

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

No, OKRAAP will actually worsen the climate crisis. Demolition led redevelopment on the scale of OKRAAP will generate massive amount of carbon at every stage. It is utterly pointless to reduce traffic to net zero by 2030 if everything that leads up to this point produces millions of tonnes of carbon emissions. The damage will already have been done. There is a real failure to address the Climate Emergency within the plan.

- OKRAAP claims they are 'committed to tackling the Climate Emergency by achieving carbon neutrality by 2030'. (Page 38 printed version). How can this be the case they are ignoring the embodied carbon emissions created in construction?
- Total carbon emissions energy consumption (gas and electric) from high-rise buildings are twice as high as in low-rise rising to 2.5 x for any building of 20 or more storeys . The densities achieved by tall towers can be achieved with lower-rise slab or courtyard buildings. It is not always necessary to build tall to achieve high densities and energy use could, in many cases, be greatly reduced by building in different forms on fewer storeys.
- Buildings overshadowing green areas also damage the existing biodiversity as many plants need direct sunlight to thrive and flower, with reduced plant life the insect population that can be supported is reduced.
- There is no mention of using more sustainable or greener alternatives rather than existing modern building staples. Hempcrete is a more sustainable better than carbon neutral building material, this and other new developments should be explored for redevelopment that really does consider the environment.
- Taller buildings that stand up above their neighbours are more exposed to these strong winds, as well as to more hours of direct sun. Thus energy use for heating and cooling would both be increased. Elevators also contribute to the carbon footprint.
- There is a strong focus on tall buildings within OKRAAP strategy. A 48 storey high rise as part of a 3 tower block development has been approved in order to finance the Bakerloo Line Extension which is delayed indefinitely. This will clear the way to build another 2 high rises of nearly 70 storeys on the current Tescos and Argos sites. 44 storeys have been approved at Malt Street and 24 storeys on Verney Road. There are also high rises planned for The Ruby - artists impressions indicate buildings in excess of 40 storeys. These tall buildings will be damaging to the climate emergency in both the construction phase; embodied carbon and then during their lifetime of usage regarding energy consumption as outlined in the above points.
- The construction industry does not feature within the Fact Box of Highest Carbon Emissions in Old Kent Road. This is a massive oversight given that the construction industry is responsible for 10% of all carbon emissions purely in regard to embodied carbon. Combined with the incessant need for deliveries on huge articulated lorries because of the scale of the building work planned

for OKR this will pollute the air massively. Construction is 2nd only to transport in terms of carbon emissions and yet it has been conveniently overlooked within the Climate Emergency Strategy.

- Southwark's commitment to the climate emergency has been poorly thought out and appears to be nothing more than greenwashing in the face of this evidence.
- Many residents welcome the plans claims to support retrofitting especially with designated and non-designated heritage assets as this would not only decrease carbon emissions but would also preserve the character and heritage of the area. Given the climate emergency why is so much of OKRAAP demolition led?

2. Do you agree with the AAP3 proposals to connect to the District Heat Network?

No, there are a number of reasons to object to the District Heat network

- Many of the existing social housing blocks are already connected to the District Heat Network and have experienced long standing problems with total loss of heating for days and even weeks during the the winter 2020-2021. As it stands the District Heat Network is not fit for purpose and is failing. How can it possibly function under further strain with increased households?
- The District Heat Network is linked to a single supplier who holds the monopoly and is very expensive for residents. There is no possibility to switch suppliers as with other energy modes of gas and electricity; the price is kept artificially high as there is no open market competition. This means that low income households often won't be able to afford to heat their homes so disadvantaged, vulnerable often elderly residents are being put at risk.
- The substations themselves are very noisy and need to be located close to the developments they are supplying.

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

- The Bakerloo Line Extension Corridor cannot exist without the actual construction of the BLE. TfL London announced the mothballing of the BLE 10 March 2021 because of the pandemic. It has officially been put on hold due to Covid austerity issues. Crossrail 2 is on hold indefinitely, with Crossrail 1 (Elizabeth Line) running well behind schedule. No work will be on BLE until Crossrail 2 is completed. In all probability it will be 20 - 30 years before the proposed BLE can open.
- The infrastructure to support such a huge population increase simply does not exist. For this reason alone the OKRAAP should be deemed unsound
- The transport accessibility level as existing can not support more than double the existing population and is already under strain following 'increased demand on existing public transport infrastructure' (page 36 printed version)

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

Youth provision is to be welcomed but it needs to replace what has been lost as well as provide for an increasing population.

