made clear in the text should the site allocation be retained in the Plan.

OKR 18: Gasworks, Southwark integrated waste management facility (IWMF) and electricity substation

See comments made under Table 1 above.

For areas to be retained as SIL, other acceptable land uses should be more specific to include appropriate B uses classes (B1c, B2 and B8).

Appendix 1 – Guidance on Business and Relocation Strategy

The GLA is pleased to see that a business and relocation strategy has now been included. However the strategy should refer to relocating businesses in intensified SIL and mixed used development outside SIL. The Strategy will need to reflect the work undertaken by GVA and any outcomes.

The Mayor will issue his formal opinion on general conformity when requested at the proposed submission stage. If you would like to discuss any of my representations in more detail, please contact Brianne Stolper (020 7983 4286) who will be happy to discuss any of the issues raised.

Yours sincerely,



Juliemma McLaughlin
Assistant Director – Planning

cc Florence Eshalomi, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL

Annex 1 – Comments from Transport for London (TfL)

1) New Southwark Plan: Proposed New and Amended Preferred options policies

We note that the current consultation is limited to new and amended policies only. As such, we intend to provide further comments on those policies that are not proposed to be amended at the next (submission version) stage, as we believe there are some outstanding comments from the previous (preferred options) version that may not have been addressed. This includes TfL-owned sites, such as Peckham bus garage. I understand my colleagues in TfL Commercial Development will be responding separately as a 'land owner'.

Amended Policy DM48 Car Parking

The restraint based residential car parking standards, particularly requiring 'car free' residential development in PTAL 5-6 areas, is strongly supported. It is in line with the draft Mayor's Transport Strategy in this respect, and will help support the Mayor's ambitious mode shift target away from car travel.

There appears to be no guidance on non-residential standards. The NSP must provide this to avoid ambiguity when negotiating with developers. As such the policy should at least contain wording that 'defers' to the London Plan standards for non-residential uses and/or provide its own standards (if more restrictive). TfL would expect a baseline of 'car free' non-residential development i.e. zero non-operational car parking in the majority of the borough, particularly in the higher PTAL areas in the north, and in OAs.

Similarly, the lack of clear guidance on the quantum of town centre parking could lead to ambiguity in negotiations with developers. The policy mentions 'appropriately sized' off-street town centre car parking which is obviously open to interpretation. So again, the NSP should contain wording that 'defers' to the London Plan standards/policy for town centre uses and/or provide its own standards (if more restrictive). A reference to the design of any parking provision could be an opportunity to ensure the needs of people walking and cycling are considered and vehicle dominance is reduced in line with the Healthy Streets Approach. A statement could also be included on the approach to charging for town centre car parking.

The policy requiring access to an electric vehicle (EV) charging point at every parking bay is strongly supported as this will be required to support the Mayor's aim of a switch to zero carbon transport by 2050. An addition of a reference to the London Plan requirement for 20 per cent of provision to be 'active' from the offset would be welcomed, with the remaining provision being 'passive.'

While car club provision can play a role in reducing the need to own a car, particularly when they can enable a lower provision of private parking, the location and promotion of these services should be carefully managed to prevent those who would not otherwise use a car to start driving. The approach to central London set out in the draft Mayor's Transport Strategy has a strong focus on prioritising active travel and public transport over other modes, and as such these services are not appropriate within the CAZ. The contributions of developers towards the cost of car club membership could potentially be used for purposes that are better aligned with the Mayor's goals, such as cycle parking provision.

Crystal Palace and Gipsy Hill Area Vision

The statement that *'the area is less well served by public transport than many other parts of Southwark'* is not strictly true. Crystal Palace bus station is just over the borough boundary and is one of the key bus interchanges in south London. As such, much of the area has a PTAL of 6a (excellent).

Parts of the area have a lower PTAL of 3 (occasionally 2), but this reflects the lower development density and limitation imposed by the local road/greenspace network, and overall it compares favourably to other places in the north of the borough such as Bermondsey and Old Kent Road. Given the relative importance of bus services in the area, development should improve public transport particularly by facilitating bus priority measures where possible, in order to help reduce bus journey times. This could be mentioned explicitly, for example in bullet point four or five in paragraph 1.1.2.

Amended site allocation NSP06: Land bounded by Southwark Street, Redcross Way and Crossbones Graveyard

This is a TfL owned site so comments will be provided by TfL Commercial Development team.

New site allocation NSP65: Camberwell Green Magistrates Court

This is a key town centre site, so the policy could give guidance on car parking i.e. should be car-free, given PTAL 5 town centre location. Development of the site should also facilitate cycle hire expansion, in line with the Council's ambition to expand the cycle hire scheme to Camberwell.

New site allocation NSP66: Discovery Business Park and Railway Arches

The site vision diagram could indicate opportunity for improved connectivity for walking/cycling under the railway lines (ie south west to north east), as well as alongside (Low Line). This would help overcome severance of the viaduct, for example by opening up railway arches as is being proposed for the Biscuit Factory site just to the east. In this respect, the 'design and accessibility guidance' should also mention improved cycle, as well as pedestrian access. Improved walking/cycling should also be considered alongside also improving bus south west to north east connectivity. Again, guidance on the approach to car parking could be given, noting that the pictures contain a relatively high number of parked cars.

Development of the site should also facilitate cycle hire expansion in line with the Council's ambition to expand the cycle hire scheme further into the borough.

New site allocation NSP67: Swan Street Cluster

Two of these sites front Great Dover Street, which is a TfL road (TLRN) and part of the strategic road network. As such, the development of the two sites must allow for all servicing to easily take place off the Great Dover Street frontage, and provide enough 'set back' to allow for tables and chairs associated with the active frontages to be placed off the public highway. The mature street trees on the western footway should also be protected.

TfL would need to consider the potential impact on public transport, given the potential scale of the development and location in a very busy part of central London; the adjacent Borough Underground station in particular is relatively constrained, the platforms being accessible by lift only.

Development would need to protect the existing docking station in Swan Street and provide for expansion of cycle hire, given the likely increased demand.

These above issues should be summarised in the 'site vision' and/or 'design and accessibility guidance' as appropriate.

New site allocation NSP69: Dulwich Telephone Exchange, 512 Lordship Lane

The 'design and accessibility guidance' should reference the fact that Lordship Lane is part of the strategic road network (SRN) and, as such, development of the site should not impact on traffic flow of that road, for example in design of the access junction, and providing off-street servicing.

New site allocation NSP70: Denmark Hill Campus East

The 'design and accessibility guidance' should reference the fact that Denmark Hill is part of the SRN and, as such, development of the site should not impact on traffic flow of that road, for example in avoiding new/consolidating exiting access junctions, and providing easily accessed off-street servicing (noting that bollards have been placed along both sides of Denmark Hill, suggesting that unlawful servicing is an issue). The approach to car parking should be set out, particularly given that health facilities can have unique issues in this respect, for example demand for visitor car parking. Development of the site should also facilitate cycle hire expansion in line with the Council's ambition to expand the cycle hire scheme further into the borough. Development would also need to consider additional demand on bus services, as Denmark Hill is a key bus corridor to the south of the borough.

2) Old Kent Road Draft AAP: Proposed New and Amended AAP Policies

We note that the current consultation is limited to new and amended policies only. As such, we intend to provide further comments on those policies that are not proposed to be amended at the next ('proposed submission') stage, as we believe there are some outstanding comments from the previous version that may not have been addressed.

Amended Policy AAP12: Town Centre

Old Kent Road is a historic key strategic movement corridor from south east London and Kent to central London. It is a TfL road (TLRN) and this makes the OA quite unique in that the TLRN forms the 'spine' of the OA at street level. As such, proposed policy could have fundamental implications for the operation of the road.

TfL is fully supportive of the Council's vision to transform the area to a 'town centre', thereby making Old Kent Road a 'high street', in line with the Mayor's 'Healthy Streets' vision. However, a key caveat is that the road will need to maintain its movement function, with particular emphasis on pedestrians, cyclists, buses but also for traffic/freight.

To this end, TfL is developing plans for the road that seek to optimise the balance between the modes, improving conditions for pedestrians and cyclists whilst maintaining bus reliability/speeds and minimising impact on general traffic flow, in line with the Mayor's 'Healthy Streets' policy. Given the space constraints in places, this is proving to be a complex design challenge. We are finding that on-street waiting and loading is a particular issue and constraint; it reduces space for 'sustainable transport' modes, and can, particularly when unlawful, create congestion which has adverse implications for air quality and bus reliability/patronage.

