

Cabinet

Tuesday 19 October 2021

11.00 am

Ground floor meeting rooms, 160 Tooley Street, London SE1 2QH

Appendices – part 2

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SOUTHWARK'S HISTORIC ENVIRONMENT

HERITAGE SUPPLEMENTARY
PLANNING DOCUMENT (SPD)



Figure 1 : Southwark Cathedral

Draft Foreword

The immensely rich and varied architecture, archaeology and history of Southwark is of national and international significance, ranging from prehistoric flint scatters, through Shakespearean playhouses, to the vast industrial Tate Modern. Our historic environment is an important and essential community benefit, contributing many tangible and intangible benefits to wellbeing, culture, and the sense of place and identity.

At the same time, Southwark also has some of the highest regeneration activity experienced anywhere in London. We recognise that Southwark's unique historic environment is a finite and non-renewable resource, and requires sustainable management based upon best practice, clear principles, consistent policies and sound guidance. Our aim is to find a balance between our commitment to the historic environment and to sustainable development.

The purpose of this document is to show how the development decisions the Council make are considered, and are consistent with national and local policy and guidance. Policies within the Southwark Plan protect the historic environment from harm and ensure that heritage-led development conserves or enhances heritage places and their settings.

Southwark Council have produced this Supplementary Planning Document (SPD) to set out our approach to the management of heritage assets and to show how we protect and celebrate our common humanity in harmony with the economic and social needs and aspirations of the people who live, work and visit Southwark now, and in future generations. History is not just about the past, it is an essential and unstoppable process and all of us are living histories, creating new history every day. History can help us to understand and engage with our contemporary places and cultures, and nurture a sense of belonging and identification for everyone.

We hope that this document will provide clear guidance to help manage change in the historic environment through the planning system. We hope it will set out our commitment to Southwark's unique heritage and celebrate new history in the making, but above all provide helpful and clear advice on how to approach these matters and find sustainable outcomes.

Councillor Helen Dennis

Cabinet Member for Climate Emergency and Sustainable Development
Southwark Council

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1 About this document

The aim of this Supplementary Planning Document (SPD) is to provide guidance on how to apply the relevant policies of the Southwark Plan and the emerging New Southwark Plan concerning the historic environment. It gives advice on how to conform to the additional national and local legislature and policies, within which the Council must operate. Its aim is to help people to understand heritage matters and provide advice on the conservation, preservation and enhancement of the historic environment. It is designed for a wide readership, including applicants, owners, residents, planners, community groups and developers.

This document is a Supplementary Planning Document (SPD), which means that it is supplementary to the saved policies of the Southwark Plan and the New Southwark Plan. SPDs contain non-statutory guidance that expands on development plan policies. This document shows how the Council expects our planning policies to be addressed by planning applications and how we make our planning decisions. SPDs can be a material consideration in planning decisions but are not part of the Plan. It should be noted that SPDs are subject to statutory preparation procedures under Regulations 11-16 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This document has been compiled by Southwark Council, but elements of the text repeat closely the wording and phrasing used in national legislation, the National Planning Policy Framework and within guidance and information prepared by Historic England.

This document has been divided into several sections: an introduction (section 1), followed by a short overview of legal and policy context (section 2), definitions of heritage terminology which will be used throughout (section 3), and detailed sections on historic buildings (section 4), archaeology (section 5) and natural capital (section 6). The document also contains a glossary of technical terms (section 7) and abbreviations (section 8) used within the SPD to help clarify the document.

2 Our vision

Southwark Council takes its role as the custodian of the historic environment very seriously. Our vision is to preserve, conserve, celebrate and enhance Southwark's unique, but also fragile and irreplaceable historic environment. It is also our responsibility to balance this vision with our commitment to sustainable development and to providing housing and long-term benefits and a fairer future for the people of Southwark. We have a proven track record in delivering heritage-led regeneration, through community and public engagement and supporting the objectives of the Local Plan as well as promoting good growth and quality place-making.

Heritage plays a central role in Southwark's cultural life, and it is the basis of Southwark's distinct character and allure, reflected in many diverse voices through musical, literary and artistic creative events and delivered through cultural groups, open spaces, libraries, heritage centres, museums, theatres, galleries and venues.

History, and how people interpret the value of historic places, looks very different depending upon who you are and where you are looking from. There are many different voices that contribute to making Southwark so special, including social, communal, cultural, economic, spiritual, political, activism, artistic, and literary experiences and these reflect personal matters of belief, gender, sexuality, race, ethnicity, age, mobility and all have equally important histories that must be preserved, recorded and protected. As part of Southwark Stand Together, the council pledged to conduct an anti-racist audit of the borough to identify statues and street names that do not reflect our borough's diversity, especially anything with links to slavery or our country's colonial past, and to identify positive opportunities for the celebration of more diverse figures.

Research has shown that the historic environment can contribute to positive social benefits, providing the foundation for positive growth, promoting social cohesion and contributing positively to physical and mental health wellbeing.

Writing this SPD offers the Council an opportunity to show that we hear and celebrate all the voices of Southwark that have shaped its unique and special character and history. Our aim is to co-design a heritage strategy with Southwark communities so we understand what people value about the places that they connect with, so the Council can actively build stronger connections, reinforce local cultural identities, celebrate diversity and support creative industry. The first step to achieving that is to provide guidance on how the Council manages the historic environment, which is the purpose of this SPD.

This SPD seeks to provide an informative overview of all our heritage assets, and show how this can be balanced with our commitment to enabling appropriate sustainable development. The SPD is an important step towards designing a heritage strategy for Southwark that identifies what people value about their heritage and how it plays an active role in community life.

We hope this SPD will be a catalyst for people to join together and see how heritage assets represent an opportunity for achieving successful heritage-led regeneration.

3 How can I learn more and get involved?

We rely on community knowledge and the great experience that local people have to learn about the past and identify what makes places special. There are many ways you can get advice and information and tap into this local knowledge and research, for example by joining or contacting local groups, historical societies, organisations, records/archives and charities.

You can also get involved in engagement with the Council by contacting our specialist staff in the design and conservation planning team or through our network of museum and library services.

For example, the Conservation Area Advisory Group (CAAG) is formed from representatives of local historical, civic and amenity societies. CAAG meets monthly to review planning applications received in Conservation Areas and provide independent advice to the Planning Committee.

Where a heritage asset may have a cultural or faith interest to a particular community, it is important to consult them as their views and information may add to the understanding of the asset's significance.

Figure 2 : Modern Infill Development



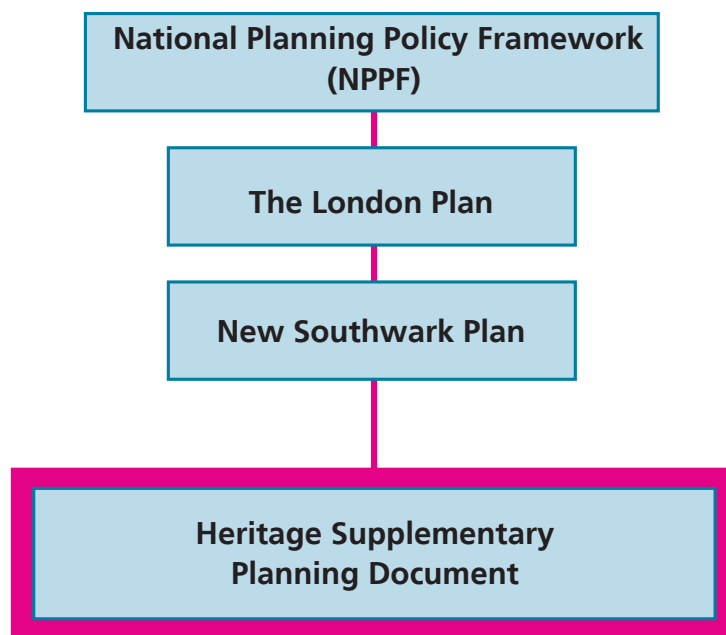
4 What is the legal and policy context?

Our planning decisions are shaped by legislation and based upon Government policy and guidance, this section is an introduction to the principal elements of conservation law and local and national policy and guidance.

The duty for all Local Planning Authorities (LPAs) is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 (The Act) as amended and updated, this act places great weight on the “special architectural or historic interest” of designated heritage assets worthy of preserving and enhancing for future generations. Designation of any part of the borough as a Conservation Area or statutory listing of a building, gives the Council planning powers and responsibilities within that area that are additional to those normally available through the Town and Country Planning Act 1990 (the Planning Act).

Managing change in the historic environment is complex and every site or place must be considered on its own merits and a site specific management strategy devised. There is not a ‘one size fits all’ solution for many heritage questions. It is important to be aware that a single methodology or applying a particular piece of legislation may not be sufficient to gain a full understanding of the relevant issues concerning heritage matters, and this SPD should be read in conjunction with the relevant legislation, national planning policy and guidance, and other current guidance and advice notes. Sometimes, there are several different approaches that may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives.

There are also responsibilities on the landowner towards the historic environment, so if you own a listed building or a heritage asset you must ensure that you recognise your own legal responsibilities as the steward of that heritage asset. Heritage crime covers very many different aspects, including neglect or wilful damage. There are several key pieces of legislature and national and regional guidance documents which must always be complied with:



4.1 The National Planning Policy Framework 2021 (NPPF)

The National Planning Policy Framework (July 2021) or NPPF sets out the Government's planning policies for England and how these should be applied. It introduces the presumption in favour of sustainable development and requires all development to conserve or enhance heritage places and their settings. Where there is 'harm' the NPPF asks decision makers (the Local Planning Authority (LPA) to consider whether that harm can be outweighed by the public benefits of the proposal including, where appropriate, securing its optimum viable use (NPPF paragraph 201). The NPPF requires applicants to be able to provide sufficient information to allow the LPA to make informed decisions (NPPF paragraph 194).

The NPPF reinforces these principles stressing that heritage assets are irreplaceable and once lost can never be recovered. It requires the LPA to avoid harm to heritage assets and to ensure that development conserves or enhances heritage assets and their settings.

Applicants have to be able to describe the 'significance' of any heritage places affected (paragraph 206) and quantify the contribution made by their setting. It states that great weight should be given to the place's conservation (NPPF paragraph 199). For this reason, this guide explains briefly how to quantify value, significance and contribution to setting. The NPPF also states that as a minimum the local Historic Environment Record (HER) should be consulted and an expert assessment made (NPPF paragraph 194).

For sites with archaeological interest, the NPPF states that developers should submit an appropriate desk-based assessment and, where necessary, a report on the results of a field evaluation a first stage of archaeological fieldwork by trial trenching (NPPF paragraph 194). This SPD shows how to access the HER, and how to commission archaeological assessments and evaluations.

The NPPF also has related guidance given in the Planning Practice Guidance (PPG) and in Good Practice Advice Notes 1 to 3: Good Practice Advice Note 1 (GPA1 The Historic Environment in Local Plans); Good Practice Advice Note 2 (GPA2 Managing Significance in Decision-Taking in the Historic Environment); and Good Practice Advice Note 3 (GPA3 The Setting of Heritage Assets).

4.2 The London Plan (2021)

Council policy must be in general conformity with Greater London Authority (GLA) policy. The London Plan includes the Mayor of London's general policies in respect of the development and use of land in Greater London and includes statements dealing with general spatial development aspects of other Mayoral strategies. It stresses the importance of heritage conservation to London. The emerging draft New London Plan promotes the sustainable growth of London and includes a set of policies for the historic environment in Chapter 7 'Heritage and Culture'.

4.3 The Southwark Local Plan

The Southwark Plan (2007), Core Strategy (2011) (particularly Strategic Policy 12: Design and Conservation), and area SPDs include policies and guidance that require that all development must conserve or enhance heritage assets and their settings. These documents contain specific policy and detailed advice and must be closely consulted prior to putting forward any proposal affecting a heritage asset in Southwark. The draft New Southwark Plan addresses this policy area in the 'Southwark Together' section, in particular policies 18 to 25.

5 Understanding Heritage Terminology

There is a lot of jargon associated with heritage matters and sometimes it is hard to understand precise meanings.

A glossary of key words and phrases is provided at the end of this SPD, but the really key terms are described below.

5.1 What does the 'historic environment' mean, and what is a heritage 'place' or 'asset'?

The 'historic environment' is a very general term used to refer to everywhere around us that has something special about it from a heritage point of view, this can be architectural, archaeological, historical, artistic or even the association to people, actions or events. Spiritual, social, commemorative and memorial values also contribute to the significance of a place.

5.2 What do we mean by 'significance' and 'heritage values'?

'Significance' is defined in the NPPF as 'the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'.

It captures what makes a place special, from a heritage point of view: this can be architectural, archaeological, historical, artistic or even an association with people, actions or events. Spiritual, social, commemorative and memorial values also contribute to the significance of a place.

Significance can also be described using [Historic England's Conservation Principles](#) heritage values: evidential, historical, aesthetic and communal.

5.3 What is a heritage 'place' or 'asset'?

The term 'heritage place' goes beyond physical form, to involve all the individual characteristics that can contribute to giving somewhere a distinctive 'sense of place'. Certain places hold special meanings for people and a strong 'sense of place' that can be deeply felt by local inhabitants and appreciated by visitors. It reflects the knowledge, beliefs and traditions of diverse communities and provides a sense of inclusivity, continuity and a source of identity. It is a social and economic asset and a resource for learning and enjoyment. Understanding the historic character of a place is an essential starting point for deciding its future.

Heritage places can range from a bollard to individuals groups of buildings, to a whole town or region. They can be small features of local historic value or those of the highest significance, such as World Heritage Sites (WHS) or Scheduled Ancient Monuments (SAM).

In planning terms heritage places are often referred to as heritage 'assets', because they make a positive contribution or bring a benefit to their locations. The phrase 'heritage asset' is pretty interchangeable with 'heritage place'. The term heritage asset is used when we want to refer to one specific and individual heritage item, rather than generalising about an area.

Heritage places are grouped into: 'designated' and 'undesigned' heritage assets identified by law or by the local planning authority as having a significance justifying consideration in a planning decision.

5.4 What is a 'Designated Heritage Asset'?

The NPPF uses the term 'designated heritage assets' to refer to heritage places that have been selected under a range of relevant legislation or criteria for formal recognition of their heritage value and significance, including registration, listing, scheduling and inscription.

5.5 What is an 'Undesignated Heritage Asset'?

The NPPF refers to 'undesignated assets' as places which do not have this formal recognition, but may nevertheless be demonstrably equivalent in value to formally recognised assets, and in some cases should be treated in the same way.

Southwark has a range of undesignated heritage assets and we have selected the key assets below. The value of places can change over time and heritage value and significance may become apparent when new evidence or knowledge is revealed. It is important to understand which heritage assets have legal protection (designated) and which do not (undesignated), however, for the purpose of this document the vast range of heritage places and assets is divided into three sections by type: Built Heritage, Archaeology, and Natural Capital.

5.6 Built Heritage, Archaeology and Natural Capital

It is important to understand which heritage assets have legal protection (designated) and which do not (undesignated). However, for the purpose of this document the vast range of heritage places and assets is divided into three sections by type: Built Heritage, Archaeology, and Natural Capital.

'Built Heritage' means all the heritage places and features that survive as buildings, earthworks or structures above or below ground and are visible and/or visit-able.

'Archaeology' refers to buried archaeological finds, layers, structures and features which are buried below the ground and generally are not visible

'Natural Capital' is another term for the stock of renewable and non-renewable resources (e.g. plants, animals, air, water, soils, minerals) that combine to yield a flow of benefits to people. It includes all the distinctive natural features of the landscape that add to the sense of character and distinctiveness of a place.

5.7 National designation vs Local designation

Some assets are of national importance and are designated by the Secretary of State for Digital Culture Media and Sport on the advice and recommendation of Historic England.

Nationally designated Heritage Assets include World Heritage Sites, Scheduled Ancient Monuments, Listed Buildings and Registered Parks and Gardens

All other heritage assets, including Conservation Areas and locally Listed Buildings are considered to be locally designated heritage assets.

DESIGNATED HERITAGE ASSETS

Southwark has the following designated heritage assets and information on these and how to manage them through the planning process is provided below. we have the following types of designated heritage assets or places:

- World Heritage Sites – in adjacent boroughs;
- Scheduled Ancient Monuments;
- Listed Buildings and Structures;
- Conservation Areas;
- Registered Parks and Gardens;
- Archaeological Priority Areas;
- Protected and Veteran Trees;
- The marine environment (River Thames and its foreshore);
- Article 4 Directions;
- Metropolitan Open Land;
- Consecrated ground;
- Disused cemeteries;
- War Graves;
- Tree Preservation Orders.

Table 1: Designated Heritage Assets

UNDESIGNATED HERITAGE ASSETS

Undesignated heritage assets include:

Buildings and features of Heritage Interest

- Archaeological Remains;
- Locally Listed Buildings;
- Assets of Community Value;
- Buildings built before 1960;
- Trees in the Curtilage of Listed Buildings;
- Infrastructure – bridges and viaducts;
- Structures of Industry – Gasometers or cranes;
- Socially or culturally significant buildings – schools or churches.

Buildings and features of Townscape Merits

- Groups of buildings of consistent design and character;
- Trees in Conservation Areas;
- Historic features – like Stretcher fences.

Table 2: Undesignated Heritage Assets

What you need to tell us when developing in the context of Heritage Assets

A step-by-step guide to the information that must be included in a Heritage Statement that is submitted as part of your planning application, how it helps us to process your planning application and make a planning decision.

The NPPF defines the steps we need to take before we can approve a proposal affecting a heritage asset. First to identify the significance or importance of the asset, then to understand the impact or effect of the proposal on the asset, and finally to consider whether that impact is justified or necessary.

1 The significance of your asset

Tell us what is important about your heritage asset and its setting.

a) Its history

Tell us about the heritage asset, its current use and if it has parts that may be older than others. This will be your Heritage Statement.

b) Academic and other research

What information has been published about the asset?

For example:

- Listing description / Statement of significance
- Conservation Area Appraisal
- Conservation Management Plan
- Archaeological Desktop study
- Arboricultural Assessment
- Historic Area Assessment
- Area Characterisation Assessment

Remember when an asset is recognised as a heritage asset the whole asset is listed and protected.

c) Its value

List those parts of the heritage asset that may be more important than others either because they have evidential, historical aesthetic or communal values..

d) Its setting / context

Tell us about how the asset can be appreciated by the public – how it is located on its site and how it relates to other properties nearby.

We will use this information to confirm what is important about the heritage asset. We may visit to inspect the property.

Depending on the significance of the heritage asset we may ask for more information about the heritage asset and this may delay your application.

2 The impact of your development

Tell us how will your proposal affect the heritage asset, its significance and its setting.

a) The heritage asset

Prepare drawings, plans, sections and elevations to scale showing the heritage asset and how it will be affected by your proposal. Drawings should show the asset:

- In its current form i.e. as existing;
- The alterations you wish to make to it i.e. as existing with demolitions / removals; and
- The completed development i.e. as proposed

b) Its setting

Prepare drawings and/or visualisations of the proposal in its context

- Elevations of the heritage asset together with its neighbouring properties to scale
- 3D visualisations of the proposal relative to the heritage asset
- Accurate Visual Representations (AVRs) of the proposal in its surroundings

We will use this information to gauge if there is harm to the heritage asset and its significance due to your proposal. We may ask for more information about the impact of your development and this may delay your application.

3 Justification for your proposal

Tell us why is it necessary to affect the heritage asset in this way and what are the benefits of the proposal

a) Is the harm necessary?

Prepare technical studies to show why it is necessary for your development to affect the heritage asset in this way.

Remember 'development' includes:

- Change of use
- Engineering works
- Demolitions / removals
- Alterations / extension

b) What are the benefits?

If your development proposes all of the works listed above in a), your planning permission is likely to require separate and additional technical studies for each.

List the benefits of your development. Remember that heritage assets are valued by the public. It is desirable to retain and improve a heritage asset rather than lose it.

Where you think there are additional public benefits to your proposal make sure you highlight them.

Public benefits are only those that improve the public's ability to access, learn about, or enjoy the heritage asset.

We will use this information to consider whether the harm we have identified above is necessary and outweighed by the benefits of the proposal.

Developments will also need to be compliant with relevant fire safety regulations as part of validation requirements.



Figure 3 : Hay's Galleria, Grade II Listed

6

The Historic Environment in a Changing Climate

6.1 How does Climate Change Affect the Historic Environment?

The Climate Change Committee's 2020 6th Carbon Budget report outlines the climate outcomes of continued or increasing carbon emissions in the UK. The main hazards associated with climate change in the UK identified in this report are increasing temperatures and changes in precipitation patterns. Hotter drier summers and warmer wetter winters are resulting in drought, flooding, and erosion; extremes of wetting and drying; potential for flooding of historically inundated areas such as water meadows, marshes and former riverbeds; increase in severity of storms.

This will also result in an increase in invasive species, vegetation, pests and disease. These will all have an effect on the historic environment — including below-ground archaeology, underwater and intertidal features, built heritage and architecture and historic landscapes and natural capital — in a variety of ways, positive and negative.

It is critical that the built environment, including the historic built environment, adapts to climate change to cope with the impacts of changing temperatures, flooding and drought. The historic built environment can contribute to the mitigation of the negative effects of climate change through carbon reduction measures such as sensitive retrofitting and the reuse of building materials where possible.

6.2 Southwark and Climate Change

The UK passed legislation in June 2019 committing to becoming carbon neutral by 2050, and the government has adopted the 6th Carbon Budget in 2021, committing to an interim target of reducing carbon emissions by 78% on 1990 levels by 2035. This brings forward existing net zero targets. The Carbon Order (2021) has set out a carbon budget of 965,000,000 tonnes of carbon dioxide equivalent for the next budgetary period 2033-2037. This is a legally binding reduction target.

Southwark Council declared a Climate Change Emergency in March 2019 and reinforced its commitment to combatting carbon emissions and rising global temperatures, joining in April 2019 the international Climate Change Campaign and drafting a strategy to become Carbon Neutral by 2030. Policy in this section is framed by the Climate Change Act 2008. The London Plan (7.31B) recognises the need to 'identify potential modifications to reduce carbon emissions and secure sustainable development' within the historic environment. The London Plan also highlights the need to minimise carbon dioxide emissions in major developments, in accordance with the following energy hierarchy:

- Be lean: use less energy
- Be clean: supply energy efficiently
- Be green: use renewable energy
- Offset

Developments must prioritise energy efficiency decisions according to this hierarchy, with offsetting carbon the last resort. This hierarchy primarily focuses on operational carbon, the greenhouse gases released during construction or use of a building. However it is also essential to consider as a part of 'being lean' the embodied carbon of existing structures, materials and landscapes of any proposed developments.

Southwark Council adopted a Climate Change Strategy in 2021 that sets out the borough-wide approach to tackling the climate emergency. Actions arising from the Strategy in relation to the historic environment include a review of planning policy to better support the retrofitting of heritage buildings to reduce carbon emissions. All development, refurbishment and / or retrofitting of historic buildings must be compliant with New Southwark Plan policies. This includes onsite carbon reduction targets for major development.

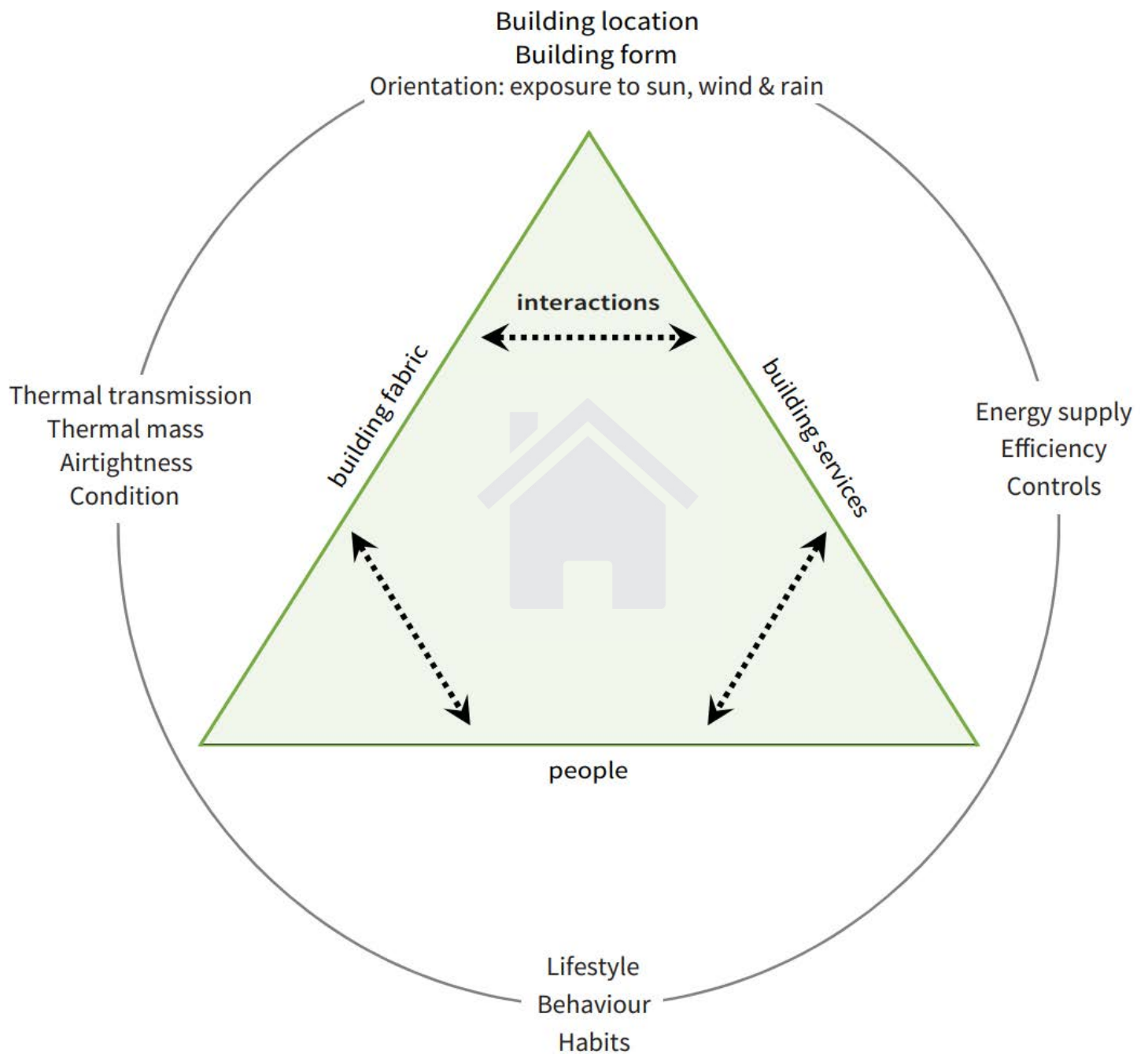


Figure 4 : Building Performance Triangle - The whole building approach: key considerations, impacts and interactions that an application needs to consider. Source - Historic England, Energy Efficiency and Historic Buildings

6.3 Re-use: Embodied Carbon in the Historic Environment

The built environment is estimated to be responsible for 35%-40% of total carbon emissions in the UK (Sturgis et al, 2017), and buildings are estimated to be responsible for 79% of total carbon emissions in Southwark. Historic buildings can contribute to reducing carbon emissions through re-use, especially when considering embodied carbon — the carbon released through the whole process of manufacture, transport, construction and demolition of a building through its life cycle. The carbon generated during the construction of an historic building has already been released. It is increasingly important to prioritise the re-use of existing buildings to reduce present and future carbon emissions and support more sustainable development (Carrig 2019; Historic England, 2020; Dorpalen 2020).

There is a vast amount of embodied energy in existing buildings that is wasted if the building is demolished to make way for a new one. In most cases comprehensive upgrades with regard to carbon efficiency are possible as an alternative. However, this could have a social and economic cost. Historic buildings are inherently sustainable; they were built to last a long time without requiring demolition or replacement. The key to their longevity is that historic buildings can be flexibly adapted so that they can be used for a number of purposes, or easily altered to take on new uses. Historic green spaces and natural capital contribute positively to reducing carbon emissions. They can help to counteract the effects of urban heat islands. Historic natural features such as peats, marshes and plant life also help through 'carbon sequestration', the long-term storage of carbon from the past. This duty extends to the edges of your site. For example landowners are responsible for all rainfall on their land. This emphasises paving gardens as little as possible, depaving where possible and changing any remaining paving to being permeable. In addition, gardens should contain as many plants as possible to benefit UK wildlife biodiversity.

In responding to the climate emergency, adaptive re-use or retrofitting is the primary approach that should be taken towards historic buildings. The 'whole building approach' endorsed by Historic England can be utilised to identify the opportunities and / or limitations to retrofitting on a case-by-case basis. This approach includes a 'holistic' consideration of the building's fabric, services and human behaviour. In contrast to the more generic approach of mainstream retrofitting, the whole building approach allows for the unique and complex characteristics of historic buildings to be taken into consideration. It is important to take utilise this approach as it can help to mitigate the risk of inappropriate interventions which might harm the significance of the building i, cause inappropriate fabric decay or even harm human health.

6.4 Reduce: Use Less Energy Through Sympathetic Retrofit

Achieving significant on-site carbon reduction though using less energy and supplying energy efficiently is very feasible. Despite these, buildings will always have energy demands, no matter how efficient they are so a first step is to seek to reduce the energy your building uses. The historic environment has an important role to play in climate change mitigation (reducing carbon emissions) especially through the greening of existing buildings. Historic buildings can be refurbished and retrofitted to be more energy efficient. In a recent study, a sensitively retrofitted

Victorian terrace house was shown to release far less carbon than an energy-efficient new build; when carbon released over the whole life cycle of the building was taken into account a new build would take c. 60 years to pass the retrofitted terrace house in carbon savings (Carrig 2019). However this is not a one-size-fits-all exercise and energy efficient modifications suitable for new build properties may not be appropriate for older buildings, and in some cases could cause harm to historic fabric.

Older buildings were often designed to be permeable, to encourage the flow of air and moisture into and out of a building to control heat and moisture levels; some traditional building techniques and natural materials can more easily expand and contract in varying hot dry and wet cold weather and so may be more durable, long-lasting and sympathetic to historic fabric than modern alternatives.

Building regulations 2010, Part L1B discusses the conservation of fuel and power in existing dwellings; Historic England have issued technical guidance on how these regulations apply to historic buildings in their Energy Efficiency and Historic Buildings reports which can be found on their website. Any development involving energy efficiency retrofitting of an historic building, including (but not limited to) installation of insulation, draught proofing, replacement of windows, installation of renewable energy sources (e.g. photovoltaics, microgeneration), etc, should consult these guidance documents to ensure these interventions are suitable for an historic building, to improve energy efficiency while minimising harm to historic significance. Interventions such as draught-proofing can offer high energy efficiencies without a large expense.

Energy efficiencies should also be considered when carrying out other repair work, to reduce energy expenditure and overall cost. Any modifications to historic buildings must consider the impact on historic fabric and minimise harm. In some cases, energy efficiency retrofitting and installation of renewable energy sources may be allowed under permitted development rights. However, such developments for listed buildings, buildings within conservation areas, or those within the setting of a designated heritage asset will usually require planning permission and/or listed building consent. Please consult a council officer if you are unsure if your project requires permission.

Opportunities to improve the energy efficiency of historic buildings may include draught proofing measures, improved insulation and secondary, double or triple glazing windows. In some cases, it may be appropriate to consider boiler upgrades and or other types of energy provision such as air or ground source heat pumps. Historic England regularly publishes useful advice notes on the opportunities and approaches to improving the energy efficiency of historic buildings on their website. The extent to which these opportunities may be appropriate depends on the building in question.

6.5 Recycle: sustainable building materials

Most buildings will need to be replaced at some time when their materials or structure come to the end of their working lives. Re-using materials from these buildings could make a significant contribution to reducing carbon in new developments. Some materials are easier to recycle and reuse than others, steel or aluminium for example. Some materials are high in embodied energy, through their manufacture and transportation, such as concrete or brick. However, when bound together with lime mortar bricks can be easily separated back into individual bricks for re-use in future developments and certain concretes can be broken to be re-used as aggregate for more concrete. Sustainable materials and recycling of materials from demolition will be encouraged in developments within Southwark.

If a building has reached the end of its life and demolition is the only feasible option remaining, Southwark Council strongly encourages the recycling of building materials such as brick and concrete aggregate, for example, through their reuse on future developments, and the consideration of Circular Economy Principles. When a building is demolished, every effort should be made to ensure that the recyclable building materials are made available for future developments, and developers should seek to use recycled building materials wherever possible.

What you need to consider in context of changing climate

1 Assess the building and its context using the whole building approach

- Identify building composition and materials
- Identify the current and future uses of the building
- Identify current energy use, moisture levels, and assess any issues to be remedied
- Identify the heritage value of the building or its parts
- Identify how it relates to the street, landscape and community

2 Devise design and specification strategy

- Devise a strategy that balances heritage, energy and human health needs
- Use the 'whole building approach' when devising design and specification strategy

3 Installation

- Engage professionals that are trained, experienced and interested in responsible retrofitting
- Ensure that design and process are regularly checked against the design and specification strategy

4 Use and maintenance

- Ensure that occupants understand the services and fabric measures undertaken and the benefits of correct use and maintenance
- A manual should be provided to occupants which includes a timeline for future maintenance checks / work

7 Introduction to 'Built Heritage Assets'

Southwark has a broad selection of built or above ground heritage assets, many of which are designated – this means they are of National Importance . A brief summary of each type is shown below.

7.1 World Heritage Sites

7.1.1 What is a World Heritage Site (WHS)?

A World Heritage Site (WHS) is a landmark or area which is selected by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) as having “Outstanding Universal Value” (OUV) to all humanity - today and in future generations. WHSs can have cultural, historical, scientific or other form of OUV and are legally protected by international treaties. There are nearly one thousand WHS worldwide, including places such as the Great Wall of China, the Pyramids and Stonehenge.

There are three World Heritage Sites in central London: the Tower of London; Westminster; and Maritime Greenwich

7.1.2 World Heritage Sites in Southwark?

We do not have any World Heritage Sites in Southwark, but Policy P23 of the draft New Southwark Plan refers to World Heritage Sites and their settings, because the ‘local setting’ zone or buffer zone of the Tower of London, extends across the River Thames to covers part of north Southwark. In addition, the wider setting of the Palace of Westminster World Heritage Site extends to the edges of Bankside and North Walworth.

7.1.3 What is the World Heritage Site Local Setting Zone?

New development proposals in Southwark must consider the impact on the setting (including views) of London’s World Heritage Sites. Development within the setting zone or buffer zone of the Tower of London will only be permitted when the significance of the ‘Outstanding Universal Value’ (OUV) of the World Heritage Site is sustained and enhanced. Elsewhere in the borough development potentially affecting the strategic views to the Tower of London, Westminster and Greenwich will also need to be considered.

7.2 Locally Listed Buildings

7.2.1 What is a Locally Listed Building?

A locally listed building is a building, structure or feature which is not listed at national level but is important in the local context owing to its special architectural or historic interest or its townscape or group value. The protection of local heritage is important because it enhances the value of Southwark’s built environment, but also maintains a sense of local distinctiveness which can assist with regeneration and place-making.

7.2.2 Does Southwark have a Local List?

Southwark first issued a list of ‘Buildings of Local Interest’ in November 1972. The list is being reviewed alongside this SPD. This draft list, which conveyed no statutory protection to the buildings identified, contained approximately 930 buildings or other structures. Of these, over 130 have since been demolished, and 390 have subsequently been designated as listed buildings and added to the statutory list. One of these, Six Pillars, Crescent Wood Road, is now listed at Grade II*.

Of the remaining 400-410 buildings on that list, the very large majority [380] are residential dwellings and half of the remainder have shops on the ground floor. There are only four public houses; three warehouses/industrial buildings; one ecclesiastical building and one school. Almost all the properties in question can be dated to the late Georgian or early Victorian periods: the most recent items are a pair of boundary posts dated 1870.

This limited selection clearly fails to do justice to the full range of Southwark's built heritage. For example, it fails to identify the massive contribution made by Victorian and earlier 20th century public, commercial and industrial buildings. In light of this, the Council have decided in consultation to compile a new local list, based on a set of clearly defined criteria aligning with Policy P25 in the draft New Southwark Plan. These new criteria are also detailed in this document.

7.2.3 How Can I Nominate a Building To Become 'Locally Listed'?

Anyone can nominate a building, structure or open space in the borough to be considered for local listing. This include building owners as well as local communities. All nominations will be considered against the criteria set out below, and if it is deemed to be of sufficient significance the building, structure or open space will be added to the Local List.

Local Listing will be undertaken by the Director of Planning on the advice of the Design and Conservation planning team. Local Listing nominations should be sent to the Design and Conservation planning team and should include:

- Full address or a location map of the building, structure or open space if it has no address;
- Clear, up-to-date photographs of the main elevations of the building, structure or open space;
- Any information about the building, structure or open space (e.g. the date it was built, the name of the architect etc.);
- Details of any specialised function (such as industrial use) or historical associations;
- Details of the local listing criteria with which the building, structure or open space is considered to comply;
- How the building fits in with and enhances its location.

Figure 5 : Locally Listable Building



7.2.4 What are the broad selection criteria for a 'Locally Listed' building?

In order to reflect more accurately the full range of Southwark's historic environment, the contributions made by all categories of buildings need to be taken into consideration. All unlisted buildings, or structures or open spaces in the borough are eligible for consideration for inclusion on the new Local List.

The criteria for inclusion will essentially be whether, by virtue of any inherent architectural or historic interest, or by forming part of an interesting group, they make a positive contribution to the character or appearance of an area. Buildings of all ages can be considered for inclusion, although the more recent their date, the more strictly the selection criteria will be applied.

The way in which buildings make their contributions to the character of an area will vary widely. Some building types, such as pubs, banks and civic buildings, were deliberately designed to impress visually, to catch the eye with a virtuoso display of architectural embellishment. Others, such as Victorian or Edwardian office buildings, sought to demonstrate their commercial respectability with a more sober use of ornamentation. Still others, such as some industrial buildings or warehouses, are positively reticent in their architectural treatment, relying on a noble simplicity and calm grandeur for their impact. Good examples of each design approach will be eligible for consideration.

Contribution to the street scene can be as worthy of consideration as individual architectural merit. Particularly important will be street corner buildings, which successfully exploit their location as a focus for views, or which skilfully turn the corner. Other buildings that catch the eye for positive, rather than negative, reasons can include chapels or church halls, which often successfully terminate or punctuate street terraces. In the case of the terraces themselves, some discrimination will be necessary. Good examples will be eligible for consideration, where consistent original detailing consistently survives intact, but terraces whose integrity has been excessively compromised by unsympathetic modern alterations are unlikely to be selected.