- Bermondsey Library, Bermondsey, Peckham and Walworth Town Halls have been recently sold off together with a number of schools and a homeless hostel. 231 Old Kent Road (a tiny venue to provide as a youth centre when the OKR has highest youth demographic of Southwark). This and the addition of 2 new schools can not even be to replace what has already been lost. Poor consolation prizes and that will not be anywhere near enough to provide for the existing community; never mind the huge projection for increased population.
- There have been a number of ball court and infill site campaigns run across the borough recently as Southwark council appears to be targeting ball courts, open areas and green spaces for redevelopment. These spaces are already utilised as casual recreational play areas by children and young people and should not be lost. Protecting these facilities is as important as creating new ones.

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

Housing

Previous consultation has highlighted the need for housing in the Old Kent Road, especially the delivery of affordable homes and a mix of family homes. The plan aims to provide 20,000 homes with a target for 7,000 affordable homes including 5,000 social rented homes. This means that 13,000 of the new homes will be unaffordable to Southwark and London residents. Who are these homes being built for? They are being direct marketed to overseas investors without any benefit to the existing community. Lendlease properties in Elephant and Castle have just come onto the rental market in excess of £4K pcm for a 3 bed. Rentals at Elephant Park start at £1826 pcm for a studio flat rising to £2207 pcm 1 bed and £3190 pcm 2 bed. Renters would need to be earning £95K per year to rent a 2 bed; so will likely sit empty. This building strategy is actually worsening the housing crisis as developers are actively artificially increasing the price of housing stock.

- Only 8% of the existing Southwark population can afford the homes at full property value price.
- Regeneration of the area has seen property developers actively driving up housing costs by direct marketing to overseas investors who may never even visit their 'investment opportunities'. This impacts negatively on local businesses who can not benefit from the custom of an absent population.
- 1 in 24 homes lie empty across Southwark.
- 10% of Londoners have left the capital since the pandemic started. We are currently in negative migration due to crippling housings prices, desire for

green space, working from home, reduction in student influx and migration to Europe following Brexit.

- Southwark Council has actually demolished more social housing than it has built in recent years. The Aylesbury Estate which is currently being redeveloped will represent a loss of approximately 1400 socially rented homes; 50% of what was originally provided in 1977. OKRAAP fails to mention the social housing that is being lost in the face of redevelopment
- To raise the number of homes from 14,500 to 34,500 without the BLE is unthinkable, indeed the OKRAAP states that the BLE 'will enable substantial growth' (page 12 printed version) therefore without the BLE substantial growth will be disabled.
- Retrofitting existing social housing is the most cost effective and least damaging to both environment and social cohesion. Maydew house was 'decanted' 5 years ago and still sits empty. This is completely unnecessary. In France award winning architects Anne Lacaton and Jean-Philippe Vassal; a french duo specialise in renovating post-war public housing. They renovate and expand (giving existing flats new winter gardens and adding new flats on the sides of the concrete structures) in a careful, incremental way. Nobody has to move out of the flats and rents are not raised. There is no 'decanting; or 'stock transfer'. More and better quality social housing is achieved without displacing entire communities which is actually worsening the housing crisis. This style of retrofitting costs a fraction of the demolition led developments which are currently being carried out at the Aylesbury Estate.
- The new council homes should go to those already on the waiting list and should favour key workers with a focus on keeping communities together. This would represent 60% of the total amount of housing being built OKR but the plan only outlines 7,000 new socially rented and intermediate homes.
- Mayor's commitment to work with leading house builders to give Londoners 'first dibs' for up to a month on all new homes under £350,000'. Exactly how many homes are going to be built at that price range? Every new build apartment I've seen marketed with OKRAAP has started at £650,000+ ,

6. Do you know how to find affordable housing that will be built in the area?

- There is a lot of confusion about 'affordable' rent as opposed to social rent. As developers artificially increase house prices within their development and the area 80% of that inflated price is unaffordable to 92% of Southwark's population. We need assurances that all 'affordable rent' will be capped at London Living Rent.

7. Could the council do more to inform people of its approach to local lettings? Through the local lettings policy, 50% of new council homes will be let to local residents to deliver a direct benefit to the existing community.

- Why only 50% when so many communities have already been decanted and displaced (residents of the Heygate Estate have been relocated as far away as Newcastle).
- 12,000 households currently on the waiting list in Southwark, yet Southwark have only pledged to build 11,000 council homes by 2043. A deficit of 1,000 homes. This clearly indicates that 100% new council homes should go to the local community/those already on the waiting list in the area.

