RECOMMENDATIONS

That the cabinet member for regeneration and new homes

1. Agrees the selection criteria used to determine sites for shop front investments in the borough which is summarised in paragraphs 35-36 with the full criteria attached as appendix 1.

2. Agrees the adoption of two programmes of shop front improvements, one at Peckham High Street / Rye Lane and the second across other key regeneration areas in the Borough as set out in paragraphs 38-47 of this report.

3. Agrees allocation of funding for these two programmes (paragraphs 54-58), site locations (paragraph 37 and the map in Appendix 2) and the phasing of works (paragraphs 51-52).

BACKGROUND INFORMATION

4. In 2014 cabinet approved a capital bid for further High Street and Shop Front Investment for £2 million which has been programmed between 2015/16 and 2018/19. This follows an initial 5 year capital programme Investing in Local Retail Environments (ILRE) which saw improvements being made to some 24 shopping parades across the borough.

5. This has since been revised following a successful bid to the GLA for New Homes Bonus for £525,000. This will directly substitute that capital investment reducing the council’s capital investment to £1.475m. See paragraphs 21-26

ILRE Phase 1

6. This first ILRE programme run by the council was retailer led investment, which meant that retailers could decide as a collective with their neighbouring shops as to how the money allocated to their parade could be invested. For the most part retailers opted for investment in their own premises and this included new shop fronts, signage, shutters and lighting. Some conservation work was undertaken as were improvements to the immediate public realm.

7. The broad objectives for the original ILRE programme were based around small scale sites with preference for under 10 shops in a parade, sites outside town
centres, sites where there had been no recent investment or improvement, and projects that would help improve the local economy and amenity. There was also an equitable spread of sites across the breadth of the borough.

Nunhead OLF

8. Between 2011 and 2014 the council delivered a programme of investment in Nunhead funded by the London Mayor through the Outer London Fund programme and the council’s Area Renewal funding. This took a different approach to the ILRE programme which focused largely on the physical uplift of shopping frontages to stimulate growth and bring local people back to shopping locally. The OLF programme took a wider perspective and in conjunction with shop front works looked at a programme of investment around creating a sense of place through careful rebranding of shops, marketing through Nunhead shopping bags, public realm improvements and a carefully crafted programme of events and activities that would help people to discover or rediscover Nunhead, and what this shopping area provided.

High Street Challenge

9. High Street Challenge is a two-year council programme with a £600k fund awarding grants to commission a series of innovative, spatially-based projects. The concept is to attract fresh, innovative ideas to animate and inject energy into our high streets; prioritising business-led and community-led initiatives to complement our substantial capital investment in places and focus on people and businesses as assets, to build community capacity and small business engagement in the transformation of areas. The aims are to:

- Drive footfall, town centre growth and building capacity
- Diversify high streets offer to meet changing demands
- Transform spaces, attract and engage new customers
- Improve connections between communities and businesses
- Encourage temporary uses/meanwhile spaces

10. Several High Street Challenge round 1 projects have now been funded and implemented. Round 2 recommendations have been made and grants will be awarded imminently. Parades that have secured funding through High Street Challenge that will complement any work undertaken through the second phase of shop front and retail improvement work are:

- Tower Bridge Road – Tower Bridge Road Alliance for a series of events
- Walworth Road – Walworth Town Team: marketing events to increase footfall
- East Street – Plaza Latina market 3 weekends in August on Nursery Row Park
- Camberwell – SE5 forum by feasibility study for a Camberwell town centre BID and; Wormfood Ltd to put on an event Camberwell Fair on the Green in July 2015.

Townscape Heritage Initiative

11. Southwark Council has received a confirmed grant of £1.675m from the Heritage Lottery Fund (HLF) to help restore Peckham Town Centre.
12. The money will be made available under the Heritage Lottery Fund Townscape Heritage Initiative (THI) – a grants programme set up to provide much needed investment for communities to improve and regenerate the historic built environment for the benefit of local residents, workers and visitors.

13. The five year Peckham Townscape Heritage Initiative (THI) scheme will see 44 of the most important historic buildings on Peckham High Street and Rye Lane shortlisted for a grant to repair damaged facades, reinstate lost historic features and install high quality traditional windows and shop fronts. Grants will range between 20-70% based on the nature of works.

14. Owners will also be encouraged to bring vacant floor space in the upper floors back into use to support the local economy and provide much needed housing.