As such, and so as to balance the policy wording that encourages 'active frontages' – indeed seeks to make Old Kent Road the 'primary shopping frontage' – the APP policy (and reasoning) must set out a clear requirement for off-street or alternative provision for deliveries and servicing for sites fronting Old Kent Road, for example use of on-plot service areas, side roads and/or consolidated off-street loading areas. The policy/reasoning should also make it clear that development proposals that are not able to meet this requirement are likely to be refused planning permission. Certainly, there should be no need for additional car parking bays on Old Kent Road, and opportunities to reduce and minimise existing parking and loading bays will be explored as part of the on-going design process.

An additional issue that needs to be considered at an early stage is the approach to 'tables and chairs' associated with cafes and restaurants. Adequate space behind the 'back of footway' (or elsewhere) needs to be 'designed in' to development proposals from the outset. Subsequent 'tables and chairs' applications that encroach onto the footway of Old Kent Road will be contrary to the aims of re-

design of the corridor to increase space for pedestrians, and as such they are likely to be opposed by TfL as the Highway Authority. The policy framework to avoid this should be set out in the AAP. See also comments in support of policy AAP25 (air quality).

This policy could also be the appropriate place to re-emphasise the potential need for land safeguarding and/or set back/provision of land for sites fronting Old Kent Road to allow for the aforementioned highway improvements e.g. for footway widening, cycling facilities and/or junction improvements. TfL's on-going design work will inform this in practice.

Amended Policy AAP21: Car Parking

The highly restraint based car parking policy is strongly supported, and is fully in line with the draft Mayor's Transport Strategy.

Amended Policy AAP25: Air Quality

The requirement to provide initial residents free membership of the cycle hire scheme, and possible 'bulk buy' business use membership, via s106 agreement, could be stated here (bullet point five), as per a similar requirement for car clubs as stated in policy AAP21.

Bullet point six should include mention of creating neighbourhoods 'easy to cycle around', as well as 'easy to walk around' (in line with the Mayor's Healthy Streets objectives).

Bullet point seven is supported, as it encourages 'retail/café' frontage off Old Kent Road, which would help overcome the issues raised in respect of policy AAP12 above i.e. that tables and chairs on the Old Kent Road frontage will not be appropriate unless adequate space is provided being the 'back of footway', designed into development proposals from the outset (TfL's experience is that cafes and restaurants often request tables and chairs fronting even the busiest stretches of the TLRN, for example Borough High Street).

Bullet point eight (street tree provision restricting air circulation) could be interpreted to be at odds with Mayoral policy to plant more street trees in order to absorb pollution. Obviously, TfL would want to work closely with the Council on the protection of existing and provision of new street trees on the TLRN to ensure an appropriate balance between appearance, pollution mitigation and street function.

Paul Robinson

From: [REDACTED]
Sent: 20 September 2017 15:02
To: [REDACTED]; Juliemma McLoughlin; [REDACTED]
[REDACTED]@southwark.gov.uk; [REDACTED]
[REDACTED]
Subject: RE: OKrd

Thanks [REDACTED]

Have you held similar meetings with the other industrial occupiers of the sites affected in this part of Ossory Road to understand what their intentions are and whether they would be supportive of the mixed use approach you are suggesting including in particular:

- Newey & Eyre Electrical Supplies
- Kaymet London Ltd

It would be helpful to understand their position in addition to the ABC Self Store - as their operations may be less conducive to mixing with residential.

Please could you also confirm the area (in hectares) of what would remain as SIL in Glengall Road/Ossory Road in your proposal – again this will help us in coming to a view on your proposals for this element of SIL.

Many thanks
[REDACTED]

From: [REDACTED]@southwark.gov.uk]
Sent: 19 September 2017 12:33
To: Juliemma McLoughlin; [REDACTED]
[REDACTED]@southwark.gov.uk; [REDACTED]
Subject: OKrd

Hi All

Thanks for this mornings meeting its was very helpful.

Myself and [REDACTED] just met up with the [REDACTED]. They are keen to keep the business on site, as are we, but are also supportive of mixed use. Which they think could work well with [REDACTED].

[REDACTED]


Interestingly 36% of their space is let to local businesses for storage so its all part of the local business ecosystem.

They employ 4 people on site, but myself and [REDACTED] confirmed that we weren't chasing higher job densities necessarily, but more keen to ensure the functioning of the wider area in support of central London. [REDACTED] said they would be happy to look at mixing more SME type uses in with [REDACTED].

They confirmed that they don't have large volumes of traffic servicing the site, which is borne out from myself and [REDACTED] experience of visiting the sites.

I will forward over the current master planning work.

regards



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Paul Robinson

From: Juliemma McLoughlin
Sent: 28 September 2017 15:59
To: [REDACTED]
Cc: [REDACTED]
[REDACTED]@southwark.gov.uk; [REDACTED]
[REDACTED]
Subject: RE: OKR meeting today

Hi [REDACTED]

I am afraid that there are still conformity issues between us relating to the release of SIL and town centres (Canada Water and OKR).

Canada Water

I understand your concerns about our response to you regarding the designation of Canada Water as a Major centre. We consider that Canada Water currently performs a District centre function, but we continue to recognise Canada Water as having the potential to become a Major town centre, accommodating retail growth, diversifying the type of uses and scale of premises, and spatially integrating the shopping centre and leisure park with the wider area. Subject to implementation of these developments, we will be able to reclassify Canada Water in a future version of the London Plan. I would also encourage you to continue to update your retail evidence to ensure that the appropriate scale of development comes forward. In future studies I would encourage you to consider the impact of significant development at Canada Water on the function of the wider town centre network outside Southwark, and in particular on nearby centres such as Deptford, New Cross, Lewisham and Canary Wharf.

Old Kent Road

We continue to hold to our view that the OKR could support two future potential District centres. Southwark's own retail study says that "there is potential to create a local centre at the north end" and that "there may also be potential to create a local or town centre towards the southern end". Two districts therefore goes a bit further than Southwark's own evidence, though that seems appropriate given the scale of development envisaged here.

Strategic Industrial Land

We continue to object to the proposed SIL release at Latona Road and Hatcham Road however we support the two additional areas to be designated as SIL

Latona Road

The issue is whether the Ossory Road part of SIL should be retained or released. We question whether the existing businesses including Safestore, Kaymet and the electrical wholesaler could continue in a mixed format without curtailment and what the impact on the existing SIL would be. The area suggested by Southwark for release is also partly opposite the back end of ASDA with noisy flues and extractors and these would not be considered a pleasant or appropriate outlook for any residential development. Given these issues, we are not convinced that we should accept release of SIL here.

Hatcham Road

We continue to object to the proposed SIL release here but would support the small amount of SIL release as presented at the meeting and in our response to the AAP consultation. Introducing mixed use here will undermine its industrial function and the boundary proposed by Southwark could easily be nibbled away until there was nothing left. The area is also isolated in public transport terms.

We do support release of SIL in the area closer to Old Kent Road (Ilderton Road) and the area close to South Bermondsey Station.

Kind Regards,

Juliemma McLoughlin

Chief Planner

Development, Enterprise & Environment

City Hall, London

From: [REDACTED]@southwark.gov.uk]

Sent: 19 September 2017 18:02

To: [REDACTED]@southwark.gov.uk>

Cc: Juliemma McLoughlin [REDACTED]london.gov.uk>

Subject: OKR meeting today

Dear Juliemma

Thanks very much for meeting us today, we really appreciate your time.

My understanding is as follows:

The affordable housing objection to intermediate rent can be overcome by referring to the Mayor's scheme in the reasons of the policy.

The PRS objection asking for it for properties with 60 to 90k is not an issue any more.

[REDACTED] will get back to Southwark on the specifics on a couple of boundary lines on SPIL.

[REDACTED] will get back to us on the approach of trying to change an adopted development plan policy for Canada Water town centre.

We disagree on the approach to Old Kent Road as we would like to designate as a Major town centre with a wide boundary and the GLA understand the ambition but do not recognise this as a town centre and would prefer designation as 2 adjacent district town centres with narrow boundaries. We should try to find a compromise.