Schools, especially those erected for the London School Board or the London County Council, are often key buildings both for the community and for the townscape. Many of these have been unsympathetically altered or extended in the post-War period but, certain examples will be serious candidates for inclusion. Street furniture can also make a valuable contribution to the street scene. Good examples will be eligible for inclusion and could include: cast iron bollards or boundary markers [particularly if they are dated]; war memorials; lamp standards, or the distinctive painted timber finger posts on the Dulwich Estate.

7.2.5 How does Southwark choose the criteria for a Locally Listed Building?

The following criteria are based upon the recommendations of Historic England in their Good Practice guidance for Local Listing. In addition to this, criteria for local designation will be based on the character of localities and specific areas within the borough.

7.2.6 What are the criteria for locally listing a building?

There are several broad criteria which will determine whether the Council will add a building to the local list they are:

7.2.6.1 Age and Rarity

The building stock of Southwark primarily dates to the expansion of London to the south during the 19th century. Buildings and structures dating to before this expansion are rare and worthy of consideration. Many of these earlier buildings have been converted for to retail or commercial uses and have lost most of their special interest at ground-floor level. As such, they are unlikely to meet the criteria for Local Listing.

7.2.6.2 Aesthetic value and landmark status

This criterion is based on the intrinsic design value and architectural interest of an asset relating to local styles, materials or any other distinctive local characteristics. A building with strong communal or historical associations, or because it has especially striking aesthetic value, may be singled out as a landmark within the local scene worthy of Local Listing

7.2.6.3 Group value

For consideration under this criterion, assets should contribute to a group of buildings or structures with a clear visual, design or historic relationship. For example, much of the 19th century development of Southwark was based upon numerous landed estates developing their land holdings, some of which, such as the Trinity Estate are Listed, almost in their entirety, other estates are Conservation Areas, for example the Pullens Estate, and others have been impacted by later development.

7.2.6.4 Historic, Evidential, Communal and Social Values

Southwark Council manages a scheme of Blue Plaques which are nominated by and voted for by the general public. Buildings and sites which have been nominated and successfully selected as part of this scheme should be included on the Local List if they are not already Listed. Other local plaque schemes might also be eligible.

Street furniture in Southwark frequently includes details of historic estates, boundaries, the earlier borough structure, historic parish boundaries and toll roads. Features such as these are worthy of inclusion on the Local List if not already Listed. However, those that have been moved from their original locations may not meet the criteria for Local Listing.

7.2.6.5 Archaeological interest

The industrial and recent archaeology of Southwark is expressed in many of its surviving buildings, these present different characters within the borough, for example, warehousing around Southwark Street, leatherworking buildings in Bermondsey, features and structures associated with the Surrey Docks in Canada Water as well as earlier warehouses, mills and industrial works focused upon the waterfront could all be of significance and worthy of consideration for local listing.

Another example of archaeological interest could be the many of the parks and open spaces of Southwark that date from after the Second World War and preserve earlier settlement patterns and features within their boundaries. For example Geraldine Mary Harmsworth Park covers the area of the former Bedlam Hospital and it is likely the ward blocks survive as archaeological features within or beneath it. Other parks have been established through the clearance of bomb sites after the Second World War and contain memories of the social history of these former built up spaces.

7.2.6.6 Designed landscaping

Southwark's parks, landscapes and other open spaces could be worthy of Local Listing under this criterion if their design is considered to be of significance. Southwark has a number of Registered Parks and Gardens. Features associated with these important heritage assets, such as gates, railings, walls, pavilions, bandstands, bridges, walled gardens and water features could be suggested for inclusion on the Local List.

Southwark has a number of parks and open spaces which are also of heritage value and can reflect earlier settlement patterns, such as areas of designated common, village greens or former churchyards.

7.2.7 Can I develop or make changes to a Locally Listed structure?

There will be a general presumption against demolition or substantial demolition of buildings included in the list of locally designated heritage assets. Draft New Southwark Plan policy P25 'Local List' requires development to take into account Locally Listed Buildings and structures that positively contribute to local character and amenity

In determining planning applications, we will ask applicants to provide a Heritage Statement that records the features of significance of any their locally designated Listed heritage assets that could be affected by their proposals, and describes how the proposed development will affect those features of significance.

When considering the impacts of a proposed development on a Locally Listed heritage asset, great weight will be given to the applicant's efforts to conserve or adapt the building, minimising harm or loss through substantial alteration or destruction. As Locally Listed assets are irreplaceable, any harm or loss will require clear and convincing justification.

Where a proposed development will lead to substantial harm to or total loss of significance of a Locally Listed Building, we will refuse consent, unless it can be demonstrated that the wider public benefits of the scheme outweigh the harm, including securing an optimum alternative use for the building. All of the following apply:

- The nature of the locally designated heritage asset prevents all reasonable uses of the site; and
- No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its retention; and
- The proposed replacement is of exceptional quality of design; and
- The harm or loss is outweighed by the public benefits arising from bringing the site back into use.

In the event that the demolition of a locally designated heritage is considered to be justified, the applicant will be asked to carry out a detailed record of the building for future generations. This building record will be to agreed standards determined by the Council, in line with current guidance

7.2.8 Will my building be locally listed and can I appeal a local designation decision?

When a building is added to the local list the owner/occupant will be informed in writing. If you wish to appeal the listing you must write to the Director of Planning at the Council explaining why you think your building is not of local architectural or historic interest. Similarly, if the Council chooses not to Locally List a building then the person who proposed the Listing can write asking the Director of Planning to revisit the decision.

7.3 Listed Buildings

7.3.1 What is a listed building?

Under the Planning (Listed Buildings and Conservation Areas) Act 1990, a Listed Building is a building of special architectural or historic interest that is included on the national list of historically important buildings. The Government puts together this list with advice from Historic England.

All buildings included on the statutory 'List of Buildings of Special Architectural or Historic Interest' are subject to controls and regulations under the 1990 Act. These controls apply regardless of whether or not a property lies within a Conservation Area. Conservation Areas do however provide the setting for many Listed Buildings, and often include several such buildings within their boundaries.

7.3.2 What does the grading mean?

Listed Buildings are graded according to their architectural or historic value (or both). Grade I applies to buildings or structures of outstanding or exceptional interest, and of national importance. Only about four buildings are listed at Grade I. They are Southwark Cathedral, the George Inn, St. Peter's Church, Walworth and Tower Bridge.

Grade II* applies to particularly important buildings or structures of more than special interest. These account for about 4% of all Listed Buildings and examples include Dulwich College and Picture Gallery and several churches.

Grade II applies to buildings or structures of special interest. As is the case nationally, most of the Listed Buildings in Southwark are in Grade II category. Most Listed Building owners are likely to live in a Grade II building as these make up 92% of all Listed Buildings.

7.3.3 What buildings in Southwark are Listed?

Only a very small percentage of Southwark's buildings are Listed. This fact alone makes every Listed Building special. The purpose of listing is to make sure that the special interest of these buildings is taken into account in decisions affecting their future. In order to protect Southwark's built heritage, special planning controls apply to Listed Buildings. All buildings included on the statutory 'List of Buildings of Special Architectural or Historic Interest' are subject to controls and regulations under the 1990 Act. These controls apply regardless of whether or not a property lies within a Conservation Area. Conservation Areas do however provide the setting for many Listed Buildings, and often include several such buildings within their boundaries.

Southwark has approximately 1,000 entries on the National Heritage List, which can be found on the Historic England website, but these also include one entry for multiple properties. In total, there are over 3,000 buildings and structures which are listed within the borough. Listed Buildings range from: houses, schools, offices, railings walls and gates, tombstones and monuments. Historic England includes "Selection Guides" for each type of property or structure and the criteria for adding a building to the

7.3.4 When should a building be Listed?

All the buildings considered for Listing are judged according to a set of national standards and criteria. In summary, these relate to architectural interest; historical interest and close historical associations with events or nationally important people; and group value, where buildings have an important architectural or historical unity or a fine example of planning, such as squares, terraces, street frontages and set-pieces.

As well as buildings, the List includes other structures of special architectural or historical interest such as monuments, bridges, garden buildings, telephone kiosks, gate piers, walls, fountains, street furniture, milestones and gravestones. Generally, all buildings built before 1700 which survive in anything like their original state are included, and most buildings that were built between 1700 and 1840. Between 1840 and 1914 only buildings of definite quality and character are Listed. Occasionally, exceptional modern buildings may be listed. The criteria for Listing can be found on Historic England's website [here](#).

7.3.5 What is 'curtilage' Listing?

A building or structure which is within the 'curtilage' of a Listed Building is controlled by the same consent regime as the main listed building. This means that other structures or buildings such as walls, cellars, garden features, that pre-date July 1948, may also be Listed by association and require separate Listed Building Consent for their alteration or removal. The principles of what applies as curtilage to a Listed Building are shown in detail in Historic England's Advice Note 10 'Listed Buildings and Curtilage'

7.3.6 What is Listed Building Consent?

Listed Building Consent (LBC) is considered under the terms of the Planning (Listed Building and Conservation Areas) Act 1990 [the Act] as amended and updated. The main principles of the Act are repeated in the National Planning Policy Framework (NPPF) (2021), and reinforced by the Council's policies, and associated guidance documents. The main issue in these cases is the effect of the proposal on the special architectural and historic interest of the Listed Building. The Act places great weight on the 'special interest' of heritage assets and their settings, and stresses the importance of preserving and enhancing their architectural and historic significance. It requires Local Planning Authorities (LPA) to avoid harm to heritage assets and to ensure that development conserves and enhances heritage assets and their settings.

The Council is required to consult or notify Historic England on certain applications for Listed Building Consent or where applications affect the setting of a Listed Building. Where demolition is concerned, the national amenity societies are also consulted. The draft New Southwark Plan policies relating to Listed Buildings and the historic environment are material considerations in determining a listed building consent application.

7.3.7 What is Listed Building Consent required for?

You must get Listed Building Consent (LBC) from the Council before carrying out any work which could affect the special architectural or historic interest of the building. This includes work to the outside and to the inside of a Listed Building, and often including work in its grounds or to its boundary. This means that works that generally involve like-for-like repairs are not likely to need Listed Building Consent.

Like-for-like repairs that generally do not affect the special architectural or historic interest of the building include:

- Repainting
- Replacing slipped tiles
- Replacing modern wall or floor finishes
- Replacing modern kitchen or bathroom fittings

Works that will require LBC

- Replacement of windows
- Replacement of roof finishes
- Installation of new central heating
- Installation of a new Kitchen or Bathroom in a room that did not serve that purpose
- Rewiring.

Figure 6 : The Hop Exchange, Grade II Listed



7.3.8 Certificate of Lawful Development for Listed Building Consent

Some works to a listed building do not require Listed Building Consent like regular maintenance or like-for-like repairs but could include the replacement of a modern fixture or fitting like a kitchen or a modern stud partition. In these cases and if you need the re-assurance of a formal decision of the council owners are advised to apply for a Certificate of Lawful Development - LBC

Where you are expecting an installer to certify their work and are likely to rely on that certificate in a conveyancing search, you are advised to get a Certificate of Lawful Development for LBC.

7.3.9 Do I need pre-application advice for Listed Building Consent?

If you have a Listed Building and meet the criteria set out in section 4.2.7, you must first obtain Listed Building Consent from the Council before starting any works. There is no fee for applying and the procedure is the same if you have a Grade I, II* or II statutory listed property.

You will need to fill out an application form for Listed Building Consent, which can be downloaded or completed on line. When you apply for Listed Building Consent it is important that you present your proposals fully, clearly and accurately as this will speed up the process. The number of drawings and level of details required depends on the complexity of your building and your proposed works. The drawings must be to a recognised metric scale and include, as a minimum:

- A site plan at a scale of 1:250 or 1:2500 outlining the building in its surrounding context
- Existing elevations, floorplans and sections — including any proposed demolitions — at a scale of 1:50 or 1:100, showing the current layout and appearance of the area of the building that will be affected (areas of proposed demolitions should be clearly highlighted with a hatch)
- Proposed elevations, floorplans and sections at a scale of 1:50 or 1:100, showing the works that you intend to carry out
- Detailed drawings at a scale of 1:5 or 1:20 of any particular elements of works (e.g. new or replacement fixtures or fittings)
- A Design and Access statement
- A Heritage Statement

If your site is within an Archaeological Priority Area (APA), your Listed Building application will also need to consider the effect of your proposal on any archaeological (buried below ground) significance of your site. Your Heritage Statement should have a chapter assessing 'archaeological significance' and you may need to also submit a separate Archaeological Desk-Based Assessment (DBA), alongside the Heritage Statement, in support of your application. Depending on the complexity, it may be helpful to provide axonometric drawings or photographs to further explain the changes.

7.3.10 What is a Heritage Statement?

When we process your application, we will be assessing whether your proposed changes will affect the special architectural character or historic interest of the property or its setting, and to what extent those changes are harmful. We will be considering whether the works are essential or could be carried out in a more sensitive manner.

To assist us in our task you will need to submit a Heritage Statement with your application. The statement should explain the significance of the Listed Building, the impact of your proposal on the Listed Building, and the justification for the proposed impact. (see 'Principles of Development in the Context of Listed Buildings'). Alternatively, you may wish to employ a heritage specialist or an architect that is trained or experienced in listed buildings to prepare the Heritage Statement on your behalf.



Figure 7: Trinity Street Terraces, Grade II Listed

7.3.11 How do I apply for Listed Building Consent?

If you have a Listed Building and are looking to alter or extend the property in a way that affects its character or appearance as a building of special architectural or historic interest, or demolish the building, you must first obtain Listed Building Consent from the Council.

There is no fee for applying and the procedure is the same if you have a Grade I, II* or II statutory Listed property. You will need to fill out an application form for Listed Building Consent, which can be downloaded [here](#) or completed on line. You can also search to find out if your building is Listed and read the list description [here](#).

When you apply for Listed Building Consent It is important that you present your proposals fully, clearly and accurately, as this will speed up the process. The number of drawings and level of details required depends on the complexity of your building and your proposed works. Your Heritage Statement should include the minimum information we require to assess your application as set out in the step-by-step guide on the following page.

Depending on the complexity, it may be helpful to provide axonometric drawings or photographs to further explain the changes.

7.3.12 Conditions attached to a grant of Listed Building Consent

Often consent is granted for works to a Listed Building and conditions are attached to the decision. Some conditions require no further information to be submitted ("compliance conditions") and some require further information in the form of an application to discharge a condition to satisfy the authority that the details would not harm the special character of the listed building. ("Pre-commencement decisions").. A standard condition is also applied giving consent for the work to commence within 3 years of the issuing of the decision. ("Time limit condition")

There is no fee currently associated with an application to discharge a Listed Building Consent condition. Officers will usually contact the applicant or agent 10 days prior to a decision being issued to notify them of the intent to add a pre-commencement condition to an approval.

Example of compliance conditions

- "All works shall be carried out in accordance with approved plans"
- "All materials adjacent to the works shall be repaired to the match the existing"
- "All slate used in the re-roofing shall be natural Welsh slate"

Example of pre-commencement or above grade conditions:

- "Prior to the commencement of development on site, samples of all external materials shall be provided on site and agreed in writing by the Local Planning Authority"
- "Prior to the commencement of works to the windows and doors, section drawings of all joinery at 1:5 scale and elevations at 1:20 scale showing the frame, jambs, cills, glazing and opening mechanism shall be approved in writing by the Local Planning Authority."

Once a pre-commencement condition has been discharged, work on the building or the specific element of the building is able to commence. If works commence and the condition has not been discharged, the works are considered to be unauthorised and an offence under part 7 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

7.3.13 What happens if I do not maintain my Listed Building?

Most owners and occupiers recognise Listed Buildings as an important part of our heritage and are pleased to maintain their properties. In all cases, repairs and alterations will need to be carried out with materials that are in keeping with the original buildings. This may sometimes be more expensive than it would for a modern building, but in most cases their use helps to maintain the value of the building, architecturally and financially.

If you allow your Listed Building to become run down, we can serve a repair notice. This means that you must carry out specific repairs to the building within a certain time limit. However, we usually only use these notices as a last resort. In the case of unoccupied buildings, we can serve an urgent works notice and then carry out work to make a building windproof and weatherproof. We can then charge you for the work or place a charge on the land. Urgent works and Repairs Notices are contained within the provisions of the Planning (Listed Building and Conservation Areas) Act 1990.

Prior to taking formal action, we will try to work with owners to ensure compliance and maintenance is kept up. In some cases, it may be possible for the building to be placed on Historic England's Heritage At Risk (HAR) Register. The Council will work with statutory bodies and heritage groups to assist in securing a future for buildings on the Heritage At Risk Register including seeking funding for grant aid and using informal negotiation and formal methods to restore to the building to the extent it is removed from the HAR Register.

7.3.14 Can I propose a building for listing?

If you are concerned about the future of a historic building, monument, park, garden, or war memorial that you know and love, you can apply for it to be protected through the listing system by completing Historic England's online application form.

There are three simple steps to follow:

- Step 1: Make sure that the building or site you are nominating is not already on the List, by searching the list
- Step 2: Check that the place you are nominating is eligible
- Step 3: Complete the form using the Historic England step-by-step guidance

What you need to tell us when developing in the context of Listed Buildings

A step-by-step guide to the information that must be included in Planning and Listed Building Consent applications, how it helps us to process your the application and make a planning decision.

1 The significance of your Listed Building

Tell us what is important about your Listed Building and its setting.

a) Its history

Tell us about the Listed Building, its current use and if it has parts that may be older than others.

b) Academic and other research

What information has been published about the asset?

For example:

- Listing description / Statement of significance
- Is it also in a Conservation Area?
- What does the Conservation Area Appraisal say about it

Remember the whole building is listed and not just its facade.

c) Its value

List those parts of the heritage asset that may be more important than others either because they have evidential, historical aesthetic or communal values.

d) Its setting / context

Tell us about how the Listed Building can be appreciated by the public – how it is located on its site and how it relates to other properties nearby.

We will use this information to confirm what is important about the Listed Building. We may visit to inspect the property. Depending on the significance of the Listed Building we may ask for more information about the heritage asset and this may delay your application.

2 The Impact of your development

Tell us how will your proposal affect the Listed Building, its significance and its setting.

a) The Listed Building

Prepare drawings, plans, sections and elevations to scale showing the listed building and how it will be affected by your proposal. Drawings should show the building:

- In its current form i.e. as existing;
- The alterations you wish to make to it i.e. as existing with demolitions / removals; and
- The completed development i.e. as proposed

b) Its setting

Prepare drawings and/or visualisations of the proposal in its context

- Elevations of the listed building together with its neighbouring properties to scale
- 3D visualisations of the proposal relative to the listed building
- Accurate Visual Representations (AVRs) of the proposal in its surroundings

We will use this information to gauge if there is harm to the Listed Building and its significance due to your proposal. We may ask for more information about the impact of your development and this may delay your application. Any harm to the building, its significance or its setting should be avoided and will need to be justified. There is a strong presumption against granting planning permission where harm to a heritage asset or its setting is identified. The NPPF requires us to assess the degree of the proposed harm and to decide if it is 'Substantial Harm' or 'Less than Substantial Harm'.

We judge the degree of harm by the proportion of the building/structure that is affected and the significance of the affected building. We will only consider Substantial Harm in wholly exceptional circumstances – in most cases Substantial Harm will be refused. When the degree of Less than Substantial Harm has been assessed, we consider the justification for that harm.

3 Justification for your proposal

Tell us why is it necessary to affect the Listed Building in this way and what are the benefits of the proposal.

a) Is the harm necessary?

Prepare technical studies to show why it is necessary for your development to affecting the heritage asset in this way.

Remember 'development' includes:

- Change of use
A Building Control Assessment setting out how the proposal will meet building control requirements like fire separation (Part B) and sound separation (Part E), means of escape (Part B), energy consumption (part L) and Access (Part M) will affect the Listed Building and protect its historic features
- Engineering works
Basement excavations or new structural works like a new steel frame or concrete beam will need Structural Engineer's calculations
- Demolitions / removals
A detailed condition survey by a specialist will be required for all window or door replacement
- Alterations
Where these involve removal of historic built fabric they should be kept to a minimum and preserve the arrangement of rooms. The division of rooms should be avoided

b) What are the benefits?

List the benefits of your development. Remember that Listed Buildings are valued by the public and are of national significance.

Where you think there are additional public benefits to your proposal make sure you highlight them – public benefits are only those where improvements to public access to the heritage asset are proposed.

We will use this information to consider whether the harm we have identified above is necessary and outweighed by the benefits of the proposal. We will only recommend for approval those proposals where the public benefits arising from the proposal outweigh the Less than Substantial Harm the we have identified.

Developments will also need to be compliant with relevant fire safety regulations as part of validation requirements.



Figure 8: Modern development adjacent to a Conservation Area

7.4 Conservation Areas

7.4.1 What is a conservation area?

Southwark Council has a duty under Section 69 of the *Planning (Listed Buildings and Conservation Areas) Act 1990* to designate as Conservation Areas those ‘areas of special architectural or historic interest, the character of which is desirable to preserve or enhance.’ It is the overall character of an area, rather than the individual buildings, which is important when designating a Conservation Area. These areas are important in ensuring that development proposals are moderated to preserve the best of the past and allow for sympathetic high quality modern development. The Conservation Area will include both listed and unlisted buildings, modern buildings, open spaces, walls, trees and any other features of interest where they contribute to the special character of the area.

The Act requires the Council to decide whether any parts of the borough are areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance, and then designate these areas as Conservation Areas. As a result of this requirement the Council has an ongoing programme for the assessment of potential new Conservation Areas (and extensions to existing Conservation Areas), which is reviewed on an annual basis. Decisions to designate will only be made following a detailed assessment of the character of an area, and local consultations.

The designation of new conservation areas, extension of existing ones and the adoption of Conservation Area Appraisals and Management Plans will require the agreements of members via committee, cabinet or delegated powers. Consultation will take the form of

- Consultation letters to the existing occupiers of the properties within the area
- A public exhibition or meeting
- Report to the relevant committee or cabinet

The NPPF places great weight on the designation of new Conservation Areas and states in paragraph 191 that: “When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.”

You can ask the Council to consider the designation of new Conservation Area if you have evidence to demonstrate that an area has special architectural or historic interest worthy of preserving. It is particularly important if such requests are accompanied by supporting information like a **Historic Area Assessment** which charts the history and character of the area, illustrations including historic maps, an audit of important buildings, suggested boundaries and details of any threats to the area's character.

The Council's Design and Conservation planning team can advise whether a property lies within a Conservation Area. Conservation Area status is however recorded as a land charge on properties lying within that area and, as all local land charges are registered by the Council, members of the public may also request a search of the register. Conservation Areas are also recorded on the mapping system on Southwark Council's [website](#) and are designated on the Planning Policies Map.

7.4.2 What are the criteria for designating a Conservation Area?

The main purpose of designating a Conservation Area is to preserve and enhance the character and appearance of the area. The emphasis of planning control in Conservation Areas is not preventing development, but managing change that will harmonise with the special architectural or historic qualities of the area and protect open spaces and the wider setting of the Conservation Area.

7.4.3 What do I need permission for in a Conservation Area?

Planning permission is required for certain external works to a dwelling house in a Conservation Area. This is in addition to the standard restrictions to permitted development that apply to all single dwelling houses. Works that require planning permission as a result of Conservation Area status include:

- house extensions that extend beyond any side wall of the dwelling house or to rear greater than single storey;
- the cladding or any part of the exterior such as windows or shopfronts;
- any addition or alteration to the roof;
- the erection of a building or enclosure e.g. garden shed between a wall forming a side elevation of the dwellinghouse and the boundary;
- the erection of chimneys, flues or soil and vent pipes to front or side elevations fronting a highway;
- the installation of an antenna (satellite dish) on a chimney, wall or roof slope which faces a highway and is visible from a highway. Also on buildings taller than 15 metres.

In addition works to install domestic microgeneration equipment (solar photovoltaic, wind turbines, source heat pumps etc.) will require planning permission as a result of Conservation Area status. Please note this list is not exhaustive and is a guide as to when planning permission is required.

7.4.4 Demolition in Conservation Areas

Planning permission must be obtained from the Council for any demolition. Permission for a demolition in a Conservation Area will only be granted if the proposed replacement will conserve or enhance the character and appearance of the Conservation Area. A planning application for demolition of a building in a Conservation Area should include justifications for the demolition and proposals for the replacement or redevelopment. The construction of the new or redeveloped scheme will be a condition of the consent for demolition.

Positive Contributors

There is a presumption against demolition of buildings identified as 'making a positive contribution' to the Conservation Area. Positive Contributors (such as but not limited to, Locally Listed Buildings) are recognised in the adopted Conservation Area Appraisal and protected in their own right due to their local importance. Developments affecting Positive Contributors should seek to retain and repurpose the existing building preserving its features of architectural or historic significance

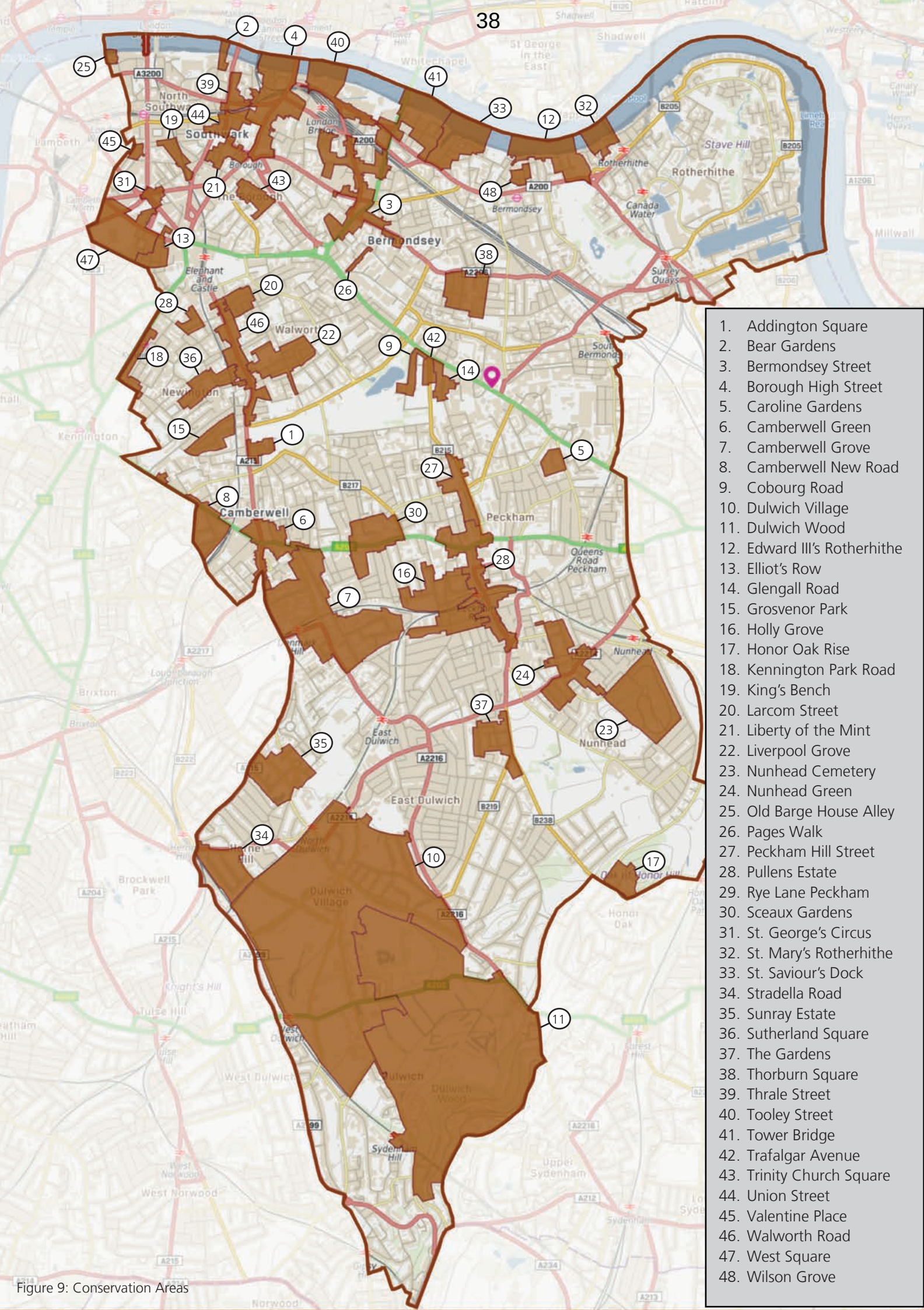


Figure 9: Conservation Areas

CONTENTS OF A HISTORIC AREA ASSESSMENT

Part 1: Historical Overview of the area

- Early history of the area
- Population and change
- Economic activity

Part 2: The form of Development

- Residential development
- Commercial development
- The emergence of a townscape over time
- The influence of people, social or cultural movements that have shaped the townscape

Part 3: The Character of the area today

- Definition of the extent of the historic area
- Recognition of Sub-areas where relevant
- Description of the sub-areas

Part 4: Distinctiveness and Significance

- Identify buildings or features that survive from distinct eras
- Recognise groups that define character (commercial, residential or civic)
- Identify intangible heritage – cultural or social distinctiveness

Part 5: Historic references

- Bibliography
- Archive research
- Historic photos
- Historic maps

Table 3: Contents of a Historic Area Assessment

7.4.5 What is a Conservation Area Appraisal?

The Government encourages Local Planning Authorities (LPA) to produce 'Conservation Area Appraisals' for each Conservation Area. These describe what is special about each Conservation Area and lay down policies for the preservation and enhancement of each area. In the Conservation Area Appraisal you can find out more about the historic significance of the area overall, the various sub-areas or parts of the Conservation Area, guidance for new development in the area and an audit of important buildings in the Conservation Area.

A Conservation Area Appraisal is adopted by the Planning Committee and includes important guidance about what you can and cannot do in each area. We have produced Conservation Area Appraisals for some, but not all Conservation Areas within Southwark. It is in the process of updating these appraisals and producing them for areas that have not yet been appraised. We do this to ensure that policies and our understanding of what is special about the area is kept up to date.

7.4.6 Trees in Conservation Areas

Trees within a Conservation Area are given special protection and there is a presumption in favour of protecting those which make a positive contribution. Anyone wishing to fell, top or lop a tree with a trunk over 75 mm in diameter (measured 1.5 metres above the ground) must give Southwark Council six weeks' written notice of the work.

This is to allow the Council time to assess the impact of the proposal on the character and appearance of the Conservation Area. This is called a 'Section 211 notice' and it gives the LPA an opportunity to consider protecting the tree with a Tree Preservation Order (TPO).

CONTENTS OF A CONSERVATION AREA APPRAISAL

Part 1: Introduction

- What is a Conservation Area?
- Purpose of this Appraisal: Conserving what's special
- Using this document
- Location, description and summary of special architectural and historic interest of the Conservation Area

Part 2: History and archaeology

- Early history and archaeology
- Commerce, transport and housing
- Townscape development
- Identification of Sub-areas

Part 3: Appraisal of special character and appearance of the area - What's special

- Historic significance
- Layout and form
- Landmarks, local views and setting
- Character areas
- Listed buildings
- Audit of designated and undesignated features

Part 4: The Conservation Area today

Part 5: Management and development guidelines

- What changes can you make to your building or your development site? What about trees?
- What needs permission
- Trees
- How will be the Council judge planning applications?
- Advice on common building projects:

Part 6: Boundary of the Conservation Area

- Potential boundary changes
- Management of the Conservation Area
- Consultation

Table 4: Contents of a Conservation Area Appraisal

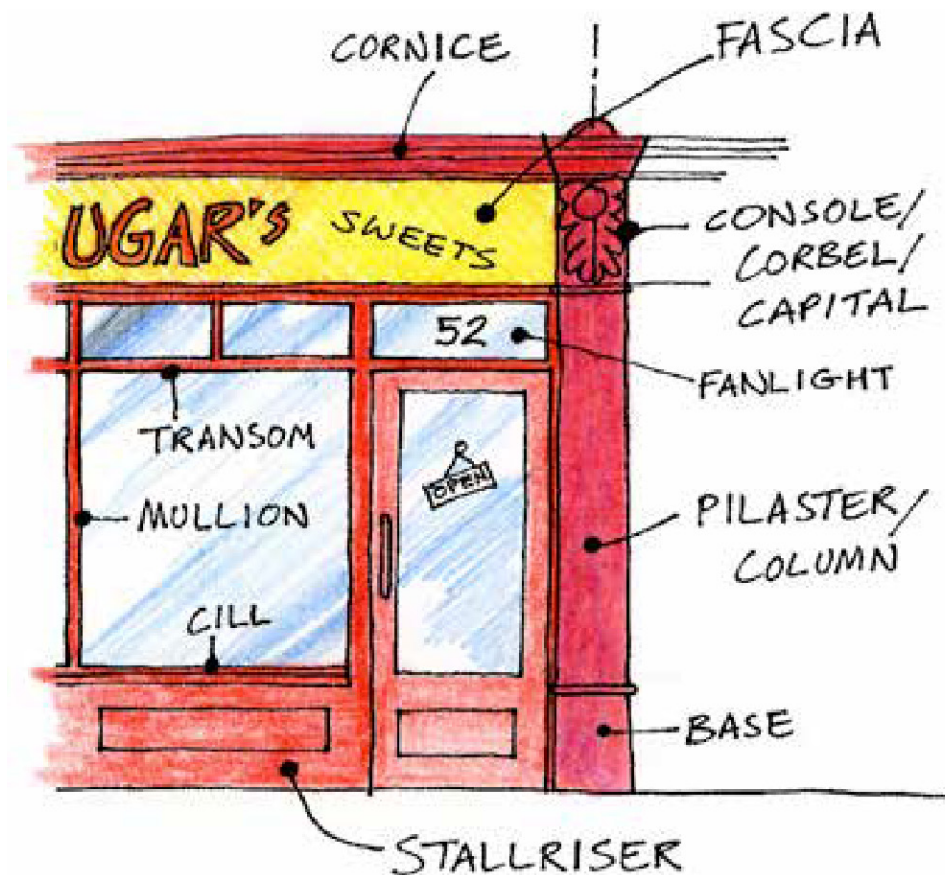


Figure 10: Shop Fronts Illustration

7.4.7 Shop fronts in Conservation Areas

In Conservation Areas that are characterised by their commercial frontages we place a particular emphasis on the design quality of shop fronts and signage, as these are elements that are intrinsic to the areas character and often the most prominent part of a building in the streetscape. In these areas the quality of design and materials should be appropriate to the building and to the wider character or appearance of the Conservation Area.

7.4.7.1 The elements of a shop front

Most, if not all shopfronts are designed in a primary structural frame, within which secondary elements and detailing add character and visual interest. A traditional shopfront may include the entrance doorway to the accommodation above. The basic elements of a typical shop front are: the stallriser; symmetrical layout; pilasters and corbels; fascia and cornice.

The primary frame or surround to a traditional shopfront would typically include side columns or pilasters, often topped by decorative console brackets. Capping the shopfront would be a projecting cornice, below which is the fascia or signage zone (which sits within the height of the corbels/console brackets). Within this outer frame sit the shopfront window(s) and door(s); often there will be a door to the shop and another door to the accommodation above. Below the window would be a stallriser, which can be plain or panelled/tiled.

The console, corbel or capitals are often the most exuberant and decorative elements of a shopfront, and are particularly important for their role as 'dividers' between adjacent shopfronts. Not only is this the traditional treatment for shop fronts but the cornice provides an architectural and visual division between the commercial base and the uses above.

The fascia is a key element in any style of shopfront as this determines the scale of the lettering/signage that can be the most visually prominent part of a shopfront. As a general rule-of-thumb, the depth of the fascia should not exceed one quarter of the height from pavement to the underside of the fascia. The consoles/corbels will generally be the same height as the fascia. The fascia should not extend below the top of the pilaster or into/above the cornice zone. The fascia should never breach the window-cill of the first-floor windows above. A single fascia should not run over several shop frontages or units, even if a shop has taken over adjoining premises, instead individual/original proportions should be maintained.

Projecting box fascias (often with internal illumination and a plastic materiality) are similarly to be avoided as they are visually obtrusive and detracting from the quality and character of a shopfront. The stallriser gives a strong base to a shopfront, whether it is timber or masonry, faced in tiles or plastered. It also helps to protect a shopfront from knocks and damage, thereby more robust. The fenestration design should create a well-proportioned structure to a shopfront, in a way that a frame-less glass or large single-panes cannot. Sub-division with mullions, transoms, top-lights and other features will add interest and character, in a design that ties together all the elements of the shopfront.

7.4.7.2 Doors

The entrance to a commercial unit should provide level-access with no impediment to disabled ingress. The design of the doors, and fan-lights above, should have a direct relationship to the fenestration design of the shopfront; there is however some scope for variety in the design of the upstairs-access door, although this should fit-in with a consistent overall design approach.

7.4.7.3 Awnings and canopies

Retractable apron blinds covered in canvas are often characteristic features of historic shopfronts and should be retained. Modern plastic canopies are not acceptable within Conservation Areas, and are not desirable elsewhere. In terms of scale, the extended awning should not appear over-dominant on the facade when extended, and should not cover the whole depth of the pavement. The mechanism and storage-housing for an awning should not be in a surface-mounted box, but should be contained within the fascia.

7.4.8 How are applications for developments affecting Conservation Areas considered by the Council

For all applications in a conservation area, or which affect the setting, the Council will require a heritage statement setting out the significance of the Conservation Area.

In general, the Council will look at all planning application in Conservation Areas to check that the proposals are sympathetic and do not harm the character and appearance of the Conservation Area. This does not necessarily rule out good, modern buildings but the emphasis, above all, is on quality of both design and materials and appropriateness of scale and massing. An important test of any development in a Conservation Area is its visibility from the public domain both from inside and outside the Conservation Area. The visibility of a development affects the character and appearance, as well as the setting of a Conservation Area. 3D Views of the proposed development from a number of public vantage points are normally required before an application can be validated.

The most sensitive development is typically affects the roof-line or silhouette of the Conservation Area because, depending on the separation, this can appear dominant or incongruous in a cohesive historic setting of a Conservation Area. For example first floor extensions as well mansard and dormer roof extensions are generally resisted in our residential Conservation Areas where these features are not prevalent.