Tall Buildings

In response to consultation, the plan has changed the three “Tiers” of tall buildings, with the tallest, “Tier One” buildings now categorised as over 20 storeys.

These buildings are required to achieve the highest standards of design as well as enable the creation of new park space including play space as identified in the masterplan.

The tallest buildings will be at the proposed Bakerloo Line stations and main crossings of Old Kent Road.

8. Do you agree with the new tall buildings plan?

No, there is far too much focus on tall buildings in the plan;

- Tall buildings provoke notoriously high wind speeds particularly at their bases which subsequently suffer from a volatile microclimate.
- Shadowing also negative impacts on biodiversity as many plants require full sun to thrive, without these following species we lose insects and the impact on the ecosystem continues.
- Clusters of towers (as planned for the Ruby Triangle/Cantium Retail Park+ Southernwood Retail Park/Tescos/Argos site) cast greater proportions of the street in shadow and create dark alleyways where concentrations of stagnant air and pollution can be found.
- Lack of outside space and being able to relate to the scale of the people in the street lead to feelings of separation, isolation and depression. This is particularly acute within families especially where young children are involved. Numerous studies illustrate tall buildings are detrimental to individuals and society/community. The majority of those studied experienced greater mental health problems; higher fear of crime, fewer positive social interactions and more difficulty rating children and depression. Rates of mental illness actually rise with floor level (Richman, 1974. Goodman, 1974 and Hannah 1979). Childhood development is also delayed in infants raised above the fifth floor of a high rise (Oda Taniguchi, Wen & Higurashi, 1989). Children on higher floors also go outside to play less often which impacts not only on development but also social skills, community and health (Nitta, 1980, in Oda et al., 1989).
- In light of Grenfell do we really want high rise buildings?

- the size and massing of building in areas is continually increasing far beyond what is set out originally in the plan and previous assurances given to existing residents.
- Every time that the height increases this sets a precedent so within a couple of years that local areas character is completely lost and overshadowed by ugly new developments.
- Dangerous planning applications include privacy glass as standard because the heights and massing of developments are in such close proximity that opaque glass is necessary. This will negatively impact on the physical and mental health of new residents and increase electrical consumption through increased need for artificial lighting.
- The higher you go, the more inefficient the building becomes in terms of the net area measured against carbon emissions from operation, construction and maintenance.
- the life expectancy of glazed cladding systems is only 40 to 50 years before replacement is required.
- The manufacturing of constructing a 20-storey building constructing out of cement creates 1,200 tonnes of carbon dioxide in embodied carbon.
- Office and residential buildings use more energy per square metre, the taller they are, according to new research from UCL.
- Electricity use, per square metre of floor area, is nearly two and a half times greater in high-rise office buildings of 20 or more storeys than in low-rise buildings of 6 storeys or less.
- Gas use also increases with height, by around 40%.
- No relation to existing buildings – 48 storeys is huge height when compared to the existing architecture on Old Kent Road - most of it is not taller than 3 storeys.
- Tall buildings also increase the carbon emissions of surrounding buildings with secondary emissions caused by overshadowing meaning residents in lower buildings require more electricity to power artificial lighting and increased demands on heating systems.
- Inadequate sound-proofing means neighbours become a noise nuisance and this creates conflict within the building.
- Tall buildings already completed across Southwark are ugly, homogenous and completely indistinctive. The bar has been set very low in terms of design quality.

Movement

To address the Climate Emergency and to ensure local residents have the opportunity for safer and more active travel modes, the plan sets out improvements to Old Kent Road including pedestrian crossings, segregated bus and cycle lanes, quiet routes and changes to the local road network.