Herne Hill Southwark will discuss with Lambeth the status of the town centre.

We will share the employment and retail studies and also the OKR masterplanning work.

Therefore there are no strategic conformity issues. There needs to be some further conversation about the detail of boundaries for employment and town centre designations, the status of some town centres and a few details of site allocations. I will lead on that and I will discuss with [REDACTED]

Please let me know if I misinterpreted any of your feedback or if I have made any omissions and thank you again for your time.

Kind regards

[REDACTED]

Sent from my iPhone

On 19 Sep 2017, at 12:33, [REDACTED]@southwark.gov.uk> wrote:

Hi All

Thanks for this mornings meeting its was very helpful.

[Duplication of email chain P 27]

Paul Robinson

From: [REDACTED]@southwark.gov.uk>
Sent: 09 October 2017 11:56
To: [REDACTED]
Juliemma McLoughlin; [REDACTED]
[REDACTED]
Subject: Old Kent Road (without downloads)
Attachments: Appendix 3 Hatcham Sub area draft.pdf; OKR AAP meeting.pptx

Hi

Following on from our last meeting I thought it would be useful to set up a further meeting at which we can brief you on progress with the OKRAAP, [REDACTED] will be in touch.

I will do a fuller note, that I will circulate later this week but essentially we are looking to do a further consultation on the AAP on 12 December. The revised AAP will have a different format and an increase emphasis on employment uses of a wide variety of types from distribution to light industrial to SME office. (Bow Tie diagram to follow)

We have a number of masterplans being developed at the moment (see attached OKR Meeting)) for which I will forward the links to the current drafts.

We will have 4 sub areas in total, 1. Mandela Way/Tesco, 2. Cantium Retail Park/ Glengall /Verney Road, 3. Hatcham/Ilderton/Toys R US, 4. Admiral Hyson/Galleywall Estate. The latter we are calling a SIL Hub (in combination with Lewisham sites).

In brief at Mandela Way we have asked Maccreanor Lavington to come up with a mixed use scheme that retains distribution uses with residential over. We have asked [REDACTED] to do similar at 6 Bridges. And we have asked Stitch to do similar at the eastern end of Verney Road. On Cantium/Glengall we are looking at sme/maker spaces mixed with residential rather than distribution, and on Hatcham similar on the core grid sites, but with distribution/builders merchants on to Ilderton Road.

On the SIL Hub we are in discussion [REDACTED] about replacing the existing single story sheds with a 3 story shed on the [REDACTED] and relocating an arts storage business to the site (which employs 180 people) . We aim to promote the same SIL intensification approach on the rest of the retained SIL.

The attached Appendix 3 is latest draft of how we intend to set out each of the sub areas in the AAP. Work to do, but I hope you get the gist. Key is making sure we are clear about land use and building typology to ensure we get a genuine and sustainable mix of employment uses, with servicing that works and is credible. But also set out in the draft is more detail on open spaces and the retention of older building, and building height.

Regards

[REDACTED]

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MIXED USE TYPOLOGIES

SUB AREA

HATCHAM & ILDERTON

(OKR 19 & 20)

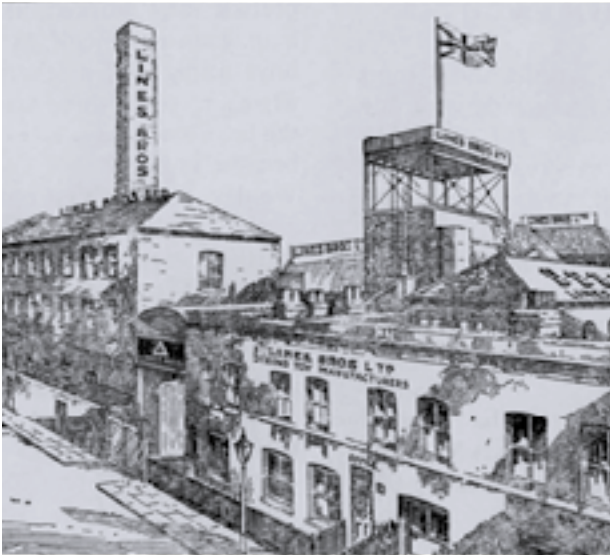
HISTORICAL

Historically, this area in Southwark was a residential area for the workers of Hatcham Manor Works, the gas works, factories lining the Surrey Canal and nearby docks. Businesses included toy factories, leatherworks, mechanical engineers and chemical manufacturers.

The residential street layout was lined with modest Victorian terraces with back yards. This has reflected the pattern of development today where land ownership remains fragmented.

The area was bombed during World War II, leaving large parts of the site in ruin. Between 1951-1964, businesses build premises on site for industrial use. These units have been modified and are what currently occupies the site today.

MORE TEXT AND/OR PHOTOS
ADD SUB-AREA BOUNDARY?



top: drawing of the Lines Bros factory on Ormside Street
below: Lines Brothers advertisement
right: ordnance survey map of area from 1916



HATCHAM AND ILBERTON TODAY

The Hatcham Road Area is densely populated with small to medium sized businesses. There is a diverse range of services and manufacturing, from heavy industrial production to small studios and offices. Businesses work together, sometimes subcontracting work and other times lending expertise or supplies, creating a rich ecosystem of local commerce.

The light industrial units have been extended and modified to accommodate small start-ups and micro businesses. There has been a notable growth in creative studios, attracting artists, sculptors, architects and music production. The area has become more diverse as the cultural and creative sectors have grown, incorporating new event spaces, gallery space and churches, making for a livelier environment than a traditional industrial estate.

To the east is the Overground Railway line and the borough boundary with Lewisham. Past the arches is the Winslade Estate and Millwall football ground in Lewisham. To the north is Ilderton Primary School and low rise housing from the 1980's. The residential character of this area is quiet and is somewhat secluded from Ilderton Road. Further north is Bermondsey Trading Estate, a dense industrial park with medium sized units. To the west is the Integrated Waste Management Facility and the gasholders, the largest of which has been listed for its historic significance. To the south is the Tustin Estate and Pilgrim's Way Primary School.

*ADD SUB AREA BOUNDARY TO MAP
ANNOTATE WITH KEY FEATURES, ROADS*



top: Thompson & Sons Ltd, 60 Hatcham Road
bottom: Church goers on Hatcham Road
right: OS Map



HATCHAM AND ILBERTON: A NEW NEIGHBOURHOOD

Vision

Here is an opportunity to build on the strengths of the Hatcham Road area as the thriving business community it is today, providing new homes as well as brand new business space for the growing arts and cultural sectors, light manufacturing and creative industries. Buildings to the west of Ormside Street will retain their industrial function with opportunities for further intensification and growth. The Penarth Centre will remain home to over 25 businesses and eclectic mix of uses. Ilderton Road will serve a new function as a mix of larger scale industrial, depot or warehousing uses underneath new high quality homes. Development will help to introduce new pockets of green space and green routes linking to new shops and services and the tube station on Old Kent Road.

Site area: XX ha

Indicative capacity: 1,700 homes,
XXX jobs, Floorspace XXX m²
Community (D class uses) including gallery space and artists studios.

- Redevelopment of the site must:
- Provide replacement employment uses (B use class) on all ground floors;
- Accommodate existing businesses in new development where possible;
- Provide new green space with a commercial focus to create a new east-west walking and cycling link;
- Retain mature street trees and enhance the public realm and widen pavements on Hatcham Road and Manor Grove;
- Support the use of Ormside Street and Ilderton Road as commercial traffic and servicing routes;
- Adhere to a future one-way road system;
- Provide on site servicing;
- Provide on street disabled parking spaces.

Building heights should be between 5 and 8 storeys. Taller buildings (around 10 storeys) will be acceptable towards Manor Grove where significant improvements to the public realm of the street are proposed. Building heights should be lower on Ormside Street and Penarth Street and stepping up in height towards Hatcham Road and Ilderton Road.

Phasing and implementation: Land ownership around Hatcham Road is very fragmented and many independent businesses are owner occupiers. Businesses and landowners are encouraged to collaborate to achieve a consistent building typology across plots and retain existing business functions where possible.

- BUILDINGS TO RETAIN?