15. The grant will also enable the council and its partners in the community to put in place a programme of complementary initiatives centred on the better knowledge and enjoyment of this important historic town centre.

16. It aims to bring wider benefits to the community of Peckham with a unique set of complementary initiatives including traditional building skills, improved knowledge of the history of the area and a celebration of its heritage.

**Mayors High Street Fund**

17. In 2014 The GLA launched a new programme of high street investment called the High Street Fund, created to build on the success of the Outer London Fund aimed specifically at helping London’s high streets to grow and become more vibrant. The fund is making up to £9m available until March 2016 to support projects that help deliver the Mayor’s ambition.

18. Funding is being directed to places that have potential for growth and where there is the commitment and capacity for real long-term change. Successful projects will create vibrant, attractive places that underpin good growth and they will address the interrelated challenges of accommodating new homes on London’s high streets, while nurturing businesses and enhancing civic life.

19. Southwark Council made a successful bid for Old Kent Road and East Street to the value of £510,000 for a study and public realm strategy for Old Kent Road and considering options for reconfiguring East Street market to optimise the market and shopping environment of users and market traders and shop owners.

20. Complimenting this Adelente Advances, supported by Southwark Council, were successful in a bid to provide business support and undertake work on East Street including looking at a Latin American festival along the lines of Carnival del Pueblo.

**New Homes Bonus**

21. The New Homes Bonus (NHB) is a government grant paid to reward local authorities for every new home built in their area. Southwark Council manages a rolling 10-year capital programme and has a strategic aim to generate and support housing growth.

22. Southwark received £2.6 million of NHB funding in 2011/12 and anticipates receiving a further £52 million in the period to 2016/17.
23. Most of the NHB funding generated over this period will be used to support the council’s capital programme, creating places that will attract further housing development through a wide range of investments in the environment and community infrastructure.

24. Until this year there was also a revenue element to the grant to support the basic service needs that house building generates within a local authority. Government has made changes to the way this grant is distributed and it will now be topsliced to create the LEP (London Enterprise Panel) New Homes Bonus programme of £70m to be distributed between the 32 London Boroughs to meet the priorities set out in The Growth Deal for London¹.

25. Southwark made a submission for these funds in 2014 towards the High Street Regeneration programme. It is a programme of capital investment directly aligned with the Love Shopping programme and revenue funding for Economic development projects such as events marketing and enterprise initiatives. The intention is that the NHB funding will offset the capital and revenue investment being made through the council’s Capital Programme.

26. The GLA advisors administering the programme have strongly indicated a preference to support the Lower Road and Tower Bridge Road projects within this programme. Southwark Council has applied for £525,000 NHB capital funding and is currently refining the bid.

**Phase two of Southwark’s shop front and shopping parade investment – Peckham’s High Streets and “Love Shopping”**

27. From the wealth of projects detailed above, the council is increasingly widening its breadth of experience in working to stimulate economic growth through investment in our high streets and with local businesses. From the lessons learned from the above mentioned programmes the emerging economic environment and much discussed role of the high street nationally, the recent capital bid for Southwark’s High Streets takes a combined yet slightly different perspective.

**Aims and Objectives**

28. The main focus for this next phase of shopping parade and shop front improvement is focused on supporting investment in and around the council’s strategic Regeneration Areas and Town Centres (see figs 1 & 2). This will include shopping parades on the cusp or fringes of the council’s Regeneration Programme that provide or could with support provide valued services for local communities but might not directly benefit from regeneration funded initiatives and may struggle in competition with new or revitalised shopping areas and town centres. However it was considered that the north of the borough (Bankside and Bermondsey) already had a quantum of development and degree of market intervention that did not require public sector support.

29. The key desired outcomes of the programmes are:

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¹ The Growth Deal For London priorities
• To support and spread the uplift and investment in strategic regeneration areas and on the fringes of town centres within Southwark.
• To improve local business environments that would otherwise be unlikely to receive investment
• To retain existing businesses
• To attract new businesses to vacant premises
• To create and champion incubator and pop up uses in our high streets
• To increase the number of local employment opportunities
• To engage local businesses and traders (owners and occupiers of premises) in the scheme, resulting in local ‘ownership’
• To encourage the establishment and capacity of local business networks
• To increase commercial activity
• To increase public safety and reduce fear of crime
• To improve the provision of local amenities (i.e. a broad range of shops and services to meet the needs of local communities) for existing new and emerging communities.