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

- Southwark Council declared a Climate Emergency in 2019 and claims to be committed to the delivery of net zero carbon development in Old Kent Road by 2030. (Page 20 printed version). Yet building on the sheer scale of OKRAAP will create a massive amount of embodied carbon, especially with the demolition led redevelopment.
- E-scooters are dangerous and ILLEGAL!
- Is there a commitment to fit charging points for electric vehicles? There is a complete lack of them in the area. How can people switch to electric when there is no provision for the actual running of these cars?
- How can it be possible to make the whole of the Old Kent Road 'an exemplary Healthy Street'? without the addition of the BLE which is now mothballed indefinitely? A large part of the success of OKR is its ease of access for lorries, vans, collections and deliveries. It is one of the main artery roads into and out of London connecting our capital with the whole of the South East and our ports. Essential goods and deliveries are brought into the capital via this main road. Dismantling of the goods railways decades ago means there is no alternative transportation system available for movement of heavy goods.
- The focus on it being 'car free' will negatively affect many local people especially the working class community as well as the less able bodied and elderly. Anyone who needs a vehicle to travel to work as they have kit/tools/materials is being discriminated against. The plan only seems to consider those who only require a laptop to work and those who are physically fit.
- Bicycle theft is rife in Southwark - 9215 bicycles were stolen 2011-2017 ranking it the 4th worst borough for bike theft in London. There has been a 23.92% increase in bike theft in Southwark during lockdown and it is seen as a 'low risk crime'. If Southwark is serious about promoting cycling; better security has to be introduced.
- Whilst the new developments may remain 'car free' they will be relying on deliveries and servicing (electrics, plumbing, building maintenance etc.) all of which means trucks and vans. With such an intensified plan for populating the area one may have to assume that even actually reducing the amount of traffic will finally result in traffic maintaining current levels as the population grows.
- There is a total failure on behalf of the council to understand the nature of traffic and essential journeys in the area purely because of wanting to achieve targets.
- The plan states that the gyratory will be removed after the opening of the new Burgess Park Bakerloo Line Extension, but the BLE is mothballed indefinitely as per TfL's statement March 2021.

- Many businesses located on OKR are based here because of the access to the main arterial road including all the courier companies.

Economy and Town Centres

The approach to the delivery of mixed use and vibrant town centres and increased employment opportunities has been updated to commit to no net loss of industrial floorspace across the plan area, increase in affordable workspace and opportunities for local businesses. The plan also proposes two town centres at each end of Old Kent Road with a focus on delivering a new high street along its length.

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

- In reality who exactly is going to want to live on top or next to an industrial unit? The heavy goods vehicles, delivery hours, noise of manufacturing etc., do not create a peaceful environment. That is why industrial and residential have been in separate zones for so long. It would also restrict the kind of businesses that could sit side by side residential; anything requiring chemicals with an odour or noisy machinery would create disturbance in a residential area as would any work during unsociable hours.
- Only 10% affordable work space will be left after redevelopment. Currently all of the work/industrial space is affordable because it has not been redeveloped.
- 10% affordable workspace reflects the real attitude towards business and manufacturing within the area. This 10% affordable workspace is only compulsory in developments over 500sqm meaning that in excess of 90% affordable workspace will be lost.
- 10,035 jobs and 716 businesses which will be either displaced or lost forever in redevelopment. Whilst there is a focus on job creation there seems to be no focus on protecting existing businesses which have been successful in this locality for many years. Considering the economic crisis the UK is experiencing following the pandemic and Brexit we fear that the rampant gentrification plans will not result in job creation but will actually close fully functioning businesses.
- No real understanding of industry within the plan by the council. Any industrial space as opposed to office space is dependent on its very nature by deliveries and exports - requiring vans and lorries.
- In reality there is absolutely no requirement for additional office space within the area. Many offices are now empty following the pandemic and continued trend to work from home. Many businesses are cutting back on costly offices so they can continue to survive through the economic crisis.

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

- No mention of pubs? Pubs are historically a significant meeting place accessible to the whole community; especially the elderly and working classes..
- focus on creating a new high street is entirely outdated. The high-street has been dying a well documented death across the UK for at least 10 years. Much of this is due to internet shopping. The pandemic has compounded this and many successful brands have been closing many of their retail units which have historically underperformed.
- OKR is home to a rich mix of ethnic minorities. Much of the wide diversity already existing in terms of cafes and restaurants on OKR will be lost when rents increase as part of the regeneration/gentrification drive. We don't want another high street full of familiar chains, we wish to preserve the existing distinct mix.

Design and Heritage

The design guidance for development in the Old Kent Road is set out in the Design policy, and in the “design requirements” section of the sub areas site allocations.

The site allocations contain more detailed guidance on building height, sustainable design guidance, accessible ground floors, appropriate densities and typologies and how good design can protect and enhance historic features.

Five new conservation areas are also proposed as well as locally important buildings that are identified to be retained.

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

The plan maintains that listed and non-listed heritage assets and buildings are to be protected and enhanced; yet the reality of what is happening in the borough is the destruction and loss of heritage assets.