7.4.9 Guidelines for development in Conservation Areas

In general, we will assess all planning application in conservation areas to check that the proposals are sympathetic to its surroundings. This does not necessarily rule out good, modern buildings but the emphasis, above all, is on quality of both design and materials and appropriateness of scale and massing. To check which works are permitted and which are not see Historic England's guidelines for altering buildings or developing within a Conservation Area, available [here](#).

7.4.10 Permitted Development in Conservation Areas

Most forms of development require the granting of planning permission. There are however a number of exceptions ('permitted development') that do not require authorisation under the Planning Acts and these are set out within the General Permitted Development Order 1995 (GPDO). The range of permitted development rights outside Conservation Areas is narrow and is further reduced in designated Conservation Areas. You should check the categories of works requiring planning permission in Conservation Areas and ensure are complying with the legal process. Details of this are available on our website.

7.4.11 Article 4 Directions (the Withdrawal of Permitted Development Rights)

Article 4 Directions allow the Council to gain control over works normally considered to be permitted development rights in certain sensitive areas. These directions can control small-scale change that might gradually erode the character of a Conservation Area or of a group of assets, such as alterations to windows and doors, roofs and front garden areas. Where an Article 4 Direction (GPDO (2015) (England) (as amended) applies, planning permission is required for the specified works under the Town and Country Planning (Permitted Development, Advertisement and Compensation Amendments) (England) Regulations 2019. Before undertaking any works it is therefore always advisable to contact the Council to check whether your property is subject to Article 4 Direction controls.

Some of the Southwark Council Article 4 Directions include;

- **Sunray Estate Conservation Area**
The Conservation Area is the subject of an Article 4 Direction, confirmed by the Secretary of State on 13 November 1987, under which some categories of external alterations, which would otherwise constitute "Permitted Development", are subject to control.
- **Railway Arches**
The Council confirmed Article 4 Direction to remove permitted development rights relating to the conversion of railway arches to residential dwellings on 27 October 2016. This is to ensure residential amenity is protected.
- **Public Houses**
The Council has confirmed immediate Article 4 Directions to protect traditional public houses across the borough. This is in recognition of the unique community and historic value pubs bring to local communities.
- **Light Industrial**
The Council confirmed an Article 4 Directions in March 2018 to protect light industrial land uses on selected sites across the borough. This is in recognition of the important contribution light industrial premises make to local employment in the borough and the local and wider London economy.
- **The Old Southern Railway Stables and the Forge**
The Council has confirmed the immediate Article 4 Direction on 8 November 2018. The Article 4 Direction removes permitted development rights for the demolition of the Old Southern Railway Stables and the Forge at the junction of Catlin Street and St James's Road

What you need to tell us when developing in the context of Conservation Areas

A step-by-step guide to the information that must be included in a Heritage Statement that is submitted as part of your planning application, how it helps us to process your planning application and make a planning decision.

1 The significance of your property in the Conservation Area

Tell us what is important about your property and its place in the Conservation Area.

a) Aesthetic

Tell us about the property, its current use and its age*

Where is it in the Conservation Area – is it on a primary road or a prominent corner – and how does it relate to other properties nearby – is it part of a group of similar design or age?

*If it is statutory Listed you should also follow the guidance on Listed Buildings.

b) Academic and other research

The Conservation Area Appraisal is a very important document

What does the Conservation Area Appraisal say about the property?

For example:

- Which Sub-area is it in and
- What is significant about its sub-area
- Is the property mentioned in the Conservation Area Appraisal (the Conservation Area Appraisal lists properties that make a positive contribution to the cConservation Area as well as other buildings or features of historic interest)
- Are there historic photos of the property in the Local Histories Library
- Has the property been altered or extended – are their old surviving parts of the property that you are aware of

c) Cultural

Some properties may be of artistic or cultural value.

d) Its setting / context

Tell us about how the property can be appreciated by the public – how it is located on its site and how it relates to other properties nearby.

Does the Conservation Area Appraisal mention the property or its location in the views of the area?

What does the appraisal say about the immediately neighbouring properties – are they recognised as positive contributors or statutory Listed?

We will use this information to confirm what is important about the property. We may visit to inspect the property

Depending on the significance of the property in the Conservation Area we may ask for more information about the property, its age and condition, and this may delay your application

2 The Impact of your development

Tell us how will your proposal affect the Conservation Area, its significance and its setting

a) Conservation Area

Prepare drawings, plans, sections and elevations to scale showing the property and how it will be affected by your proposal. Drawings should show the building:

- In its current form i.e. as existing; and
- The completed development i.e. as proposed

b) Its setting

Prepare drawings and/or visualisations of the proposal in its context:

- Elevations of the listed building together with its neighbouring properties to scale
- 3D visualisations of the proposal relative to the neighbouring properties
- 3D views and photomontages from nearby streets in its surroundings

We will use this information to gauge if there is harm to the Listed Building and its significance due to your proposal

We may ask for more information about the impact of your development and this may delay your application

3 Justification for your proposal

Tell us why is it necessary to affect the Conservation Area in this way and what are the benefits of the proposal.

a) Is the harm necessary?

Tell us why it is necessary for your development to affect the Conservation Area in this way.

How does the proposal conserve or enhance the character and appearance of the Conservation Area?

b) What are the benefits

List all the public benefits of your development – these may be social or economic benefits as well as improvements to the Conservation Area like the restoration or repair of a dilapidated building.

We will use this information to consider whether the harm we have identified above is necessary and outweighed by the benefits of the proposal.

Developments will also need to be compliant with relevant fire safety regulations as part of validation requirements.

7.5 Heritage At Risk (HAR)

7.5.1 What is Heritage At Risk?

Historic England's Heritage At Risk Programme (HAR) identifies those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development and adds them to a national Register. The Register is an annual Historic England publication which identifies the most important heritage assets at risk of damage or loss. The programme highlights to communities about the condition of their local neighbourhood. It encourages people to become actively involved in looking after what is precious to them. It also reassures them that any public funding goes to the most needy and urgent cases. As public and private finance remains scarce, there is a need to focus on the heritage assets that are at greatest risk and that offer the best opportunities for positive development

7.5.2 Southwark Council's approach to Heritage At Risk (HAR) ?

Accurate and up-to-date information on the condition of buildings on the register is the key to positive intervention. There is a range of measures available to the Council to bring about the repair of our Buildings at Risk. The Council has statutory powers (including Compulsory Purchase Orders CPO) to carry out repairs in default but this can involve considerable public money. It is often better to work with the owner and facilitate repair and reuse by seeking to overcome the obstacles to reuse, finding development partners and securing grants.

The HAR programme is reviewed every year by Historic England and the Council for publication in October, the Register is updated annually based on the working knowledge of officers. We have several buildings on the register and have a track record of successes in restoring HAR buildings and having them removed from the list.

7.5.3 How can I get involved in Heritage At Risk?

You can apply to Historic England to have heritage assets added to the Heritage At Risk register and get involved in the programme [here](#).

7.6 Grant Programmes

Grant programmes are a good way of securing additional funding for repairs to our historic buildings and to learn more and celebrate our historic environment. The Council has a strong track record of securing and delivering grant moneys for our Heritage At Risk. These often involve grants for repair and restoration works to private properties where the Council, its grant funders and private owners can work together to fund the works.

Over the years we have secured a number of such grant programmes including: Partnership Scheme in Conservation Areas (PSiCA); Heritage Action Zone (HAZ); and Townscape Heritage Initiative (THI). Every grant programme has its own criteria and funding requirements. Grants will not normally pay for all your costs and all normally require a contribution from the owner of the property which may range from 5% to 30%.

7.6.1 What is a Heritage Action Zone (HAZ)?

Heritage Action Zones (HAZs) are a national initiative by Historic England working with local people and partners, including Local Planning Authorities. They are 3–5 year area-based partnership projects with the aim of unlocking the power in England's historic environment to invest in historic places, create economic growth and improve quality of life in villages, towns and cities.

7.6.2 The Walworth HAZ

The Walworth Heritage Action Zone (HAZ) is a five-year partnership running until 2023, overseen by the London Borough of Southwark and Historic England, with significant contributions from the Walworth Society. Other partners include Southwark and Lambeth Archaeological Excavation Committee (SLAEC), Museum of London, Creation Trust, London South Bank University, Lendlease and Notting Hill Genesis. The Walworth HAZ is an opportunity to deliver a variety of research, community, conservation and improvement projects with a single vision. The project aims to protect the special character and social vitality of Walworth, to proactively manage and enhance its unique heritage assets, restore vacant properties, deliver new housing, improve public realm and put heritage at the heart of delivering sustainable growth.

7.6.3 The Peckham Townscape Heritage Initiative (Peckham THI)

The Peckham Townscape Heritage Initiative (Peckham THI) is a five year grant programme funded jointly by the Heritage Lottery Fund and Southwark Council and is due to end in Autumn 2022. The purpose of the project is to contribute to the regeneration of Peckham town by part-funding the restoration and repairs of some of Peckham town centre's oldest and finest buildings. In 2014, the Heritage Lottery Fund granted £1.675m towards this project and Southwark have committed additional funding to make a common fund of £2.3m. Apart from the repair and restoration work on 12 of the town centre's buildings, the Peckham THI catalysed the designation of the Peckham Lane Peckham Conservation Area which affords a measure of long term protection of the eclectic and characterful sense of place within Peckham town centre. In addition a stakeholder group, the Peckham Heritage Regeneration Partnership has instigated, funded and runs a programme of community initiatives including walks, talks and school projects to promote awareness of the Conservation Area, Peckham's history and built environment.

7.6.4 The St George's Circus and Camberwell Green PSiCA

The St George's Circus and Camberwell Green PSiCA was a three year project funded jointly by Historic England (formerly English Heritage) and Southwark Council. In 2010 this £450,000 project delivered the whole-building restoration and repair of some of the most prominent and finest buildings in the St George's Circus and Camberwell Green Conservation Areas

8 Archaeology in Southwark

8.1 Archaeological Sites

8.1.1 What is Archaeology?

Archaeology is the study of people and past activities from the evidence that they leave behind, normally this takes the form of buried layers and deposits (stratigraphy), finds (artefacts) and features (pits, post-holes, ditches, wells, etc.). Archaeological interest is also contained in the fabric of historic buildings and the evidence contained in historic landscapes.

In the context of the National Planning Policy Framework (NPPF), archaeological interest means evidence of past human activity which is deemed worthy of expert investigation by professional archaeologists.

Archaeology is protected in different ways, Southwark contains 9 scheduled monuments that are protected by statute. Other archaeological remains in the borough are managed through national and local planning policy.

8.1.2 Archaeology in Southwark

Southwark contains some of the most important urban archaeological sites in Britain, and more detailed information on our amazing archaeology is available on our website.

Policy P22 Archaeology of the draft Southwark Plan sets out our approach to archaeology and development and lists the information that we will require in order to make informed planning decisions concerning archaeological interest.

Southwark has archaeological sites dating from Mesolithic times (8,500 BC to 4,000 BC) in a pre-urban landscape to buried deposits relating to modern London as a world city. Often our archaeological sites contain evidence of numerous phases of archaeological occupation on the same site, with prehistoric archaeological layers at the bottom overlain by successive layers of Roman, early medieval, medieval, post-medieval and later archaeology. As well as buried archaeological sites many standing buildings, monuments and statues and landscapes also preserve an archaeological interest that is worthy of study and recordings.

We recognise that archaeology is finite and non-renewable and once it is gone - it is gone forever, therefore, the Council works hard to preserve this fragile resource. Southwark is unique as it is the only London borough (apart from the City of London) that employs its own expert in-house archaeologist to provide specialist planning advice.

The other thirty-one London boroughs receive archaeological advice from Historic England via the Greater London Archaeological Advisory Service (GLAAS). GLAAS and Southwark Council are members of the Association of Local Government Archaeological Advisers UK (ALGAO) and work closely together to protect and preserve archaeological interest and endorse best practice across the capital and nationally.



Figure 11: The main excavation area at Harper Road, Borough, where a Roman sarcophagus and Roman buildings flanking the realigned course of the Roman road of Stane Street were discovered (PCA).

8.1.3 How do I find out if there is Archaeology on my site?

Archaeological interest is extremely hard to determine because it is invariably completely buried from sight, which makes it really difficult to accurately predict! Also, the circumstances of every site are different and archaeological advice will vary significantly from site to site, depending upon many factors, for example, if there is evidence that previous development (for example, deep basements or underground car-parks) has already damaged or destroyed archaeological deposits.

Buildings and landscapes also preserve an archaeological interest. In many areas of the borough former industrial buildings still survive, frequently such building have been adapted for other uses, but retain evidence for former functions. Other buildings within core areas of historic settlements, or conservation areas, may also be of archaeological interest and are worthy of study or recording.

If you want to develop in Southwark or carry out any works which might affect buried archaeological deposits you will need to consult the council and seek the advice of our Archaeologist and look at our website for on-line advice. Initially, you will need to find out whether your site is within one of our six Archaeological Priority Areas (APA) and, if so, what tier rating that APA has.

The draft APA boundaries are found on the Planning Policies Map, and draft New Southwark Plan policy P22 'Archaeology' sets out the policy requirements. Pre-application consultation with our archaeologist is strongly encouraged to ensure planning applications are supported by appropriate information.

8.1.4 The Historic Environment Record (HER)

We use numerous different streams of evidence to determine which of our sites may contain archaeological deposits. One major source is the Historic Environment Record (HER) the Southwark dataset of which is provided and regularly updated by the Council, but is maintained and managed under licence from Historic England. HERs exist all over the country.

The [HER for Greater London \(GLHER\)](#) is a computerised record containing nearly 200,000 entries providing data on historic places, archaeological sites and finds, historic buildings, parks and landscapes and many other supporting sources of information. It is continually updated with priorities for enhancement reflecting the particular character of London, its historic environment, and the pressures upon it. Other sources of information we use are: archaeological excavation archives and reports, historic documentary and oral records, historic maps, photographs and aerial photographs, among many other primary and secondary sources.

This evidence base provided by the HER enables the Council to determine where archaeology is likely to still survive and, where it does, we have protected these areas by designating them as Archaeological Priority Areas (APAs) or protecting them in other ways through the planning process.

8.2 Scheduled Ancient Monuments (SAM)

8.2.1 What is a Scheduled Ancient Monuments (SAM)

A Scheduled Ancient Monument is a legally protected (generally archaeological) site that is considered to be of national importance. Scheduled Ancient Monuments are described here because of the high level of legal protection that is afforded them, not all of Southwark's SAMs are archaeological monuments, for example the pumping engine house for Brunel's Thames tunnel at Rotherhithe.

Also, not all scheduled sites are ancient, but scheduling is restricted to the most important examples of each type of monument requiring protection, following close criteria for selection. It is normal now to refer to sites as 'scheduled monuments', rather than by the longer term 'Scheduled Ancient Monuments'. The legal process of 'Scheduling' will add the site to the 'Schedule' (the list of legally-protected monuments) maintained by the Secretary of State for Digital, Culture, Media and Sport (DCMS), under powers contained in the Ancient Monuments and Archaeological Areas Act 1979 (as amended).

8.2.2 Scheduled Monuments in Southwark?

Policy P18 of the draft New Southwark Plan refers to the conservation of the historic environment and natural heritage and includes our policies on scheduled monuments. We have a range of scheduled monuments in Southwark, including a Roman boat, Roman bath-house, Shakespearean playhouses (the Rose, the Globe and the Hope), medieval religious and secular great houses and more modern sites such as Brunel's pumping engine house. Our Area Policies in the draft New Southwark Plan also refer to SAMs. .

8.2.3 What do I need to know about Scheduled Monuments?

Scheduled monuments are protected by law, and any development that affects a scheduled monument requires formal written Scheduled Monument Consent (SMC) from the Secretary of State for DCMS. Historic England's, Inspector of Ancient Monuments, London Office, gives advice to the government on each application and administers the consent system. In assessing applications, the Secretary of State will aim to ensure that the significance of protected sites is safeguarded for the long term.

Formal Scheduled Monument Consent (SMC) consent must be obtained before any work can begin on a scheduled site, as carrying out unconsented works on a scheduled monument is a criminal offence. The formal application process of applying for SMC and receiving a response from DCMS can take a significant time and this should be programmed carefully into any proposals affecting SAMs.

Additional legislative procedures apply and specific advice will be needed. For example, it is a criminal offence to: disturb a scheduled monument by carrying out works (outside Class Consents) without SMC; cause reckless or deliberate damage to a monument; and, use a metal detector or remove an object found at a monument without a licence from Historic England.

8.3 Archaeological Priority Areas (APA)

8.3.1 What is an Archaeological Priority Area (APA)?

An Archaeological Priority Area (APA) is a defined area where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries. APAs exist in every London borough and were initially created in the 1970s and 1980s either by the boroughs or local museums. Historic England GLAAS have been carrying out a London-wide appraisal of the APAs to update them and have introduced a 'tiered' system, which distinguishes those areas which are most significant from others which although still of interest are not quite so sensitive.

Southwark carried out an appraisal of all our APAs in 2018, the results of which were published as an evidence-base to support the draft New Southwark Plan. Up-to-date Archaeological Priority Areas (APAs) provide a sound evidence-based spatial framework for local plan making and decision taking.

The purpose of new APA appraisal system across London is to provide a consistent and sound evidence-base and practical tool for strategic planning. Archaeological Priority Areas (APAs) have now been categorised according to significance into Tiers ranked 1 (most significant) to 3, with all other areas within the borough being in Tier 4. Tier levels indicate when there is a need to understand the potential impact of the proposed development on the heritage asset's significance.

Policy P22 in the draft New Southwark Plan has defined six Archaeological Priority Areas (APAs) in Southwark, of which one is a Tier 1 APA, and five are Tier 2 APAs. You can find out if your site is within an APA by consulting our on-line mapping database and consulting the Planning Policies Map.

8.3.2 What is a Tier 1 APA?

A Tier 1 APA is a defined area which is known, or strongly suspected, to contain a heritage asset of national significance (a scheduled monument or equivalent); or is otherwise of very high archaeological sensitivity. We have one large Tier 1 APA in Southwark called 'North Southwark and Roman Roads'. This APA fulfils the criteria for a Tier 1 APA, in that it contains scheduled monuments and numerous sites that may be deemed to be equal or equivalent to a scheduled monument in NPPF terminology.

The northern part of the borough contains some of the most important multi-phase deeply stratified urban archaeological sites in the UK, including half of the Roman town of *Londinium*, Roman temples and cemeteries, vast Tudor palaces, monastic houses, Shakespearean playhouses, medieval prisons, and scheduled monuments. For this reason the 'North Southwark and Roman Roads' APA is designated the top tier of archaeological protection.



Figure 12 : Artist's impression of Southwark's Elizabethan playhouses and bear baiting arenas on Bankside (MoLA)

8.3.3 What will I need to do if my site is in a Tier 1 APA?

If your site lies within a Tier 1 APA then policy P22 requires that you submit an Archaeological Desk Based Assessment and the results of an archaeological evaluation (trial trench investigation across the site) in support of any planning application. Planning applications involving any below ground excavation works will need to be assessed for archaeological interest and must provide clear ground-tested evidence of the archaeological significance of the site in order for the Council to be able to make an informed planning decision. As we cannot physically see whether archaeology survives on your site, we will ask you to find a way to provide that information for us. With regard to archaeology, the general principle in decision making is that the Council will only grant planning consent on sites where we have clear evidence and sure knowledge of what the likely archaeological significance and value of the site is.

Every archaeological site is different and each brings its own challenges. The benefits of early consultation with the Council cannot be overestimated and is essential to ensure that you have provided all the necessary information to support your application. There is no single evaluation methodology appropriate for all situations, but an evaluation should be of a scale to enable a sufficient sample of the site to be investigated. We may ask you to provide a range of information including: Archaeological Desk Based Assessment, evaluation, Written Schemes of Investigation (WSI), historic building recording and analysis among other works. Further explanation of this information can be found in the glossary of terms. Many applicants do not realise that planning policy requires them to actually carry out an archaeological sample dig (pre-determination evaluation) prior to submitting their application if their site is in an APA, or that failure to comply with this can may be a reason for non-validation or potentially even refusal of the application.

Archaeological Desk-Based Assessment and evaluation are just the first stages in determining a site-specific archaeological strategy for your site and may be followed by a range of further archaeological mitigation requirements including: preservation in situ schemes; redesign; excavation; further evaluation; geoarchaeological sampling and analysis; watching briefs; post-excavation assessment; publication; public engagement; interpretation, display; and archiving. However, for the vast majority of sites most archaeological requirements are very quickly and easily resolved, and there are lots of pragmatic solutions to managing archaeological projects, for nearly all applicants the initial concerns associated with dealing with archaeological deposits are very soon dispelled.

After assessment and evaluation, the further stages or archaeological work may be made enforceable through the addition of archaeological pre-commencement conditions on any grant of planning consent. Conditions, a S106 planning obligation or a combination of the two may be required. The use of conditions or obligations can be applied where the legal and policy tests in the NPPF have been met, and it has been established that sustainable development can only be achieved through harm to an archaeological heritage asset, requiring its excavation and recording.

8.3.4 What will I need to do if my site is in a Tier 2 APA?

In addition to the large Tier 1 APA Southwark also has five Tier 2 APAs. Tier 2 is a local area within which the GLHER holds specific evidence indicating the presence or likely presence of heritage assets of archaeological interest. These generally highlight our historic villages as well as a possibly prehistoric burial mound in Dulwich. Development in Tier 2 APAs needs to follow the same process for Tier 1 sites, but it is possible that in some rare cases an archaeological evaluation may not be required prior to determination of the planning application. As noted above though all planning applications must provide sufficient evidence to allow the LPA to make an informed planning decision with regard to archaeological interest.

Southwark does not contain any Tier 3 APAs.

8.3.5 Do I need to consider Archaeology if my site is not in an APA?

Yes, even if your site is not in an APA you should double check for archaeological interest. The designation Tier 4 (outside APA) is given for any location that does not, on present evidence, merit inclusion within an Archaeological Priority Area. Tier 4 areas are not necessarily devoid of archaeological interest and may retain some potential unless they can be shown to have been heavily disturbed in modern times. All major planning applications especially over 0.5 hectares in area, whether in an APA or not, should be assessed for archaeological interest and any sites that require an Environmental Impact Assessment (EIA) should also be assessed.

Current good practice advice for the historic environment emphasises that the information required in support of applications for planning permission should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset need to be proportionate to the significance of the heritage assets affected and the impact on that significance.

8.3.6 What do I need to know about archaeology?

All archaeological projects must be conducted in a scientific manner by properly qualified, experienced and competent archaeologists operating with sufficient resources and time to provide positive outcomes relevant to the specific purpose of the project, and proportionate to the significance of the archaeological interest.

All works need to be carried out in accordance with Historic England GLAAS Standards for Archaeological Work and the range of guidance and standards provided by the Chartered Institute for Archaeologists (CIfA).

Where proportionate to the significance of the investigation, the Council may require that the archaeological works are opened to and interpreted for the public, and a scheme for public engagement should be included as part of the WSI. Opportunities for public engagement could include enabling participation in investigation, providing viewing platforms and interpretation panels, jointly designed open days in partnership with the local community, public talks and online forums as well as coverage in local media. Once analysed, the results and the knowledge gained may be communicated, in addition to formal publication and deposition of the archive, through displays, exhibitions and popular publications and might inform site design and public art.

The finds and records from London excavations provide an immensely valuable public resource. The owners of finds and records are urged to donate these to the appropriate Museum as a matter of best practice in the public interest; in most cases this will be the Museum of London. Arrangements for the curation of the archive should be agreed prior to starting fieldwork. Where the archive is to be deposited with the Museum of London, this should be set out in the Deed of Transfer or Deposit Agreement which should be included in the WSI and submitted to the Council for approval in writing.

There are many ways you can get involved in archaeological activities across Southwark, and there are many groups and organisations that you can join or follow.

Figure 13 :Brunel's Thames Tunnel, built between 1825 and 1843 (Museum of London)



8.4 The law and burial archaeology

8.4.1 What do I need to know about human burials?

There are important legal requirements that apply where development or on-site evaluation may affect human remains and established professional guidelines must be followed. The law and burial archaeology is extremely complex and guidance on compliance with burials legislation is available from the Ministry of Justice and Historic England. There is a wide range of guidance available to assist you in managing works relating to burial grounds.

As the principle guidance states, the treatment of human remains is one of the most emotive and complex areas of archaeological activity. In 2001, a Human Remains Working Group was convened jointly by English Heritage (now Historic England) and the Church of England in order to address the issues. Their remit concerned burials from Christian contexts dating from the 7th-19th century AD in England. This provided a coherent group of material to which a consistent theological framework could be applied in order to help inform ethical treatment and for which reasonably specific guidance might be given. The first edition of this document, published in 2005, was a synthesis of the results of the group's deliberations. It aimed to provide reasonably comprehensive guidelines covering treatment of human remains and associated artefacts and grave markers at all phases of an archaeological fieldwork project, including decisions concerning whether remains should be retained long-term for scientific study or reburied following completion of the analysis phase of the fieldwork project. A revised 2017 edition represents an update to that document, intended principally to reflect developments in matters relating to Christian burial law that have taken place since 2005.

8.4.2 What do I need to know about Consecrated Land and Disused Burial Grounds?

Development affecting any former burial ground is regulated by statute, principally the Burial Act 1857, the Disused Burial Grounds Acts of 1884 and 1981, and the Pastoral Measure 1983.

The exhumation of any human remains requires approval from either the Secretary of State or the Church of England, depending on the current location of the remains. Exhumations from land which is subject to the Church of England's jurisdiction will need the Church's authorisation (Faculty consent or the approval of a proposal under the Care of Cathedrals Measure 2011). This includes consecrated ground in cemeteries.

Exhumations from land which is not subject to the Church of England's jurisdiction will need a licence from the Secretary of State, under the relevant burial act as amended by the Church of England (Miscellaneous Provisions) Measure 2014. A licence is required from the Secretary of State if the remains are not intended for reburial in consecrated ground (or if this is to be delayed, for example where archaeological or scientific analysis takes place first).

Under the Town and Country Planning (Churches, Places of Religious Worship and Burial Grounds) Regulations 1930, the removal and re-interment of human remains should be in accordance with the direction of the local Environmental Health Officer.

If removal is essential it can only take place under Faculty jurisdiction, Ministry of Justice licence, Environmental Health regulations, and if appropriate, in compliance with the relevant acts. A strategy for the removal, assessment, analysis and reburial/retention of human remains must be agreed with the Council and included in the WSI. Where human remains are suspected to survive the relevant permissions should be obtained before works commence. Unexpected human remains encountered during excavations can be removed only once the relevant permissions have been received and the Council have been notified. Copies of the permissions must be submitted to the Council.

8.4.3 Southwark and burial grounds

Southwark has a large number of historic burial grounds (19th century or earlier) which can be grouped together. We also have extensive evidence for Roman funerary ritual and burial rite. The majority of our burial grounds are Church of England but we also have burials of other denominations, faiths and belief systems. Several of our Christian cemeteries are consecrated ground and therefore come under the Church of England's faculty jurisdiction but the borough also includes other burial grounds outside of this jurisdiction. The majority of cemeteries are open to the public, some are open spaces and parks and some still function as burial grounds and accept new burials or cremations.

The principal assumptions underpinning the current guidance, and the basis on which the Council manage their burial grounds, is:

- That human remains should always be treated with dignity and respect.
- Burials should not be disturbed without good reason. However it is noted that the demands of the modern world are such that it may be necessary to disturb burials in exceptional circumstances.
- Human remains, and the archaeological evidence for the rites which accompanied and commemorate their burial, are important sources of scientific information.
- There is a need to give particular weight to the feelings and views of living family members when known.
- There is a need for decisions to be made in the public interest, and in an accountable way.
- Any exposed human remains must be screened from public view.

In accordance with current guidance, all legal matters concerning Planning Law, Burial Law and Ecclesiastical Law with regard to consecration, Faculty jurisdiction, the legal effects of consecration, and the treatment of human remains has to be complied with

In accordance with current guidance set out the Advisory Panel for the Archaeology of Burials in England (APABE) we make an archaeological distinction between burials which are under 100 years old and burials over 100 years old. The former are deemed to not be of archaeological interest, but where interments are more than 100 years old *'the area should be should be archaeologically evaluated. [and] Any subsequent exhumations should be monitored and if necessary carried out, by archaeologists'*. This approach has been agreed by the Human Remains Working Group convened in 2001

8.4.5 What do I need to know about Ecclesiastical and faith buildings?

Ecclesiastical buildings are fully subject to planning control but whilst they are being used for ecclesiastical purposes; some ecclesiastical buildings are generally exempt from conservation area and listed building controls, if the denomination or religious group that use the building have instituted the necessary controls that offer the same protection as the secular system operated by local authorities. If in doubt appropriate advice should be sought from the council prior to works.

Church of England Cathedrals, such as Southwark Cathedral, are managed under the Care of Cathedrals Measure (2011).

Where a heritage asset may have a cultural or faith interest to a particular community, it is important to consult them as their views and information may add to the understanding of the asset's significance. Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of place. It includes the sense of inspiration and wonder that can arise from personal contact with places long revered, or newly revealed.

9 Nature

9.1 The Historic Environment and the Natural Environment

The natural environment, like the historic environment, makes a positive contribution to community life by boosting wellbeing, increasing mutual understanding and cohesion and encouraging a stronger sense of place. Natural assets include geology, soil, air, water and all living things and their ecosystems, as well as natural processes and functions. It is this 'natural capital' that makes human life possible.

Natural capital relates to the elements of nature (assets) that provide benefits to people, whether directly or indirectly. It is possible to make an assessment of the value of these resources for now and for the future. There are several legal requirements that you need to be aware of when considering the relationship between the historic environment and the natural environment.

9.1.1 Southwark and the Natural Environment

In an urban context, the richness of Southwark's biodiversity lies in our parks, open spaces, rivers, trees, private gardens and features such as green roofs that collectively form an essential green infrastructure. In order to preserve these landscapes and the wildlife they attract within the borough, there are a number of legal protections afforded to these assets, from single trees, groups of trees to woodlands, parks, gardens and whole areas.

Certain wildlife species are statutorily protected under UK and European legislation. Natural England provides a list of protected species as well as guidance relating to these protected species. The London Biodiversity Action Plan (BAP) identifies important habitats and species, categorised under birds, fungi, invertebrates, vertebrates and plants, as well as setting targets for improvement in both quality and quantity. [The Southwark Biodiversity Action Plan \(BAP\)](#) focuses on those habitats and species located within the Borough.

Policy P18 of the New Southwark Plan refers to heritage assets 'and their settings'. This includes designated natural assets such as registered parks and gardens; trees within the curtilage of a Listed Building; trees that contribute to the historic character or appearance of Conservation Areas; and trees that are subject to a Tree Preservation Order (TPO); and ancient hedgerows.

In line with standards set out in the London Plan, most of the Borough is within 1km of Metropolitan or Borough Grade Nature Conservation Sites and 500m of any nature conservation site.

9.2 Trees as heritage assets

9.2.1 What do I need to know about Trees?

All parts of Southwark benefit from the presence of trees and woodland and the Council always takes appropriate action to encourage continuity and enhancement of the tree cover. The Council has a duty towards tree protection under the Town and Country Planning Act 1990. Additionally, the Hedgerow Regulations 1997 give Local Planning Authorities responsibilities to prevent the removal of important hedgerows.

Many trees are protected by legislation, and it is essential that you establish the legal status of your trees prior to carrying out works to them. Unauthorised work to protected trees could lead to prosecution, resulting in enforcement action such as fines or a criminal record. Tree Preservation Orders (TPO), Conservation Areas, Planning Conditions, Felling Licences or Restrictive Covenants legally protect many trees in the UK.

9.2.2 What is a Tree Preservation Order (TPO)?

A Tree Preservation Order (TPO) makes it a criminal offence to cut down, top, lop, uproot, wilfully damage or wilfully destroy that tree without the Council's permission. All types of tree can be protected, and a TPO can protect anything from a single tree to all the trees within a defined area or woodland.

Southwark is one of the first London Boroughs to undertake a wholesale review of all its TPOs and our work is informing standards for best practice for the management of TPOs as public assets across London. We assess the suitability of a tree for a TPO through a strict criteria process known as TEMPO (Tree Evaluation Method for Preservation Orders). For the protection of Trees in Conservation Areas see section 8.3.7

9.2.3 How do I find out if my Trees are protected?

The Council maintains a register of all trees subject to a Tree Preservation Order (TPO). The Council's interactive [mapping service](#) shows all trees and sites subject to a TPO; furthermore, there are overlay mapping layers for each of the Conservation Areas.

9.2.4 Can I nominate a tree for a Preservation Order?

Yes, please contact designconservation@southwark.gov.uk if you feel a tree is at risk of removal or is of considerable benefit to the area. A member of the Urban Forestry Team will conduct a TEMPO evaluation and assess the tree for inclusion in the Council's register of TPO trees.

9.2.5 Trees and Planning Conditions

Adding conditions to a grant of planning consent is a method frequently used by the Council to safeguard trees, hedgerows and other soft landscaping on sites during development and afterwards. If it is proposed to retain trees for the long term then a TPO is often used rather than a planning condition. If valid planning conditions are in place then anyone wishing to undertake work to trees shown as part of the planning condition must ensure they liaise with the Council and obtain any necessary consent or variation.

The nature and level of detail of information required to enable the Council to properly consider the implications and effects of development proposals varies between stages and in relation to what is proposed. If you plan to remove a tree then compensation for the loss of the tree will normally be required.



Figure 14: TPO 190: Zelkova Elm

9.2.6 How is compensation for tree loss calculated?

In exceptional circumstances, payment in lieu via a formal agreement with the Council is used to mitigate tree loss. This is calculated by using a software tool called Capital Asset Value for Amenity Trees (CAVAT). Amenity trees provide a wide range of tangible and intangible benefits to society. These include the “regulating ecosystem services” of cooling local air temperatures, intercepting rainfall and reducing air and water pollution and the socio-cultural ecosystem benefits of helping to make cities safer, more diverse and attractive, and wealthier.

Southwark’s most valuable tree as assessed through CAVAT is the Zelkova Elm located at the junction with Dulwich Common and College Road. It has a CAVAT value in excess of £734,000

9.2.7 What other protections are there for our natural capital within the borough?

As well as the River Thames, Southwark also has Ancient Woodland, Ancient and Veteran Trees Registered Parks and Gardens, and SINC/SSSIs.

9.2.8 What classifies woodland as ancient?

An Ancient woodland is one which has been continually wooded since 1600 and is generally considered to have never been cleared since prehistoric times. These old woodlands on London Clay with English Oak forming the prevalent tree canopy is interspersed with Hornbeam, Ash, Wild Cherry, Field Maple, Crab Apple and the less common Wild Service Tree. Below the canopy, the under-storey typically comprises Hazel, Yew, Hawthorn, Holly and willow. Primarily covering Dulwich and Sydenham Hill Woods, The Great North Wood wider extents have been mapped using the John Rocque map of 1769 together with the Ordnance Survey of 1879. Other important woodland habitats are identified through Ordnance survey mapping and cover areas of Honor Oak, Peckham Rye, Nunhead and Rotherhithe.

9.2.9 Ancient and Veteran Trees

Veteran and Notable Trees in Southwark can be viewed via the Ancient Tree Inventory.

9.3 Registered Parks and Gardens

Southwark has a number of registered Parks and Gardens of Special Historic Interest (PGSHI), including Southwark, Dulwich, Peckham Rye and Belair Park and also Nunhead Cemetery.

Historic England maintain a Register of Historic Parks and Gardens of Special Historic Interest. These registered landscapes are graded I, II* or II, and include private gardens, public parks and cemeteries, rural parkland and other green spaces. They are valued for their design and cultural importance, and are distinct from natural heritage designations. Inclusion on the Historic England Register of Historic Parks and Gardens brings no statutory controls, but there is a clear presumption in favour of upholding their significance in government planning guidance, so they do gain protection. Local Planning Authorities are required to consult Historic England on applications affecting sites registered as Grade I or II*, and the Gardens Trust on sites of all grades. The setting of other listed heritage assets can also protect registered landscapes.

9.4 SINC/SSSIs: Sites of Interest to Nature Conservation/Scientific Interest

Within the Borough there are a number of recognised sites of importance for nature conservation that have been identified in a hierarchy of importance. These are areas of particular importance to nature conservation where public understanding of nature conservation issues is encouraged.

With reference to the NPPF, special attention must be given to developments adjacent to these sites with regards the impacts of construction.

What you need to tell us when developing in the context of Trees

A step-by-step guide of the information you need to send us and how it helps us to process a planning application and make a planning decision

To make an application to carry out tree works you will need to complete an application form and submit it to the LPA. The form can either be submitted through the Planning Portal or directly to the LPA.

1 The significance of your asset

Tell us what is important about your heritage asset and its setting.

a) Its history

Tell us about the tree(s), species, location and tree number; i.e; T1 Oak

b) Academic and other research

What information has been published about the asset?

For example:

- Tree Preservation Order
- Conservation Area Designation
- Prior Management of the Tree
- Previous Planning Approval for Tree Works
- Arboricultural Assessment
- Loss Adjuster's/ Insurer's Report
- Root DNA Identification
- Crack Monitoring Report
- Drainage Surveys
- Historic Area Assessment
- Area Characterisation Assessment

Remember when an asset is recognised as an heritage asset the whole asset is listed and protected.

c) Its setting / context

Tell us about how the tree can be appreciated by the public – how it is located on its site and how it relates to other properties nearby.

We will use this information to confirm what is important about the heritage asset. We may visit to inspect the property. Depending on the significance of the heritage asset we may ask for more information about the heritage asset and this may delay your application.

2 The Impact of your development

Tell us how will your proposal affect the heritage asset, its significance and its setting.

a) The Tree (s)

Prepare drawings, plans, photos and photomontages showing the tree(s) and how it will be affected by your proposal. The assessment should show the asset:

- In its current form i.e. as existing;
- Prior Management of the Tree
- The alterations you wish to make to it i.e. as existing with demolitions / removals/ access pruning;
- All subterranean impacts, including geotechnical works, site remediation, contamination work, UXB surveys, crane bases, attenuation tanks, serviceruns, piling regimes, lift pits, grubbing out or removal of old concrete floors foundations/basements/ tanks, terracing, landscaping or levelling, underpinning.
- The completed development i.e. as proposed ,

b) Its setting

Prepare drawings and/or visualisations of the proposal in its context

- A Site Plan
- Photographs, Photomontages.
- Arboricultural Report (TPO)
- An Arboricultural Implications Assessment. (Developments)
- Root Protection Area. The Root Protection Area or RPA of a tree is determined as a radius of 12 x the diameter of the tree when measured at breast height (DbH) and expressed as a circle.