PICTURES OF THE MIX



HATCHAM AND ILBERTON: BUILDINGS AND LAND USES

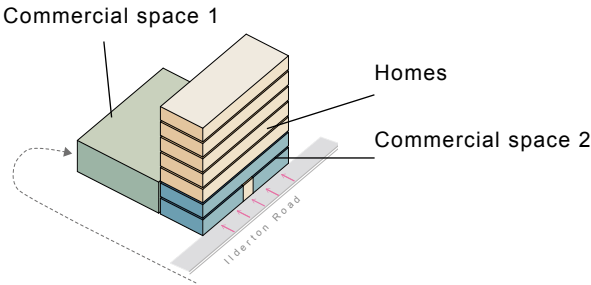
In this area development must deliver three different types of mixed use buildings that will accommodate high quality homes and workspace in this sub area, alongside standalone residential and commercial buildings. Each type provides residential and commercial floorspace in different configurations depending on the size and location of the site. Each typology will require:

- 100% reprovision of commercial space which includes yard space
- Active frontage onto the street with preference given to commercial space
- All to provide basements to provide residential servicing

HORIZONTAL MIX

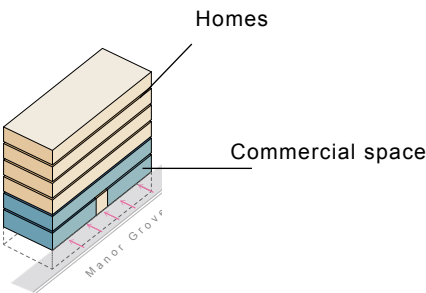
This allows for the two halves of the building to operate separately. On Ilberton Road, small business units and residential units create a quiet street frontage and the rear will operate for light industrial uses, depots or distribution uses adjacent to the railway embankment.

Suitable uses: Builders merchants, vehicle storage, warehouses, distribution, depots



VERTICAL MIX

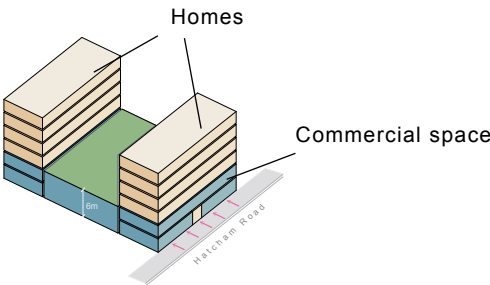
Employment floorspace will be provided at ground and first floor. Basement levels should be utilised to accommodate residential servicing and commercial storage. In some cases, studio workspaces can be provided at basement level however the suitability of this should be discussed with future occupiers or workspace providers. **Suitable uses:** Artist's studios, galleries, hybrid making and office space



HORIZONTAL/VERTICAL MIX

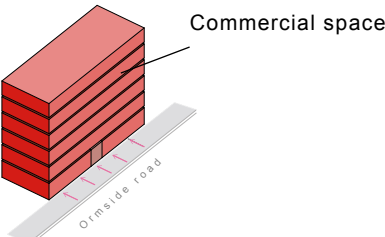
Employment floorspace will be provided on the ground and first floor street side with a double height unit in the centre. This central space should be a minimum of 6 metres high and the number of columns on plan should be reduced to an absolute minimum. Residential amenity space should be provided on the rooftop.

Suitable uses: Light industrial workspaces, hybrid making and office space, co-working, light manufacturing



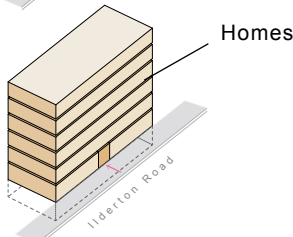
COMMERCIAL

Stand alone commercial buildings can be designed bespoke to suit particular sectors or occupiers.

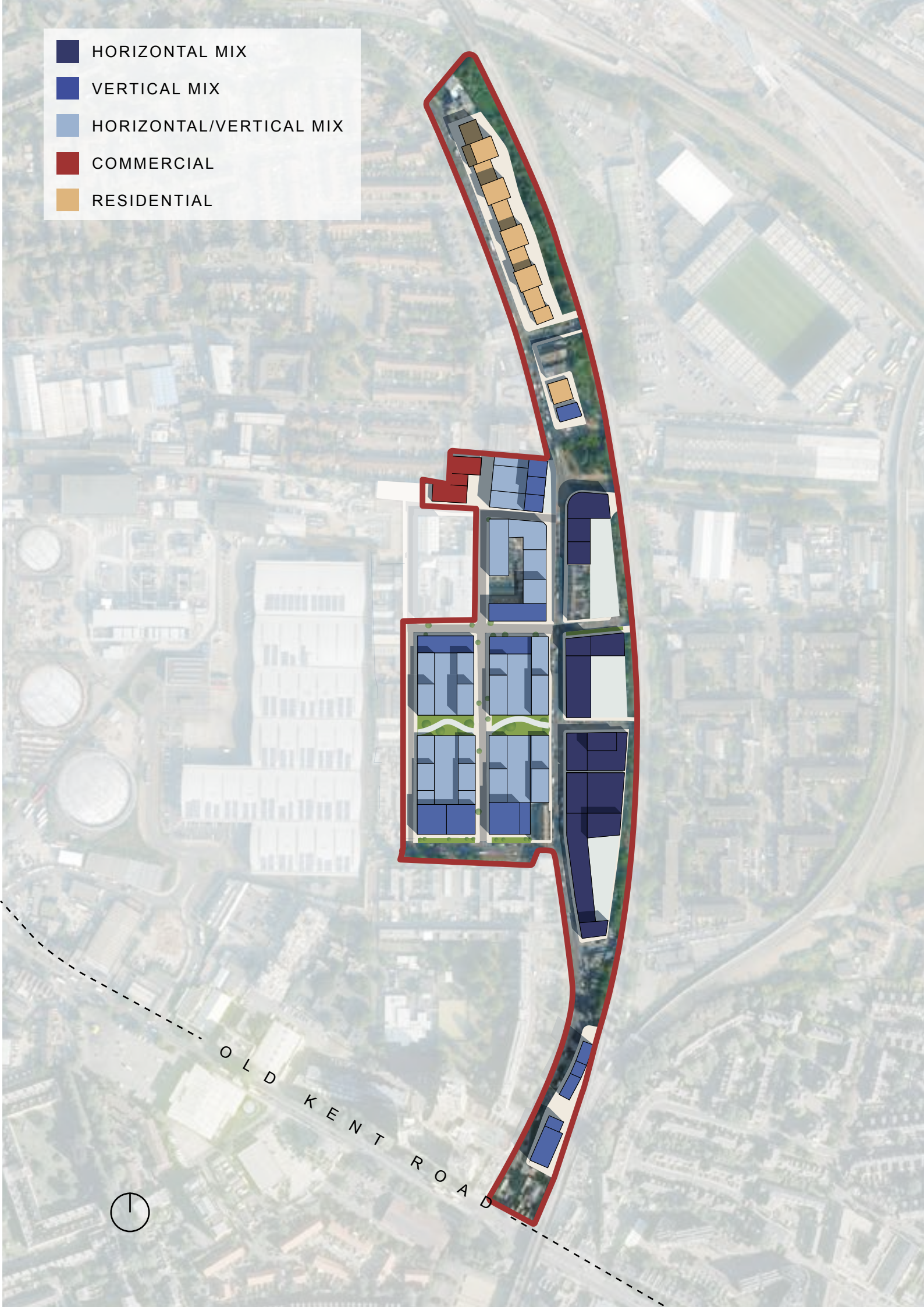


RESIDENTIAL

Residential development should integrate sympathetically with surrounding residential development to the north of Ilberton Road. A range of typologies should be explored including terraced townhouses and duplexes, mansion houses and perimeter blocks. Residential entrances are on well-lit, safe streets.