- Beautiful old warehouses are completely engulfed by the hideous development of London Square.
- Stunning Arts and Crafts style cottages dating 1908 on Curtis Street are dwarfed by and completely overshadowed by the neighbouring Rich Industrial Phase 3 build.
- Huge, ugly buildings (many more than double the height of existing architecture) are being built right next to conservation areas on Grange Walk, Grange Road and Pages walk. This degrades the conservation area as it is engulfed by imposing, enormous, characterless builds bearing no relation in terms of design, scale and massing to those conservation areas or previously existing architecture. More sensitivity is required when building next to these areas to preserve these heritage and conservation sites for all to enjoy. All height restrictions as laid out in NSP should be adhered to and any applications for taller builds must be refused. More stringent regulations regarding design

must be applied near conservation areas as the majority of new builds are at worst ugly, and at best homogenous and bland.

- Every time the height of a development is allowed to increase it sets a precedent for the next planning application to go higher so that within a couple of years the local areas character is completely lost and overshadowed by ugly new developments which rarely meet any of the aspirations in The Masterplan.
- Thomas Beckett illicitly had its historic interior removed without permission. This should be reinstated.
- Duke of Kent pub (built 1856 pre-dating the Grade II listed Fire station and the same period as Lord Nelson also Grade II listed) - now OKR Mosque, no.365; which has been allowed to fall into disrepair by its current owners, to make way for a new building which is completely out of context and keeping with the surrounding architecture. The existing building should be protected as a heritage asset.
- Green Man pub (the pub closed in 2012) another historical tavern not mentioned in the plan - 1858 (pre-dating the Grade II listed Fire station and the same period as Lord Nelson also Grade II listed). This building should be upgraded to Grade II listed as a matter of urgency with all exterior and period interiors protected.
- Gatehouse Grange Walk (Grade II listed)- this site has seen the destruction of a non-designated heritage asset now thought to date to the same period as the Gatehouse. The owners are currently taking legal action on developers for unlawful practices which have severely damaged the Gatehouse. Planning permission should never have been granted for this development; this evidences the culture of hitting housing targets at the cost of heritage assets. More stringent strategies need to be employed and a greater understanding of conservation and heritage sites are clearly required.
- Dulwich Hospital dating back to 1887; currently in the demolition process. The building, described at the time as being one of the finest of its kind, was designed by Henry Jarvis & Son, reputable local architects (who also designed Southwark Town Hall building). Whilst this building is not in OKRAAP its demolition shows the lack of regard given to heritage. It would have been cheaper and greener to retrofit this beautiful building and would have preserved this public heritage asset.
- Retaining and retrofitting would be welcomed, so why is so much of OKRAAP demolition led?

Parks and Open Spaces

In response to consultation, more green space has been identified in the plan. The revised masterplan increases the provision of open spaces including at Frensham Street and Livesey Park (around the gasholder).

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

- Southwark Council felled 2000 trees 2018-2020. OKRAAP states that 3000 new trees will be planted but will we actually end up with more trees? There is no accounting for mature trees which are being felled.
- Southwark Council is the 5th worst borough in London in terms of access to green space. considering the strain already placed on green spaces with the existing population green space provision would have to be more than doubled for Southwark just to retain it's poor ranking status.
- Numerous council estates have been objecting to 'infill' sites which means they are losing their only local green space and children's play areas.
- Shadowing also negative impacts on biodiversity as many plants require full sun to thrive, without these following species we lose insects and the impact on the ecosystem continues. Clusters of towers (as planned for the Southernwood Retail Park/Tescos/Argos site) cast greater proportions of the street in shadow and create dark alleyways where concentrations of stagnant air and pollution can be found.
- The proposed Mandela Way Park exact location raises concerns about how this will affect the existing road layout and accessibility.

Consented Development

A number of schemes have started in the Old Kent Road.

14. What do you think of development completed to date?

- Communities are largely unaware of the context of the proposed development.
- The plan looks to expand the population exponentially it is simultaneously reducing community assets.
- Harper Rd Social Services Centre and Bermondsey Library, Southwark Park Day Centre and a number of schools and a homeless hostel have all been sold off. Offering 231 Old Kent Road and 2 new schools can not even being to replace what has already been lost.
- The majority of existing residents are completely unaware that OKRAAP is currently open for public consultation. Southwark Council together with the developers are not actively attempting to inform the existing community of masterplans and planning applications. Opportunities to meaningfully engage with the community are being lost; Southwark Council have completely failed

to mention OKRAAP is out for public consultation on it's social media platforms (twitter and Instagram) , there is also no mention of it in Southwark Life. Developers are actively targeting engagement with residents of different postcodes to where the actual proposed development is situated, therefore the targeted communities have no idea of context. More stringent rules regarding public consultation must be drawn up; the immediate community who will be most impacted on by the development should be targeted.