We will use this information to gauge if there is harm to the heritage asset and its significance due to your proposal We may ask for more information about the impact of your development and this may delay your application.

3 Justification for your proposal

Tell us why is it necessary to affect the nature in this way and what are the benefits of the proposal

a) Is the harm necessary?

Prepare technical studies to show why it is necessary for your development to affecting the heritage asset in this way. Remember 'development' includes:

- Demolition
- Excavations
- Extensions
- Foundations
- Tree Removal
- Tree Pruning
- Root Pruning
- Hard Landscaping

b) What are the benefits of the proposal

If your development includes any or all of the above, it is likely to require separate and additional studies for each. List the benefits of your development. Remember that heritage assets are valued by the public. It is desirable to retain and improve a heritage asset rather than lose it. Where you think there are additional public benefits to your proposal make sure you highlight them – public benefits are only those where improvements to public access to the heritage asset are proposed.

In most cases mitigation for tree loss should be met on site via new planting. Where there is a reduction in total girth loss, which cannot be provided for on site; this should be met via a S.106 agreement. In exceptional circumstances – payment in lieu via a formal agreement with the Council is used to mitigate tree loss.

We will use this information to consider whether the harm we have identified above is necessary and outweighed by the benefits of the proposal.

9.5 The River Thames and its foreshore

9.5.1 Why is the River Thames and the foreshore important?

The River Thames is the heart of London and also its largest archaeological site. The river and foreshore contain submerged heritage assets as well as buried and preserved ancient landscapes. Research into aspects of London's relationship to the Thames is a significant regional research priority (see Museum of London 2015). It contributes to important thematic research into the formation processes of the river and the Thames Basin, London's prehistoric past, and its development from a Roman outpost into a global city. The study of archaeological evidence relating to the Thames has the potential to contribute to analysis of long-term records of Climate Change and sea level rise as well as identifying the resulting impact on development. The case studies for the 'Thames Discovery Programme' and 'London and the tidal Thames 1250–1550' provide examples of ongoing work in this area, with the Thames Discovery Programme providing an outstanding example of the importance of community involvement in the study and stewardship of the historic environment.

9.5.2 Southwark and the River Thames

Much of Southwark's distinct character relates to its enduring relationship with the river. Once an area of islands and marshes, Southwark has been a place for crossing the River Thames at London Bridge for 2000 years. Policy 24 of the draft New Southwark Plan refers to the River Thames (1.1 to 1.9); we recognise that the strategic importance and unique character of the River Thames needs to be maintained and enhanced to enable the use and enjoyment of the Thames for all. The River Thames and its hinterland comprise the Thames Policy Area. The Thames Policy Area makes an important historical and environmental contribution to Southwark and London enabling significant recreation, tourism, nature conservation and open space provision.

9.5.3 What do I need to know about development on or near the River Thames?

Any proposed development affecting the river, river wall or foreshore of the River Thames will require historic environment safeguards and appropriate permissions. This can include additional measures such as licences from the Marine Management Organisation (MMO) and consultation with authorities such as the Environment Agency (EA) and Port of London Authority (PLA). Artefacts which qualify as treasure under the Treasure Act 1996 are legally required to be reported to the coroner within 14 days. Wreck material – including flotsam, jetsam, lagan or derelict material – is legally required to be reported to the Receiver of Wreck within 28 days. If you do not report within the time frames, you may be fined. Complex matters such as scour, alteration to the river regime, marine assets, submerged landscapes, deep channel deposits, dewatering of buried habitats, secondary impacts on the riparian historic environment, must also be considered.

9.5.4 Is the foreshore publically accessible? How about 'mudlarking'?

The foreshore has several access points, however it is a hazardous environment with extremes between high and low tides, a quick flowing current, wash from passing river vehicles, potentially uneven or dangerous surfaces and other hazards. Swimming is prohibited in central London and is potentially lethal. PLA guidance suggests 'enjoy the river safely from dry land at embankment level. Anyone visiting the foreshore does so entirely at their own risk and must take personal responsibility for their safety and that of anyone with them'. Searching the foreshore for artefacts or historic features 'in any way for any reason' requires a current foreshore permit from the PLA. According to the PLA: 'searching includes all such activities including searching; metal detecting; digging, or 'scraping'. This also applies even if you do not intend to remove anything from the foreshore. Permits for searching and 'mudlarking' can be applied for from the PLA via their website. Any artefacts you find should be reported to the Portable Antiquities Scheme officer at Museum of London.

The mandatory Treasure Act and Wreck reporting laws also apply for searching and mudlarking (see section above). For group activities including walks or guided tours or other non-intrusive visits, you must apply for written permission from the PLA.

9.6 Views, vistas and panoramas

9.6.1 What are Borough views?

Borough views are significant views and panoramas that make a positive contribution to experiencing Southwark's environment within London, informing how we are located in an historic and important world city. Major and Strategic Major applications that affect these Borough Views must provide Accurate Visual Representations (AVRs) photographs to demonstrate the impact of the proposal on the Borough Views.

9.6.2 Southwark's views

Policy P21 of the New Southwark Plan protects the borough views of significant landmarks and townscape. These views include:

- London Panorama: A wide panorama of central London across a substantial part of the borough, consisting of:
 - A Landmark Viewing Corridor.
A geometrically defined corridor that focuses on a focal point (e.g. St Paul's Cathedral). The Corridor restricts unacceptable development by defining a maximum permitted development threshold beneath the viewing plane of the Corridor.
 - Wider Assessment Areas.
Located either side of the Landmark Viewing Corridor that protects the sensitive edges of the Corridor from unacceptable development.
- Linear View: A narrow linear view of an urban object across a substantial part of the borough and central London.
- River Prospect: An important borough panorama of the River Thames and its foreshores from within Southwark. This type of view are 'sensitive' to new height and may include a number of important landmarks.

9.6.3 View scoping

During pre-application discussions you will need to scope and agree a series of views of your proposed development which will be required for detailed Townscape and Visual Impact Assessment. Our SPDs and AAPs may also have identified a number of views which should be tested if relevant.

Views should be presented as Accurate Visual Representations photographs using 24mm and 50mm camera lenses with the proposal generally in wireline. The most sensitive views i.e. those affecting the setting or significance of heritage assets to be fully rendered. Care should be taken to include winter and summer views and in some case night-time views.

Views are considered in accordance with Historic England guidance on development in the context of heritage significance (i.e. what is significant about each view) and allow for a better understanding of the impact a proposal might have on that significance through a process of qualitative assessment.

9.6.4 VuCity

The Council utilises a software application called VuCity which is a 3D rendered model of the entire borough. Major (up to 50 units or 50,000 sq ft) and Strategic Major Application schemes (more than 50 units or 50,000 sq ft) will be required to provide a 3D electronic model in an FBX file format so that it can be inserted into the VuCity model so the proposal may be assessed within its context.

10 Heritage Crime

Southwark's Scheduled Ancient Monuments, Listed Buildings and Conservation Areas are by definition of national importance. It is only right that the Council should act to protect them from criminal damage and to enforce against unauthorised works that harm their special character.

10.1 Prosecution and enforcement

10.1.1 What constitutes a criminal 'offence'?

It is an offence for anyone to carry out works that require Scheduled Ancient Monument consent or Listed Building Consent without the consent being first obtained.

It is similarly an offence to demolish a building within a Conservation Area without express planning permission. The offence carries a maximum penalty of two years' imprisonment and/ or a fine. The fine is unlimited and can take into account any financial benefits that may come from the work. The Courts will insist that the unlawful work is reversed and the historic fabric restored, which often includes rebuilding any structure or building demolished in full replica.

The offence is committed by the person who carried out the unlawful works and by anyone who instructed the unlawful works to be carried out, including the property manager or owner. It is not a defence to say that you did not know the building was protected or within a Conservation Area.

Figure 15: Before and after 549 Lordship Lane



10.1.2 Heritage enforcement

As well as prosecuting any breaches of law, the Council may issue a Listed Building enforcement notice. Similarly, this will require the owner or property manager to restore any unauthorised works that come to light, or to alleviate their effects. There is no time limit on this. Any unlawful works carried out in previous years that affect the special character of the building can be enforced against.

Failure to comply with the enforcement notice is itself an offence and carries an unlimited fine. You are therefore advised to comply with the enforcement notice even if the works were carried out by a previous owner, or risk committing a criminal offence. Alternatively, you may apply for retrospective Listed Building Consent or appeal against the enforcement notice. However, you run the risk of failure to obtain the consent and of being prosecuted. Furthermore, it does not alter the fact that the work was carried out unlawfully and the Council may choose to seek prosecution regardless.

You should therefore seek advice and the appropriate consents before undertaking work that could affect the special character of a Listed Building or Scheduled Ancient Monument, or involves the demolition of a building within a Conservation Area. It is also important that your solicitor confirms that the appropriate consents are in place when selling or purchasing a heritage building.

In carrying out its enforcement work, the Council must give priority to those cases where the unauthorised works are to its most treasured heritage assets and/ or where public interest is high. Greater attention will be given to protecting our Scheduled Ancient Monuments and Grade I and II* Listed Buildings. Nonetheless, we will enforce against unlawful work to Grade II listed buildings and demolition within conservation areas, subject to available resources. The extent and significance of harm caused by the unauthorised work and the Council's previous success at appeal are important factors in determining whether we proceed with the prosecution.

Similarly, the Council will prioritise enforcement action against the unauthorised felling or pruning of trees within its Conservation Areas or those covered by Tree Preservation Orders

11 Glossary of terms

This section includes a definition of terms and words used throughout this SPD in a specific or technical sense. The definitions are extracted from various sources mainly the NPPF and also Historic England's Heritage definitions list, which is a comprehensive list of terms used within heritage protection legislation and documents. It can be sourced here: https://historicengland.org.uk/advice/hpg/hprdefinitions/#cat_P_word_Definition:%20Principles%20of%20Selection

Alteration: Work intended to change the function or appearance of a place

Archaeological Priority Area: Generic term used for a defined area where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries. They are sometimes called other names including Archaeological Priority Zones, Areas of Archaeological Significance/Importance/Interest or Areas of High Archaeological Potential.

Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places and of the people and cultures that made them (NPPF definition). There can be an archaeological interest in buildings and landscapes as well as earthworks and buried remains.

Architectural interest: In listed buildings this refers to buildings that are important to the nation because of their architectural design, decoration and craftsmanship. Also, important examples of significant plan forms, particular building types and techniques such as using cast iron, the early use of concrete and early prefabricated buildings.

Conservation: The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance (NPPF definition).

Conservation Area: An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance, designated under what is now s69 of the Planning (Listed Buildings and Conservation Areas) Act 1990

Context: Any relationship between a place and other places, relevant to the values of that place

Curtilage: In law, the curtilage of a house or dwelling is the land immediately surrounding it, including any closely associated buildings and structures, but excluding any associated open fields beyond.

Designation: The recognition of particular heritage value(s) of a significant place by giving it formal status under law or policy intended to sustain those values

Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation (NPPF definition).

Desk Based Assessment: A desk-based assessment is a written research document. It will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation to do so.

Development: Development means the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land.

Equality Implications: Public bodies are responsible for ensuring that their plans, policies and activities do not unfairly discriminate against a group protected by equalities legislation. It is the responsibility of the public bodies that we advise to ensure that they have paid due regard to local equality implications when implementing our advice

Evaluation: An archaeological field evaluation is the initial stage of investigation, by the excavation of archaeological trial trenches. It is carried out in support of a planning application to enable an informed decision. Evaluation will seek to define and characterise the archaeological remains on a site. Where archaeological remains are discovered or predicted, and the proposed scheme has an impact on those remains, further archaeological work will be necessary. This may be a mitigation strategy for remains that would be undisturbed, full excavation, or a combination of the two. Evaluation can involve different methods and practises. Evaluation can also be non-intrusive, for example, geophysical, chemical or survey techniques or intrusive, for example, auger, borehole, monitoring of geotechnical work, test pits or trenches.

Fabric: The material substance of which places are formed, including geology, archaeological deposits, structures and buildings, and flora

Freedom of Information: We are subject to the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 which provide a general right of access to information we hold or for which we are responsible. We may provide the information you have supplied in response to a request made under this legislation, subject to any exemptions which apply. We will consult with external parties as necessary prior to releasing information.

Harm: Change for the worse, here primarily referring to the effect of inappropriate interventions on the heritage values of a place

Heritage: All inherited resources which people value for reasons beyond mere utility Heritage, cultural inherited assets which people identify and value as a reflection and expression of their evolving knowledge, beliefs and traditions, and of their understanding of the beliefs and traditions of others

Heritage Asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing) (NPPF definition).

Heritage, natural: Inherited habitats, species, ecosystems, geology and landforms, including those in and under water, to which people attach value

Historic environment: All aspects of the environment resulting from the interaction between people and place through time, including all surviving physical remains of past human activity, whether visible, buried or submerged and landscaped and planted or managed flora (NPPF definition).

Historic Environment Record (HER/GLHER): A public, map-based data set, primarily intended to inform the management of the historic environment. Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use (NPPF definition). Historic England maintains the Historic Environment Record for Greater London.

Historical interest: For buildings this refers to buildings that have important aspects of the nation's social, economic, cultural or military history, such as industrial buildings, railway stations, schools, hospitals, theatres, and town halls.

Group Value: For buildings this refers to buildings which have an important architectural or historical unity or a fine example of planning, such as squares, terraces, model villages and model courtyard farms. As well as buildings, the list includes other structures of special architectural or historical interest such as monuments, bridges, garden buildings, telephone kiosks, gate piers, walls, fountains, milestones and gravestones.

Maintenance: Routine work regularly necessary to keep the fabric of a place in good order

Material: Relevant to and having a substantial effect on, demanding consideration

Mitigation: a measure introduced to avoid or reduce an effect.

Natural Change: Change which takes place in the historic environment without human intervention, which may require specific management responses (particularly maintenance or periodic renewal) in order to sustain the significance of a place

Object: Anything not (now) fixed to or incorporated within the structure of a place, but historically associated with it

Place: Any part of the historic environment, of any scale, that has a distinctive identity perceived by people

Potential: In some places, the nature of the archaeological interest cannot be specified precisely, but it may still be possible to document reasons for anticipating the existence and importance of such evidence. Circumstantial evidence such as geology, topography, landscape history, nearby major monuments and patterns of previous discoveries can be used to predict areas with a higher likelihood that currently unidentified heritage assets of historic and archaeological interest, will be discovered in the future.

Preserve: To keep safe from harm

Proportionality: The quality of being appropriately related to something else in size, degree, or other measurable characteristics

Public: Of, concerning, done, acting, etc. for people as a whole

Renewal: Comprehensive dismantling and replacement of an element of a place, in the case of structures normally reincorporating sound units

Repair: Work beyond the scope of maintenance, to remedy defects caused by decay, damage or use, including minor adaptation to achieve a sustainable outcome, but not involving restoration or alteration

Restoration: To return a place to a known earlier state, on the basis of compelling evidence, without conjecture

Research Framework: A suite of documents which describe the current state of knowledge of a topic or geographical area (the 'resource assessment'), identifies major gaps in knowledge and key research questions (the 'agenda') and set out a strategy for addressing them. A resource assessment and agenda for London archaeology has been published and a strategy is in preparation.

Reversible: Capable of being reversed so that the previous state is restored

Setting of a Heritage Asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF definition). The surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape

Sensitivity: The likelihood of typical development impacts causing significant harm to a heritage asset of archaeological interest. Sensitivity is closely allied to significance and potential but also takes account of an asset's vulnerability and fragility.

Significance: The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence but also from its setting (NPPF definition). The sum of the cultural and natural heritage values of a place, often set out in a statement of significance

Sustain: Maintain, nurture and affirm validity

Sustainable: Capable of meeting present needs without compromising ability to meet future needs

Transparent: Open to public scrutiny

Value: An aspect of worth or importance, here attached by people to qualities of places

Value, aesthetic: Value deriving from the ways in which people draw sensory and intellectual stimulation from a place

Value, communal: Value deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory

Value, evidential: Value deriving from the potential of a place to yield evidence about past human activity

Value, historical: Value deriving from the ways in which past people, events and aspects of life can be connected through a place to the present

Value-based judgement: An assessment that reflects the values of the person or group making the asset

Written Scheme of Investigation (WSI): All archaeological investigations, building recording projects or other works concerning the historic environment should have a project design, known as a method statement or Written Scheme of Investigation (WSI). Clearly stated aims, objectives, risks, products and tasks are essential. When incorporated into a defined methodology, this allows for programming and planning decisions to be made responsibilities to be made clear, and a successful project to run. For projects initiated through the planning system, such as through a condition attached to planning permission, Listed Building Consent or Scheduled Monument Consent, a written scheme of investigation is a requirement. Written Schemes of Investigation are expected to conform to all current professional standards for the proposed fieldwork. It is best practice for those involved in pre-determination fieldwork to liaise with the Council regarding the requirements and necessary consents prior to the implementation of any work.

12 List of Abbreviations

CHB Centre for Human Bioarchaeology
 ClfA Chartered Institute for Archaeologists
 DCLG Department for Communities and Local Government
 DCMS Department for Culture, Media and Sport
 EH English Heritage (now Historic England)
 EIA Environmental Impact Assessment
 GLAAS Greater London Archaeology Advisory Service
 GLHER Greater London Historic Environment Record
 HE Historic England (formerly English Heritage)
 HER Historic Environment Records
 HLC Historic Landscape Characterisation
 LAARC London Archaeological Archive and Research Centre
 MoL Museum of London
 MoLA Museum of London Archaeology
 NHPP National Heritage Protection Plan
 NPPF National Planning Policy Framework
 PPG15 Planning Policy Guidance 15: Planning and the Historic Environment
 PPG16 Planning Policy Guidance 16: Archaeology and Planning
 PPS5 Planning Policy Statement 5: Planning for the Historic Environment
 TDP Thames Discovery Programme
 TEMPO Tree Evaluation Method for Preservation Orders
 WSI Written Schemes of Investigation

13 Useful Contacts

Archaeology

Senior Planner Archaeology, Design and Conservation Team
Planning Division, Place and Wellbeing
Southwark Council
0207 525 3969
designconservation@southwark.gov.uk

Design and Conservation Team

Planning Division, Place and Wellbeing
Southwark Council
designconservation@southwark.gov.uk

Heritage Action Zone

Project Officer, Design and Conservation Team
Planning Division, Place and Wellbeing
Southwark Council
0207 525 7898.

Peckham Townscape Heritage Initiative

Project Officer, Design and Conservation Team
Planning Division, Place and Wellbeing
Southwark Council
0207 525 3265.

Planning Enquiries

Planning Division, Place and Wellbeing
Southwark Council
0207 525 5403
planning.enquiries@southwark.gov.uk

Figure 16: Tower Bridge, Grade I Listed





Heritage Supplementary Planning Document
Equalities Impact Assessment
June 2021

The Purpose of an Equalities Assessment on Planning Policy

This document assesses the Heritage Supplementary Planning Document against the protected characteristics highlighting where there is a positive impact, negative impact or neutral impact.

The council is required by UK Law to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics, as set out in the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act 2010). The council carries out Equalities Analysis (EqIA) of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals in the Equality Act 2010 and on Human Rights that replaces all previous equality legislation into one overarching act.

The Town and Country Planning Association sets out in 'Beyond Box-Ticking: A Short Guide to meaningfully assessing Local Plan policy impacts on equality and inclusion' that an equalities assessment should:

- Recognise that planning policies and decisions impact different people differently
- Multiple groups in society who are both under-represented in engagement with planning processes and often at most risk with planning processes and often most at risk of being negatively affected by planning outcomes

Local planning authorities should therefore assess the potential impacts of draft policies on different groups at an early stage, and adjust policies accordingly overtime. Those who are those subject to the equality duty must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Equalities Issues in Southwark

Southwark is very diverse, in terms of demographic, needs and characteristics. Planning policy must therefore respond to a wide range of issues and needs to deliver the best outcomes for all, and reduce the negative impacts of development on people.

How is LB Southwark responding to resolve these issues in planning policy?

Borough-wide strategic policies in the New Southwark Plan set out the Council's regeneration strategy to work with local people to improve neighbourhoods and create new opportunities for the future. They are also used to set the context for our detailed planning policies and to make planning decisions.

Consultation is addressed more widely in the emerging Statement of Community Involvement and Developer Consultation Charter, of which an update is currently being prepared. This aims to create a more transparent and more easily understandable and accessible planmaking and decision-taking process for members of the public to be involved in. It is proposed that larger planning applications must provide a consultation plan to demonstrate that the developer has properly consulted on their development. The plan-making and decision-making process and how the Heritage SPD guidance is engaged with is set out in the Statement of Community Involvement.

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty.

Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- We consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- We have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- We review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- We take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- We consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the [protected characteristics](#) and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others who can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present within divisional/departamental/service business plans. These will be placed on the website for public view under the council's Publications Scheme.

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk). Whilst the equality analysis is being considered, Southwark Council recommends considering health and wellbeing implications, as health and health inequalities are strongly influenced by the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce health inequalities and this is reflected in its values and aims. For this reason, the council recommends considering health and wellbeing impacts in all equality analyses, not forgetting to include identified potential mitigating actions.

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Heritage Supplementary Planning Document
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Equality analysis author	Gemma Williams and Athena Hylton-Thompson		
Strategic Director	Stephen Platts		
Department	Planning Policy	Division	Chief Executive
Date of analysis	September 2021		
Sign-off		Position	Date

Section 2: Brief description of policy/decision/business plan

The immensely rich and varied architecture, archaeology and history of Southwark is of national and international significance, ranging from prehistoric flint scatters, through Shakespearean playhouses, to the vast industrial Tate Modern. Our historic environment is an important and essential community benefit, contributing many tangible and intangible benefits to wellbeing, culture, and the sense of place and identity.

At the same time, Southwark also has some of the highest regeneration activity experienced anywhere in London. We recognise that Southwark's unique historic environment is a finite and non-renewable resource, and requires sustainable management based upon best practice, clear principles, consistent policies and sound guidance. Our aim is to find a balance between our commitment to the historic environment and to sustainable development.

The Heritage SPD provides guidance on how to apply the relevant policies of the Southwark Plan and the emerging New Southwark Plan concerning the historic environment. It gives advice on how to conform to the additional national and local legislature and policies, within which the council must operate.

The Heritage SPD will help people to understand heritage matters and provide advice on the conservation, preservation and enhancement of the historic environment.

It is designed for a wide readership, including applicants, owners, residents, planners, community groups and developers.

This document is a Supplementary Planning Document (SPD), which means that it is supplementary to the saved policies of the Southwark Plan and the emerging New Southwark Plan. SPDs contain non-statutory guidance that expands on development plan policies. SPDs can be a material consideration in planning decisions but are not part of the Plan.

Section 3: Service users and stakeholders

Service users and stakeholders	
Key users of the department or service	Members of the public; Developers; Planning agents and planning applicants; Local Authorities; Councillors; Chief Executive's Department; Local amenity groups.
Key stakeholders were/are involved in this policy/decision/business plan	Members of the public; Developers; Planning agents and planning applicants; Local Authorities; Councillors; Chief Executive's Department; Historic England; Local amenity groups.

Section 4: Pre-implementation equality analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken.

The first column on the left is for societal and economic issues (discrimination, higher poverty levels) and the second column on the right for health issues, physical and mental. As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that health is given special consideration, as it is the council's declared intention to reduce health inequalities in the borough.

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
There is potential sensitivity with the adaptation of historic assets to meet accessibility requirements needed by young children or elderly people as a result of the guidance set out in the Heritage SPD as it can restrict works. However, these will be assessed on a case-by-case basis if the matter arises as it will depend on the significance of the heritage asset. The Heritage SPD will also be of positive benefit as its aim is to protect historic assets within the borough and militate against any unacceptable or harmful development. This would result in a positive impact on residents of all ages in the borough.	There are no health impacts identified for the above protected characteristic as a result of the Heritage SPD.
Equality information on which above analysis is based	Health data on which above analysis is based
All data illustrated in emerging New Southwark Plan IIA Objective 3: To promote social inclusion, equality, diversity and community cohesion (IIA05); IIA Objective 4 which states: To protect and enhance quality of landscape and townscape (IIA011); These objectives seek to increase the protection of community assets and heritage, improve the local area and quality of life, improve accessibility to travel and prevent social isolation by enhancing community cohesion. All data illustrated in emerging New Southwark Plan IIA Objectives 1, 2, 8, 9, 10, 13. These objectives seek to deliver development which is inclusive and engaging positive change within the community, by protecting and promoting positive externalities whilst reducing and tackling negative externalities.	
Mitigating actions to be taken	
We will continue to monitor and review the Heritage SPD to ensure that the likelihood of negative impacts arising is minimal.	

Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
There is potential sensitivity with the adaptation of historic assets to meet accessibility requirements as a result of the guidance set out in the Heritage SPD as it can restrict works. However, these will be assessed on a case-by-case basis if the matter arises as it will depend on the significance of the heritage asset. There are no other impacts identified for the above protected characteristic as a result of the Heritage SPD.	There are no health impacts identified for the above protected characteristic as a result of the Heritage SPD.
Equality information on which above analysis is based	Health data on which above analysis is based
All data illustrated in emerging New Southwark Plan IIA Objective 3: To promote social inclusion, equality, diversity and community cohesion (IIA05); IIA Objective 4 which states: To protect and enhance quality of landscape and townscape (IIA011); These objectives seek to increase the protection of community assets and heritage, improve the local area and quality of life, improve accessibility to travel and prevent social isolation by enhancing community cohesion. All data illustrated in emerging New Southwark Plan IIA Objectives 1, 2, 8, 9, 10, 13. These objectives seek to deliver development which is inclusive and engaging positive change within the community, by protecting and promoting positive externalities whilst reducing and tackling negative externalities.	
Mitigating actions to be taken	
We will continue to monitor and review the Heritage SPD to ensure that the likelihood of negative impacts arising is minimal.	

Gender reassignment - The process of transitioning from one gender to another.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
There are no impacts identified for the above protected characteristic as a result of the Heritage SPD.	There are no health impacts identified for the above protected characteristic as a result of the Heritage SPD.
Equality information on which above analysis is based	Health data on which above analysis is based
All data illustrated in emerging New Southwark Plan IIA Objective 3: To promote social inclusion, equality, diversity and community cohesion (IIA05); IIA Objective 4 which states: To protect and enhance quality of landscape and townscape (IIA011); These objectives seek to increase the protection of community assets and heritage, improve the local area and quality of life, improve accessibility to travel and prevent social isolation by enhancing community cohesion. All data illustrated in emerging New Southwark Plan IIA Objectives 1, 2, 8, 9, 10, 13. These objectives seek to deliver development which is inclusive and engaging positive change within the community, by protecting and promoting positive externalities whilst reducing and	

tackling negative externalities.

Mitigating actions to be taken

We will continue to monitor and review the Heritage SPD to ensure that the likelihood of negative impacts arising is minimal.

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
There are no impacts identified for the above protected characteristic as a result of the Heritage SPD.	There are no health impacts identified for the above protected characteristic as a result of the Heritage SPD.
Equality information on which above analysis is based	Health data on which above analysis is based
All data illustrated in emerging New Southwark Plan IIA Objective 3: To promote social inclusion, equality, diversity and community cohesion (IIA05); IIA Objective 4 which states: To protect and enhance quality of landscape and townscape (IIA011); These objectives seek to increase the protection of community assets and heritage, improve the local area and quality of life, improve accessibility to travel and prevent social isolation by enhancing community cohesion. All data illustrated in emerging New Southwark Plan IIA Objectives 1, 2, 8, 9, 10, 13. These objectives seek to deliver development which is inclusive and engaging positive change within the community, by protecting and promoting positive externalities whilst reducing and tackling negative externalities.	
Mitigating actions to be taken	
We will continue to monitor and review the Heritage SPD to ensure that the likelihood of negative impacts arising is minimal.	

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
There could be a negative impact on this protected characteristic if they also own, live in or within the setting of, a listed building or conservation area. There is a restriction on development and works allowed within these areas which requires an understanding or prior experience with the planning system not held by every community in the borough. This can result in a disproportionate amount of enforcement action being taken against different groups. However, the Heritage SPD aims to counter this negative by providing a benefit of a vast amount of guidance on how to address works to heritage assets and reduce enforcement action as a result.	There are no health impacts identified for the above protected characteristic as a result of the Heritage SPD.
Equality information on which above	Health data on which above analysis is

analysis is based	based
All data illustrated in emerging New Southwark Plan IIA Objective 3: To promote social inclusion, equality, diversity and community cohesion (IIA05); IIA Objective 4 which states: To protect and enhance quality of landscape and townscape (IIA011); These objectives seek to increase the protection of community assets and heritage, improve the local area and quality of life, improve accessibility to travel and prevent social isolation by enhancing community cohesion. All data illustrated in emerging New Southwark Plan IIA Objectives 1, 2, 8, 9, 10, 13. These objectives seek to deliver development which is inclusive and engaging positive change within the community, by protecting and promoting positive externalities whilst reducing and tackling negative externalities.	
Mitigating actions to be taken	
We will continue to monitor and review the Heritage SPD to ensure that the likelihood of negative impacts arising is minimal.	

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
There is a positive benefit as a result of the Heritage SPD for this protected characteristic as buildings of social and cultural importance to religious or belief communities can be protected. In particular, the Local List guidance is considered to have a positive impact as the formulation of the list provides the opportunity for the religious or belief communities to protect the buildings, they value the most.	There are no health impacts identified for the above protected characteristic as a result of the Heritage SPD.
Equality information on which above analysis is based	Health data on which above analysis is based
All data illustrated in emerging New Southwark Plan IIA Objective 3: To promote social inclusion, equality, diversity and community cohesion (IIA05); IIA Objective 4 which states: To protect and enhance quality of landscape and townscape (IIA011); These objectives seek to increase the protection of community assets and heritage, improve the local area and quality of life, improve accessibility to travel and prevent social isolation by enhancing community cohesion. All data illustrated in emerging New Southwark Plan IIA Objectives 1, 2, 8, 9, 10, 13. These objectives seek to deliver development which is inclusive and engaging positive change within the community, by protecting and promoting positive externalities whilst reducing and tackling negative externalities.	
Mitigating actions to be taken	
We will continue to monitor and review the Heritage SPD to ensure that the likelihood of negative impacts arising is minimal.	

Sex - A man or a woman.

Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
There are no impacts identified for the above protected characteristic as a result of the Heritage SPD.	There are no health impacts identified for the above protected characteristic as a result of the Heritage SPD.
Equality information on which above analysis is based	Health data on which above analysis is based
All data illustrated in emerging New Southwark Plan IIA Objective 3: To promote social inclusion, equality, diversity and community cohesion (IIA05); IIA Objective 4 which states: To protect and enhance quality of landscape and townscape (IIA011); These objectives seek to increase the protection of community assets and heritage, improve the local area and quality of life, improve accessibility to travel and prevent social isolation by enhancing community cohesion. All data illustrated in emerging New Southwark Plan IIA Objectives 1, 2, 8, 9, 10, 13. These objectives seek to deliver development which is inclusive and engaging positive change within the community, by protecting and promoting positive externalities whilst reducing and tackling negative externalities.	
Mitigating actions to be taken	
We will continue to monitor and review the Heritage SPD to ensure that the likelihood of negative impacts arising is minimal.	

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
There is a positive benefit as a result of the Heritage SPD for this protected characteristic as buildings of social and cultural importance to the LGBT+ communities can be protected. In particular, the Local List guidance is considered to have a positive impact as the formulation of the list provides the opportunity for the LGBT+ communities to protect the buildings they value the most.	There are no health impacts identified for the above protected characteristic as a result of the Heritage SPD.
Equality information on which above analysis is based	Health data on which above analysis is based
All data illustrated in emerging New Southwark Plan IIA Objective 3: To promote social inclusion, equality, diversity and community cohesion (IIA05); IIA Objective 4 which states: To protect and enhance quality of landscape and townscape (IIA011); These objectives seek to increase the protection of community assets and heritage, improve the local area and quality of life, improve accessibility to travel and prevent social isolation by enhancing community cohesion. All data illustrated in emerging New Southwark Plan IIA Objectives 1, 2, 8, 9, 10, 13. These objectives seek to deliver development which is inclusive and engaging positive change within the community, by protecting and promoting positive externalities whilst reducing and tackling negative externalities.	
Mitigating actions to be taken	
We will continue to monitor and review the Heritage SPD to ensure that the likelihood of negative impacts arising is minimal.	

Socio-economic disadvantage – although the Equality Act 2010 does not include socioeconomic status as one of the protected characteristics, Southwark Council recognises that this continues to be a major cause of inequality in the borough. Socio economic status is the measure of an area's, an individual's or families economic and social position in relation to others, based on income, education, health, living conditions and occupation.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The Heritage SPD guidance will have a negative impact to those who are both in a socio-economic disadvantaged position and live in, or within the setting of a heritage asset as it is more expensive to undertake home renovations due to the requirement for traditional or special materials and features. For example, timber windows are advised in these areas which can be more expensive than a PVC alternative. However, the Heritage SPD is also considered to have a positive impact on residents disadvantaged by their socio-economic status as it provides a vast amount of guidance on how to address works to heritage assets and can reduce the need for paid specialist advice or enforcement action as a result of not understanding the relevant planning requirements and legislation. Additionally, the Heritage SPD will help conserve and protect the heritage assets of a socio-economic disadvantaged area which provides a benefit to those who live there as it maintains the quality of the built environment and restricts harmful development. In particular, the Local List guidance is considered to have a positive impact on residents disadvantaged by their socio-economic status. The formulation of the list would support long-term, high-quality place making by taking into account local listed structures and visual amenity of adjoining occupiers, improving the public realm for all, and giving the opportunity for the local community to protect the assets it values the most.	The Heritage SPD will provide a positive benefit as it provides guidance on how applicants who own, live, or are within the setting of a heritage asset can sensitively retrofit buildings to improve efficiency and provide better health outcomes.
Equality information on which above analysis is based	Health data on which above analysis is based
All data illustrated in emerging New Southwark Plan IIA Objective 3: To promote social inclusion, equality, diversity and community cohesion (IIA05); IIA Objective 4 which states: To protect and enhance quality of landscape and townscape (IIA011); These objectives seek to increase the protection of community assets and heritage, improve the local area and quality of life, improve accessibility to travel and prevent social isolation by enhancing	

community cohesion.

All data illustrated in emerging New Southwark Plan IIA Objectives 1, 2, 8, 9, 10, 13. These objectives seek to deliver development which is inclusive and engaging positive change within the community, by protecting and promoting positive externalities whilst reducing and tackling negative externalities.

Mitigating actions to be taken

We will continue to monitor and review the Heritage SPD to ensure that the likelihood of negative impacts arising is minimal.

Human Rights

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol.

Potential impacts (positive and negative) of proposed policy/decision/business plan

The Heritage SPD aims to conserve local heritage assets, restrict development in conservation areas, conserve built and natural heritage, protect borough views, conserve archaeological resources, protect World Heritage Sites, support long-term high-quality place making by taking account of local listed structures.

This protects local identity and improves public realm considerate of the Human Rights Act.

Information on which above analysis is based

All data illustrated in emerging New Southwark Plan IIA Objective 3: To promote social inclusion, equality, diversity and community cohesion (IIA05); IIA Objective 4 which states: To protect and enhance quality of landscape and townscape (IIA011); These objectives seek to increase the protection of community assets and heritage, improve the local area and quality of life, improve accessibility to travel and prevent social isolation by enhancing community cohesion.

All data illustrated in emerging New Southwark Plan IIA Objectives 1, 2, 8, 9, 10, 13. These objectives seek to deliver development which is inclusive and engaging positive change within the community, by protecting and promoting positive externalities whilst reducing and tackling negative externalities.

Mitigating actions to be taken

We will continue to monitor and review the Heritage SPD to ensure that the likelihood of negative impacts arising is minimal.

Section 5: Further action and objectives

Based on the analysis above, areas are identified as requiring more detailed analysis or key mitigating actions.

Number	Description of issue	Action	Timeframe
1	Ensure that the Heritage SPD is adopted within the shortest timeframe possible by the Council to ensure heritage assets can be protected and the benefits identified can be secured.	Progress the Heritage SPD towards formal adoption at Cabinet.	Heritage SPD to be decided at Cabinet on 19 th October 2021.
2	Ensure that the implementation of the Heritage SPD is monitored following adoption for potential actual effects on different groups.	The outcomes of implementing the guidance in the SPD will be monitored through the Authority Monitoring Report (AMR). Equality analysis is an on-going process and that does not end once the SPD is implemented.	The monitoring arrangements will be undertaken annually.



Heritage Supplementary Planning Document (SPD)

Consultation Report

September 2021

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1. Introduction

1.1. What is the Heritage Supplementary Planning Document (SPD)?

- 1.1.1. The Heritage SPD provides guidance on how to apply the relevant policies of the Southwark Plan and the emerging New Southwark Plan concerning the historic environment. It gives advice on how to conform to the additional and local legislature and polices, within which the council must operate.
- 1.1.2. The Heritage SPD will help people to understand heritage matters and provide advice on the conservation, preservation and enhancement of the historic environment.
- 1.1.3. It is designed for a wide readership, including applicants, owners, residents, planners, community groups and developers.
- 1.1.4. This document is a Supplementary Planning Document (SPD), which means that is supplementary to the saved policies of the Southwark Plan and the emerging New Southwark Plan. SPD's can be a material consideration in planning decision but are not part of the Plan.

1.2. What is this Consultation Report?

- 1.2.1. A consultation report explains the consultation that has been undertaken as part of the preparation of the Heritage SPD. Consultation for the Heritage SPD opened on Monday 11 January 2021 and was due to close on Monday 5 April 2021. However, as a result of the New Southwark Plan (NSP) going through Examination in Public (EiP), the closing date was extended to Monday 10 May 2021.
- 1.2.2. The consultation report also sets out how the comments received from individuals and organisations have been considered and how they have influenced the final version of the Heritage SPD.
- 1.2.3. This report sets out how we have met statutory requirements as well as our local requirements for consultation on supplementary planning documents.
- 1.2.4. The statutory requirements can be found in our Statement of Community Involvement (SCI) (2008) which sets out how the Council will consult on our planning policy documents and planning applications. The SCI refers to several legal and regulatory requirements, both in terms of methods of consultation and particular bodies that we must engage with. When the SCI was produced it was done so with regard to the Town and Country Planning (Local Development) (England) Regulations 2004 and the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. In April 2012, both sets of regulations were replaced by the Town and Country Planning (Local Planning) (England) Regulations 2012. We have subsequently ensured that consultation on the SPD meets the requirements of the SCI and the updated regulations. More information is set out within section 4 of this report.