- HORIZONTAL MIX
- VERTICAL MIX
- HORIZONTAL/VERTICAL MIX
- COMMERCIAL
- RESIDENTIAL

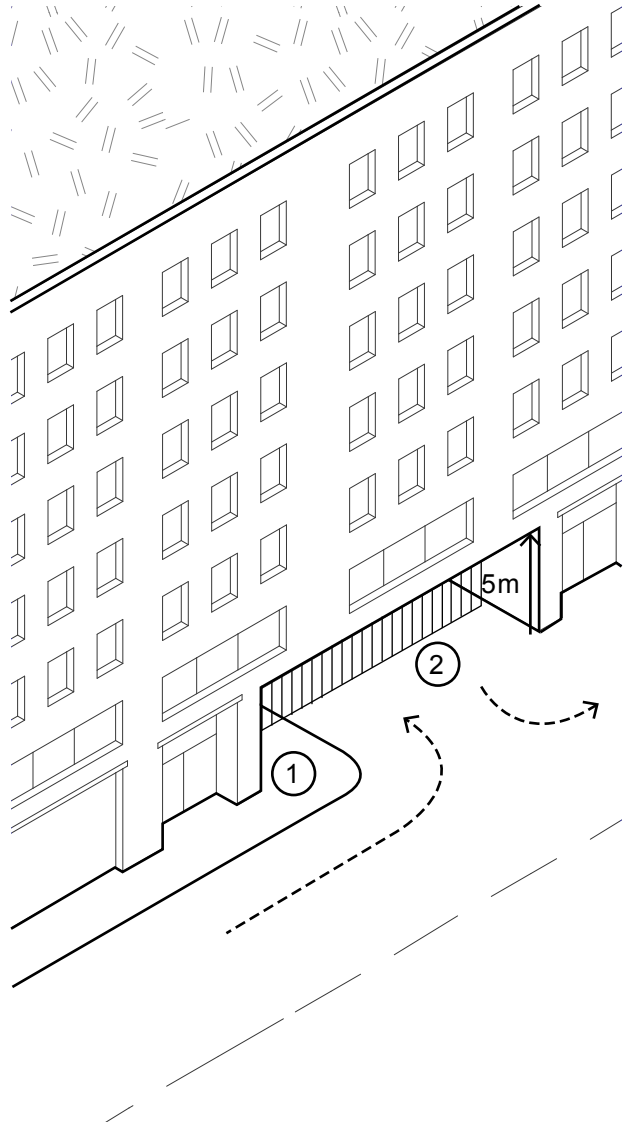


ACCESS AND SERVICING

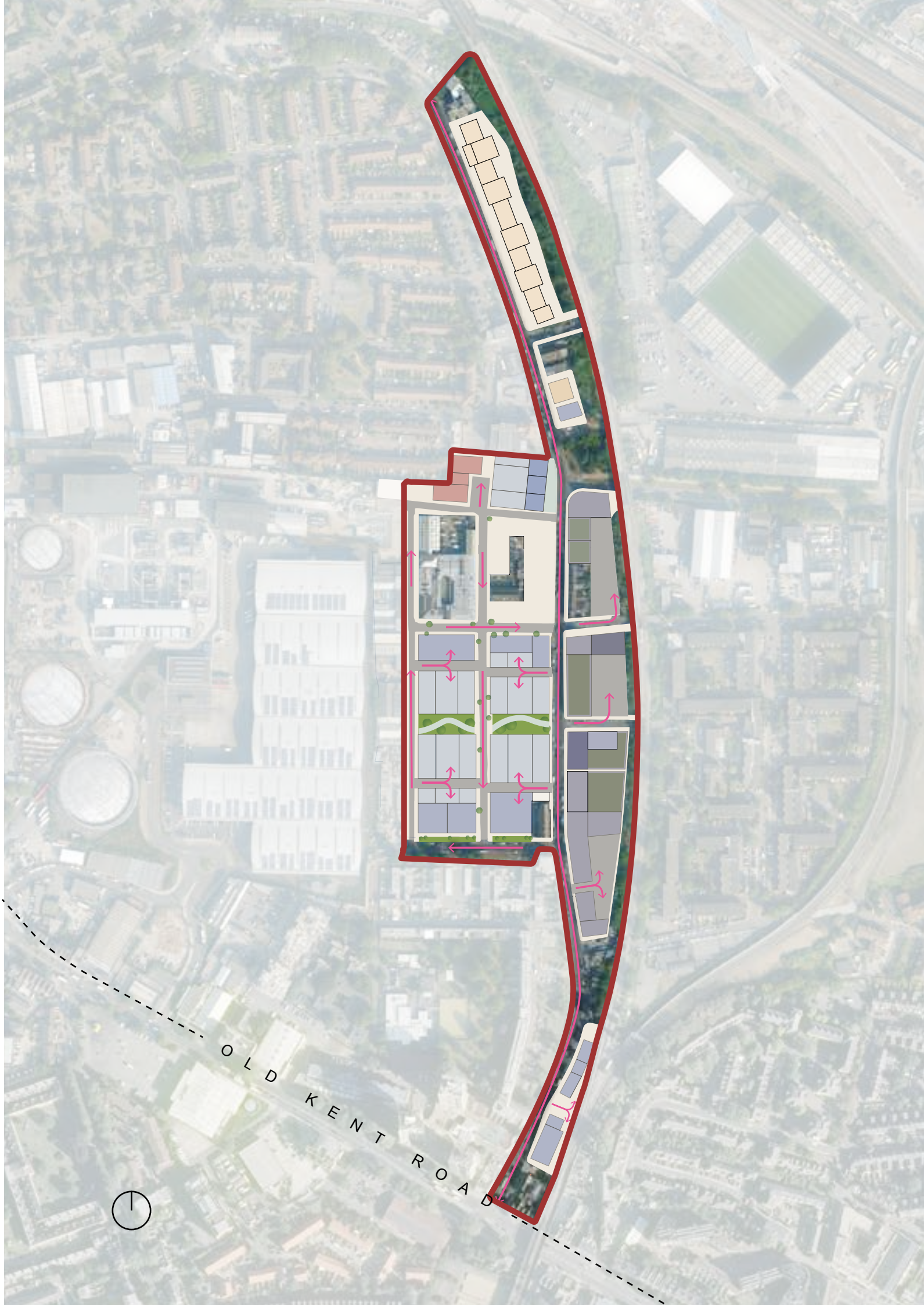
We will require successful and safe servicing for all homes and commerical uses within the area:

- Servicing to commercial spaces and yards should take place off-street to ease pressure on the road network.
- Undercrofts should have a minimum height of 5m to allow clearance for delivey vehicles.
- Where possible, servicing should be rationalised to serve multiple commerical units to reduce the number of trips.
- Where appropriate, servicing roads may also be intergrated into storage and yard space.
- Consideration should be given to the approach of a loading bay or access point in terms of pedestrian legibility. Tactile paving and stepping back gated access gives plenty of time to warn pedestrians of a moving vehicle.

- *RELATIONSHIOP WITH ROUTES/ NETWORK*
- *ROAD SAFETY*
- *KERBSIDE*
- *YARD SERVICING ILLUSTRATION*
- *LAYBY SERIVICING ILLUSTRATION*



1. approach to undercroft access should have tacile paving and visibility around the corner
2. inset gate to slow down lorries and provide security to comemrcial units