- An opportunity was missed to raise awareness when Council Tax bills were sent out; a leaflet could have easily been included in the mailout.
- The plan firmly states that buildings fronting onto Crimscott Street should be between 6 - 8 storeys; yet we are already seeing the finished construction of 9 storeys as part of the London Square development which incidentally is one of the ugliest buildings to be constructed in recent years bearing more resemblance to a multi-storey car park or the recently demolished Heygate Estate rather than referencing existing builds in the area or working in any sympathy with the neighbouring Conservation Areas of Grange Road and Pages Walk. These monstrous planning applications did not consult most of the existing residents in the locality and should have been refused as they break with planning policy.
- Gated communities don't contribute anything to the existing local community. London Square/Rich Industrial Phase 3 were supposed to have gardens accessible to all but they are actually marketing the finished design as a gated community.
- Strategic social exclusion must be banned in all future developments; it creates barriers within society.
- Names for sites are also misleading; very few people are aware that Strathclyde holdings Southernwood Retail Park is in fact the Tesco's/Argos site.
- Clearer planning and communication needed;
 - consultation timeframe for Walworth Town Hall was only 7 days starting 20th March 2020 and ending 27 March 2020.
 - Southernwood Retail park consultation was done without giving the community full facts and not clear at all

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

- Bad practice of developers framing questions to ensure that existing residents can only give the answers that the developers need for the proposal to be approved – LIKE THESE QUESTIONS
- The council has frequently extended construction working hours throughout the pandemic on many sites across Southwark. This is totally unacceptable with so many people in lockdown working from home and home schooling. It

has made life for residents a complete misery. Many sites were also using floodlights to work these extended hours in the dark which created a light pollution issue on top of the noise nuisance.

- Many roads have been made difficult to access next to huge developments. This combined with LTNs has actually increased traffic and carbon emissions rather than addressing them.
- There is a total failure to work with the existing community in regards to developers carrying out works with no notice being given as to when works are starting etc., generally it is left to the public to complain as and when things happen. More positive engagement needs to happen with such an ambitious building programme.
- Southwark Council have to do more to protect existing residents from unscrupulous developers working unlawfully. Currently residents have to take construction companies to court for damage to their property caused by construction.

Final thoughts

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

- The social & economic effects of the pandemic and Brexit has fundamentally changed the landscape over the last year and the plan should be revised to reflect this.
- Why do we need a new school? Southwark has already sold off schools across the borough including Cherry Garden School, Tuke Street School, Whitstable Day Nursery there are also plans to close St John's Walworth (a highly respected primary school) in September 2021. Why can't we keep existing schools open? It would make far more sense financially and ecologically to renovate these existing buildings and keep those schools running rather than build new ones.
- Do we really need a hotel? Why when the hotel on Bermondsey Square has historically performed badly and is better situated to access the village feel/destination of Bermondsey Street, Southbank and central London.
- There is a failure to mention the height of the new build on Southernwood Retail Park adjacent to the proposed tube station. Currently 48 storeys have been approved which will negatively impact on all surrounding homes.
- The concept of completely removing or repurposing the flyover is insanity. The flyover directs all traffic from Elephant and Castle and therefore central London out down the OKR/A2. The flyover actually reduces vehicle emissions by keeping traffic moving. Demolishing the flyover will cost in excess of £13,000,000 and actually create further carbon emissions purely in the act of its destruction.

- The addition of a Lido within Livesey Park would be welcomed by the community and would really add a lot of value to the area, making it a destination in the summer but only if it is not overshadowed. For a Lido to be enjoyed in the UK it needs to be exposed to full sun for the entire day.
- There are no plans for new hospitals, police stations or fire stations but OKRAAP plans to more than double the population.
- Water pressure has dropped in recent years due to increased demands following redevelopment. Water pressure will drop further as more homes are built. There will also be increased pressure on water availability in the area.
- Current sewage systems are inadequate and outdated; can not cope with such a huge population intensification.