1.3. How to find your way around this document?

1.3.1. The consultation report is structured in the following way:

- Section 1 - Introduction
- Section 2 - Heritage Supplementary Document Consultation
- Section 3 - Monitoring our Consultation
- Appendices

1.4. Where to get more information

1.4.1. The Heritage SPD can all be viewed on our website:

<https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/supplementary-planning-documents-spd/spd-by-planning-topic?chapter=2>

1.4.2. Copies are also available by contacting the Planning Policy Team using the following methods:

- **Email:** planningpolicy@southwark.gov.uk
- **Telephone:** 020 7525 0146
- **Post:** Planning Policy, Chief Executive's Department, Southwark Council, FREEPOST SE1919/14, London SE1P 5LX

1.5. What happens next?

1.5.1. The Heritage SPD is being taken to cabinet on 19 October 2021. Once adopted, the Heritage SPD will be monitored through the Authority's Monitoring Report (AMR).

1.5.2. The emerging New Southwark Plan will replace the Core Strategy (2011) and the Saved Southwark Plan (2007) and is likely to provide updated policies relevant to the Heritage SPD. For current information on the progress of the New Southwark Plan please see our webpage at:

<https://www.southwark.gov.uk/planning-and-building-control/planning-policyand-transport-policy>

2. Heritage SPD consultation

2.1. Who was consulted and how?

2.1.1. We consulted a wide range of residents, developers, landowners and planning agents on the Heritage SPD and as such, have met the requirements of our Statement of Community Involvement (2008) (SCI).

2.1.2. In addition, the Localism Act 2011 requires co-operation between local authorities and a range of other bodies and organisations during the preparation of planning policy and guidance. This is called the "Duty to co-operate". The

Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (2012) set out these prescribed bodies and further information on the need for local authorities to work with their neighbouring boroughs on strategic planning issues and cross boundary issues. Appendix A of this report sets out both the prescribed bodies and our neighbouring boroughs. All of these organisations were consulted as part of the SPD consultation.

2.1.3. The consultation carried out for the Heritage SPD is detailed in the following tables. We have set out how this has met the minimum SCI requirements as well as additional consultation undertaken.

2.1.4. In accordance with our SCI, the Heritage SPD was available for comment for a period of 12 weeks, from Monday 11 January 2021 to Monday 10 May 2021.

Table 1: Minimum consultation as required by our SCI

Method of Consultation	Consultee	Date	Comments
Send a mail out to all statutory consultees informing them of the consultation and inviting comments	Statutory consultees		Notification was sent out through MySouthwark which all statutory consultees are signed up to.
Displaying consultation documents at our offices.	All		As council offices are closed, we would have printed one copy per person and sent it out to individuals if requested All documents were made available online and everyone was encouraged to use this facility first.
Upload the documents onto the council website for the public to view	All		All documents relating to this consultation are available here: https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/supplementary-planning-documents-spd/spd-by-planning-topic?chapter=2
Advertise the consultation in the local press	All		This will be Southwark News

Table 2: Additional Consultation

Method of Consultation	Consultee	Date	Comments
Update MySouthwark users regularly of the consultation and where to find consultation documents	All	11.01.2021	An email was sent to the 16,000+ contacts signed up for planning policy email notifications and updates via MySouthwark.
Advertise the consultation through Council social media such as Twitter.	All		Sent out regular updates and reminders through council social media pages.
Display the Heritage SPD and accompanying documents on the Council's Consultation Hub with an online questionnaire available for comments	All	11.01.2021	A link to the Consultation Hub was sent in regular updates to MySouthwark users https://consultations.southwark.gov.uk/corporate-strategy/heritagespd/
Present the document to Southwark's Conservation Area Advisory Group (CAAG) at a monthly meeting.	All	23.01.2021	Southwark's Conservation Area Advisory Group (CAAG) is formed from representatives of local historical, civic and amenity societies. The group provides regular guidance on planning applications that may affect the character or appearance of our conservation areas. The document was presented at the CAAG meeting on Tuesday 23 January 2021 by a Design and Conservation team leader.

Public consultation event with a presentation to be live streamed. Followed by questions and answers session to talk about the Heritage SPD and consultation in planning.	All	16.02.2021	A public consultation event was held on 16 th February 2021 where an overview of the document was given by the previous Cabinet Member for Climate Emergency, Planning and Transport, Councillor Johnson Situ, and was followed by a presentation by the Group Manager of the Design and Conservation team and a Q&A session.
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2.2 How many comments were received on the Heritage SPD?

2.2.1 19 formal representations were received from statutory consultees, various groups and members of the public. Further details on the responses is set out in Section 2.3 - Summary of Consultation responses received on the Heritage SPD

2.2.2 The full representations and the officer comments to these representations are set out in appendix D.

2.3 Summary of Consultation responses received on the Heritage SPD

2.3.1 A summary of the representations received and from whom are set out below.

Local Councillors

Chapter 1 – About this document

2.3.2 No responses were received from local Councillors for the Heritage SPD

Statutory consultees and other public bodies

2.3.3 Representations were received from Historic England, The British Sign and Graphics Association, Natural England, and Spatial Planning on behalf of TfL

Chapter 1 – About this document

2.3.4 n/a

Chapter 2 – Our vision

2.3.5 n/a

Chapter 3 – How can I learn more and get involved?

2.3.6 n/a

Chapter 4 – what is the legal and policy context?

2.3.7 n/a

Chapter 5 – understanding Heritage Terminology

2.3.8 n/a

Chapter 6 – The Historic Environment in a Changing Climate

2.3.9 n/a

Chapter 7 – Introduction to ‘Built heritage Assets’

2.3.10 n/a

Chapter 8 – Archaeology in Southwark

2.3.11 (HE) The document contains useful content and advice on the local historic environment. Reference to the policies of the New Southwark Plan should be referenced in the document. For example policy P18 Listed Buildings should be referenced in The Principles of Development in the Context of Listed Buildings (page 28).

Chapter 9 – Nature

2.3.12 n/a

Chapter 10 – Heritage Crime

2.3.13 n/a

Chapter 11 – Glossary of terms

2.3.14 n/a

Chapter 12 – List of Abbreviations

2.3.15 n/a

Chapter 13 – Useful Contacts

2.3.16 n/a

Local residents, individuals and groups

2.3.17 14 residents, individuals, some of whom are represent local groups submitted comments via the Consultation Hub.

Chapter 1 – About this document

2.3.18 n/a

Chapter 2 – Our vision

2.3.19 n/a

Chapter 3 – How can I get involved?

2.3.20 The list of contacts should be updated to reflect local groups within the borough

Chapter 4 – What is the legal and policy context?

2.3.21 The policies of the New London Plan should be listed. And the hierarchy of the policies from the London Plan, National Planning Policy Framework (NPPF) and the New Southwark Plan.

2.3.22 Historic England is not referenced in this section, which is belived to be odd as its referenced in Chapter 5.

Chapter 5 – Understanding Heritage Terminology

2.3.23 More detailed explanations should be provided here for the different types of values mentioned in the chapter.

2.3.24 Highlighted an error of repetition of the phrase ‘it is important’ paragraph 5.5.

Chapter 6 – The Historic Environment in a Changing Climate

2.3.25 Question on how Southwark will discourage the use of the car use and installing electrical car charging points is not positive addition as introduces a different form of car and takes away from pedestrian paths and cycle routes.

2.3.26 More information on retrofitting, installing renewable energy resources and how to make building to achieve net zero whilst being able to preserve the historic environment.

2.3.27 To provide more information on the harm to the historic environment as a result of demolition.

2.3.28 The chapter needs to be updated with the Mayor’s goals

2.3.29 The guidance from Historic England on ‘Energy Efficiency’ should be made clearer, it seems to be lost in the text. The information from Historic England is very useful.

2.3.30 More emphasis should be placed on the skill and craft that people should/may have on repairing historic buildings, rather than talking about prefabricated cladding systems.

2.3.31 The explanation between heritage and climate change is welcomed, in particular the link between re-use and embodied carbon, however, a clear statement on the interconnected issues around repair, conservation, avoidance of demolition, should be included.

Chapter 7 – Introduction to ‘Built Heritage Assets’

2.3.32 More detail should be provided on this section. Definitions/explanation should be used when talking about shopfront, so it is clear for readers. Illuminated signs are

commonly used and modern technology have made them slimmer so why can't they be used in Conservation Areas and on Listed Buildings? Further explanation should be added in this section differentiating between modern and traditional shopfronts.

- 2.3.33 Further detailed and clarity on Permitted Development Rights for owners of Listed Buildings and buildings within a Conservation Area. This information should also be updated to reflect the changes from the Government
- 2.3.34 Building heights should be considered and not introduce skyscrapers. Rents are too high for old stall holders.
- 2.3.35 The proposed new Conservation Areas in the Old Kent Road needs to be included.
- 2.3.36 Examples of locally listed buildings should be included and to allow the community to help gather information on the buildings that are currently on the local list.
- 2.3.37 More information should be included on what happens after a building is nominated for the local list.
- 2.3.38 More guidance on the contents of Heritage Statements and what information should be included in this document.
- 2.3.39 The guidance included in Conservation Area Appraisals, particularly on the Walworth Road and development.
- 2.3.40 Strong support for the shopfront policy of the SPD, however, there are not a lot of applications submitted to the Council that conform with this policy.
- 2.3.41 Locally listed building should be moved and be put after designed heritage assets.
- 2.3.42 Historic England's 55 page guidance should be summarised and put in the Heritage SPD.
- 2.3.43 An updated map highlighting the Conservation Areas in the borough as it not clear currently, suggested to add numbers, and make it a whole A4 page.
- 2.3.44 The illustration on shopfronts is good. The guidance is slim and should be more detailed, similar to Westminster's .
- 2.3.45 There should be information about contested heritage assets, as there are applications for statues to be removed.
- 2.3.46 The shopfront guidance is good, should a shopfront design guidance be created.
- 2.3.47 Listed building principles of development should be updated to reflect the information of the National Planning Policy Framework.
- 2.3.48 Conservation Area principles of development section 1(c) cultural' in the Conservation Areas guide strikes me as ultra vires. There is no statutory

requirement to research famous occupants of a house before submitting an application.

Chapter 8 – Archaeology in Southwark

2.3.49 The dates of the Mesolithic period should be corrected to 10,000 BC - 4,000 BC.

2.3.50 Should have a reference to burial licenses issued under the 1981 Act.

2.3.51 Should include how long a scheduled area is scheduled for.

2.3.52 The Heritage SPD seems to provide warnings and problems rather than providing guidance and solutions for works that may be carried out.

Chapter 9 - Nature

2.3.53 There is not enough information on Tree Preservation Orders (TPOs), the age requirements for a tree

2.3.54 Building heights of new developments have not been included in the heritage SPD, nor has an example of scale in relation to the building and the tree.

2.3.55 A clearer explanation about the protected view terminology and clarified which buildings might infringe on this legislation

2.3.56 Noticed a numbering issue.

2.3.57 At present, section 9.1.1. does not accurately reflect that much of the endangered biodiversity of Southwark.

2.3.58 A list of useful contacts within the borough of groups/organisations who deal with amenity.

2.3.59 More detail on borough views and how they are mapped. The information should also align with the NPPF.

2.3.60 The following questions have arisen:

- How much weight does heritage assets have in registered parks and gardens?
- How set out borough view?

Chapter 10 – Heritage Crime

2.3.61 Examples of when Southwark has enforced penalties should be included here.

Chapter 11 – Glossary of terms

2.3.62 n/a

Chapter 12 – List of Abbreviations

2.3.63 n/a

Chapter 13 – Useful Contacts

2.3.64 n/a

Table List

2.3.65 n/a

Figure List

2.3.66 n/a

2.3 Developers, planning agents and interested parties

2.3.1 No representations were submitted by developers, planning agents or other interested parties.

2.4 Summary of changes made to the draft Heritage SPD

2.4.1 The key themes to come out of the consultation were;

- 2.4.1.1 Need to expand upon guidance in chapter six, 'Historic Environment in a Changing Climate'
- 2.4.1.2 Additional clarifications to be provided in chapter seven, 'Introduction to Built Heritage Assets' in order to make guidance clearer and consistent
- 2.4.1.3 Summaries requested of external guidance documents such as those from Historic England

2.4.2 Chapter six, 'Historic Environment in a Changing Climate' has been added to, with updated information and further diagrams provided. Additional clarifications have been provided within chapter seven, 'Introductions to Built Heritage Assets' and guidance updated with any national or regional policy changes to ensure consistency. The SPD was not considered the place to provide extensive summaries of external guidance as the document would become overly lengthy, however, any relevant external guidance has been linked to and signposted.

2.4.3 Full consultation responses and how they have been dealt with can be found in the Appendix D.

3. Monitoring our Consultation

3.1. Why we monitor our consultation

3.1.1. Our statement of community involvement indicates that the success of consultation can in part be measured by the number and diversity of consultees and responders. This is particularly important for Southwark which is very diverse and includes many traditionally hard to reach groups. We want to ensure the final SPD meets the needs of those living, working and visiting the area.

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

3.2. How we monitor our consultation

- 3.2.1. After every stage of consultation, we look at the people and groups that have commented on the planning document and look back over the events and consultation activities we carried out to see whether we should have targeted more or different groups. We feed this into our planning for future consultation on our planning policy documents.

Appendix A – Consultation notification email/mailout

Appendix B – Zoom question and answer session invitation

Appendix C – Press notice

Appendix D – Table of detailed summary of representations and council response

Appendix A – Consultation Notification email / mailout

GOV Delivery email notification sent: 12th January 2021

Heritage Supplementary Planning Document

Southwark Council is consulting on the draft Heritage Supplementary Planning Document from 11th January until 5th April 2021.

The Heritage SPD provided detailed guidance on how to apply the relevant policies of the Southwark Plan and the emerging New Southwark Plan concerning our historic environment.

The Heritage SPD also sets out further advice on how we expect development to be consistent with wider national and local legislation and policy, within which the council must operate.

It has been written to provide better understanding of heritage matters and provides clear advice on the conservation, preservation and enhancement of our historic environment. It is designed for a wide readership, including applicants, building owners, residents, planners, community groups and developers.

Consultation will take place from 11 January 2021 to 5 April 2021.

How to comment on the Heritage Supplementary Planning Document

The plan can be viewed [here](#).

Comments can be made via the Consultation hub [here](#).

If you have any questions or issues, please contact planningpolicy@southwark.gov.uk

Southwark Council

Appendix B – Zoom question and answer session invitation

Invitation to question and answer session on 16th February at 6pm

Appendix C – Press notice

Appendix D - Table of detailed summary of representations and council response

Chapter	Reference	Name	Comment	Response
Chapter 6 - The Historic Environment in a Changing Climate		Caroline Knight	I would like to know how Southwark plans to discourage car use. Installing on-street electric charging points only encourages a different type of car use and takes up space that could be used for public, pedestrian or cycling movement.	This is not considered to be within the scope of the Heritage SPD
Chapter 6 - The Historic Environment in a Changing Climate		Anonymous	I would like the document to further prioritise measures that reduce energy usage by allowing for energy efficient retrofitting and installation of renewable energy sources in/on buildings in conservation areas and listed buildings under permitted development rights. I would hope that making additional allowances for this in combination with educating residents and installers on historic character/sensitivities will speed the transition towards achieving net zero while maintaining the historic environment of Southwark.	This is not considered to be within the scope of the Heritage SPD as we cannot amend policies, but additional guidance could be included for assistance
Chapter 6 - The Historic Environment in a Changing Climate		Mark Morris	Expand upon harm caused by demolition	Chapter 6 of the SPD explains the harm caused by demolition in environmental terms. Harm is caused to a heritage asset through the removal of its fabric or loss of its features. In the case of a demolition the harm to the heritage is due to the total loss of a feature or a building of architectural or historic significance and should be avoided. The principle here is that the demolition of a historic building will not only lead to the loss of its architectural, or cultural significance, but should also be considered in environmental terms because there is a vast amount of embodied energy in existing buildings that is wasted if the building is demolished to make way for a new one.
Chapter 6 - The Historic Environment in a Changing Climate		Hannah Platt	Chapter 6 needs to be updated with the Mayor's Plan goals and document should be read by planning committee	The energy hierarchy will be updated to reflect the London Plan 2021
Chapter 6 - The Historic Environment in a Changing Climate		Jeremy Leech	This section mentions the voluminous technical guidance produced by Historic England on 'Energy Efficiency'. This priceless resource, however, seems to be lost in the text within this chapter. Highlighting this resource better would be very useful to applicants and their builders. Producing a precis on best practice from HE's guidance would be ideal but likely well beyond the scope of this document.	Providing a summary of the Historic Engalnd guidance is not considered to be within the scope of the Heritage SPD however there will be improved signposting to references and links included on the website.
Chapter 6 - The Historic Environment in a Changing Climate		Claire Hegarty	Paragraph on human skill and craft leading to careful repair. Touch on the materials of historic buildings: brick, stone, timber, and how they lend themselves to human skills, rather than say prefabricated cladding systems, which are industrialised. As much holistic linking of sustainability and repair knowledge and skill as possible! There is a story about revaluing forgotten skills, apprenticeships, valuing practical ingenuity, which builds an argument for sustainability on many levels across society.	This chapter will be expanded upon
Chapter 7 - Introduction to 'Built Heritage Assets'	7.4.7 Shop Fronts in Conservation Areas	Chris Thomas, British Sign and Graphics Association (BSGA)	We think that the whole section should be re-considered to offer sensible advice where it will be needed (or delete it entirely). At present, it is useless. For example, what is a "projecting" box fascia? If you mean "bulky" (in depth) box fascia, say so. But it will be important to emphasise that "box" fascias in general must be considered on merit. Modern internally illuminated "box" fascia signs (often in modern materials) are commonplace, particularly on modern shopfronts in all types of local and central shopping areas. Modern technology allows them to be of slim construction (LED illumination does not need as much space for heat dissipation as older form of lighting). They are commonly fret-cut so that light shows only through lettering/logos; or individual letters may be face or halo illuminated. We see no reason why these commonly-seen forms of signage should not be acceptable in conservation areas and on listed buildings where they are otherwise acceptable within their specific context. In particular, many conservation areas are thriving commercial centres, where all types of commercial activity and signage is expected. Similarly, many listed buildings in commercial areas have modern shopfronts where modern signage is equally appropriate. The generalisation that "box" signs (including those which have internal illumination) are "to be avoided" in conservation areas is totally inappropriate. It is also contrary to the requirements of the Regulations which require every advertisement proposal to be considered on its own merit in the interest of amenity and public safety, without any preconceptions of what is "normally" acceptable or otherwise. We therefore suggest that section 7.4.7 be wholly re-written. This could take the form of information on the common elements of "traditional" and "modern" shopfronts. It might then offer advice appropriate to each style (based on the simple and sensible advice in P38 and P42 of the draft Local Plan). The advice could be simple, eg advertisements which may be wholly appropriate on modern shopfronts (such as "box" fascia and projecting signs) may be out of place on "traditional" shopfronts where panel and hanging signs would be more likely to complement the age and appearance of the shopfront.	Clearer images will be given on what is defined as 'projecting'

Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.6.4 Historic, evidential, communal and social values	Derek Kinrade	Historical associations with famous people commonly merit blue plaques across the nation. You instance this in citing Southwark's blue plaque scheme. This , to my mind, is too prescriptive. There are a number of worthy candidates not , or not yet, so awarded who arguably deserve such recognition. Examples are William Griggs and William Harnett Blanch, whose homes survive. Both have been awarded plaques by the Peckham Society. It should be made clear that such associations can be grounds for nomination.	Paragraph 7.2.6.4 will have a new opening line to describe the assets of historic, evidential, communal and social value.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.3, p.28 (flowchart)	Derek Kinrade	"in the context of" in the heading is obscure. The section appears to apply only to the development OF listed buildings. Likewise on page 38 in relation to developments IN conservation areas.	This is consistent throughout the flowchart sections of the document, however the headings could be made clearer.
Chapter 7 - Introduction to 'Built Heritage Assets'	p.28	Laura Schaaf, Southwark and Lambeth Archaeological Excavation Committee	Expand - developments adjacent to listed buildings can have a harmful effect on their setting even to nullifying the reason for listing p28, para 2 - 'less than substantial harm' (included in the NPPF glossary) could constitute a 'major' harm (not included in the NPPF glossary)	This is not considered to be within the scope of the Heritage SPD
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.6	Hannah Dixon	1. Height of new buildings - important for feel of areas and background views of bermondsey street or Tower Bridge not to have Elephant and Castle or Battersea style sky scrapers in the background 2. Community importance over time (e.g. Essex Market in New York - been demolished when had huge role to play locally (new building rents too high for old stall holders and competing with modern stores) as well as huge historic role in the street traders/immigration story of the lower east side. Important local businesses can afford to stay in areas.	Southwark is an inner city borough where there are on-going commercial societal implications to development which are considered to be outside the scope of the Heritage SPD.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.3.7 Certificate of Lawfulness for Listed Building Consent	Mark Morris	This section is not explained in any way that will make sense to people who don't already know about the subject.	This section will be expanded to explain the Certificate of Lawfulness Listed Building Consent process in a clearer format
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.2 Does Southwark have a Local List	Mark Morris	Section 7.2.2 tells us that 14% of the original locally listed buildings have since been demolished. I think, based on that, that I would want some greater assurance that there was a point to what I was doing if I were to embark on nominating a building for locally listing.	The purpose of this document is to recognise this and set the groundwork for a Local List, to agree the criteria, explain how we will go about it and identify locally listable buildings, and establish our approach to developments affecting locally listed buildings.
Chapter 7 - Introduction to 'Built Heritage Assets'	Conservation areas	Hannah Platt	Needs to be updated with 5 areas in OKR AAP	The five proposed Old Kent Road conservation areas have not been designated yet, with a decision expected in September.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.6 Grant Programmes	Hannah Platt	Expand upon how grants can be applied for	Every grant programme has its own criteria and funding requirements so we are unable to expand upon each process.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.2 Does Southwark have a Local List	Hannah Platt	Provide examples of Locally Listed Buildings	Example photographs will be added to illustrate each criterion
Chapter 7 - Introduction to 'Built Heritage Assets'	Conservation areas	John Bussy	The integrity of Pages Walk Conservation Area is being serious attacked by developments on the edge of the Old Kent Road Area Action Plan (OKR AAP). Developers and case officers take no notice of the fact that there is a Conservation Area or the damage they are doing to it. As yet none of the recent applications have planning permission, and they are contrary to the requirements of the OKR AAP, but they keep on coming and they are included in documents setting out to New Southwark Plan Inspectors how the Council is meeting its housing and jobs targets.	This is not considered to be within the scope of the Heritage SPD as the document does not comment on particular examples
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.6 Local Listing	Eileen Conn	Historic, evidential, communal and social values: These criteria should be widened to include the uses of the building for the community as an important part of assessing its value. This is especially so for example with old sturdy buildings with features like high ceilings, now more rare in modern buildings.	Historic, evidential, communal and social values are specific criteria defined by Historic England which the Council needs to follow. We cannot expand upon the definition in any way

Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.2 Local Listing	Eileen Conn	7.2.2 the Local List – This comment follows up the zoom meeting PHRP held with Michael Tsoukaris on the Heritage SPD, and the suggestion made to arrange a volunteer process to help the Council gather information on the up to date state of the c400 buildings still on the draft list. This could build on the good experience we had with the Council in getting the info needed on the c300 commercial buildings in Peckham Town Centre for the THI application in 2011. Peckham Vision would be glad to help work with PHRP and the Council on developing a simple scheme to do this across the borough. We could trial it in Peckham and then roll it out across the borough with other community groups taking it on with the simple training we could refine in the Peckham trial. It could also dovetail into information and education workshops and sessions in different neighbourhoods about their local heritage.	This is useful to note for when the Council proceeds with public process of selection and inviting people to recognise and appreciate their built heritage, however is outside the scope of the Heritage SPD.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.3 How can I nominate a building?	Eileen Conn	I suggest that a new subsection ending paragraph is added here to cover what happens after a nomination is made so that the process is transparent and gives the nominator the chance to clarify anything not adequately explained in the reasons for nomination. This might be something like eg: "There will be a guidance note sent to each person making a Local List nomination explaining the procedure for taking the decisions and how the nominee can be involved in producing further information if necessary, and before a decision to turn down a nomination, how to respond to the reasons for that being the likely decision."	Further clarification will be sought on duty to inform nominator of any decision. The document already states that nominators have the right to appeal to the Director to revisit the decision. This implies that the council will explain its decision in these cases.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.7 Heritage Statements	Eileen Conn	I agree with the points made during the EIP hearings that explicit written guidance needs to be in the SPD about the contents for the Heritage Statement to make it standard coverage, and guidance produced which explains this more as necessary.	The flow charts provide guidance about what should be in the Heritage Statement which is set out in each chapter and does not need further explanation.
Chapter 7 - Introduction to 'Built Heritage Assets'	Conservation areas	Jeremy Leech	The Walworth Society would make most of its comments around the issue of Conservation Area and their quality. The Walworth Society's most significant concerns relate to the quality of preservation of the character of Conservation Areas. In the case of Walworth the one that is most contested is the Walworth Road Conservation Area. While we were delighted to see the adoption of the Walworth Road Conservation Area in 2015 and the development of a high-quality Conservation Area Appraisal (CAA), we are disappointed at the clarity of the guidance especially in relation to the development that is continually occurring to buildings throughout the length of the Walworth Road and the northern end of the Camberwell Road. On the positive side, the Walworth Road Conservation Area has been of tremendous benefit in preserving buildings such as the former Church Army Commissioner properties on Horsley Street which might otherwise have been considered for redevelopment rather than refurbishment. On the Walworth Road itself, however, there is a lack of clear guidance as to expectations as to what developers are or not permitted to do. For example, the shop front policy in the W Rd CA is little adhered to with little conformity to the aspirations of the adopted CAA. We have in recent months seen new open fronted butchers shops created on the Walworth Road in spite of specific guidance (5.3.11) in favour of a more traditional shop frontages. Most important is the issue of the increasing height of buildings. The core character of the Walworth Road is of three storey terraced buildings but there is currently a clear expectation amongst freeholders that it is not only acceptable to introduce a mansard roof on to the original terraces but also we are starting to see (eg with 220-222 Walworth Road) a desire to see two extra storeys being added. We are fearful that without far clearer guidance to developers, we will lose the original character of the Walworth Road and the street itself will become far more of a canyon with higher buildings lining it than has historically been the case. We would ask therefore that the SPD endorses the need for clear guidance for development in the Southwark Conservation Areas (we understand that this occurs in other conservation area guidance in other London boroughs) and is clearer about what and is what is not permitted for developers to expect to be able to do and what local people can expect in being able to defend and support the designated conservation areas. We would also like to see planning officers taking far more notice of these guidance requirements and adhering to these requirements with developers who are seeking	This is not considered to be within the scope of the Heritage SPD as the document does not comment on particular examples. The guidance will, however, be better applied in practice when adopted
Chapter 7 - Introduction to 'Built Heritage Assets'	7.4.7 Shop Fronts in Conservation Areas	Jeremy Leech	We strongly support policy 7.4.7 Shop fronts in conservation areas. We are, however, seeing very few applications for shop fronts that are in conformity with this policy which is already encapsulated in the adopted Walworth Conservation Area Appraisal at Shop Front Design 5.3.7 to 5.3.11. A current application (21/AP/0928) has been validated as an application and is clearly entirely out of conformity with this guidance.	The Heritage SPD will help to state what is required when shopfronts are concerned and guidance can be better applied in practice when adopted

Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.6 Local Listing	Jason Leech	Although locally listed buildings are clearly the headline act, it would make more sense to place this section in order of precedence: after the designated heritage assets. The Camberwell Society made representations about these criteria during the EIP of the New Southwark Plan. The six groups of criteria make much more sense in the Heritage SPD than draft Policy P25, but there is still a sense that some of the pairings make odd bedfellows. It would make more sense to me, and aid consistency and comparative assessment, to pair up individual selection criteria with the four heritage values set out by HE (and which overlap neatly with the NPPF's interests). That way these criteria/considerations can guide to the values which will ultimately determinate the nominated asset's heritage significance. The process (method and timeframe) whereby the local list will be compiled is worthy of a separate consultation once more detail is known. It would be worth taking this matter to CAAG.	Order can be amended to reflect order of precedence of designated heritage assets. Heritage Values – we have echoed the Historic England guidance on this including, by definition the 4 heritage values. This is a complex technical comment that would warrant a minor update
Chapter 7 - Introduction to 'Built Heritage Assets'	7.3.6 What is Listed Building Consent required for?	Jason Leech	Should reference HE's consultation draft which covers the subject the bullet points try to illustrate over 55 pages and is the best reference point currently available (to my mind). Perhaps its 'traffic light' system is something to incorporate here.	This is not considered to be within the scope of the Heritage SPD as we do not want to replicate existing Historic England guidance
Chapter 7 - Introduction to 'Built Heritage Assets'	Conservation areas map	Jason Leech	It is really useful to have a map (in Figure 6) of the borough's conservation areas. It is assumed that in the final version, the map would cover a whole A4 page. The illustration would be even more useful if the listed conservation areas could be numbered and these numbers appear on the map, so that each conservation area could be more clearly identified.	Map to be updated and made clearer with numbers
Chapter 7 - Introduction to 'Built Heritage Assets'	7.4.7 Shop Fronts in Conservation Areas	Jason Leech	Beyond the points made above, the discussion of 'shop fronts in conservation areas' is useful. The annotated illustration is also very useful in helping lay applicants to articulate their proposals. What is sad is that guidance on shop fronts is limited to under two pages; although, considering the intended scope of the SPD, perhaps these 2 pages are an unintended bonus! The City of Westminster has produced three whole SPDs (47 pages in total) covering: - 'Shopfronts, Blinds and Signs – A Guide to their Design' - 'Shopfronts and Security' - 'Advertisement Design Guidelines' This supplementary planning guidance goes further than Southwark's SPD in giving much clearer guidance on the design and construction of signs (especially as regards backlit illumination); how to secure shop fronts without roller shutters; and provides lots of examples of good and unacceptable practice to illustrate the policies. There is also guidance on the application of the TCP (Control of Advertisements) Regulations 2007 which is materially relevant in almost all applications involving development of a shop front. If not in this edition of the Heritage SPD, then in a subsequent edition or altogether separate SPD, a distillation of best practice on shop front and sign design (perhaps based on the work of Purcell on the Walworth Road), would go a huge way to improve all the borough's conservation areas centred on shopping parades (Camberwell Green, Rye Lane Peckham, Walworth Road etc).	This is not considered to be within the scope of the Heritage SPD as it is not intended as a shopfront guide
Chapter 7 - Introduction to 'Built Heritage Assets'	Statues / contested heritage	Jason Leech	There should also be something about contested heritage when there have been applications in the borough to remove statues with substantial aesthetic value when their historic value (equally substantial) is contestable. This is a very current, burning matter, especially for significantly large minority groups in the borough for whom 18th century heritage assets have a far more ambivalent significance; something which may well warrant being remembered but not celebrated in public. (The Georgian Group has published some thought-provoking guidance on this.)	Southwark Stands Together pledged to conduct 'an anti-racist audit of the borough to identify statues that do not reflect our borough's diversity, especially anything with links to slavery or our country's colonial past, and to identify positive opportunities for the celebration of more diverse figures.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.4.7 Shop Fronts in Conservation Areas	Claire Hegarty	The PHRP welcomes this reference to shopfronts, but would also encourage the delivery of a Shopfront Design Guide	This is noted, however it is not considered to be within the scope of the Heritage SPD
Chapter 7 - Introduction to 'Built Heritage Assets'	7.4.11 Article 4 Directions	Claire Hegarty	This section needs an update clarifying recent government changes in permitted development rights in conservation areas.	This will be updated to reflect recent government policy changes.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.6.3 The Peckham THI	Claire Hegarty	Text needs amending, as refers to "you". (Also 6.6.4 numbers out of sync.)	This error will be corrected
can	8.2 Archaeological sites	Laura Schaaf, Southwark and Lambeth Archaeological Excavation Committee	There is no specific mention of the archaeological study of buildings	This will be updated to mention archaeological study of buildings
Chapter 8 - Archaeology in Southwark	8.2.2 Archaeology in Southwark	Laura Schaaf, Southwark and Lambeth Archaeological Excavation Committee	The dates of the Mesolithic period should be corrected to 10,000 BC - 4,000 BC	This error will be corrected
Chapter 8 - Archaeology in Southwark	8.3 The Law and Burial Archaeology	Laura Schaaf, Southwark and Lambeth Archaeological Excavation Committee	Should have a reference to burial licenses issued under the 1981 Act	Burial licences issued under the 1981 Act will be referenced
Chapter 8 - Archaeology in Southwark		Hannah Platt	Should include how long a scheduled area is scheduled for	This information will be updated

Chapter 8 - Archaeology in Southwark		Jeremy Leech	Not being an archaeologist, I've come away thinking that, as the hypothetical owner of a building in north Southwark, before I proceed with my hypothetical basement extension, I need to apply for pre-application advice with the Council's archaeologist and then hire an archaeologist and a planning consultant. I wonder whether that's the reaction of others to the other above-ground planning pages. Perhaps that's the course of action the SPD intends to provoke. Overall though, the tenor of the SPD seems to be not 'problem-solving' but 'problem-posing'; it 'warns' (or 'forewarns') a lot more than it 'explains'.	This section will be updated to focus the Heritage SPD more on 'explaining' rather than 'warning'
Chapter 8 - Archaeology in Southwark	8.2.1 What is archaeology?	Jeremy Leech	Scheduled Ancient Monuments seem to have jumped the gun and pushed in front of '8.2.1 What is archaeology?' which would naturally lead this section.	Scheduled Ancient Monuments to be moved to between 8.2.4 and 8.2.5
Chapter 9 - Nature	TPO's	Caroline Knight	I didn't feel there was enough information about TPOs, nor how you will prevent developers from "accidentally" cutting down trees or accidentally "damaging" trees so that they eventually die. I would like to hear that Southwark Council is including in their contracts that any damage to a protected tree (accidental or otherwise) will incur a fine.	The Heritage SPD clearly states that it is a criminal offence to carry out unauthorised works to a tree under a TPO and therefore no change is required.
Chapter 9 - Nature	Borough views	Caroline Knight	There seem to be a great number of buildings planned that will be over 20 storeys. You have not given the actual estimated height nor have you provided a graphic for scale (ie. placing a picture of a planned building right next to say the Gherkin). I think by doing this, you are hiding just how high these planned buildings will be and I would like to use this opportunity to state my objection to any building higher than either 15 storeys or higher than anything that is currently built in Peckham, whichever is the tallest. Increase clarity on height of buildings proposed.	This is not considered to be within the scope of the Heritage SPD as the Borough Views policies and the site allocation in the NSP are the relevant policy.
Chapter 9 - Nature	Borough views	Caroline Knight	I think you could have been clearer about the protected view terminology and clarified which buildings might infringe on this legislation	This is not considered to be within the scope of the Heritage SPD as it is not intended to offer detailed guidance on views but to explain the process of identifying and scoping townscape and visual impact assessment. Text will however be updated to state that views are considered in accordance with Historic Engalnd guidance on setting in the context of heritage significance (i.e. what is significant about each view) and better understand the impact of a proposal on that significance through a process of qualitative assessment.
Chapter 9 - Nature	9.5.4	Lambeth Archaeolical Excavation Committee	This paragraph has been numbered 8.5.4	This error will be corrected
Chapter 9 - Nature	TPO's	Hannah Platt	More information on age requirements	TEMPO is the method used by the Council and not age so no change is required. TEMPO template will be added to the website for guidance.
Chapter 9 - Nature	Registered parks and gardens	Hannah Platt	How much weight does heritage have?	The weight of a heritage asset will depend on its significance.
Chapter 9 - Nature	Borough views	Hannah Platt	How set are they seeing as Southwark has already shifted the actual view requirements to suit planning proposals for the southernwood retail park planning application	This is noted, however it is not considered to be within the scope of the Heritage SPD as the NSP policy has been consistently applied.
Chapter 9 - Nature	9.1.1 Southwark and natural environment	Mike Priaulx	At present, section 9.1.1. does not accurately reflect that much of the endangered biodiversity of Southwark is dependent on buildings for nesting and roosting, e.g. bats, sparrows, swifts, and starlings, for example. This is especially relevant to this document as it relates mostly to older buildings which have the greatest proportion of this biodiversity. 9.1.1. Please add ", in addition to roosting and nesting spaces in older buildings which support bats and nesting birds" or similar to the end of the first sentence. The potential significance for biodiversity of the building should be considered, e.g. for bats or nesting birds.	This is not considered to be necessary to the Heritage SPD however a link to the Council's Biodiversity Action Plan will be included.
Chapter 9 - Nature	Borough views	Jason Leech	Although not necessarily for inclusion in this document, it would be useful if Conservation Area Appraisals dedicated space to discuss locally important views. This is not often done.	All Conservation Area Appraisals have section on important views. 7.4.5 will be updated to also refer to local views.
Chapter 9 - Nature	Useful contacts	Eileen Conn	I suggest this list includes the community organisations working on heritage eg all the amenity societies, and others like Peckham Vision, and history associations etc. As this is a digital document this can be updated from time to time eg annually or every other year.	List of useful contacts will be updated on the website to ensure it is kept up to date.
General	Whole document	TFL	In general terms we welcome the work undertaken and the basis this should provide on conservation and heritage matters as development comes forward as set out in the OKR AAP is implemented. It will be important going forward to ensure careful coordination between the aims and objectives of the SPD which by definition relates to conservation and the development aspirations as set out in the OKR AAP. The two should work together in providing an appropriate framework for delivery of new housing and jobs, the district centres and other regeneration alongside new and improved infrastructure, notably for TFL the Bakerloo Line extension and the Healthy Streets scheme.	This is noted, however it is not considered to be within the scope of the Heritage SPD