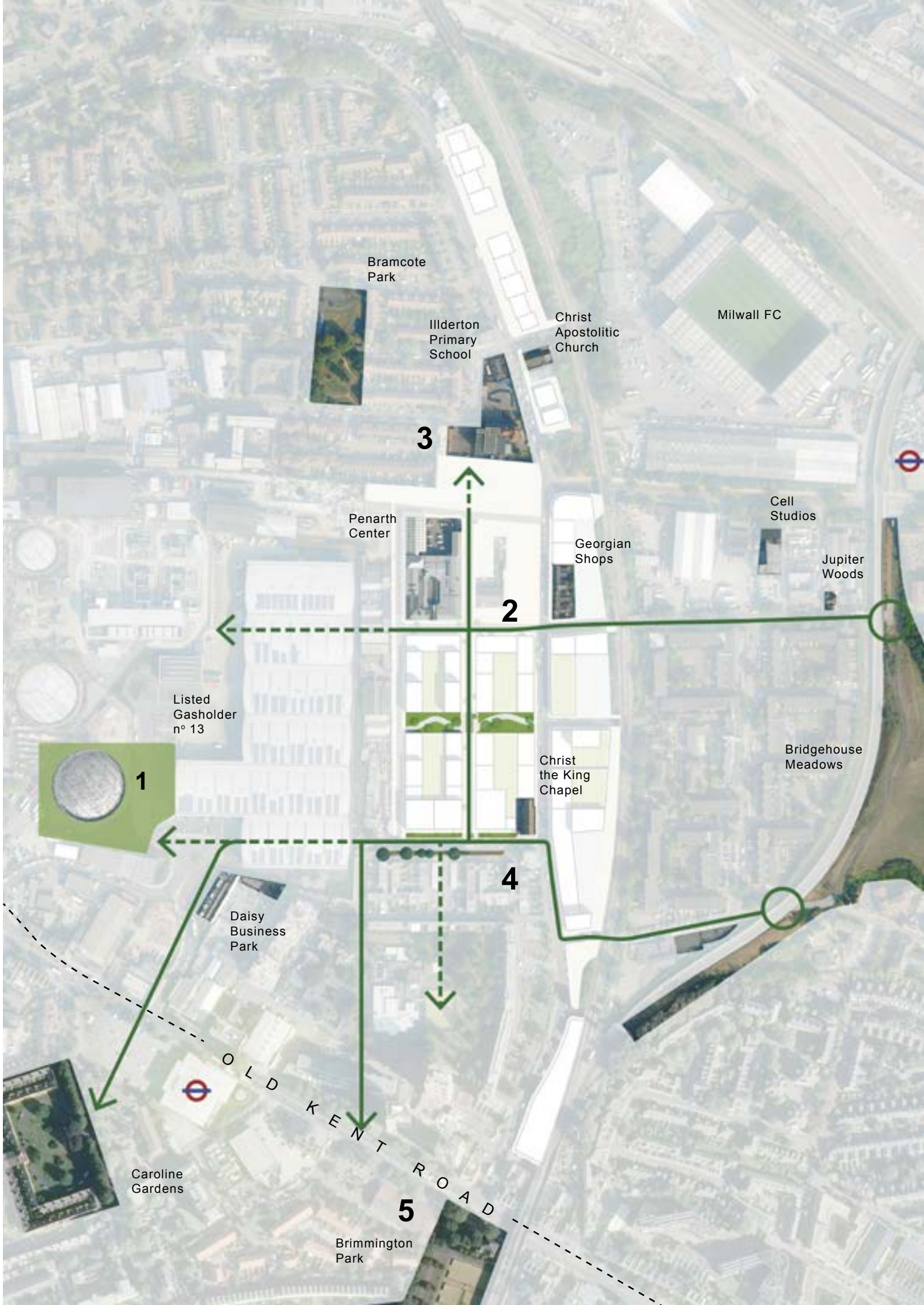


PUBLIC SPACES AND PLACES

Development must facilitate the creation of new green spaces and links between surrounding parks and local facilities such as schools, churches and the high street on Old Kent Road.

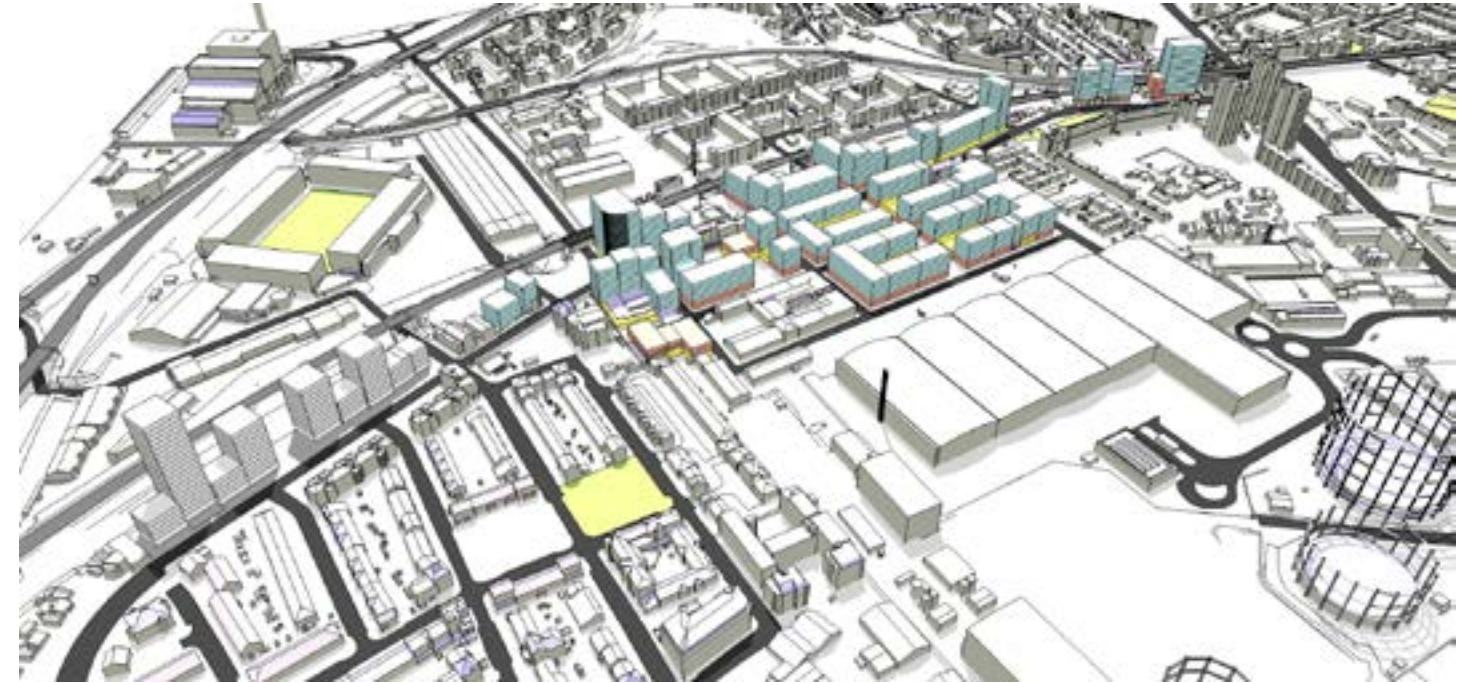
A new green space will be created within Hatcham Road which will be fronted by

- 1 GASHOLDER NO.13**
Built by engineer Sir George Livesey, this gasholder has been listed due to it being world's largest when built. It was a pioneering structure and important achievement in civil engineering. A
- 2 BRIDGE HOUSE MEADOWS**
The east-west route between the Penarth Centre and Bridgehouse Meadows is characterised by Georgian shop facades and two artist studios the east side of the railway line. The post modern facade and deco inspired windows of the Penarth Centre add character to this area. Development should reinforce this connection through urban greening and a pleasant walking environment.
- 3 ILBERTON PRIMARY SCHOOL**
The school is located on what was once the Surrey Canal, meaning there is a level difference between Record Street and Ilderton Road. This means parents and pupils south of the school walk up Ilderton Road and over the bridge to Verney Road. Development should facilitate a future level route through Hatcham Road up to Ilderton Primary and Bramcote Park to benefit local residents.
- 4 MANOR GROVE**
The open space and mature trees on Manor Grove should be retained and enhanced.
- 5 BRIMMINGTON PARK**
Development should facilitate a link between Hatcham Road to the south, through the Tustin Estate and across the Old Kent Road towards Brimmington Park. There are opportunities to connect existing parks and heritage assets with new green spaces.