30. In regards to the nature of investment this will be site dependent. Each site selected to go forward for implementation will be assessed for the suitability of a series of possible interventions. The tool box of interventions will include:

• Business Support
• Branding and Marketing
• Shopping Frontages
• Conservation Works
• Events
• Arts

31. Not all elements will be offered to each site; there will be a bespoke programme for each site based on the business and site conditions, the neighbourhood, and site suitability.

32. The sites selected for assessment, and those highlighted in the bid include Lower Road, Tower Bridge Road, Harper Road, East Street, Walworth Road (South) Camberwell Town Centre and Peckham.

33. The maps below are extracts from the new Draft Southwark Plan and show the protected shopping frontages in Southwark and the office and business locations across the borough. Both Maps also show clearly the action areas, town centres around which the sites listed above in point 32 were identified.
Site assessments were undertaken between September 2014 and November 2014 and included site visits, desk research and consultation with various sectors of the council. Each site was then scored against the criteria which are set out below in Para 36.

KEY ISSUES FOR CONSIDERATION

Criteria

The full eligibility criteria are set out in appendix 1. The criteria have been set to assist in measuring which sites are most likely to deliver the outcomes. In overview the headline criteria (and Scoring) identified for the programme are as follows:

- Alignment to existing regeneration programmes (25%);
- Local Economy Sustainability and Benefits (25%);
- Timescale (deliverability) 20%;
- Benefits to Local Environment (20%)
- Sustainability and Participation (10%).

Each of the criteria are scored from 1 - 5 (where 1 is poor and 5 is excellent) and total scores are then derived based on these weightings.

Sites

As set out in paragraph 37 and shown in appendix 2 the sites selected for assessment include;
• Lower Road
• Tower Bridge Road
• Harper Road
• East Street
• Walworth Road (South)
• Camberwell Town Centre
• Peckham – Peckham High Street

The recommendation for two programmes

38. The site assessment process provided a score for each site location to assist with final profile of sites, prioritising, and allocations of funds. All the shortlisted sites scored highly and justified inclusion in the shop front programme. See appendix 3 for overview of each individual site assessment and its associated recommendations.

39. What this site assessment and criteria did not directly take into account was the complexity of multi funded programmes at particular locations and how this should be best accommodated.

40. The only site that does not have any other funding attributed to it is Harper Road. All the other sites as regeneration areas have a complex profile of funding.

41. In most cases this causes no conflict of interest as the other funding streams complement one another and are focused on differing components of the programme e.g. highways or open space works at Walworth Road. Alternatively the funding provides a direct match e.g. high street and shop investment works but offering a comparable levels of funding. This is the case for the High Street funding and New Homes Bonus funding for East Street, Tower Bridge Road and Lower Road.

42. However in the case of Peckham there is an intricate balance of funding streams that needs to be considered. This relates to the station and town square development but most notably the Townscape Heritage Initiative (THI) funding from the heritage Lottery Fund. The THI programme will, as detailed in paragraphs 11-16, see 44 of the most important historic buildings on Peckham High Street and Rye Lane shortlisted for a grant to repair damaged facades, reinstate lost historic features and install high quality traditional windows and shop fronts. This programme will be offering between 20 -70% grant towards the cost of works depending on the nature of works.

43. This could pose a potential conflict as the ILRE or shop front programme has previously offered grants up to 100% of the value of works, which facilitated its success particularly in the current climate of financial instability and deterioration of the high street, where shop keepers have not had the funds to invest in their premises. However where financially viable a contribution from traders would be expected towards the total cost of shop front renovations.

44. It is important that other programmes the council is delivering are not compromised. However it is felt that the shop front programme could compliment the work of the THI if a similar level of grant funding for shop front work in the Peckham area were offered. This approach would add scope to the THI
programme by enabling traders in buildings that were not prioritised as key historic buildings to benefit from the wider regeneration process in Peckham.

45. As such the council recommends that two programmes are developed forward for shop front improvement works: the first for Peckham at Peckham High Street, and in particular Rye Lane; the second for the remaining regeneration areas identified above in paragraph 32.