General	Whole document	Historic England	We note and welcome the contents of the draft SPD, which contains much helpful content and advice on the local historic environment and the planning system. Our only comment therefore would be to suggest that in finalising the document, cross-references to the appropriate policies in the New Southwark Plan be included at the relevant point. So for example, in the section on page 28 (the principles of development in the context of listed buildings) there should be a signpost to policy P18 (listed buildings) in the NSP. I trust these comments are of use. Please do not hesitate to contact me should you require any further information.	Referencing to NSP will be updated as adopted.
General	Whole document	Caroline Knight	Maps could be improved. The detail and longer explanations are very helpful but the different types of maps used with the lack of key street names on all of them makes it difficult to visualise	Conservation Area Map to be updated to be clearer.
Chapter 4 - Legal and Policy context	4.2	Derek Kinrade	In section 4.2, page 5 of a heritage document it would be helpful if something could be said about the set of policies for the historic environment in the new London Plan. These are of crucial importance.	References to London Plan 2021 will be updated.
General	Whole document	Derek Kinrade	The document is very welcome, but difficult to navigate.	Contents page can be made clearer, and sub-headings on footer to aid navigation.
General	Whole document	Laura Schaaf, Southwark and Lambeth Archaeological Excavation Committee	It would be useful to have links to referenced documents. How will updates to the policy be managed in future - perhaps by reference to a Southwark Council or other website	Links to documents will be inserted where necessary
General	Whole document	Hannah Dixon	A vision at the beginning of how you expect southwark to look, e.g. some mock ups of how old architecture will be sensitively treated alongside newer developments	Updated images are to be added to reflect this.
General	Whole document	Mark Morris	The layout looks dated, cluttered and crowded. I think the content is probably fine, but the layout is cluttered and off-putting.	Layout will be revised where possible.
Chapter 9 - Nature	Borough Views	Hannah Platt	More detail on borough views, what they are and how they are mapped	This is not considered to be within the scope of the Heritage SPD as it is not intended to offer detailed guidance on views but to explain the process of identifying and scoping townscape and visual impact assessment. Text will however be updated to state that views are considered in accordance with Historic England guidance on setting in the context of heritage significance (i.e. what is significant about each view) and better understand the impact of a proposal on that significance through a process of qualitative assessment.
Chapter 10 - Heritage Crime		Hannah Platt	Want examples of when Southwark has actually enforced penalties for heritage crime (if they can actually find any)	Example to be provided of 549 Lordship Lane with photograph
General	Whole document	John Bussy	It is produced with double pages which means you need a big screen to be able to read the digital version, you cannot print a single page and a printed double page is too small to read.	The Heritage SPD is set out as single page, but presented in a double page view. This will be amended to single pages.
Chapter 9 - Nature	TPO's	Hannah Platt	More information on how to get a TPO (minimum or maximum age for trees)	TEMPO is the method used by the Council and not age so no change is required. TEMPO template will be added to the website for guidance.
General	Whole document	Jeremy Leech	I should flag accessibility. Although the language used in the draft SPD is sometimes beautifully lyrical, I did also find the text sometimes quite dense. Whereas the professional has no problem understanding the document, a lay person may find it hard-going or daunting.	Heritage SPD will be reviewed to assess where plain english alternatives are required

General	Whole document	Jeremy Leech	As regards the content: the draft SPD is very good at highlighting the considerations any applicant must factor in; however, it is much less good at indicating how to actually develop acceptable proposals. It highlights questions much more than it answers any. That may be said to be an intentional limitation because it is just one step toward a complete heritage strategy. It follows that there will be 'gaps' in the SPD as regards different standard/regular types of development of heritage assets, and that these gaps will be filled in the coming years by supplementary heritage guidance which will form a larger suite of documents. If that's the approach to be adopted though, then the reference to more detailed guidance by other heritage bodies (eg. Historic England) must be much better integrated and feature much more prominently. If the Heritage SPD is not to be the vehicle for conveying that information, then it must be the perfect route to that information. For example, in some other boroughs, the SPG ends with a 'Reading List' or 'Further Reading'. Here, details could be given of Historic England's voluminous guidance (available to download from its website), especially its Conservation Principles, Policies and Guidance (2008). Depending on the progress of the consultation draft of HE's 'Listed Building Consent Advice' nearer the time of the draft Heritage SPD's adoption, reference to this could also be made. This Advice will likely become the go-to document for all owners/custodians of listed buildings and their consultants. Equally, it might be useful to mention the Georgian Group and the Victorian Society as statutory consultees for their respective periods. Both these amenity societies, as well as the Twentieth Century Society, produce scholarly writing and can provide expert advice on proposals to develop listed buildings. It would also be helpful to applicants if it were made clear that the Planning Practice Guidance on the Historic Environment is available online, continually updated, and is a remarkably user-friendly guide on (all) planning matters.	The Heritage SPD is not intended to be the only guidance for heritage assets or as the place for replicated guidance, however it will be updated to better signpost other guidance available.
Chapter 4 - Legal and policy context		Jeremy Leech	Makes no reference to Historic England. This absence seems odd, especially when there's reference to HE's 'heritage values' in Chapter 5.	This was not raised as a concern from Historic England so no change is seen to be necessary
Chapter 3 - How can I learn more and get involved?		Jeremy Leech	This section has good purpose but is a bit flimsy. Despite seeking to guide the reader to getting involved, there are no contact details for the Conservation Area Advisory Group, or other local amenity groups. eg. The Camberwell Society has a long established Planning Sub-Committee (just as old as CAAG) which reviews all applications submitted within the Camberwell area; gives advice to current and prospective householders and developers; campaigns on strategic matters; and drafts sound planning policy. Would it not be useful to list active groups who can assist and educate, and to provide contact details for them?	List of useful contacts will be updated on the website to ensure it is kept up to date.
General	Whole document	Jeremy Leech	It might make the document clearer and easier to use if 'the development of heritage assets' formed a chapter in itself which, ultimately, paid very close reference to the final draft(s) of the New Southwark Plan's heritage policies. This section could guide householders and commercial developers on how to submit valid and acceptable applications. The 'Principles of Development in the Context of Heritage Assets' (p.6) could preface this section, followed by the 'step-by-step' guides for development within the curtilage of listed buildings and conservation areas.	No change is necessary as guidance on development is offered in each chapter within the flow chart sections.
Chapter 9 - Nature	9.6 Views, vistas and panoramas	Jeremy Leech	It needs to be clearer that not all the information requirements listed are required in all cases. As it reads, it appears that 3D visualisations, AVRs, UXB surveys (!) are par the course. Para. 189 of the NPPF is clear that 'the level of detail [in an application] should be proportionate to the assets' importance'. It would help if the purpose/value of each of these information requirement was made clear, which would also clarify the kinds of applications to which they would be relevant.	Text to be updated to clarify that accurate views and CGI's are only necessary for Major and Strategic Major applications.
Chapter 7 - Introduction to 'Built Heritage Assets'	Listed building principles of development	Jeremy Leech	'Section 1(c) Its value' in the Listed Building guide strikes me as problematic. Heritage 'values' (or 'interests' in the NPPF) are very precisely defined concepts. The step-by-step guide trips up the applicant by encouraging them to freestyle this section rather than, methodically, pick out and explain the evidential, historical, aesthetic or communal values encapsulated in their asset.	Minor amendment will be made to ensure consistency
Chapter 7 - Introduction to 'Built Heritage Assets'	Conservation Area principles of development	Jeremy Leech	'Section 1(c) cultural' in the Conservation Areas guide strikes me as ultra vires. There is no statutory requirement to research famous occupants of a house before submitting an application for a roof extension. Perhaps this section could be re-framed to explaining the two-step process in assessing (1) whether proposals harm, preserve or enhance the character and appearance of the building itself and, (2) its altered/proposed contribution to the conservation area.	Cultural' value to be removed.
Chapter 5 - Understanding Heritage Terminology	5.2	Jeremy Leech	Section 5.2 (which discusses heritage 'values' or 'interests') needs to go much further in its explanation of what is meant by evidential/historical/aesthetic/communal value, since these are fundamental concepts which underpin the management of change and decision-taking. The Glossary has a longer but still too brief explanation. A precis of paras. 30-60 of HE's Conservation Principles, with some illustrative examples of buildings encapsulating each of these values (eg. photos / case studies) would be ideal if this is to be a genuinely accessible document.	It is not considered to be within the scope of the Heritage SPD to provide a precis of another document however a link will be provided on the website to keep it up to date.

General	Whole document	Jeremy Leech	The definition of 'development' in the Glossary with reference to s55 of the TCPA 1990 may help to make its explanation more precise and declutter the 'step-by-step' guides. For example, the reference to 'change of use' is correct but not necessarily intelligible to the lay person unfamiliar with the Use Classes Order 1987 (as recently substantially amended).	Definition will be updated to provide greater clarity.
General	Whole document	Jeremy Leech	A further improvement would be a solid explanation of heritage 'harm', and how this is weighed against 'public benefit' in the planning balance. 'Harm' is mentioned in Chapter 4 and in the following chapters, and in the glossary, where it is defined but not really explained.	This is not considered to be within the scope of the Heritage SPD as the term 'harm' is defined by case law and legal precedent, and not even defined in the NPPF
Chapter 3 - How can I learn more and get involved?		Claire Hegarty	We suggest that here it would be helpful to list the "local groups, historical societies, organizations, etc", as well as the council staff, contacts and resources. This could be an expansion of Section 13 Useful Contacts.	List of useful contacts will be updated on the website to ensure it is kept up to date.
Chapter 4 - Legal and policy context		Claire Hegarty	The NPPF, London Plan and New Southwark Plan all sit in relationship to one another. Michael Tsoukaris (in his talk to us) showed a diagram which illustrates the interrelationship of these different planning frameworks. Perhaps that should be included? The document needs to take account of both the new London Plan and the NSP when approved. Any relevant heritage issues need to be explained, as it is surely unrealistic for citizens to have to go through the documents? Give full reference for Historic England 'Conservation Principles' guidance.	Diagram explaining document hierarchy to be added.
Chapter 7 - Introduction to 'Built Heritage Assets'	Principles of development in context of Heritage Assets	Claire Hegarty	From an organizational point of view, the whole discussion of the Heritage Statement would benefit from having its own section, setting out what is expected in a Heritage Statement with clear reference to listed buildings, locally listed buildings, conservation areas. The Heritage Statement is an important step in establishing the value of a building or space, and as high a standard as possible should be encouraged. We've set out below (with reference to locally listed buildings), that support and guidance for owners on the public is needed.	The Heritage Statement is explained through the flowchart sections and no change is seen to be necessary.
Chapter 5 - Understanding Heritage Terminology	5.5	Claire Hegarty	Typo: page 9 item 5.5 para 2 text repeats " It is important... etc.)	Error to be corrected.
Chapter 6 - The Historic environment in a changing climate		Claire Hegarty	The explicit relationship between heritage and climate breakdown is welcome, in particular the link between re-use and embodied carbon, and the inherent sustainability of historic buildings. A clear statement on the interconnected issues around repair, conservation, avoidance of demolition, should be inserted at this point.	Text to be updated to reinforce this interconnected issues.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2 Locally listed buildings	Claire Hegarty	The PHRP supports the adoption of a local list for Southwark which identifies, celebrates and protects heritage value across the breadth of the historic environment. The PHRP proposes that the compilation of a Southwark Local List will include an inclusive process of community engagement to encourage wide participation, and to ensure that a broad range of histories, voices and experiences is reflected in both the nomination and adoption processes. Our concern is that there is a lack of active proposals for encouraging and supporting community participation in nominating and agreeing a local list. Draft Heritage SPD item 3 'How Can I learn more and get Involved' - acknowledges the importance of community knowledge and experience and suggests ways in which people can connect and make contact with various heritage groups and organizations, and the Council's planning decision making process. However, in our opinion, this does not go far enough. It relies on people being able to take the initiative, and does not address the problem that while people are deeply interest in their built heritage and environment, they often feel detached and excluded from discussions and decision making, and the planning process feels mechanistic, technical and alienating. Surely this process of adopting a Southwark Local List (almost from scratch) is an opportunity to reconnect buildings to the space of culture and peoples' lived experience? We note that the criteria in the Draft Southwark Heritage SPD are based on Historic England's Advice Note "Local Heritage Listing: Identifying and Conserving Local Heritage" (December 2020). However, the Historic England document also emphasises the importance of : • Local consultation (item 17), • Community experience and knowledge (item 20), • Communications (item 31), • Inclusivity (items 32, 34, 37) The PHRP believes that the process of nominating and adopting a local list offers great scope for involving volunteers in assisting the council to do the necessary assessment of all the buildings on their existing draft lists - i.e. to check they still exist and if they do to complete templates on the key facts that the Council needs to know. This would echo the successful approach in recording the needed info on all the commercial buildings in Peckham Town Centre for the application to the HLF for the THI. The PHRP would be pleased to work with the council, Peckham Vision and other	The Heritage SPD will be updated to ensure that consultation between communities and affected building owners is explicitly referenced.

Chapter 7 - Introduction to 'Built Heritage Assets'		Claire Hegarty	Section 7. The principles in relation to applications concerning listed buildings and in conservation areas are written as applying to developments of such buildings. There is nothing there about developments which are external to the heritage assets but may cause harm to them (such as the Aylesham Centre proposals). For that circumstance guidance is located on page 6, but even there it is not clear who is being addressed. 'Harm'. It is explained on page 27 that the NPPF requires the LPA to assess the degree of proposed harm and to decide if it is substantial or less than substantial. This is a very crude measure if interpreted literally. The degree of harm must surely be judged on the facts of each case. There is a very real danger that if the harm is judged to be a simple 'less than substantial' it may be disregarded.	This is not considered to be within the scope of the Heritage SPD as 'less than substantial harm' is defined by the NPPF. The process of selection for the Local List is also intended to accommodate community engagement.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.64 Criteria for local listing	Claire Hegarty	Criteria for local listing. We suggest an opening 'Association with a celebrated person having lived in a building may be a factor in selection. For example.....'	No change is necessary as this is already a category for local listing 'evidential, communal and social values'.
General	Whole document	Claire Hegarty	Offer building owners information which allows them to make an informed choice about who they employ to work on their historic buildings, e.g. architects, builders, tradespeople who have experience and expertise in working with historic buildings.	This is not considered to be within the scope of the Heritage SPD as it would be inappropriate for the Council to promote organisations. Chartered bodies which can help with this matter such as RIBA, RICS, etc have been referenced
General	Whole document	Claire Hegarty	Perhaps a model document should be published to show the quality of information expected in a Heritage Statement?	This is not considered to be within the scope of the Heritage SPD as guidance has been provided.

Southwark Council Annual Workforce Report 1 April 2020 – 31 July 2021

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Executive Summary

The Annual Workforce Report demonstrates the council's commitment to openly sharing our data and the actions we will take to address areas of disparity as part of our responsibilities under the Equality Act 2010, and the public-sector equality duty. The effects of the pandemic has placed increased challenges on our workforce and we have demonstrated our commitment to our residents and our workforce by putting them first through the services we deliver. However, we understand that we still have work to do to address areas highlighted in the data and feedback from our employees. This report outlines our intentions on areas where we need to improve.

In this year's Annual Workforce Report, we have reported data on the following protected characteristics under the Equality Act 2010:

- Age
- Ethnicity & Race
- Sex
- Sexual orientation
- Pregnancy and maternity
- Gender reassignment
- Religion or belief
- Marriage or civil partnership
- Disability

The workforce data contained in this report covers the period 1 April 2020 – 31 July 2021 with the exception of the Pay Gap reports, which are for the period 1 April 2020 – 31 March 2021 (as the Gender Pay Gap legislation dictates). Data referred to in the report refers to the five departments in the council:

- Chief Executive's;
- Children's and Adults';
- Environment and Leisure;
- Finance and Governance; and
- Housing and Modernisation.

As at 31 July 2021, the council employed 4294 (headcount) employees which has been relatively stable over the last 4 years.

The report is divided into 4 sections:

- Section 1: Protected Characteristics and Workforce Profile
- Section 2: General Workforce data
- Section 3: Pay Gap data
- Section 4: EDI Workforce Action Plan

Section 1: Protected Characteristics and Workforce Profile

Age

The council has an aging workforce, with the average age of employees currently at 47 years of age.

The widest age range is between 40 – 54, which makes up 37% of the workforce and has been consistent over the last 5 years. The Environment and Leisure department has the highest number of employees over the age of 55. Age group 25 - 39 represents the lowest age group across the council.

More work will be done in this area to encourage young people to consider career opportunities in the council to ensure we have a solid succession plan in place for the future.

Sex

There is a relatively even number of female and male employees, with 51% female and 49% male which has been consistent over the last 5 years. However, there is a larger number of males compared to females in the Environment and Leisure department. In contrast, there is a higher number of female employees in the Children's and Adults' department. More work will be done to increase gender diversity to encourage both sexes to consider careers in under-represented teams, within these departments as part of our refreshed Employment Opportunities Pathway strategy.

Disability

The number of employees who shared data around disability has increased since last year from 6.1% to 6.5% with 5.5% of the employees not sharing their disability status. Further work will be done to encourage employees to share their disability status.

Race

38% of employees reported their ethnicity as Black, whereas the local population is 27%. Our workforce has 6% of employees who identify as Asian and the local population is 9%. White employees are 51% of the workforce whereas 54% of the local population is White (Census 2011). There is a small percentage of the workforce who have chosen

not to share their data (4.4%). We continue to do work to increase voluntary declarations in this area.

We have achieved greater representation (over 50% of employees) from the Black, Asian and Minority Ethnic communities, in our Housing and Modernisation, Children's and Adults' Departments, whereas we have lower representation in the Chief Executive's, Environment and Leisure Departments.

We have greater representation of Black, Asian and Minority Ethnic employees in grades 1-12, and lower representation at grades 14+ (above £50k per annum) at 26% compared to White employees. We are seeking to address this disparity through the work we are doing on our Southwark Stands Together (SST), programme to take positive action to address under-representation at senior management level.

Religion or Belief, Sexual Orientation & Gender Reassignment and Marriage & Civil Partnership

Currently, we do not hold enough information on our systems to report on the above. However, we will be doing some work throughout the year to increase reporting in these areas.

Pregnancy and Maternity

The Children's and Adults' Department had the highest number of employees who took maternity leave, in comparison with the Environment and Leisure Department. There is a higher percentage of females in the Children's department compared to Environment and Leisure, which is predominately male. This could account for the uptake in maternity leave. However, the Environment and Leisure Department has the highest uptake of paternity leave compared to other departments, which may be attributed to higher numbers of male employees.

We are reviewing our current Family Friendly policies to continue supporting working parents with a focus on those with caring responsibilities to ensure we have a range of competitive options to support the workforce.

Section 2: General Workforce Data

Southwark Stands Together

We have launched a number of activities over the last year, with a focus on tackling racial inequality and injustice in the workplace. In doing so, we have committed to working with colleagues and stakeholders across the council to encourage people to speak out and share their views on where they would like us to improve. We have launched the following under the Workforce Work-stream of the overall Southwark Stands Together programme (SST):

- Set up a SST Workforce Strategy Board and supporting governance, which consists of representation from our Black, Asian and Minority Ethnic Staff Network Group

- Solution conversations were held between February and May 2021, where employees were invited to attend confidential discussions with an external Equality, Diversity and Inclusion (EDI) consultant to suggest areas where we need to change and improve. An action plan will be devised to capture the areas where the workforce would like to see change.
- Monthly communications are shared with the workforce providing regular updates on the progress of the Workforce Work-stream.
- SST Champions are a community of employees who advocate and take part in the delivery of the work undertaken by the Work-stream.
- Supporting the Leadership Network (our leaders and managers across the council) to design and plan events to build understanding and capacity to lead in the EDI space.
- Building employment opportunity pathways to encourage Black, Asian and Minority Ethnic employees to further their careers and to encourage talent into the council.
- Connecting with our Workforce with a focus on employees who do not have access to our IT systems.
- Working with leaders and managers to train and develop them in the space of EDI.
- Supporting departments to develop their SST EDI action plans to address disparities in the workforce.

Starters & Leavers

533 people started with the council from 1 April 2020 to 31 July 2021, a decrease of 20 since the last Annual Workforce Report. 143 people resigned from the council between 1 April 2020 and 31 July 2021. Anecdotal feedback indicates that improvements can be made on the on-boarding and induction process, to provide new recruits with a good introduction to the council to help them succeed in their roles. This work will be addressed as part of a new Recruitment Strategy to make sure we attract, recruit and retain the right talent. This will also focus on achieving a better understanding of the reasons for resignation to prevent loss of talent, particularly where employees report instances of bad practice, bullying and/or harassment.

Recruitment

13,895 people pursued an application to work in the council, with the largest number of applications from Black applicants (5228), followed by White applicants (4340) and 2142 from Asian applicants. However, the data shows that more White People were successful at appointment stage compared to Black, Asian and Minority Ethnic applicants.

We have broadly comparable numbers of employees from White (51%), Black, Asian and Ethnic Minority groups (49%). However, the data shows that we have more White employees at grade 14 and above compared to Black, Asian and Minority Ethnic employees. A new Recruitment Strategy will be developed to address ethnicity and race under-representation across the council, and look at ways of improving recruitment practices to eliminate areas that prevent access to particular groups.

Agency Workers

The data shows that the council engaged between 494 to 557 agency workers from 1 April 2020 – 31 July 2021. Spend between this period was around £41m, with the highest spend in the Children's and Adults' Department. Increased demand for agency workers was mostly due to the pandemic, which led to a high demand for temporary workers in areas such as social care. An agency strategy will be developed to review our levels of spend and to address, reoccurring areas where there are challenges in hard to recruit areas and to develop alternative approaches to consolidate vacancies across the council. It will also focus on ensuring that we offer permanent employment (where possible), to lower paid workers to provide stable employment as opposed to extending short-term agency placements.

Learning and Development

The highest group of employees who accessed professional qualifications was grades 10 - 12 representing 54.7% of applications. The lowest take-up by grade was 1 – 5, where only 1.9% of applications were received from this group of employees. The data also suggests that Black, Asian and Minority Ethnic employees are less likely to undertake professional qualification training. It is also noted through conversations with employees that there is a perceived lack of career progression, particularly into senior level roles. Further work is being done to open up opportunities to support Black, Asian and Minority Ethnic employees to raise awareness of the professional qualification scheme, along with other developmental opportunities and positive action initiatives to aid career progression.

Casework

The data reports on activity, in relation to people management casework and highlights increased levels of sickness, absence attributed to musculoskeletal problems and adverse mental health. This highlights the need to focus on these two areas as part of the new well-being strategy, to support employees who suffer with these conditions. As well as to support the workforce with managing their well-being post pandemic.

More work will be done to understand trends in relation to casework such as capability, disciplinary, complaints and respect at work, with a view to exploring early resolution without the need to go through formal processes.

Section 3: Pay Gap Reporting

Gender

The mean Gender pay gap: Southwark council has a mean gender pay gap of minus 5.99%, a slight decrease from minus 6.62% % last year. This indicates that on average Southwark male employees' are paid lower than Southwark female employees' by

approximately 5.99%. For every £10 a male employee is paid, females are paid £10.59. This is predominantly due to the larger number of male workers in lower paid roles within the waste and cleansing services. The narrowing of the gap is a positive trend towards parity.

Gender Pay Gap indicator	April 2021	April 2020	April 2019
Difference in mean bonus pay	93.52%	91.84%	90.93%
Difference in median bonus pay	89.86%	90.68%	82.83%
Proportion of male employees who were paid a bonus	5.06%	4.53%	5.02%
Proportion of female employees who were paid a bonus	1.42%	1.21%	1.18%

Ethnicity

The mean Ethnicity pay gap: Southwark council has a mean ethnicity pay gap of 14.68%. This indicates that on average, for every £10 a Black, Asian, and Minority Ethnic employee earns, White employees earn £11.47, which is a small increase on last year.

Ethnicity Pay Gap indicator	April 2021	April 2020	April 2019
Difference in mean bonus pay	50.21%	54.13%	49.96%
Difference in median bonus pay	74.01%	71.46%	69.59%
Proportion of White employees who were paid a bonus	4.69%	3.69%	4.14%
Proportion Black, Asian and Minority Ethnic employees who were paid a bonus	2.12%	2.35%	2.26%

Disability

The mean Disability pay gap: Southwark council has a mean disability pay gap of 2.24%. This indicates that on average, for every £10 a non-disabled employee earns, a disabled employee earns £9.77.

Disability Pay Gap indicator	April 2021	April 2020	April 2019
Difference in mean bonus pay	69.78%	62.52%	45.79%
Difference in median bonus pay	84.26%	88.66%	81.90%
Proportion of Non-Disabled employees who were paid a bonus	3.20%	2.79%	3.07%
Proportion of Disabled employees who were paid a bonus	3.76%	3.37%	2.87%

A new Pay Gap strategy will be developed outlining our intentions to address pay gaps in relation to gender, ethnicity and disability.

Section 4: EDI Action Plan

We have analysed the data outlined in this report and developed an action plan, which outlines the work we will be doing to address disparities highlighted in the data. The action plan will be owned and delivered by Employee Experience under the Chief Executive's Department, with oversight from the Chief Officer Team and Cabinet to ensure we deliver on our commitments.

1. Introduction

- 1.1 We are delighted to present our Annual Workforce Report which demonstrates our continued commitment to transparency on our workforce data. In doing so, we are proud to be an organisation that appreciates the need to go over and above statutory responsibilities to do the best for our residents, workforce, businesses, and wider communities we are proud to serve.
- 1.2 This Annual Workforce Report comes at a time where we are faced with national and global challenges due to the pandemic. Consequently, it has never been more important to put workforce wellbeing at the heart of what we do. Despite the challenges of the pandemic, we have managed to push forward on equality, diversity, and inclusion (EDI) initiatives and put support in place to maintain the wellbeing of our workforce. In addition, we delivered a number of engagement initiatives under the Southwark Stands Together (SST) Programme; our long-term commitment to tackle racial inequality in our communities and workforce. This work has been achieved as a result of collaboration with staff who are ambitious about tackling workplace racism, inequality, and injustice.

2. Why we produce this report?

- 2.1 Our Annual Workforce Report brings together Southwark's approach to EDI and our commitment to transparency in promoting best practice. Additionally, it meets statutory obligations to produce EDI data under the Equality Act (2010) and the Public-Sector Equality Duty (PSED).
- 2.2 We have been working hard to put EDI at the heart of everything we do, and are making sustained progress. This report determines our commitment across chief officer team, senior managers and wider workforce, whilst focussing on the needs of our diverse stakeholders, who rely on us to provide fairness, equity and transparency particularly in terms of access and delivery of the services we provide.

3. Our Responsibilities

- 3.1 We understand and are dedicated to our responsibilities under the Equality Act 2010 and as a local authority we are subject to the Public-Sector Equality Duty (PSED).
- 3.2 The PSED states that we must, in the exercise of our functions, have due regard to the need to:
 - Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act;
 - Advance equality of opportunity between people who share a protected characteristic's and those who do not; and
 - Foster good relations between people who share a protected characteristics and those who do not.

3.3 The PSED covers the nine protected characteristics:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

The report provides data on protected characteristics, with the exception of marriage, civil partnerships and gender reassignment where data is not currently available.

3.4 The Equality Duty ensures that all public bodies play their part in making society fairer by tackling discrimination and providing equality of opportunity for all.

[Further details on PSED can be found here](#)

4. ***Demonstrating our commitment***

4.1 We updated our council values to include two new EDI values;

- to work to make Southwark more equal and just
- to stand against all forms of discrimination and racism.

We are incorporating key actions identified through SST into our Council Plan, strengthening engagement with residents, businesses, and the wider community to deliver those actions. These will be translated into the work we are doing with the workforce to continuously improve our approach to EDI.

This report is divided into 4 sections:

- Section 1: Protected Characteristics and Workforce profile
- Section 2: General Workforce data
- Section 3: Pay Gap data
- Section 4: EDI Workforce Action Plan

4.2 **Data**

The workforce data for this report covers the period 1 April 2020 – 31 July 2021 with the exception of the Pay Gap reports which are for the period 1 April 2020 – 31 March 2021 as the Gender Pay Gap legislation dictates.

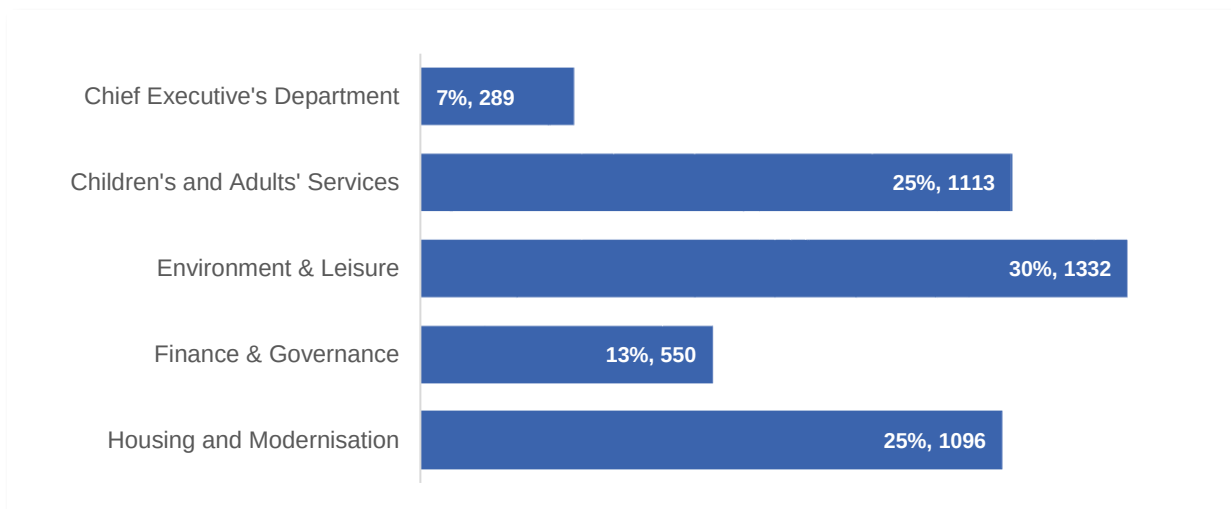
5. *Departments in the Council*

5.1 The council is made up of five departments:

- Chief Executive's Department;
- Children's and Adults' Services;
- Environment and Leisure;
- Finance and Governance; and
- Housing and Modernisation.

5.2 The employee headcount in each department is detailed in chart 1 below.

Chart 1 – Percentage and number of Employee headcount broken down by department



5.3 The council's organisational structure can be found on the [Southwark Council website](#).

6. Key Workforce Data Infographic

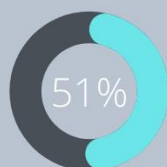
KEY WORKFORCE DATA

Annual Workforce Report 2020-21

NUMBER OF EMPLOYEES

The headcount of employees as at 31 July 2021 = 4380

Year	Headcount
Year 2019-20	4293
Year 2018-19	4196
Year 2017-18	4110
Year 2016-17	4150
Year 2015-16	4538

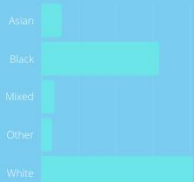


SEX PROFILE OF EMPLOYEES

The sex profile has remained fairly even over recent years with it being 50/50 in the period 2019-2020 & 2018-19

2020-21: 51% Female & 49% Male

2020-21



BROAD RACE PROFILE

Year	% Black, Asian and minority ethnic employees	% White employees
Year 2020-21	51%	49%
Year 2019-20	51%	49%
Year 2018-19	50%	50%
Year 2017-18	49%	51%



Southwark council have increased representation of colleagues from Black, Asian & Minority Ethnic communities from 22% to 26% in grades 14 & above.

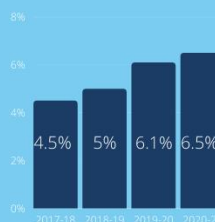
47

AVERAGE AGE OF THE WORKFORCE

There is a slight increase year on year in terms of the average age of the workforce

EMPLOYEES WITH DISABILITIES

Percentage of employees sharing that they have a disability

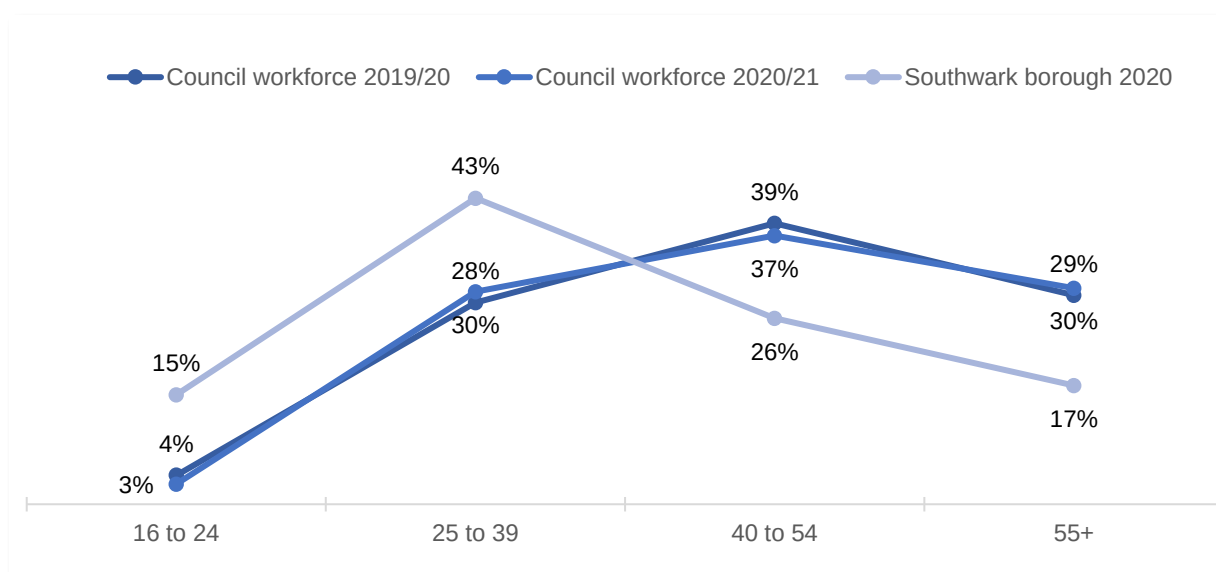


Section 1: Protected Characteristics and Workforce Profile

7. Age

7.1 The chart below shows figures for age breakdown of the council's workforce for 2020-21, compared with last year's data (2019-20) and Southwark borough's working age population in 2020. The data highlights that the council has an older workforce age profile in comparison to the local population. As highlighted in chart 2, there are no significant changes between the council's age profiles for 2019-20 and 2020-21. The 40-54 age range remains the largest group of employees within the council, although there is a slight decrease by 2% to 37%. By contrast, the largest age range for the Southwark population is 25-39 at 43%. Over two thirds of the council workforce are aged 40 and over (67%), while this age group accounts for 43% of the local working age population. This is in line with other London boroughs where the average employee age is 46, which is only slightly lower than Southwark's average of 47 years.

Chart 2 - Age comparison of council's workforce for 2019-20, 2020-21 and Southwark working age population 2020



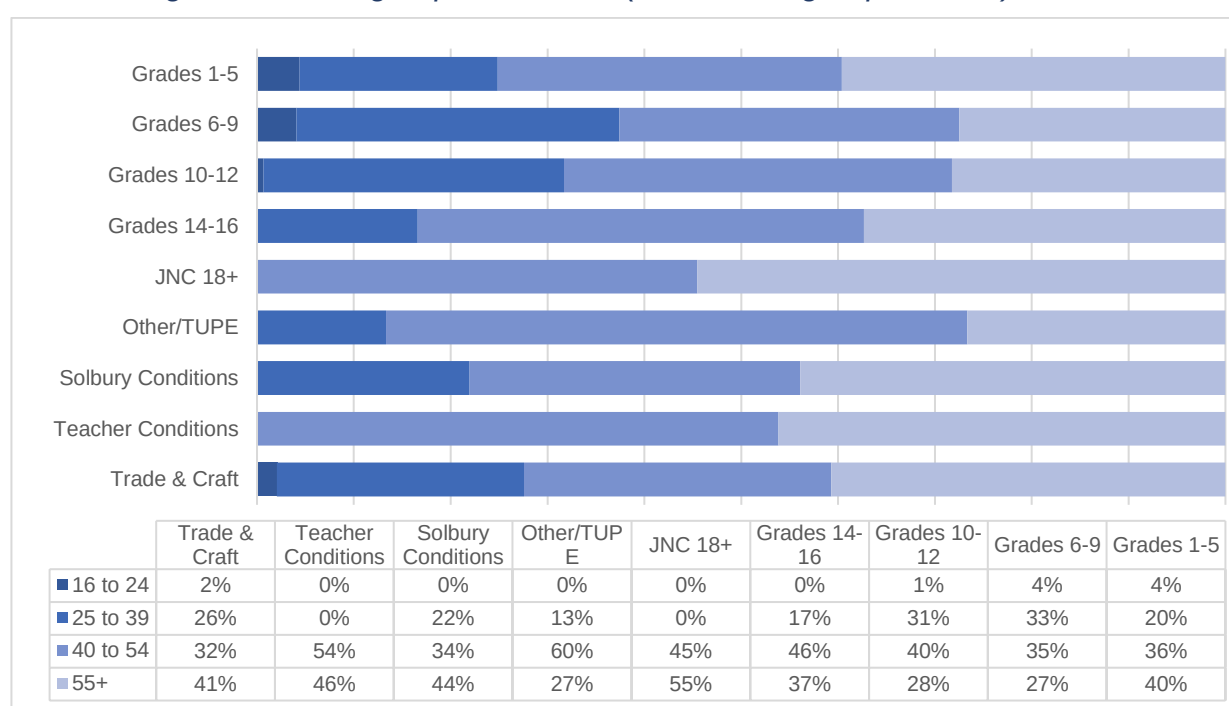
7.2 Our data shows that the council has an aging workforce, with a lower percentage of employees below the age of 40 (33%) compared to 58% for the local population. Public sector organisations tend to employ a higher percentage for this age group, with the Local Government Authority reporting 70% of the workforce as over 40 (LGA, 2020). This is in line with our data as detailed above.

7.3 Research shows that a growing proportion of the UK workforce are over 50, currently approximately 36% compared to 21% 20 years ago (Office of National Statistics, 2021; CIPD, 2018). There are specific considerations for managing an age-diverse workforce. These include a strong focus on succession planning which increases workforce stability and transfer of knowledge. Our data emphasises that 46% of senior positions (grades 14 and above) are held by employees aged 55 and over, totalling 91.5% for those over 40 (chart 3 below). Research suggests that managing an aging workforce also requires strong and supportive health and

wellbeing policies or initiatives, as this age group can experience health problems in older age if measures are not taken to prevent and manage medical conditions.

- 7.4 Succession planning improves career progression opportunities to help employees wishing to move to different roles, in turn aiding employee retention across the council. Targeted interventions, as part of strategic workforce planning, include utilising '*Employment Opportunities Pathways*' that are being developed to open up the talent pipelines for a variety of functions and roles within the council. These include internships, graduate training programmes, apprenticeships, and work experience. This will help open up new avenues for our young people aged 16-24 and increase percentages for those aged 39 and below.