BUILDING HEIGHTS

BUILDING HEIGHTS / 3D SECTION GOES
HERE



DESIGN

ARCHITECTURAL DESIGN SECTION GOES
HERE

LDS/Masterplan deadlines

OKR 3 & 4 / Mandela Way and Tesco
Macreanor Lavington
6 October

OKR 15 / Six Bridges
Makower Architects
6 October

OKR 16 & 17 / Verney & Ruby
Stitch
20 October

OKR 18 & 19
Hatcham & Ilderton
Gemma Hamblin
20 October

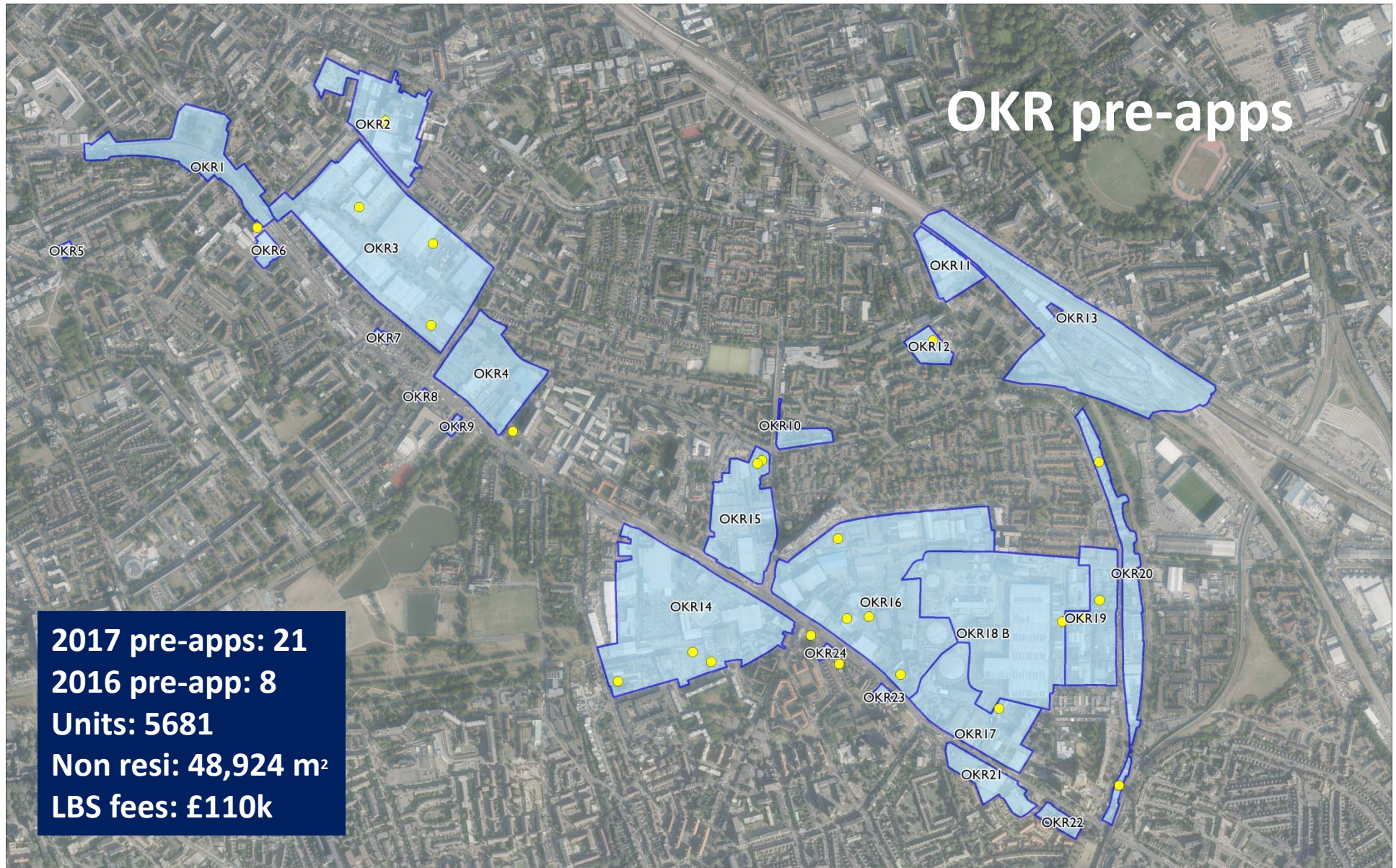
OKR 14 / Cantium
Patel Taylor
6 October

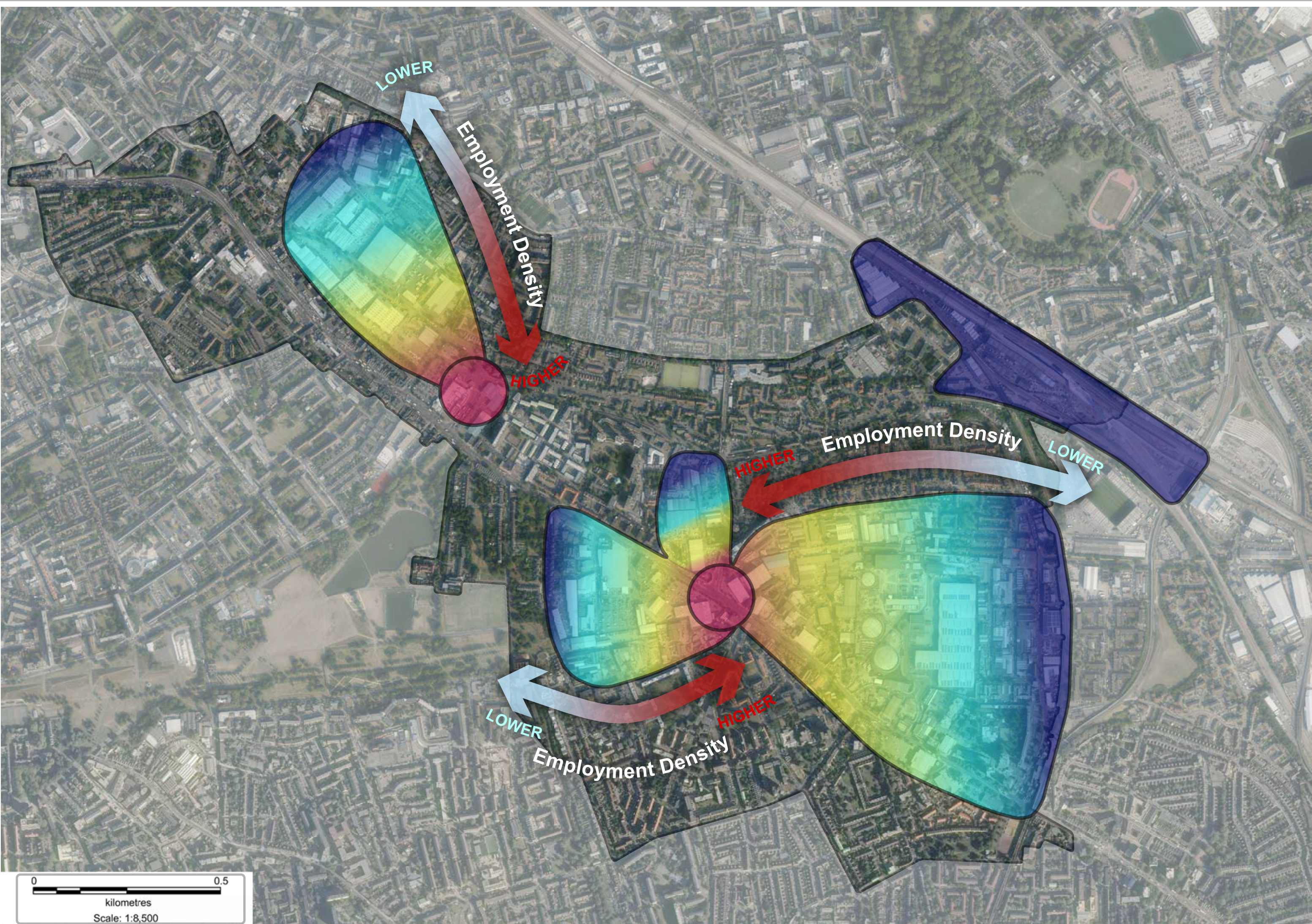
OKR 17, 21 & 22
Amy O'Shaughnessy
20 October

0 0.5
kilometres
Scale: 1:8,500

OKR pre-apps

2017 pre-apps: 21
2016 pre-app: 8
Units: 5681
Non resi: 48,924 m²
LBS fees: £110k





Paul Robinson

From: [REDACTED]
Sent: 21 November 2017 18:12
To: [REDACTED] Fiona Fletcher-Smith; Juliemma McLoughlin; [REDACTED]
[REDACTED] Debbie Jackson; [REDACTED]
Subject: RE: Old Kent Road Development Phasing Options

Thanks [REDACTED] We will come back to you asap.

[REDACTED]
Principal Strategic Planner

Greater London Authority
City Hall, The Queen's Walk, London SE1 2AA

From: [REDACTED]@southwark.gov.uk]
Sent: Tuesday, November 21, 2017 4:46 PM
To: [REDACTED] Fiona Fletcher-Smith <[REDACTED]>
[REDACTED]; Juliemma McLoughlin <[REDACTED]>
[REDACTED] Debbie Jackson
<Debbie.Jackson@london.gov.uk>; [REDACTED]
[REDACTED]
Subject: RE: Old Kent Road Development Phasing Options

Thanks [REDACTED] for helpfully setting out some options to address the issue of phasing and their pros and cons.