46. The Peckham Shop Front programme will be delivered in conjunction with the THI between 2015-2018. The programme will seek to undertake a series of interventions along Peckham High Street and Rye Lane by way of public realm and environmental streetscape works and some small scale shop front treatments. Where works are related to the public highway and streetscape the council will fully fund the works, but if any works relate to private buildings and shop fronts the programme will mirror the terms of the THI and offer up to a maximum to a 70% grant in line with the THI guidance.

47. The second programme of Regeneration Sites will incorporate Harper Road, Camberwell, Tower Bridge Road, Lower Road, Walworth Road and East Street. This programme will operate in much the same way as previous ILRE schemes across the borough and offer up to 100% grants with a preference for a small percentage contribution participating businesses.

Branding

48. With two programmes being recommended it is important to ensure that these are branded distinctively to avoid confusion.

49. Also as the programme has developed since its initiation in the borough in 2008 it is considered an appropriate time to not only distinguish it from previous investment programmes but also to provide a clear steer to local communities as to what the programme will entail.

50. Previous programmes in Peckham and Nunhead and the LOVE branding have been well received and provided opportunities of inventive and creative marketing. As such it is recommended that the Peckham investment be branded as Peckham’s High Streets and the wider programme of regeneration sites be promoted under the banner “Love Shopping”.

Phasing and Allocations

51. The justifications for funding allocations are set out in the site assessments and the individual recommendations by site in appendix 3. This includes funding being subsidised by other funding sources such as NHB, or where match funding has been committed to other programmes to maximise funding opportunities and investment in the borough.

52. Similarly the recommendations for phasing of works are based on the requirement to link up and deliver alongside other streams of funding to ensure the viability of those funding sources and therefore enhanced levels of investment in Southwark.

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2 This is to be developed further with the Council’s Communications manager
Peckham’s High Streets

53. This programme as mentioned in paragraph 46 will follow the timescales of the THI which is due to be delivered between 2015 and 2018.

54. It is recommended that £300,000 is allocated towards this programme.

“Love Shopping”

55. It is proposed that projects included in “Love Shopping” are delivered in two phases to ensure that the full resource can be allocated to projects to ensure the best outcome but also to dovetail with the development and deliver of its wider regeneration aspirations and delivery plans.

56. Phase one will commence in 2015/16, phase two in 2016/17 working through to 2018/19 for proposed completion.

57. With £300,000 being recommended for Peckham’s High Streets programme there is a budget of £1.7m between the sites for the Love Shopping programme.

58. A summary of recommendations with allocations is detailed below:

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<tr>
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<tr>
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</table>

Policy implications

59. The programme supports and complements a wide range of existing policy frameworks and strategies aligning itself with the objectives and targets for local and regional enterprise development.

London Wide

60. The programme also supports the Mayor of London’s Regional Economic Strategy and its key priorities ‘improving London’s Competitiveness and Investing in London’s future’ including objectives to:

   • encourage cost effective business support programmes for London’s businesses, and especially for SMEs and entrepreneurs..
   • To work with boroughs, developers and other partners to direct investment into existing major employment areas including the Central Activity Zone (CAZ), town centres and the Strategic Outer London Development Centres.

Council Priorities
61. The programme is clearly linked to the council’s 2014 fairer future promises

**Promise 6 – A Greener Borough**

We will protect our environment by diverting more than 95% of waste away from landfill, doubling the estates receiving green energy and investing in our parks and open spaces.

**Promise 7 – Safer Communities**

We will make Southwark safer with increased CCTV, more estate security doors and a Women’s Safety Charter. We will have zero-tolerance on noisy neighbours.

**Promise 8 – Education, Employment and Training**

We will guarantee education, employment or training for every school leaver, support 5,000 more local people into jobs and create 2,000 new apprenticeships.

**Promise 9 – Revitalised Neighbourhoods**

We will revitalise our neighbourhoods to make them places in which we can all be proud to live and work, transforming the Elephant and Castle, the Aylesbury and starting regeneration of the Old Kent Road.


The overall vision to create: “A healthy competitive business environment built on an entrepreneurial culture with improved access to quality employment opportunities for all residents.”

To achieve this vision and support economic development, the Strategy has as one of its four key objectives: ‘To promote a safe, high quality and accessible environment for businesses’

63. **The New Southwark Plan includes:**

**Strategic Policy 6: Vibrant town centres and shopping areas**

Southwark will have a network of town and local centres with new retail, leisure, office and other town centre uses, which reflect the character of the catchment area. Local centres and local shops will meet the day-to-day needs of communities.