Use this question to add anything else you think about the plan or the area. Below are specific to areas/site allocations

Rich Estate and Crimscott Street | OKR2 (wrongly labelled as Glengall Road, Latona Road & OKR)

- The plan firmly states that buildings fronting onto Crimscott Street should be between 6 - 8 storeys and yet we are already seeing the finished construction of 9 storeys as part of the London Square development. Incidentally, one of the ugliest buildings to be constructed in recent years bearing more resemblance to a multi-storey car park or the recently demolished Heygate Estate rather than referencing existing builds in the area or working in any sympathy with the neighbouring Conservation Areas of Grange Road and Pages Walk. These monstrous planning applications did not consult most of the existing residents in the locality and should have been refused as they break with planning policy.
- 6 storeys on Pages Walk is far too tall for our little street which can't even support 2 way traffic. The southern part of the street is a beautiful Conservation Area and Grange Road is also a conservation area; any redevelopment of the northern part of this street should be designed in extreme sensitivity to these Conservation Areas. The tallest build directly on Pages Walk are the recently (within 10 years) constructed 3 storey terraced houses at Rose Stapleton terrace and 4 storeys at the northernmost point of Pages Walk where it meets Grange Road. Therefore 3 - 4 storeys should be the maximum allowed on Pages Walk.

Mandela Way | OKR3

- We support the 3 storey housing with gardens backing onto our gardens on Pages Walk but want the height reduced to 2 storeys so that the terrace exactly mirrors Pages Walk Conservation Street and remains at the same height and massing of the existing build. The new terraces should also remain within the existing footprint of the build so that right to light of existing residents is not affected and the wildlife corridor running along the existing gardens and neighbouring/adjoining green space is protected and the rich

biodiversity preserved. This area supports foxes, squirrels, bats, a wide variety of birds and insects; overshadowing will negatively affect the types of flora that can grow which could be disastrous for the local bee population which is fundamental to the existence of all life. There is also the sensitive roof profile of Pages Walk which has to be considered and should not be obscured by new buildings.

- It firmly states in the plan that new buildings fronting onto Willow Walk should be restricted to 4 to 5 stories. This has to be firmly implemented as we are already seeing applications of 8 and 9 stories. All applications in excess of what is stated in the plan must be rejected to preserve the existing character and style of the area.
- We would like assurances that existing trees along Mandela Way will be preserved. Trees only start to reduce carbon emissions once they reach maturity. The existing trees also support a wide range of biodiversity.
- The Pages Walk Conservation Residents Alliance are gravely concerned with how the creation of the Mandela Way Park will 'change traffic management arrangements over the next 10 to 15 years'. It states that 'Mandela Way will be stopped up either side of the new park'. Where is the traffic exiting the beginning of the OKR and necessary for the new developments on the eastern side of the park going to be directed? The new public highway looks as though it runs straight off Mandela Way and up Pages Walk. This is not only unacceptable (going against all previous assurances given to residents by Southwark Council in previous consultations) but also undeliverable. Pages Walk is a tiny street which can not support through traffic even in one direction. This road has been closed to through traffic for well over a decade. However, when the barrier was briefly lifted for a short time a few years ago many of the residents suffered damage to their parked cars caused by trucks and vans accessing the street in a one way direction travelling northbound. It is totally unacceptable to be reducing and stopping traffic on existing MAIN ROADS and then redirecting that traffic down a tiny residential street which is also a Conservation Area. This would reinforce the feeling that many of the residents have that only the developers and new residents are not only being prioritised but it is at the cost of the existing community. Colin Wilson (Southwark Planning heading up OKRAAP) gave public assurances (18 March on Residents Group OKRAAP zoom with Southwark Council) that this new road layout as printed in the 2020 version is a printing mistake. Later under **Willow Walk** on the same page it does state 'servicing traffic must be prevented from using Pages Walk and Crimscott Street as these are narrow and limited'; this does indicate that the new road layout for Pages Walk is indeed a printing mistake but we urgently need clarification on this.
- We support the idea of Mandela Way Park but the previous draft of OKRAAP (December 2017 Page 75 printed version) showed the park existing but without cutting Mandela Way so short. This layout should be resurrected especially considering that the redevelopment planned for Mandela Way is a mix of industrial with residential. How is industry to exist without

distribution? Additionally it is naive to think that an increased concentration of residential won't require vehicle access for servicing.