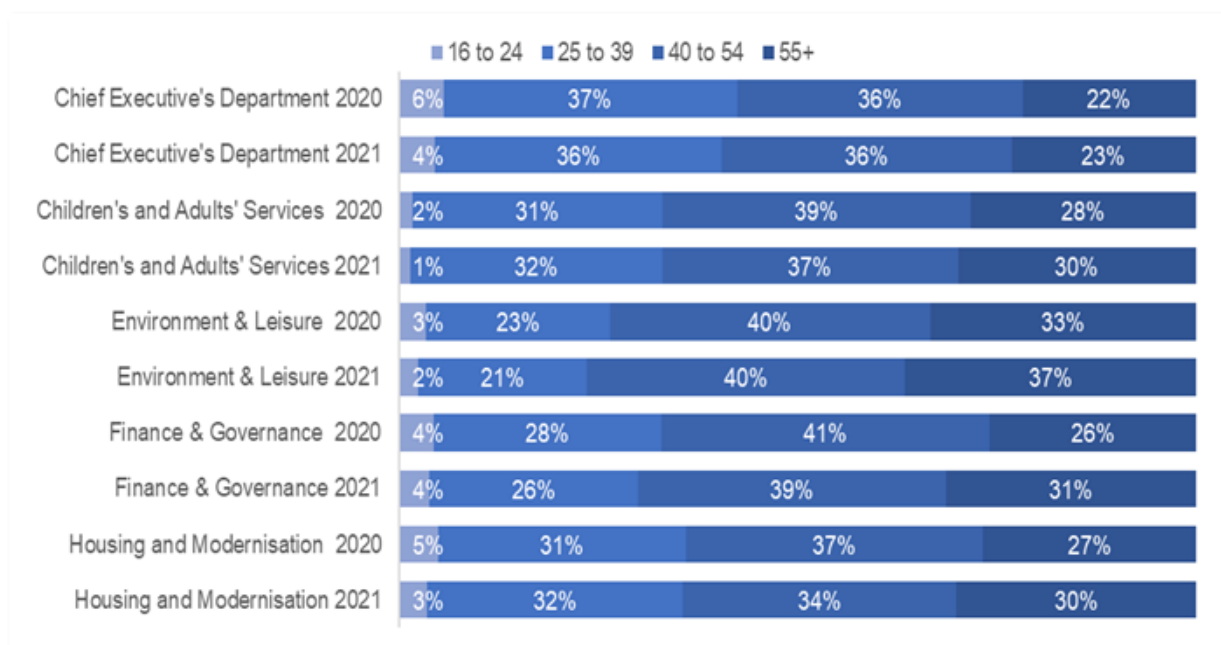
Chart 3 - Age and Grade group distribution (total Grade group = 100%)



Analysis by department

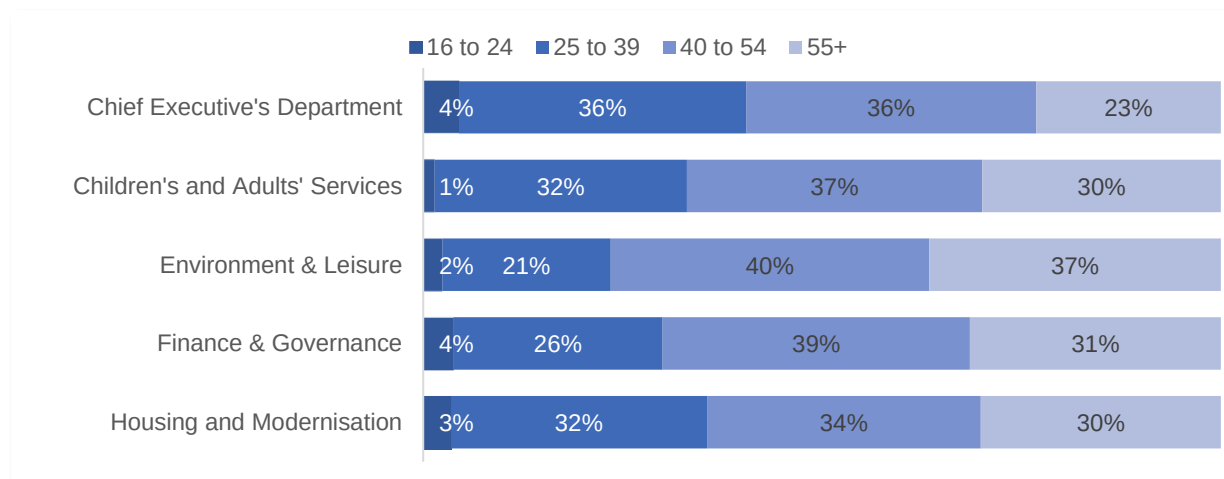
- 7.5 Chart 4 (below) shows a comparison between data for department and age distribution for 2021 and last year. There are no significant changes between the two data sets.

Chart 4 - Age and Department group distribution (total department group = 100%)



- 7.6 Approaches and activities regarding managing age diversity within the departments will vary, requiring detailed analysis to determine the best plan for each. An overarching workforce planning strategy will be developed to ensure consistency and clarity, providing a set of corporate aims for all departments, with the flexibility to address specific issues. For example, a review of data regarding departmental age distribution highlights the range of figures for employees aged 40 and over (chart 5). Although the Chief Executive department has the lowest percentage of employees in this age group, 59% is still high and indicative of the need to view steps to support an aging workforce as a corporate necessity.
- 7.7 In comparison, the Environment and Leisure department has the highest number of employees in this age range (77%) and has less office-based roles. Approximately 76% of the department's workforce are frontline and manual workers. Musculoskeletal problems are the highest cited reason for sickness absence at 36% compared to 23% for the council as a whole. It is likely that this is due to the manual nature of these roles. Established health and safety protocols and awareness continue to be integral to the roles within Environment and Leisure. This includes measures that are specific to these types of roles and ensure appropriate actions are in place to minimise the wear and tear that can result in musculoskeletal problems.
- 7.8 All departments have low numbers of employees aged 16-24 which indicates the need for there to be a corporate aim to increase this statistic as part of a workforce planning strategy.

Chart 5 Department and Age distribution



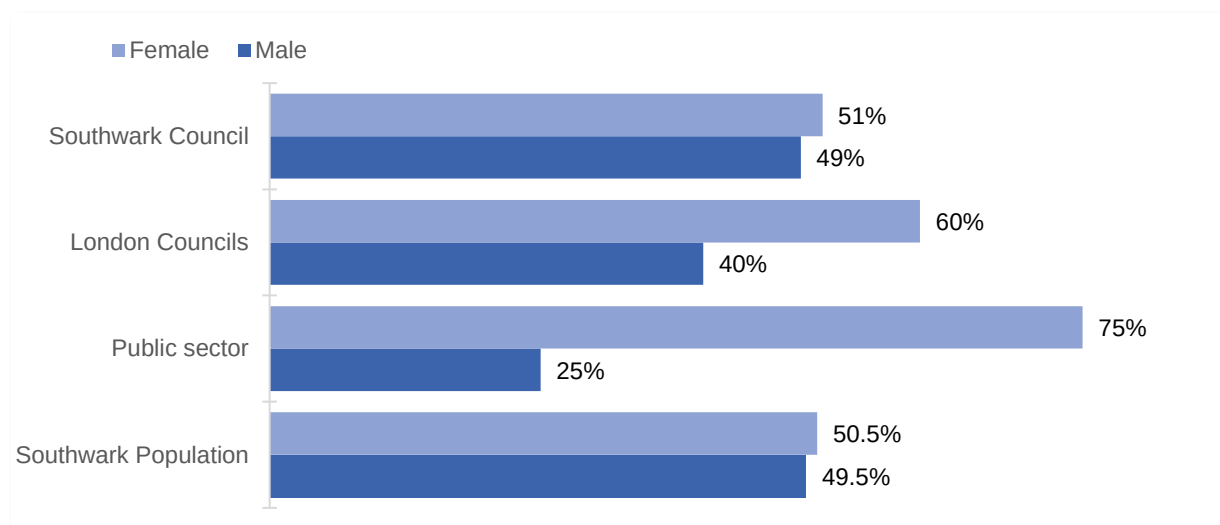
7.9 Next Steps:

- A workforce planning strategy will be developed. This will support the council to understand and anticipate current and future workforce needs, including considerations relating to age profile. This includes support from the Employee Experience Division to design of structures and roles which have defined career progression pathways, innovative and tailored recruitment and attraction programmes, plus comprehensive training and development plans.
- Succession planning for key roles and functions within the council will be a critical focus.
- Utilise the Employment Opportunities Pathways strategy once developed and increase the age profile for employees under 25.

8. Sex

- 8.1 The council's female to male ratio is relatively even, as shown in the Key Workforce Data earlier in this report, that 51% of the council workforce is female, with 49% male.
- 8.2 This is a slight change from last year where was a 50:50 split. It mirrors the data published for Southwark borough's population at 49.5% for males and 50.5% for females. London borough councils report as 60% female. According to figures for public sector employment (LGA, 2020), the ratio is 75% female to 25% male. This is a significant difference to the council's figures. It is difficult to make "like for like" comparisons as the types of services provided may vary from one organisation to another. This will, for example, impact on the sex profile where particular services remain female or male dominated.

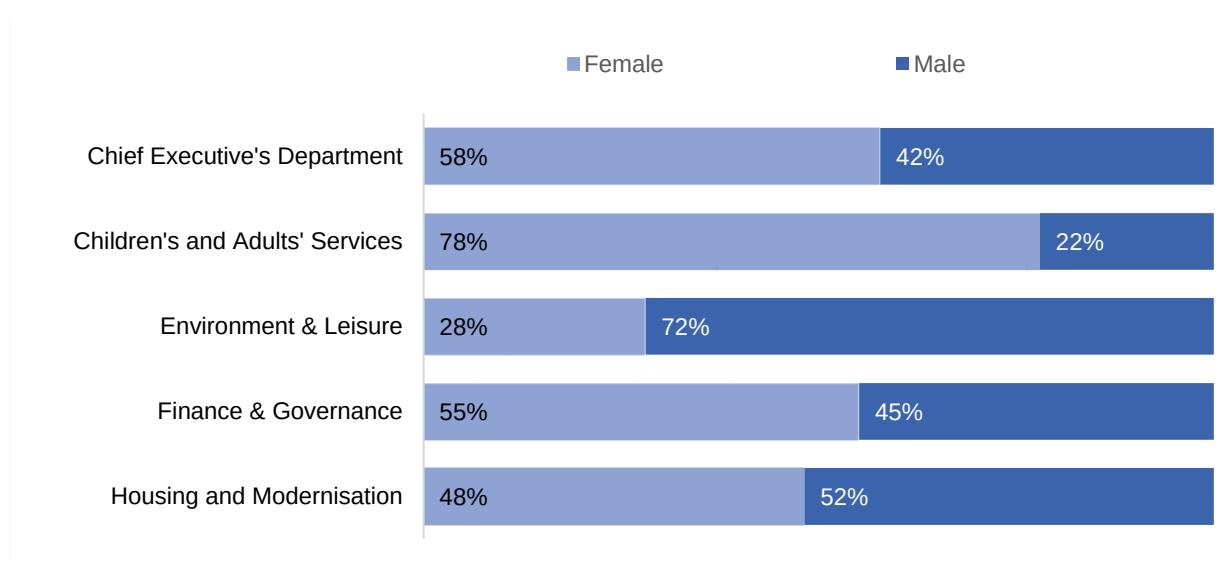
Chart 6 – Sex profile comparison: Southwark council, London councils, Public sector and Southwark population



8.3 Chart 7 shows the percentage of males and females broken down by department. The greatest differences are within the Environment and Leisure and Children's and Adults departments, where there are a larger number of female employees in the Children's and Adults department (78%) compared to Environment and Leisure (28%). This is likely to be because roles relating to social care and education are traditionally female dominated, as is the case for the Children's & Adults department. Conversely, many of the roles within Environment & Leisure, such as those in Waste & Cleansing, are traditionally male dominated.

8.4 Gender diversity brings different perspectives to a job or team dynamics, provides a better reflection of customers, and widens the talent pool. Therefore, we will need to use targeted recruitment and attraction planning to increase gender diversity in these roles and challenge gender stereotypes.

Chart 7 Sex distribution by department



Gender pay gap

8.5 The annual gender pay gap report shows the difference in pay between male and female employees within our workforce. The full report is published in Section 3 – Pay Gap Reporting.

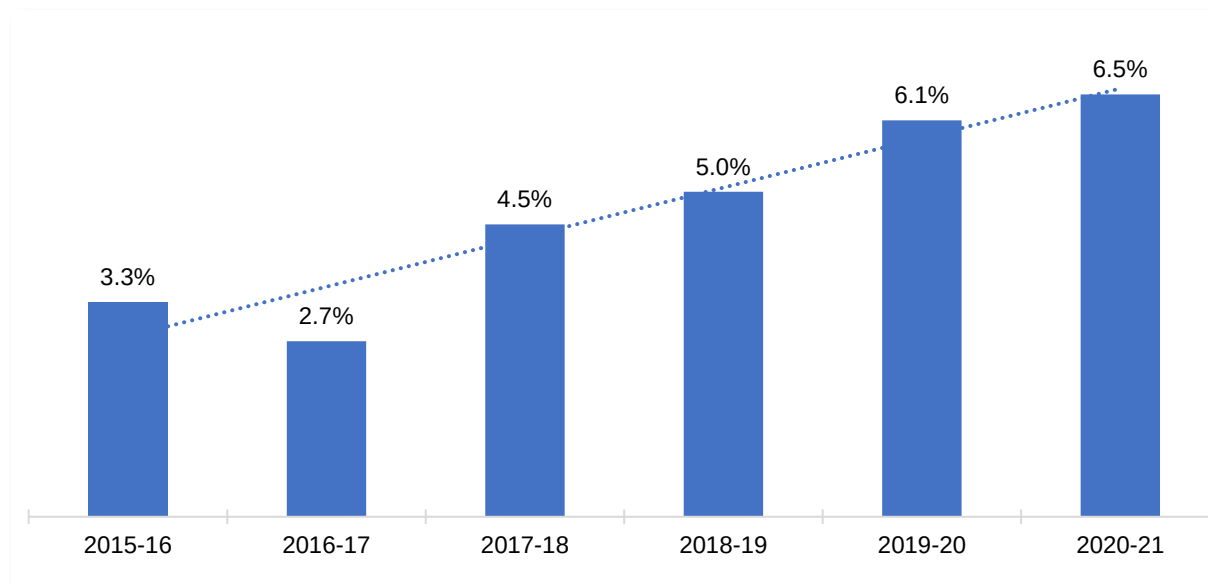
8.6 Next Steps:

- Review areas of the council where there is gender based roles and, as part of workforce planning, develop initiatives that aim to increase gender diversity and measure progress.

9. Disability

9.1 As a Disability Confident accredited employer, the council is committed to eliminating discrimination, removing barriers and promoting opportunities relating to employees, job seekers and workers with disabilities. In order for us to assist with providing support and monitoring outcomes, employees are encouraged to share their disability status. Currently, 6.5% of the total workforce have reported a disability. This has increased very slightly by 0.4% as compared to the previous year and shows an increasing trend over the past five years.

Chart 8 Disability distribution by year, with trend-line



9.2 It is important to note that on average, 55% of employees have not shared their disability status (chart 8, above). This highlights that this figure (6.5%) is unlikely to be a true indication of the number of employees with disabilities. Interestingly, the number of employees that did not record their disability increases with age. 70% of employees aged 55 and over have not recorded their status, whereas the figure is just 5% for those aged 16 to 24 (chart 9).

9.3 The council aims to create an environment where employees feel safe and comfortable to report any disabilities and discuss their needs. It is important to

understand the reasons for employees not reporting this and explore solutions for improvement. This will provide us with more reliable data to draw better conclusions regarding representation of disabled employees across all levels of the council.

Chart 9 - Employees with disabilities and Age distribution (total age group = 100%)

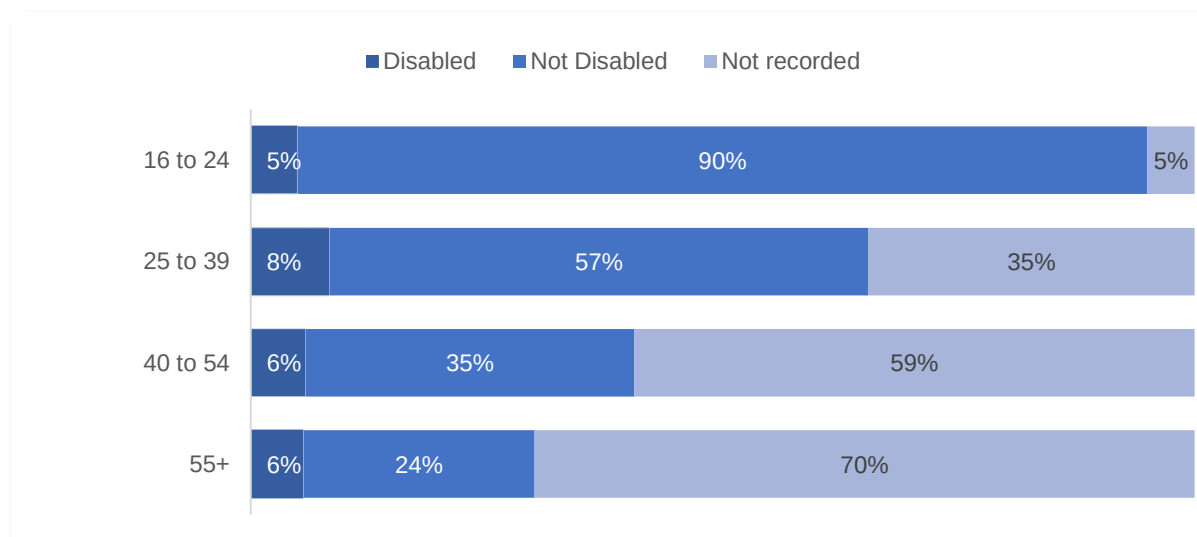
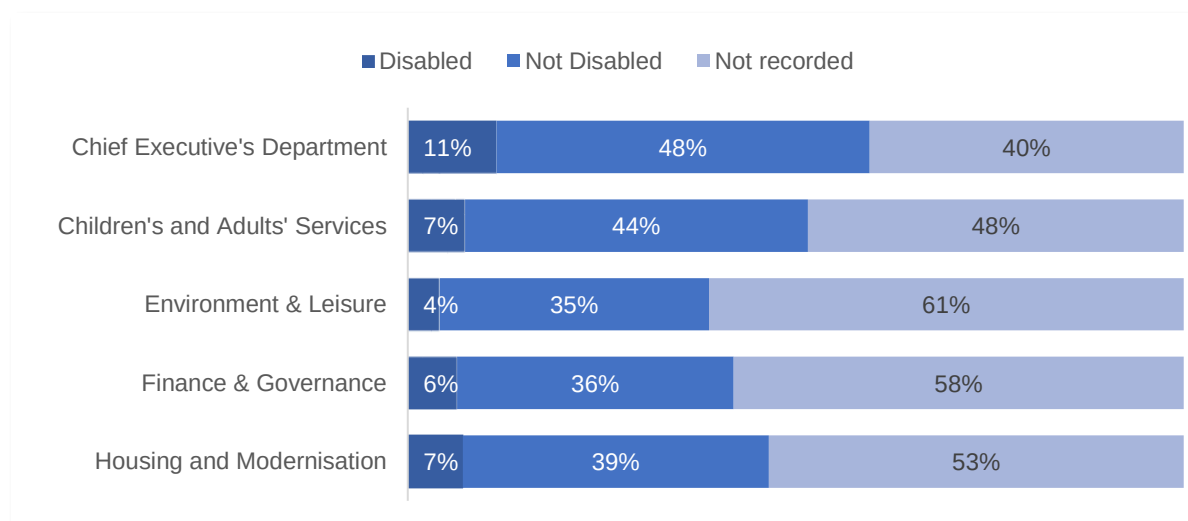


Chart 10 - Employees with disabilities as percentage of departmental numbers (total department = 100%)



9.4 Next Steps:

- In order to improve this statistic, there will need to be a drive across the council to encourage existing employees to share their disability status. Before this can take place, we will need to engage with employees, including those with disabilities and managers to explore further, aiming to minimise or remove any barriers or stigma that may prevent people from sharing their status.

10. Race

- 10.1 The Council is best positioned to serve residents and the community when it reflects the community it serves, and this report demonstrates that our workforce reflects the diversity of the borough's ethnicity and race with 38% employees sharing their ethnicity and race as Black, where the local population is 27%, 6% employees Asian and the local population is 9%, white employees are 51% of employees and 54% of the local population (Census 2007).
- 10.2 We have worked hard over the last few years to improve our data collection now there are a small number of employees who do not have an ethnicity and race record, 194 employees (4.4%). This compares with an average of 13.7% across London boroughs who do not specify ethnicity and race. We will continue to promote the 'share not declare' campaign across the Council quarterly to encourage employees to share their demographic data with us carefully explaining how it will assist and help to inform our Equality, Diversity, and Inclusion plan to reduce this gap.
- 10.3 The council employs more women (58%) from Black, Asian and minority ethnic employees than men (42%) within the workforce (chart 11) and this is reflective across the different age ranges (chart 12).

Chart 11 - Broad ethnicity of employees and Sex distribution (total Sex = 100%)

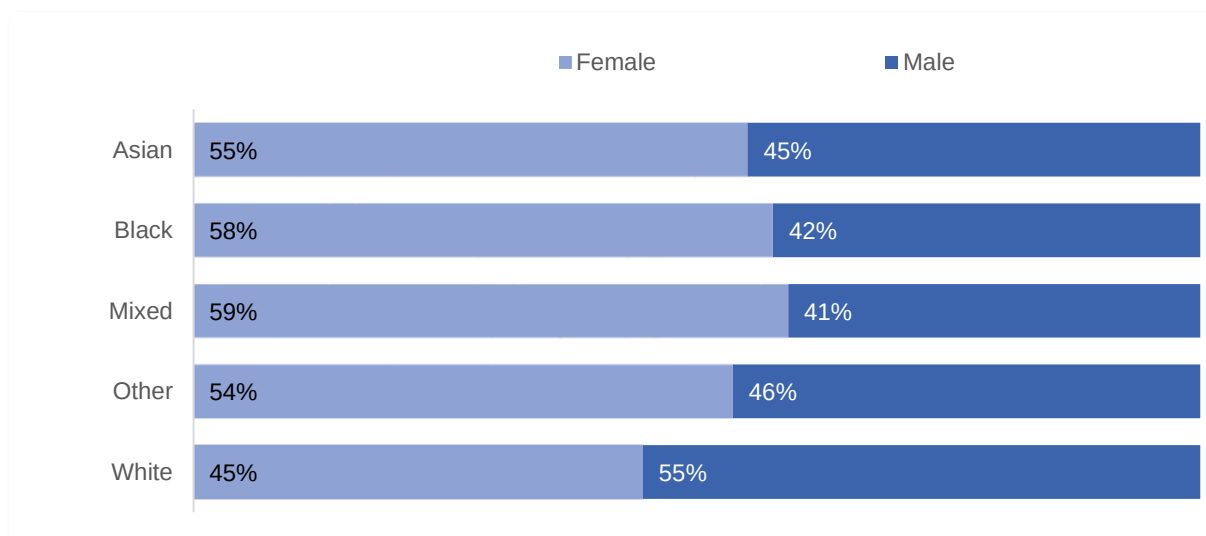
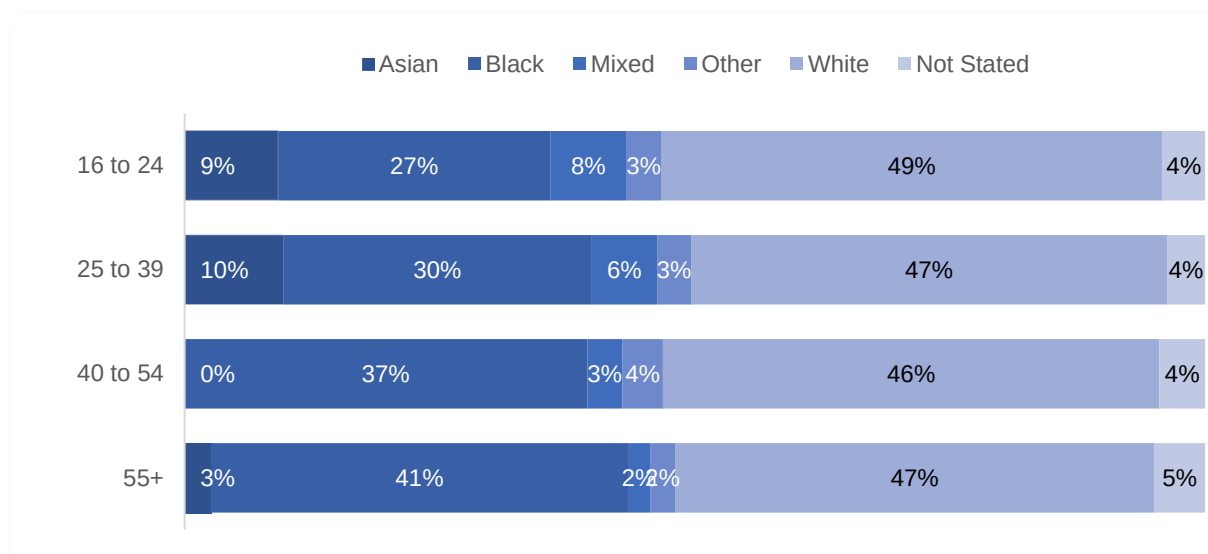
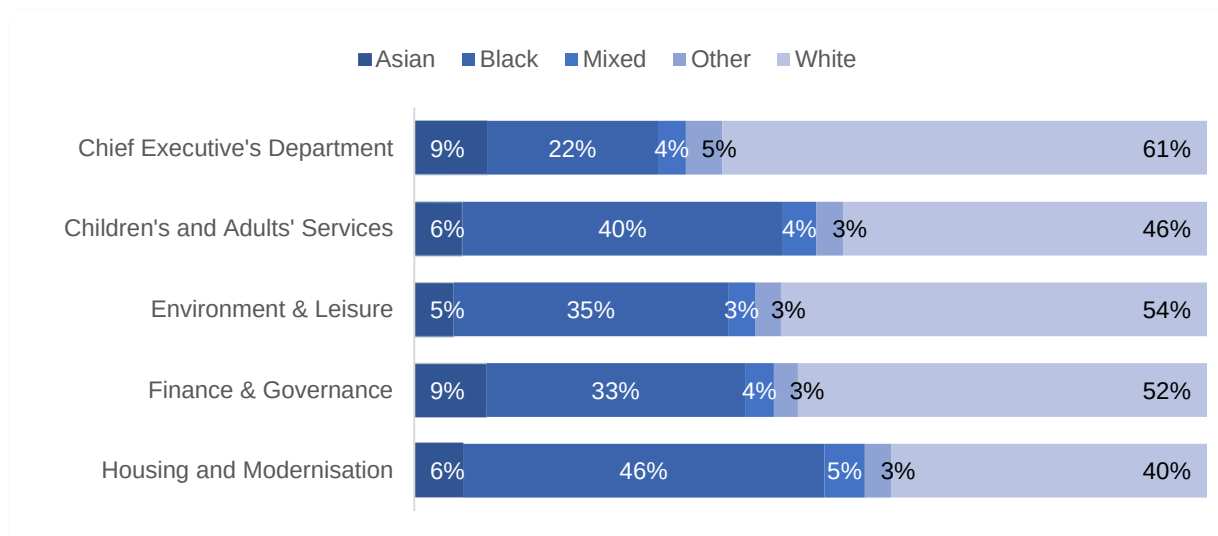


Chart 12 - Broad Race Profile of employees and Age distribution (total age group = 100%)



- 10.4 We have greater representation of Black, Asian and Minority Ethnic employees in grades 1-12. Whereas we see a decrease in representation in more senior grades (grades 14 and above £50k+ per annum), where 26% of these positions are represented from the Black, Asian and ethnic minority communities. Through the Southwark Stands Together programme – work stream (see section 2) we have a dedicated action plan to address the under representation in more senior grades including improving recruitment processes and practice, career development, education and training. We have also implemented a specific target within the Borough Plan to ensure that sections of workforce, at grades 14+, reflect the race of the local economically active population. Currently this is 38% by 2030.
- 10.5 We have achieved greater representation (over 50% of employee's) from the Black, Asian and minority ethnic communities, in Housing & Modernisation and Children & Adults departments, whereas we have lower representation in the Chief Executive's and Environment & Leisure Departments.

Chart 13 - Broad Race Profile of employees as percentage of departmental headcount (total department = 100%)



10.6 This is something we are striving to address through Southwark Stands Together departmental action plans, where services are looking in depth at their workforce statistics to implement key local actions to achieve a broader representation of our community in senior positions by 2030 across all departments. Examples of key actions that have been piloted this year (2021) are to:

- advertise internal secondments more widely across the whole organisation not within small teams and services,
- only progressing with an internal shortlist of candidates if it offers the council a diverse ethnic mix of candidates and if we fail to achieve this, the post is advertised externally,
- introduction of stakeholder panels who will specifically assess applicants on their ability to demonstrate the values of Southwark especially our two new equality and diversity values:
 - always work to make Southwark more equal and just
 - stand against all forms of discrimination and racism

Chart 14 - Broad Race Profile of employees and Grade group distribution (total Grade group = 100%)

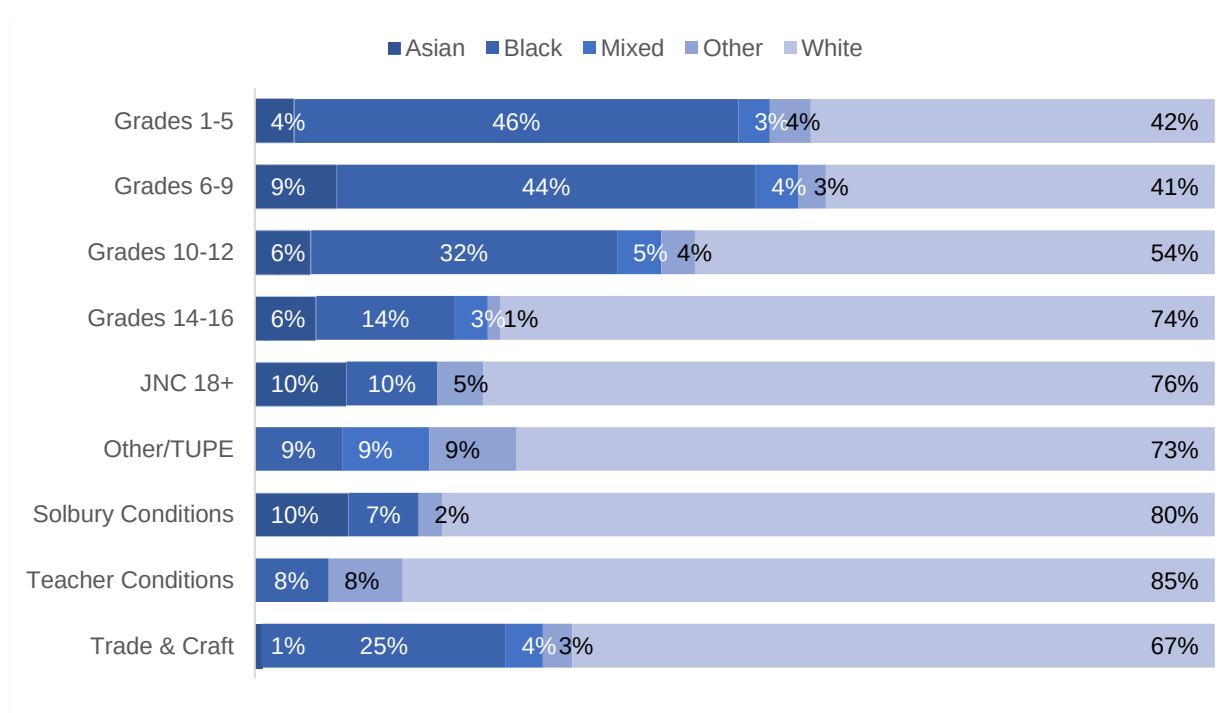
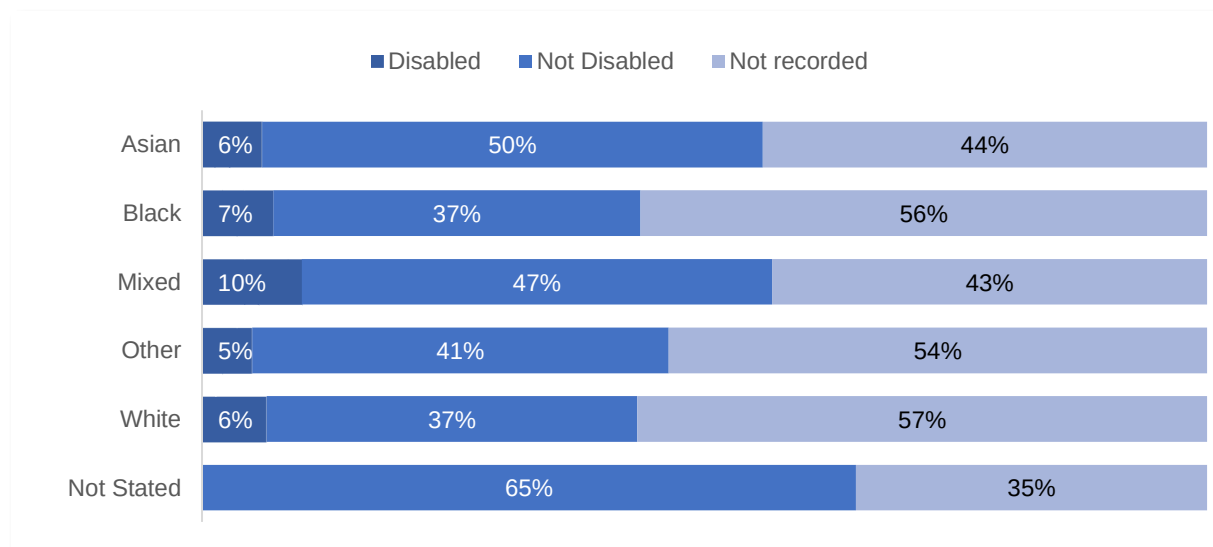


Chart 15 - Broad Race Profile of employees and Disability group (total group = 100%)



10.7 Next Steps:

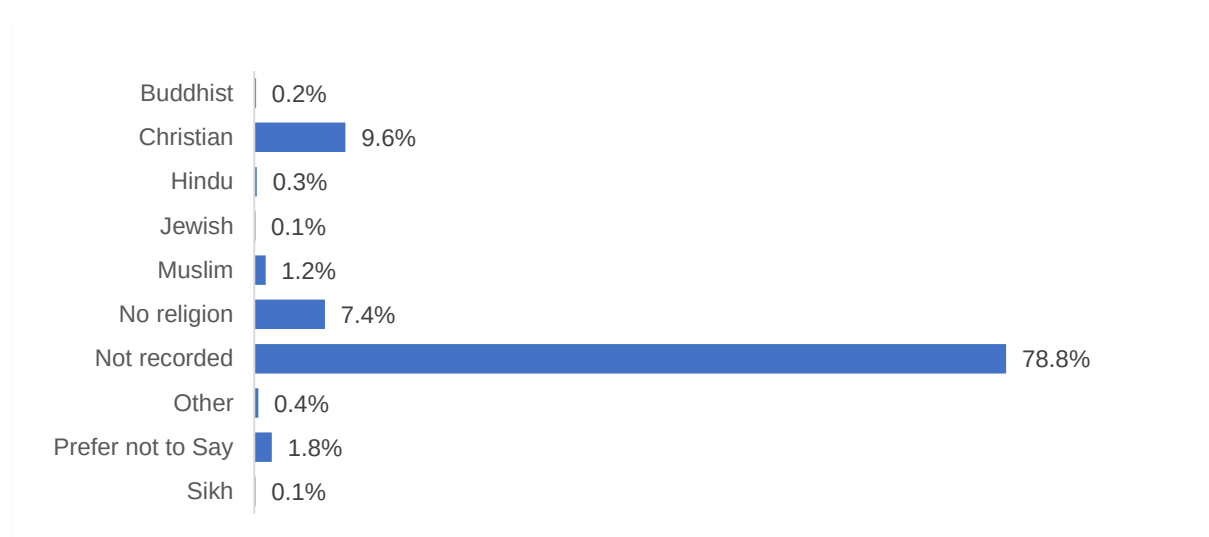
- Please see Southwark Stands Together, Race and Ethnicity Pay Gap Reporting next steps.

11. Religion or Belief

11.1 Whilst our employee monitoring data includes religion and belief, we currently do not hold enough useful data on this.

11.2 As part of the Council's Equality, Diversity and Inclusion plan we will need to ask colleagues to share this information with us to make sure that we can best support our workforce and ensure there is no issue of discrimination based on this protected characteristic. We will do this by reassuring staff that if they 'share not declare' this information it will enhance how we can support all employees to feel more inclusive at work. We will ensure new starters are asked to complete the religion and belief data set as part of our equal opportunities monitoring. All actions will be included within the Equality, Diversity and Inclusion Action Plan (detailed in section 4).

Chart 16 - Religion or belief of employees (total workforce = 100%)



11.3 Next Steps:

- We will ensure that all new starters are asked to complete the religion and belief data set as part of our equalities monitoring.

12. Sexual Orientation & Gender Reassignment

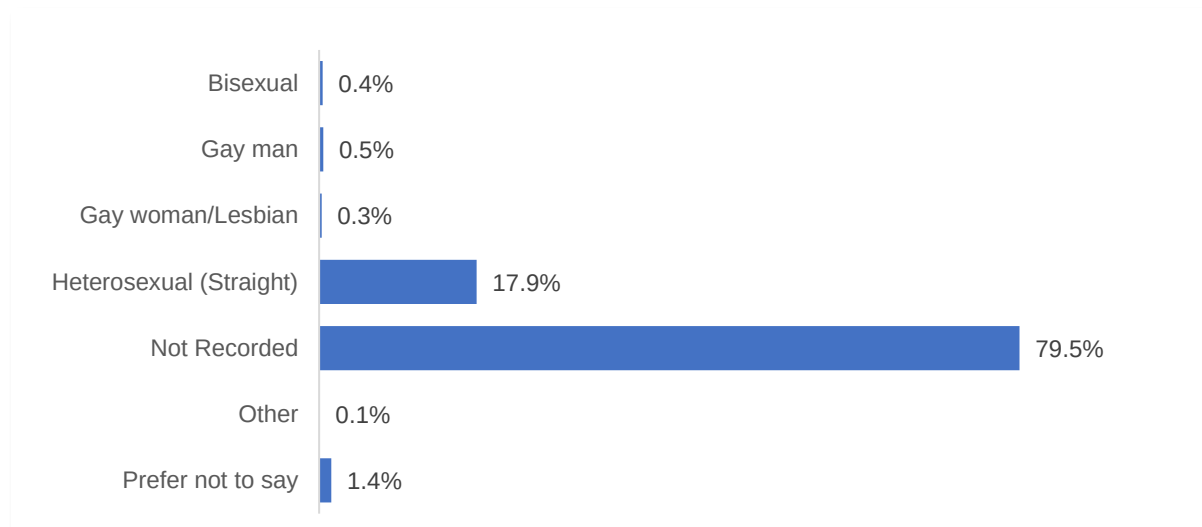
12.1 Whilst employee monitoring data includes sexual orientation and gender reassignment, we currently do not hold enough data for it to be useful inclusion in this report.