We will continue to promote and protect small, independent and affordable shops to strengthen the retail offer and competitiveness of centres.

**Strategic Policy 9: Design**

Southwark will have the highest possible standards of design to create attractive, healthy and distinctive buildings and places that are safe, easy to get around and a pleasure to be in.
Southwark’s buildings and places will have excellent architectural and urban design. They will enhance the visual and practical experience of the built environment in order to create attractive places that people will choose to live in, work in and visit.

**DM47: Shop fronts**

Southwark will encourage the retention of historic shop fronts and the provision of high quality new shop fronts.

Development for shop fronts and signage must:
- Be an excellent quality of design and give careful consideration to proportion, scale, style, detailing, colour and materials in relation to the host building and its context.
- Retain and refurbish existing traditional and historic shop fronts and features to enhance or sustain local character, or when located within heritage assets, conservation areas or the setting of heritage assets.
- Be appropriately lit for its location and context.
- Utilise internal security grilles and security solutions to encourage a welcoming environment. The use of external mounted shutter housings and solid roller shutters is not supported.
- Retain or provide a shop window if part of a change of use within town centres.

**Reasons**

Shop fronts make an important contribution to the appearance of our town centres and parades. However, some new shop fronts can harm visual amenity and local character with poor quality design, materials, signage and security shutters.

**Equalities Issues**

64. The terms of the Equality Act 2010 require the council to have a duty to bear in mind the issues of discrimination during the decision making process and for anti-discriminatory measures be embedded in the process. The council has a duty to take ‘due regard’ and this must be evidence based.

65. **Our aims and objectives on equality:** The diversity of our community is one of our most valued assets. Strong communities will thrive and prosper if individuals and groups are treated fairly and with respect, and given access to the services they need. Our aim is to provide opportunities to Southwark's residents, businesses and organisations to fully engage in the community. We understand that for equality to be achieved it must be something that everyone understands and feels able to contribute to. We will ensure that residents are involved in making our services more accessible.

66. **Our overarching policy on equality:** The council's ‘Approach to Equality Staff Guidance’ sets out our policies on equality and the overarching objectives we will work to achieve. It outlines what the government expects of us as a public sector body under the Public Sector Equality Duty, what people can expect from the council in terms of how we will plan and deliver our services, and what the
council is committed to doing. It explains our approach to advance equality of opportunity in the borough by making equality part of our day-to-day business.

67. **Resources for managers and staff:** The following tools have been developed to support managers and staff with implementing the council's Approach to Equality:

- A set of budget equality analysis tools to assist departments in assessing the equality impacts of efficiency and savings proposals for the council’s 2015/16 budget. These consist of budget equality analysis guidance note and risk matrix, budget proposal screening template and budget proposal equality analysis template.
- An Approach to Equality toolkit has been developed to advise staff on the requirements of the council's Approach to Equality.
- An equality analysis template has been developed for colleagues carrying out pieces of equality analysis as part of decisions or business plans.
- An equality analysis example has been provided to give staff an idea of the kinds of things to include in an equality analysis document.
- Guidance on the public sector equality duty and decision making has been developed to advise staff on the council's obligations around equality when setting and implementing our budget.
- Equality monitoring guidance has been developed to advise staff on the things to think about when carrying out equality monitoring of service users.

68. **Evidence base:** Walworth Road has been categorised as a 'degenerating' high street in a 2011 report by Colliers International. Further details can be found at [http://www.inspiresme.co.uk/news/premises/vacant-premises-triggering-town-declines/](http://www.inspiresme.co.uk/news/premises/vacant-premises-triggering-town-declines/). As part of the programme to address this, Southwark commissioned GVA with East Architects to produce a report entitled ‘Vitality, Viability and Vulnerability’. This looked at the whole length of the Walworth Road from Elephant and Castle to Burgess Park, investigating the potential impact of an enhanced retail offer in the north and suggested possible scenarios to ensure the sustainability and evolution of the offer further south.

69. Southwark also recently commissioned Nathaniel Lichfield & Partners (NLP) to prepare a borough-wide new retail capacity study. The study undertook an analysis of shopping patterns, reviewing quantitative and qualitative needs up to 2031, carrying out health checks, reviewing the town centre hierarchy etc.