Dunton Road and Southernwood Retail Park | OKR4

The title of this area is very misleading as the general public know this area as the Tesco's and Argos site. Previous public consultations have not listed these sites as housing either Tesco's or Argos so many of the surrounding residents were completely unaware of how these plans would affect them. Subsequently planning permission has already been granted for a tower of 48 storeys and another 2 tall towers on this site. Many residents were completely unaware of this application until permission was granted and are outraged. The diagrams outlining tall buildings within the plan are totally misleading as tall buildings are merely outlined as 20 storeys and above which is already huge but more than double that height is nothing less than a gargantuan monstrosity conveniently concealed within the crease of the plan. As permission was granted to finance the BLE which is mothballed until further notice following the pandemic and TfL's announcement March 2021 we recommend that this permission is immediately rescinded as it is;

- 1) Undeliverable.
- 2) Unsupported.
- 3) Damages green spaces including Burgess Park, the proposed new square and micro park. All of which will suffer with increased windspeed and overshadowing damaging not only public enjoyment of communal green spaces but also negatively impacting on biodiversity.
- 4) Creates excessive carbon emissions both with excessive levels of embodied carbon and also energy consumption within operation.
- 5) Detrimental and disastrous to all existing residents in the area; loss of privacy and aspect, plummeting existing homes into overshadowing thereby requiring increased heating and use of artificial lighting further pushing up carbon emissions.
- 6) Public square will be overshadowed by the trio of tall buildings and exposed to excessive winds generated by the tall buildings so who exactly is going to want to enjoy the windy sunless square?
- 7) How can this area be designated a town centre without a tube station? Town centres are well documented as dying a death across UK. The model that Southwark Council are looking to create on OKR is outdated and obsolete.

8 - 16 storeys is huge for the surrounding area most of which is very low lying at 3 storeys maximum. 8 - 16 storeys bears absolutely no relation to listed buildings, designated and non-designated heritage assets or any existing architecture.

How does removal of the gyratory system support existing industry in OKR? It will make deliveries and exports more difficult and expensive. The BLE has been mothballed by TfL indefinitely and the current plan does not address this fact.

There is a failure to understand the socio-economic factors of lower income areas in the borough. Small independent existing shops most of which are owned/rented by diverse communities of ethnic minorities rely on on the low rental premiums. Will the new shops be replacing the old shops and therefore socially cleansing the area? It is dangerous to build an entire area where only the rich can afford to live and stay in business.

Bricklayers Arms Flyover | OKR 1 & 5

This part of the plan is very confusing. Two separate options are proposed; one which completely demolishes the flyover (costing £13,000,000 + and simultaneously creating a huge amount of carbon emissions). The other which proposes repurposing the flyover into a green space. Yet in this section it states 'To enable ease of movement the exit of the flyover will be signalised to create a junction where all movements exiting Mandela Way will be abled'. This will only serve to worsen traffic. The whole point of the flyover is to direct through traffic heading further south east away from Bricklayers down the OKR/A2. Additionally the flyover which is in constant and regular use is only one way. By introducing a signalling system you are hindering ease of movement furthering cutting directly across a main road (OKR) which should be free flowing at this point due to the traffic exiting an already multi-signalised roundabout. Additionally, the existing road layout in terms of where the flyover reaches ground level and its proximity to Mandela Way would actually make turning right down Mandela Way from the flyover impossible. This concept has been poorly thought out.

The idea of turning this into a park is ludicrous. OKR is a main artery road (A2) bringing essential goods and services into London. The flyover directs this traffic out of London and actively eases traffic on the Bricklayers Arms roundabout thereby reducing carbon emissions. The carbon emissions generated by removing this facility can not be offset by a park of this size and existing local residents would actually suffer a reduction in air quality despite an increase in green space.

A pedestrian crossing already exists under the flyover and above the underpass. We really don't need another. This would be another waste of public funds.

The removal of the Bricklayers Arms Flyover also documented (page 115 printed version) stating 'The removal of the flyover or planting and converting it into a park will better connect the high street with Tower Bridge Road and New Kent Road providing improved pedestrian crossings and cycle routes'. OKR is already well connected with Tower Bridge Road. The pavements were already widened thereby reducing road space in recent years and there are safe cycle routes up Pages Walk to Quietway 1. There is also a pedestrian crossing under the flyover and a subway crossing; both of which are well used but are not in such a state of demand that more access is required. It is blatantly obvious that no real studies of this area or OKR have been carried out and there is little understanding of the existing structures, needs or requirements.

OKR 6 | 96-120 Old Kent Road (Lidl Store)

Why have Tescos received assurance of site allocation and yet Lidl hasn't? For residents at this end of the Old Kent Road this store is in easy walking distance and therefore negates the need for driving. Surely that should be retained in order to keep fuel emissions low?