Some things I'm not sure about. What do you mean by "No significant development permitted beyond a defined Core Area (TBD)"? What did you have in mind as the scale of significant development (size, number of units?) and I assume you have a rough idea of what a core area might be? Could you provide a sketch of this and how this overlays with the idea of limited SIL release. It would be good to know how much land do you think that leaves even if its only an approximate or initial proposal at present. Without this its difficult to get a sense of what you have in mind and how that fits with current developer interest and likely delivery timescales.

A significant concern I have is with some of the language. Particularly the idea of a planning permission "cap" set at 8k then 14k homes etc. I'm not sure that's not the right language to be used in the current housing context, particularly given tomorrows likely budget drive for increased housing delivery. Whilst I appreciate the need to keep a clear narrative to HMT about additionality, equally I wouldn't want the project to fall into the HMT characterisation of planning as something that stops housing delivery.

I'm not sure what approach you are taking on CR2 site delivery?

My strong preference would be to set out our stall as follows.

As a strategic and local planning authority we can give clear guidance now about the long term land use settlement in OKrd, in terms of SIL and mixed use including distribution/light industrial/resi mixed use at a scale never seen before and town centre boundaries (we aren't far apart on these). We can also set out how you maximise development capacity (avoiding sub optimal development) on the assumption that the BLE will be completed and make the case that whilst we can grant planning permissions for up to 20,000 homes we don't think that they will all be delivered without the BLE and that any delivery we do achieve will be at a rate that wont meet ambitious

government (and GLA) housing targets as set out in tomorrow's budget (and the New London Plan). Therefore we need the BLE to deliver that additionality, in terms of both numbers and speed of delivery.

What's our evidence base for the possibility of planning permissions not being implemented/implemented slowly? The current 200k plus unimplemented consents London wide, the very slow build out of Barking Riverside without a rail link, the initially slow implementation of schemes at VNEB until NLE was committed to (lots of consents granted 2010-13 but actual build out and delivery only accelerated after TfL/GLA/HMT/Boroughs had confirmed funding).

We would in any case identify in the draft AAP that there is an issue more generally with transport capacity in the area that we would continue to review with you as schemes came forward. And that if money wasn't forthcoming for BLE, we may regretfully, in the future, have to consider limiting housing delivery but since we consider without the BLE this would be some time away (probably at least 8 years) it's not the position we start from. How could we do this? We could simply not renew unimplemented consents if we got close to delivery of the 8k figure and no BLE.

From: [REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)
Sent: Friday, November 17, 2017 4:24 PM
To: Fiona Fletcher-Smith; Juliemma McLoughlin; [REDACTED] Bevan, Simon;
[REDACTED] Debbie Jackson; [REDACTED]
Subject: Old Kent Road Development Phasing Options

Hi. Following Wed's very helpful meeting; as agreed, please find a possible approach to development phasing and some thoughts on the pros and cons of different approaches to secure it.

Any thoughts appreciated in advance of the next meeting.

Also, given timings, it would be very helpful to see possible text that might go in the front of the next version of the AAP that would flag up the need for such phasing – the details of which we could then work on.

[REDACTED]
Principal Strategic Planner
Greater London Authority
City Hall, The Queen's Walk, London SE1 2AA
[REDACTED]

Option	Pros	Cons
<ul style="list-style-type: none"> Grampian conditions across all major sites. 	<ul style="list-style-type: none"> Clear planning position tied to public transport improvements and makes case for BLE. Provides certainty to landowners, businesses and developers. Well understood route to deal with uncertain delivery of infrastructure. 	<ul style="list-style-type: none"> Stops development until trigger reached so can be seen as unreasonably constraining development. Identifying and justifying suitable triggers for release. May send mixed messages to market. Open to planning challenge. May be more difficult when sites in multiple ownership.
<ul style="list-style-type: none"> Grampian conditions across selected sites – e.g. around potential tube stations or SIL. 	<ul style="list-style-type: none"> Clear planning position tied to public transport improvements and makes case for BLE. Well understood route to deal with uncertain delivery of infrastructure Focussing restrictions on key sites. Easier to enforce. Stops premature development in advance of clear programme and stations location decisions. Provides certainty to landowners, businesses and developers. 	<ul style="list-style-type: none"> Stops development until trigger reached so can be seen as unreasonably constraining development. Identifying and justifying suitable triggers for release. Identifying and justifying sites selected for Grampians. Could result in less coordinated development so need for clear masterplan within which early development must fit.

Option	Pros	Cons
<ul style="list-style-type: none"> Geographical constraints based on lease reversions. 	<ul style="list-style-type: none"> Provides certainty to landowners, businesses and developers. 	<ul style="list-style-type: none"> If existing use value low and/or development value high then developer may decide to buy out lease. Leaseholder may decide to give up lease early e.g. downsize, closure. Not a planning control and not justified via planning. Could result in less coordinated development so need for clear masterplan within which early development must fit.
<ul style="list-style-type: none"> Geographical constraint based on release of SIL/LPIL. 	<ul style="list-style-type: none"> Provides certainty to landowners, businesses and developers. Justified by other policy so less easy to challenge 	<ul style="list-style-type: none"> Could result in less coordinated development so need for clear masterplan within which early development must fit.
<ul style="list-style-type: none"> Geographical release based on distance from potential tube stations with more distant sites released. 	<ul style="list-style-type: none"> Provides clarity to landowners and developers Provides certainty to landowners, businesses and developers. Safeguards highest value development sites and land required for stations. 	<ul style="list-style-type: none"> Could be difficult to justify unless also related to proximity to other public transport/local services. Potentially brings forward sub-optimum development or high-levels of development some distance from potential tube stations.
<ul style="list-style-type: none"> Release based on developer interest and previous place making studies. 	<ul style="list-style-type: none"> Responds well to market dynamics and takes forward conclusions from earlier work. Results in better places. 	<ul style="list-style-type: none">

Option	Pros	Cons
<ul style="list-style-type: none"> Monitoring of planning permissions and build out with no explicit controls in planning permissions. 	<ul style="list-style-type: none"> Perceived as supportive to development. 	<ul style="list-style-type: none"> Means to stop permitted schemes moving to delivery unclear. No controls over geography or retaining valuable existing uses in short to medium term. Challengeable through planning appeal. Limited certainty to landowners, businesses and developers.

Possible OKR phasing – in this example based on phased release of industrial land

Phase 1: Now – to settled station locations (To Summer 2018?)

- TfL continues with station location studies and BLE remains at planning stage without approval, agreed funding or programme.
- No SIL/PLIL beyond limited agreed areas.
- No significant development permitted beyond defined Core Area (TBD).
- Planning permission cap set at (an unconstrained) 8,000 new homes and 4,000 new jobs, (i.e. could be implemented at any time).
- Broad agreement reached on scale and extent of town centre boundaries, new open space structure and initial “without BLE” public transport enhancements.
- End date will depend of whether there is further station consultation -sooner if not/later is there is.

Phase 2: Settled station location to TWAO submission (Summer 2018 - 2021)

- TWAO submitted.
- Settled station locations, but the BLE remains without agreed funding or programme.
- Limited SIL/PLIL release and only within agreed areas. More release than at Phase 1.
- Additional development permitted within Core Areas, potentially taken up by higher density development around potential station locations - reflecting agreed approach to town centres and open space.
- No significant development permitted beyond these areas.
- Initial “without BLE public transport enhancements worked up, funding confirmed and work starts/programmed.
- Planning permission cap set at 14,000 new homes and 6,000 new jobs.
- Build out limited to 8,000 new homes and 4,000 new jobs – i.e. additional 6,000 homes and 2000 jobs are not allowed to be implemented until Phase 3.

Phase 3 – Positive TWAO Decision (2022 - 2023)

- Additional SIL release around emerging town centres and main bus corridor/s.
- Higher development ceiling within Core Areas, town centres and around station locations.
- Limited development permitted beyond these areas.
- Final “Without BLE” public transport enhancements put in place.
- Planning permission cap set at 20,000 new homes and 10,000 new jobs.
- Build out limited to 12,000 new homes and 6,000 new jobs.

Phase 4: BLE construction commences (2023/24)

- Full agreed SIL release. Any remaining planning and buildout constraints removed.
- 20,000 new homes and 10,000 new jobs delivered.