70. A study of East Street Market showed a pattern of decline. According to ACORN’s most challenged life style types East Street has an overwhelming presence of ‘Urban Adversity’. There are many reasons for this decline: Sunday trading, e-trading, discount stores, regeneration, supermarkets, offer not attractive enough and existing traders reducing their trading days. The typical spend at East Street is only £14. However, the recently opened Sunday market days are attracting a higher proportion of professional people with more than a third coming from ACORN’s second most affluent type ‘Rising Prosperity’.

71. **Lessons from ILRE Phase 1:** Many of the retail premises do not comply with the requirements of the Disability Discrimination Act. However the works required to ensure compliance were outside of the scope of the project as it

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3Degenerating high streets are classified as those with a positive historical performance but a projected negative future performance
would often require internal ramps and considerable internal layout modifications. While public realm works were carried out for some of the parades; re-profiling the pavement to create step-free access was problematic due to excessive cross-falls and/or issues with building DPCs (damp proof courses).

72. For many of the traders involved in the ILRE programme English was not their first language and literacy was also found to be an issue. Furthermore many of the traders were not familiar with architects drawings and specifications and the implications of what is drawn. The ILRE programme required sign off on drawings and designs by the traders. In some instances Traders, when the finished result was not to their liking, argued that they were not sufficiently aware of what they were agreeing to.

Community impact statement

73. The Love Shopping programme is intended to enhance the overall shopping experience in Southwark to support SMEs and create a thriving sustainable local economy with new job opportunities for local people. It is also focused on making a series of improvements to shopping parades to improve the shopping environment to create places that local residents and workers want to spend time and money and that provide a good range of shops and services rather than using out of town centres and supermarkets.

Who are the people that will be affected by the issue?

74. The programme will be rolled out across the borough’s key regeneration areas. The people in particular who will be positively affected by the programme are local SMEs (independent retailers), local residents and prospective customers living or working in or near the target sites. In this phase of works there will be specific benefits of improved accessibility as all works will be DDA compliant which will assist the elderly and/or less mobile members of the community. Some of the parades serve a particular community and by improving these parades and ensure the long-term sustainability; the council is able to support these communities. To ensure that none of these communities are disadvantaged the council provides a free translation and interpreting service to those residents who need it to access essential services and who cannot get help from family and friends.

Where has it been identified that a particular issue is likely to have a disproportionate effect on a particular community/group or area?

75. It is not anticipated that there is likely to be any major adverse or less good implications for any particular communities/groups. Communities and groups located in or around programme sites will experience a positive effect as a result of the improvements that the programme will bring to local shopping parades and their surrounding areas. As stated above, the lessons learnt from the previous ILRE programme will be taken on board and adjustments made to ensure that the council is fully compliant with the Equality Act 2010.

Resource implications

76. The resource implications are outlined above and summarised in the finance concurrent below. To deliver this programme profile of projects, council costs will be recharged on a project by project basis.
Sustainable Development Implications

77. The programme of projects will be delivered in line with the Sustainable Design and Construction SPD, which requires sustainable procurement of materials, and the use of environmental technologies.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Democracy

78. This report seeks approval of various recommendations relating to shop front improvement programmes within the borough. The decision to approve those recommendations is one which is expressly reserved to the Cabinet Member under Part 3D of the council Constitution.

79. When preparing the report recommendations officers have had due regard to the requirements of the Public Sector Equality Duty (“PSED”) contained within the Equality Act 2010 in order to ensure that, as far as possible the proposals do not have an adverse effect or impact on any individual or group having protected characteristics (under the Act). Paragraphs 64 to 75 of this report describe the detail of the equality analysis which has been carried out in order to demonstrate compliance with the PSED.

Strategic Director of Finance and Governance

80. The resource implications referred to in paragraph 76 and elsewhere in this report are noted. Originally, £2,000k was approved from the council’s own capital funding for this project. A further £525k has been secured from the GLA’s New Homes Bonus. This will be used to offset the council’s own capital investment, reducing it to £1,475k and leaving the total funding available unchanged at £2,000k, as set out in paragraphs 4 and 5.

81. Any further costs relating to implementing the projects recommended in this report will be contained within existing Planning budgets.

BACKGROUND DOCUMENTS

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<th>Background Papers</th>
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APPENDICES

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AUDIT TRAIL
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