12.2 As part of the Council's Equality, Diversity and Inclusion plan we will ask colleagues to share this information to make sure that we support our workforce and ensure there is no issue of discrimination based on this protected characteristic. We will do this by reassuring employees that if they 'share not declare' this information it will enhance how we can best support all our employees to feel more inclusive at

work. We will also ensure that all new starters are asked to complete the sexual orientation and gender reassignment data set as part of our equal opportunities monitoring. All actions will be included within our Equality, Diversity and inclusion Action Plan.

12.3 Please note, in the last 3 years we have reported sexual orientation data from the most recent staff survey in 2017. The following chart is from our employee monitoring data (2021).

Chart 17 - Sexual Orientation of employees (total workforce = 100%)



12.4 Next Steps:

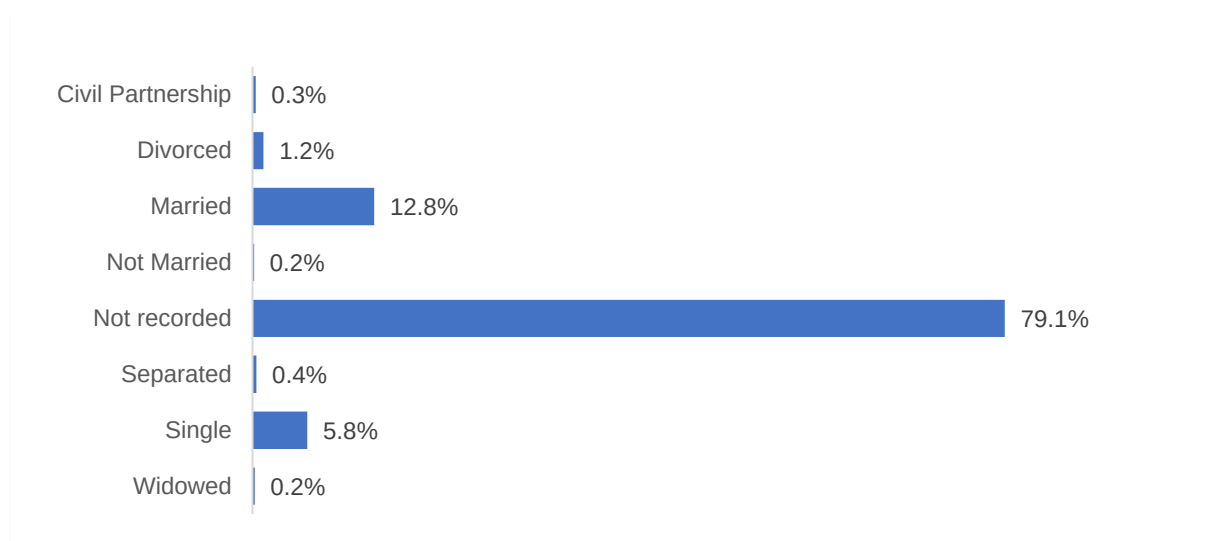
- We will ensure that new starters are asked to complete the Sexual Orientation and Gender Reassignment data sets as part of equalities monitoring.

13. Marriage and Civil Partnership

13.1 Whilst employee monitoring data now includes marriage and civil partnership, we currently do not hold enough data for it to be useful inclusion in this report.

13.2 As part of the Council's Equality, Diversity and Inclusion plan we will need to ask colleagues to share this information with us to make sure that we support the workforce and ensure there is no issue of discrimination based on this protected characteristic. We will do this by reassuring staff that if they 'share not declare' this information it will enhance how we best support all our employees to feel more inclusive at work. We will ensure that all new starters are asked to complete the marriage and civil partnership data set as part of our equal opportunities monitoring. All actions will be included within our Equality, Diversity and inclusion Action Plan.

Chart 18 - Marriage and Civil Partnership (total workforce = 100%)



13.3 Next Steps:

- We will ensure that all new starters are asked to complete the marriage and civil partnership data set as part of equalities monitoring.

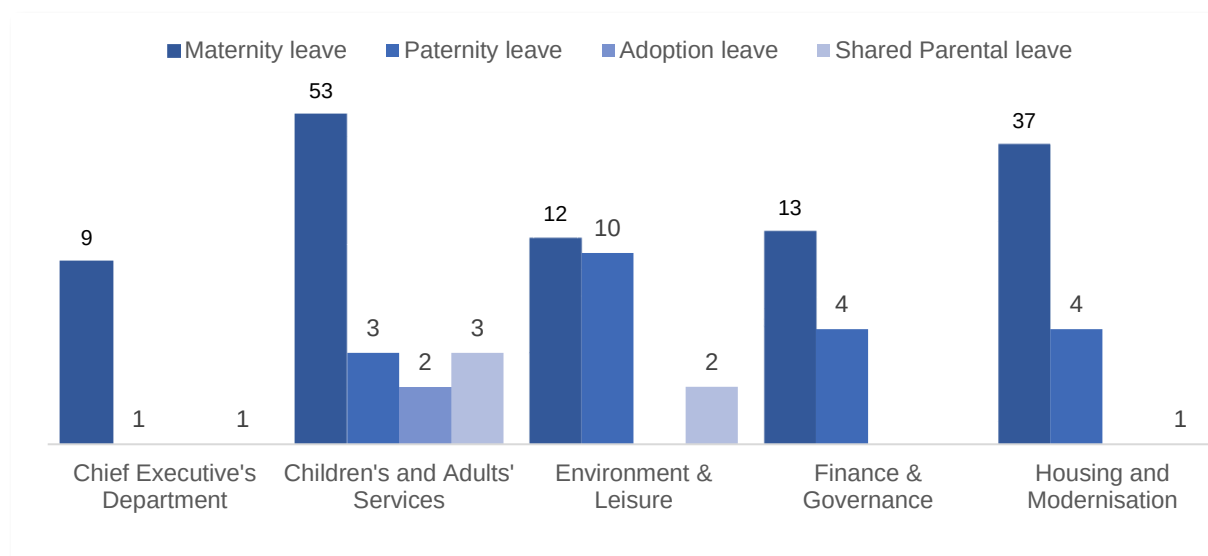
14. *Pregnancy and Maternity*

14.1 This is the second year we are including Pregnancy and Maternity in the Workforce Report. Chart 19 below shows the Council Wide position per department.

14.2 A large percentage of the Children's and Adults workforce is made up of female employees, (78%) of the workforce and this is where 42% of all maternity leave in the 2020-21 period was taken by employees.

14.3 In Environment and Leisure the workforce is predominantly male employees, 72% of the workforce and this is where we see 42% of all paternity leave in the 2020-21 period.

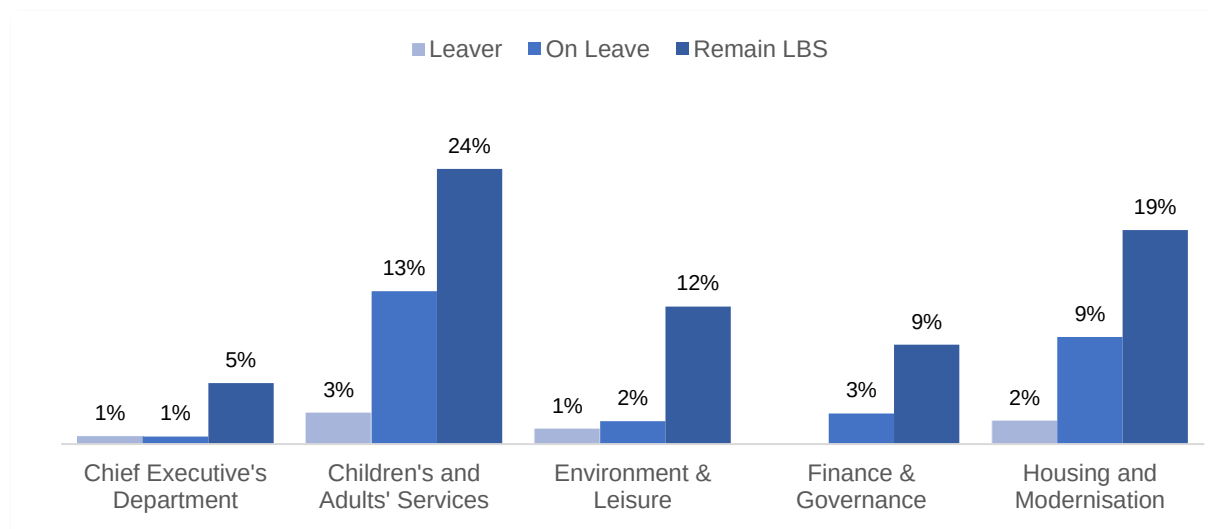
Chart 19 - Employees in department, total headcount by leave type (total employees = 150)



14.4 Seven people (all white race) used shared parental leave in the reporting year (5.6% of those eligible). Although this appears to be a very low number this is reflective of the national position where according to the HMRC in a national CIPD report on September 2021 only 2% of those couples eligible for shared parental leave took it up. Shared parental leave (SPL) allows parents to share leave between them. The right applies to both opposite-sex and same-sex couples, and similar rights apply to couples who are adopting a child.

14.5 If the women who took Maternity, Shared Parental Leave or Adoption leave during 2020-21 there was a significant retention rate, with 68% returning to work and 7% of employees taking this leave had left Southwark employment at the time of publishing the Workforce report (chart 20).

Chart 20 - Employment status of Maternity, Shared Parental Leave or Adoption leave as percentage by department (total employees = 100%)



14.6 There is further work to do across the council to modernise and promote family friendly policies. It is important for all of Southwark's workforce, male and female, to know they are supported as working parents and understand how we will do this. A full review of our family friendly policies and procedures during 2021/22 will ensure that we are supporting working parents. This is an important element of maintaining a positive gender pay gap and not disadvantaging people with parental responsibilities in the workforce.

14.7 Next Steps:

- We will conduct a review of our family friendly policies and procedures during 2021-22 to ensure we are providing good practice approach to support working parents.
- Sign up to specialised companies who can support the council to adopt good practice initiatives to make sure we are an 'employer of choice' by promoting flexible working practices and related initiatives for working parents.

Section 2:

General Workforce

Data

15. *Southwark Stands Together*

15.1 The launch of [Southwark Stands Together](#), in June 2020, prompted conversations with employees that focused on race in the workplace. We asked employees from Black Asian and Minority Ethnic backgrounds how they felt the organisation had used Equalities Diversity and Inclusion strategies to promote transparency, fairness, and accountability. We had honest and difficult conversations about perceptions, experiences, and ways we could improve the working environment for our Black, Asian and Minority Ethnic employees in the workplace. Following listening circles and solution-based conversations with the workforce they suggested a number of measures to improve experiences and development opportunities of employees from Black, Asian, Minority Ethnic backgrounds. As part of the discussion process, many white colleagues stood forward as allies, pledging to help build positive relationships of trust and accountability and using their voices to call out any forms of discrimination they may witness.

Workforce data that mirrors experiences shared by Black, Asian and Minority Ethnic employees

15.2 Our workforce data around race and progression through the organisation, mirrored examples shared in listening circles and other forums. Some examples were more nuanced such as being overlooked for promotion, lacking the same access to continued professional development (professional qualifications etc.) as white colleagues. Other testimonies were more concerning where colleagues had felt that they had been subjected to racist behaviour, without any consequence for those perpetuating such conduct. This resulted in a decision to open up historical race cases, followed by a review of services where employees had shared concerns about unfair practices.

15.3 Whilst workforce data for employees up to grade 9 reflect the ethnic make-up of the borough population, there is a stark lack of visibility of Black, Asian and Minority Ethnic employees at grades 14 and above (Ref Chart 13 refers as above). Concerns have also been raised with regards to limited career progression, where transitions into grades 10 – 12 become more challenging for Black, Asian and Minority Ethnic employees.

15.4 A breakdown of race data, across departments, shows areas of the organisation that are more starkly underrepresented in contrast with the local population. The Chief Executive's Department, Children's & Adults', Finance & Governance and Environment & Leisure are all made up of over 50% white employees where, where the borough population is made up of 54% of people from a white background. **Chart 11 refers, as above.**

15.5 Both EDI research and feedback from Southwark employees show that just as unconscious bias shows a tendency for individuals to recruit candidates who reflect their own characteristics; it can be a challenge for people from underrepresented or marginalised groups to visualise progressing in organisations. This is more prevalent where they fail to see either themselves or their wider community reflected at them in positions of leadership.

Recording Ethnicity and race data

15.6 Southwark has minimal underreporting of ethnic data, compared with other London boroughs; at around 4%, (significantly lower than the approximate 13.7% short fall of across London).

15.7 There is no legal obligation for employees to disclose data around any protected characteristics. However, we know that where underreporting occurs, it is usually because:

- Many platforms and data fields do not allow employees to disclose accurate disclosures of data beyond mass groupings.
- Some employees feel that disclosing data around protected characteristics will disadvantage them professionally; a predicament that increases with intersectionality of protected characteristics.

15.8 PwC published an ethnicity pay gap report from their research (2019) advising that, employers should explain how and why data is collected, what it will be used for and how it will benefit employees as a means to improve data collection. However, as mentioned, Southwark council collects employee data to enable us to report on the Ethnicity Pay Gap. This will be reported separately and include a commitment to an action plan that identifies both causes and solutions. Organisations who publish pay gap data (Ethnicity/Race and Gender) are vulnerable to claims of direct or indirect discrimination where they fail to demonstrate ways to mitigate data that shows a significant balance or disadvantages certain groups.

Using Southwark Stands Together to improve opportunities and progression for Black Asian and Minority Ethnic employees

15.9 Feedback from employees participating in Southwark Stands Together discussions carried out in 2020, helped define 8 work-streams that are working to progress the organisational understanding of Equalities Diversity and Inclusion (EDI) and reduce the types of issues referenced above. Employees are keen to ensure that Southwark Stands Together is more than a surface commitment to EDI improvements and anti-racist corporate rhetoric. Many spoke about wanting support and examples of practical ways to bring improvements to life and co-designing solutions with employees across the organisation, of various grades.

15.10 Below are the individual work-streams that were defined as a result of discussions with employees. Each address significant challenges that were reported in our discovery of employees experiences over the past year.

Table 1

Work-stream	Next steps
Career Progression	• Employee Value Proposition – currently being procured to delivery to employees
Corporate Training	• Review of current offers and improvements where appropriate, will be designed alongside an Employee Value Proposition (EVP)

Culture Change	Activities from ensuring all employees understand council values included in Southwark's overall corporate values with particular focus on embedding two EDI values to begin focus group discussions to define a corporate language of inclusion to describe different groups.
Employee Experience	Rebranding our HR service to become an Employee Experience Service which focuses on the areas where the experience of each employee is at its centre to help them grow and create an environment where everyone feels a sense of belonging.
Engagement and Re-education	Continuing conversations about race and equality with employees, ensuring senior leaders hear from employees who have had bad experiences and building ways to support managers in having difficult conversations
Policy	Revising and updating current policy and practice in line with best practice and with an EDI focus
Recruitment	- Developing inclusive approaches to recruitment (including how we advertise, assess, reflect our community in our interview panels) - Using Positive Action when recruiting to roles where Black Asian Minority Ethnic Employees are under represented
Leadership and Management	Focusing on upskilling our leaders and managers in the space of EDI and making sure they have the right skills to lead an inclusive and diverse workforce and to be held to account for their own behaviours and to challenge colleagues and the people they lead.

Initial improvements

15.11 We have been working hard to acknowledge historic failing and address ongoing disparities. In December 2020, the Chief Executive, Eleanor Kelly shared a statement to all employees for this purpose. However, we recognise that we still need to regain the trust of some employees who feel disenfranchised and do more to provide equal access to opportunities to address the issues identify in our data and concerns raised through the powerful voice of our workforce. The work we started last year has already made an impact, as we have seen small but welcome increases in representation of colleagues from Black, Asian and Minority Ethnic communities. This went from 22% (at 31 March 2020) to 26% (at 31 July 2021) in grades 14 and above.

15.12 A Southwark Stands Together Workforce Work stream Board was set up in December 2020 who are responsible for leading the activities under this area of the programme. The Board has responsibility for reviewing the progress made on the work streams and acts as a gateway to approve policies and practices before final ratification by the Chief Officer Team. We are proud to have regular attendance from our recognised Black, Asian and Minority Ethnic Staff Network

Group who sit as full members of the Board and have an integral role in the direction of the workforce work stream. (Refer to chart 13, as above).

- 15.13 We have also taken a number of steps that have increased employees' participation in conversations around race and raised awareness across the organisation, particularly in the leadership communities who are responsible for role modelling much of the recommendations from our staff surveys and conversations.
- 15.14 We are proud of the following initiatives and measures that are taking shape and look forward to updating employees and Cabinet as we progress these activities whilst acknowledging that there is still much to be done.

Southwark Stands Together monthly communications to employees

- 15.15 Towards the end of each month the SST Workforce Workstream project team send out an update to the council, outlining activity and upcoming opportunities to get involved in events, including some of those cited in this report. We want employees to see that SST outputs are ongoing, keep them abreast of progress and include them in the programme, where possible.

Southwark Stands Together Champions

- 15.16 We are building a community of champions who understand the objectives and commitments of Southwark Stands Together and are advocating action plan recommendations across the 8 work-streams. So far, we have 50 committed champions who meet monthly for briefings where we share updates and actions. Champions cascade Southwark Stands Together events and activity through to their service areas and teams. They also feedback particular challenges to Southwark Stands Together in their services so that we can address them. Champions are driven to create lasting change in the organisation and have specialist knowledge of their service areas, an invaluable asset in helping us understand barriers and how we can work together to achieve the ambitions the SST ambitions and continue to be an employer of choice.

Leadership Network

- 15.17 The council's 100 most senior leaders, meet quarterly to engage as a group, discuss emerging issues, alongside progress of the Borough Plan. Organisational Development is working with the Leadership Network to design an event plan for the next 12 months. Southwark Stands Together (along with Climate Emergency and local Economy) are recommended standing items at Leadership Network, as are 'Service Spotlights' where leaders present a snapshot into their service and achievements, including opportunities for collaboration with leadership colleagues and or other services. This will ensure that the work we are doing on SST remains at the heart of conversations, where leader will continue to develop skills and competencies in the space of EDI.
- 15.18 A recent Leadership Network Event held in July 2021 focused on Southwark Stands Together and introduced participants to Positive Action and its uses to

increase diversity of senior role in their services. This focused on the actions we are putting in place in how we recruit and develop individual careers. Positive Action is about taking specific steps to improve equality in your workplace. For example, to increase the number of Black people in senior roles in which they are currently under-represented. This information has been circulated to leaders and the workforce to provide information on how Positive Action is used to address disparities in the business. The steps we have recommended to start with are across recruitment and career progression. This includes the language we use in recruitment campaigns, the places we advertise, the assessment types we use (ensuring such methods don't disadvantage certain groups). It can also include the selection process, where we suggest interview panels are diverse. We are continuing to cascade Positive Action briefings, through our HR Business Partners and a series of briefings, available to all employees from September – October. Our next steps will be to move towards a Positive Action Workforce Strategy which will bring together a number of initiatives to adopt Positive Action methods and techniques to address areas of underrepresentation in our workforce. The Southwark Stands Together Departmental action plans are in progress and will be produced by the end of December 2021.

Employment Opportunities Pathways

15.19 As our HR department evolves into an Employee Experience service, we have relaunched our Employment Opportunities Pathways working group. A collaboration between Organisational Development and Local Economy teams, we are currently designing a new strategy to create a strong identity for a set of initiatives that:

- Work to increase employment across the borough;
- Harness our stakeholder connections within the organisation and externally in the education, business and arts sectors;
- Find innovative ways to use our apprenticeship levy, with our external stakeholders;
- Include and acknowledge bespoke groups within our strategy, including candidates from Black, Asian, Minority Ethnic backgrounds; alongside care leavers, Special Educational Needs (SEN), Not in Employment or Education (NEETs) and Elective Home Educated (EHE);
- Ensure that partner organisations and stakeholders incorporate Southwark Stands Together values as part of their outputs, alongside other elements Climate Change.

15.20 Our strategy will create a clear pathway of progressive opportunities that candidates can use as either bespoke placements or opportunities to progress into roles and placements that require further commitment and will broaden on experience and skills, we envisage the pathway opportunities ladder of incorporating:

- 1) Work Experience – 2 weeks (school students, leavers and ways into work cohort)
- 2) Internships – 12 weeks (school leavers, college leavers, grads)

- 3) Apprenticeships – 12 – 24 months (as above or existing members of employees at any age)
 - 4) Graduate Training Programme – 12 – 24 months (recent graduates)
- This will in turn help to deliver our socio-economic responsibilities.

Inclusive Mentoring

15.21 Earlier this year, a reverse mentoring scheme was piloted across Children's & Adults and will launch more widely in the autumn. The scheme matches senior employees with those more junior and from Black, Asian and Ethnic Minority backgrounds (although applications to the scheme are open to all employees). Applications are assessed on the basis that they will provide:

- Value for both parties so that each learn something from the other including insights into challenges in their roles, sectors and directorates;
- Applicants in junior roles, who have been traditionally under-represented in access or one to one time with individuals in leadership positions, will be given priority.

Employees with no email addresses

- 15.22 Like many local authorities we have large sections of the workforce without work email addresses or devices. Employees in this group have become increasingly marginalised as more of our communications (both corporate and transactional) are available via email or through various digital platforms.
- 15.23 Data shows us that employees without email addresses sit mainly in Environment & Leisure and Housing & Modernisation. Individuals are at more junior grades and overwhelmingly from Black, Asian and Minority Ethnic backgrounds. The distinction between our digitally enfranchised and disenfranchised is stark, across ethnic categories and presents a clear example of how and where Southwark Stands Together needs to address this exclusion.
- 15.24 The 2-tier system emerging has become particularly visible as we work to make arrangements to return to workspaces in the autumn. Although most digitally excluded employees work in roles where they have continued to be in the field or in corporate buildings, it is important that we are able to include them in conversations about Covid Secure spaces. ICT are working with directorates to create solutions for employees currently excluded, in a mixed economy of pc or laptop touch down spaces in depots, smart phones and the allocation of email addresses and Microsoft licences scaled to required usage.

Activity	SST Workstream(s)
Solution Focused Conversations outcome	Action plan - Employee Experience
Identifying service review issues	Employee Experience Culture Change

	Leadership & Management
Delivering a new leadership and development framework	Leadership & Management Culture Change
SST Departmental Action Plan production (by end of 2021)	Culture Change
EDI Strategy	All Workstreams
Positive Action Strategy	Employee Experience Career Progression Recruitment

15.25 In summary, Southwark Stands Together presents a unique opportunity to engage with employees and build momentum for genuine transformation across Southwark's workforce. Our plans will also benefit our residents and wider community, who will be included in our plans, as mentioned above.

16. Changes in the Workforce – Starters

- 16.1 There were 533 people who started work with the council within the year. The chart below shows the person's department at commencement (chart 21). The number of employees recruited was less than the 513 new starters the previous year due to the impact of Covid-19.
- 16.2 Those starting during this period have not resulted in any notable changes to the profile of the workforce in terms of sex, age, race or disability (Key workforce data).
- 16.3 60 new starters were TUPE intake as part of the Parking Service moving to Southwark. Most were in Grades 1-5 and work part time.

Chart 21 - Number of starters by department. 1 April 2020 – 31 July 2021

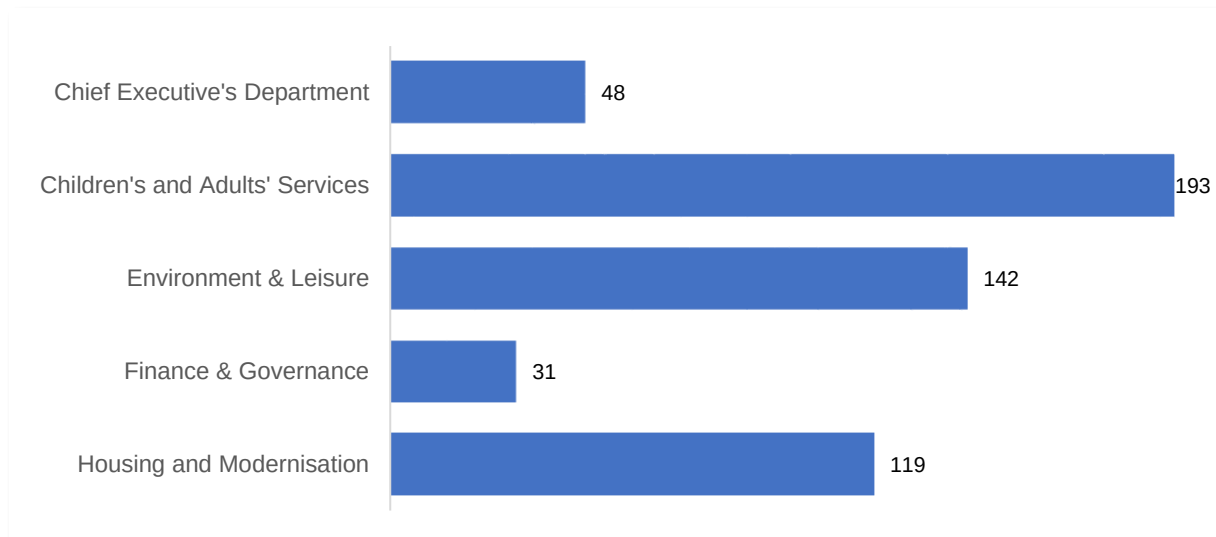
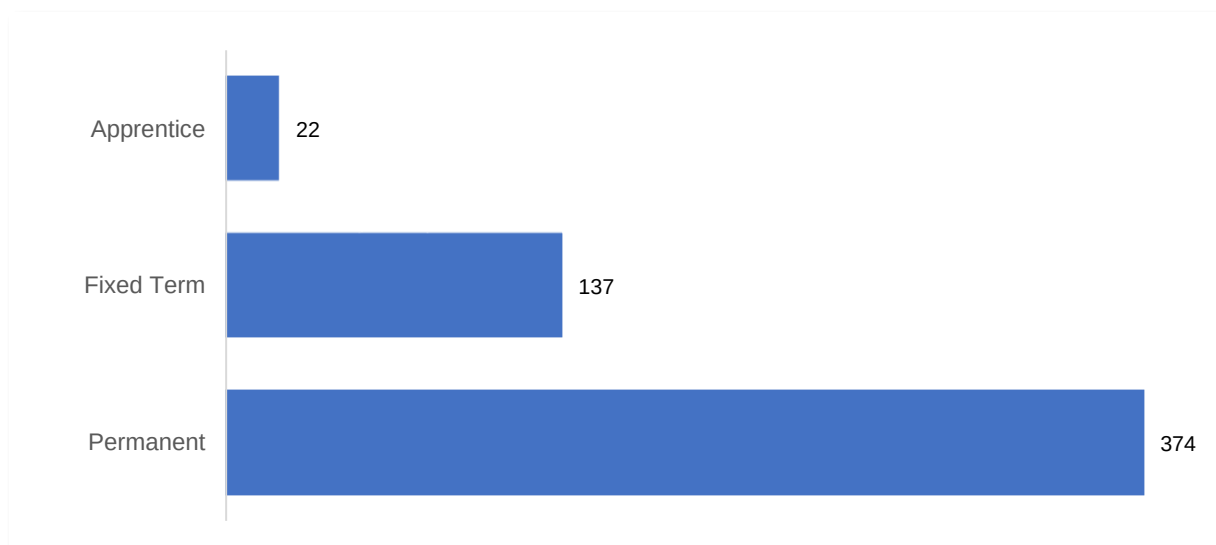


Chart 22 - Starters by contract type



16.4 Next Steps:

- Developing and reshaping the Corporate and Departmental Induction programmes for all new starters as part of the Employee Experience Strategy and Recruitment Strategy, to ensure new starters are inducted as early as possible;
- Recruitment Employee Life Cycle incorporating an engaging on-boarding experience.

17. *Changes in the Workforce – Leavers*

17.1 This section provides a detailed look at the reasons why people leave the organisation and their profile. 415 (272 in financial year 2020/21 and 143 April to

July 2021) employees left the organisation in the reporting period in comparison to 407 in 2019-20.

- 17.2 The dominant reasons for people leaving were on a voluntary basis, i.e., resignation, voluntary redundancy, retirement. Other reasons attracted relatively small numbers of employees.
- 17.3 The most common reason for leaving during the report period was resignation 64%.
- 17.4 Further scrutiny of those who left on the basis of dismissal, e.g., disciplinary or capability, appears in the relevant sections later in this report.

Chart 23 - Number of leavers by reason and Sex

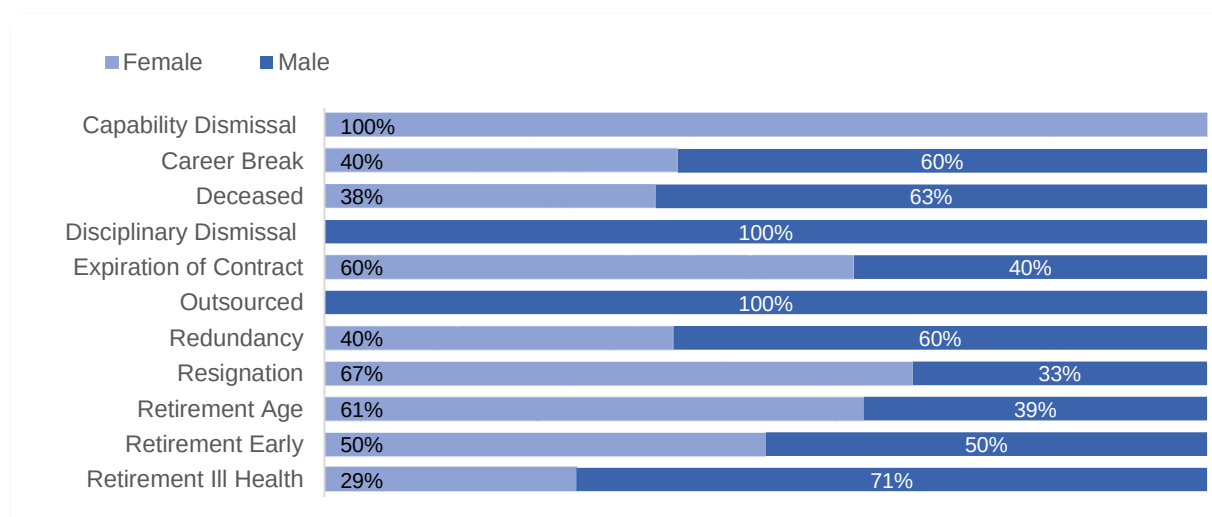


Chart 24 - Disabled leavers by reason (total disabled leaver = 26)

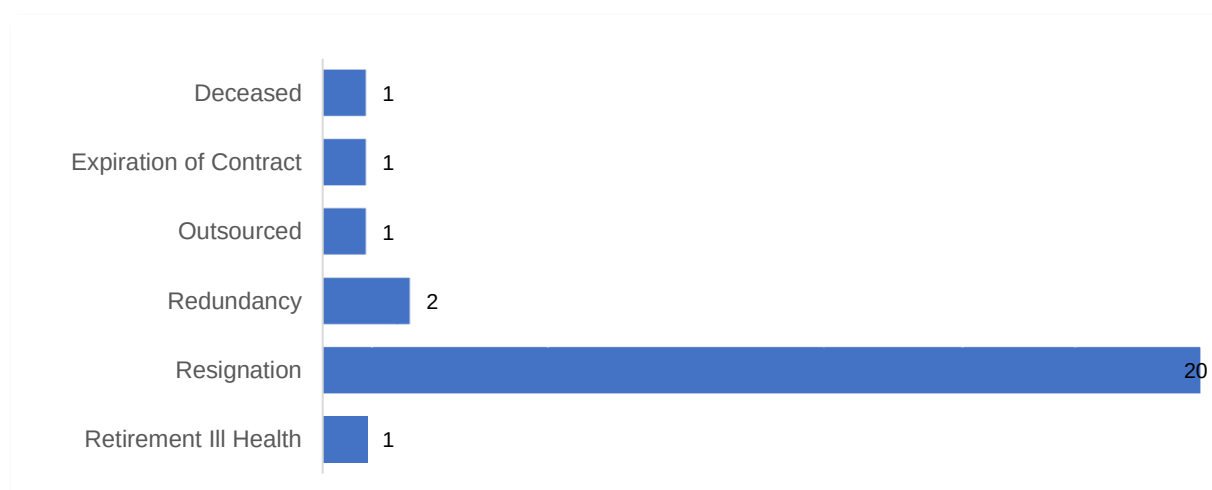


Chart 25 - Broad Race Profile of leavers by reason (total reason = 100%)

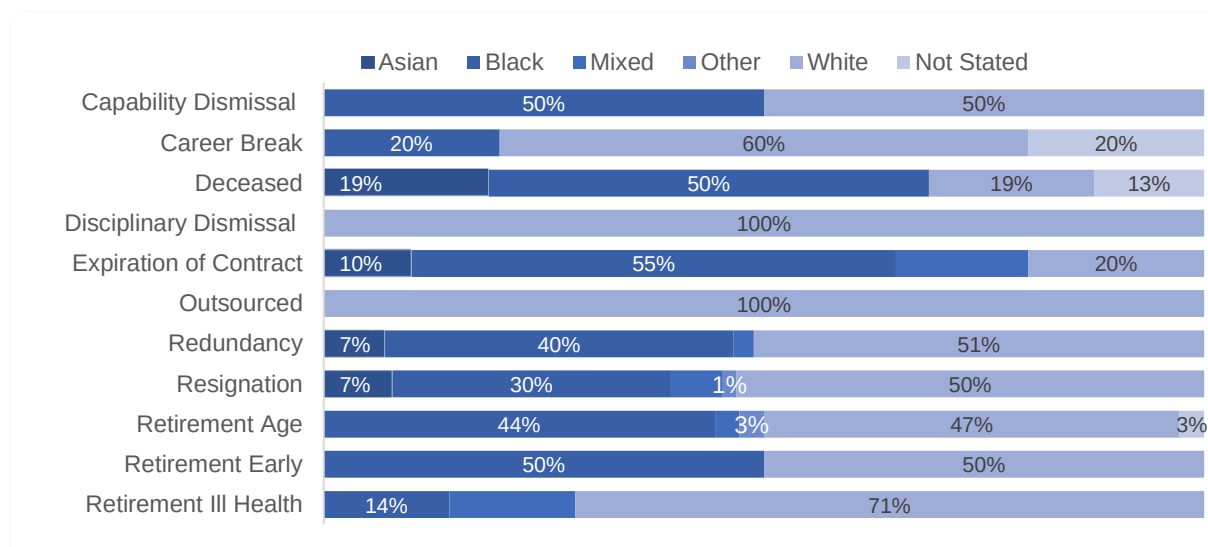
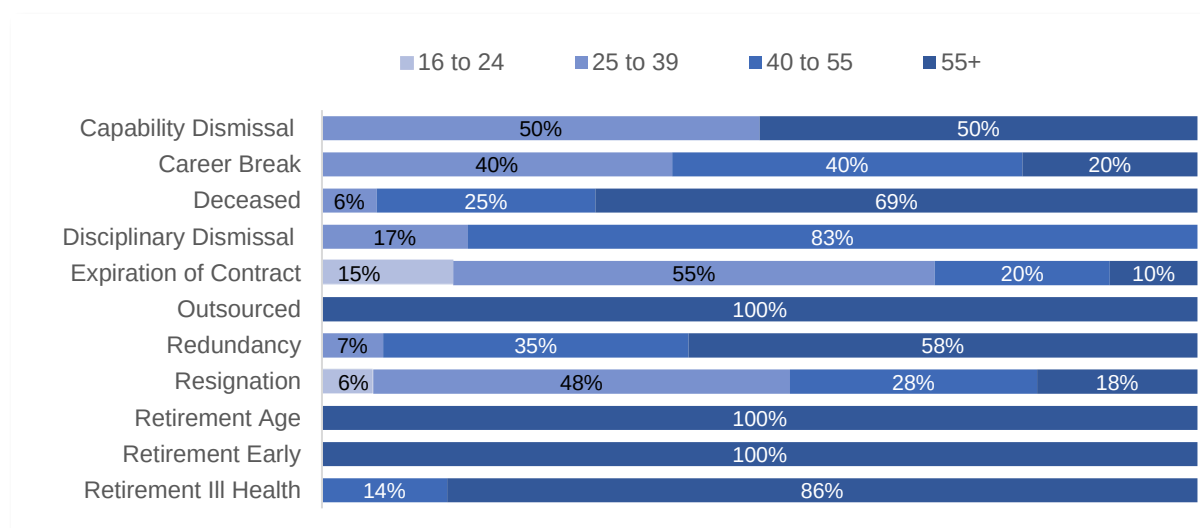


Chart 26 - Age group of leavers by reason (total reason = 100%)



17.5 Next Steps:

- Developing the exit strategy for leavers;
- Exit questionnaires' will form part of the action plan for the Business Partnering Team in line with their workforce strategy.

18. Recruitment

18.1 The following looks at recruitment activity over the year April 2020 to July 2021. Recruitment activity is defined as an advertised post with a defined closing date. More than one media (advertisements) may be used in each project. There were 583 posts advertised, of these:

- 66 posts were advertised which attracted more than 50 applicants;
- 514 posts only managed to attract 5 or fewer applicants.

18.2 Some jobs have been advertised more than once as there have been similar roles being advertised over the reporting period. For example, Occupational Therapist or Business Support officer appear multiple times and each project is counted separately. We have only reported on recruitment activity that attracted applicants.

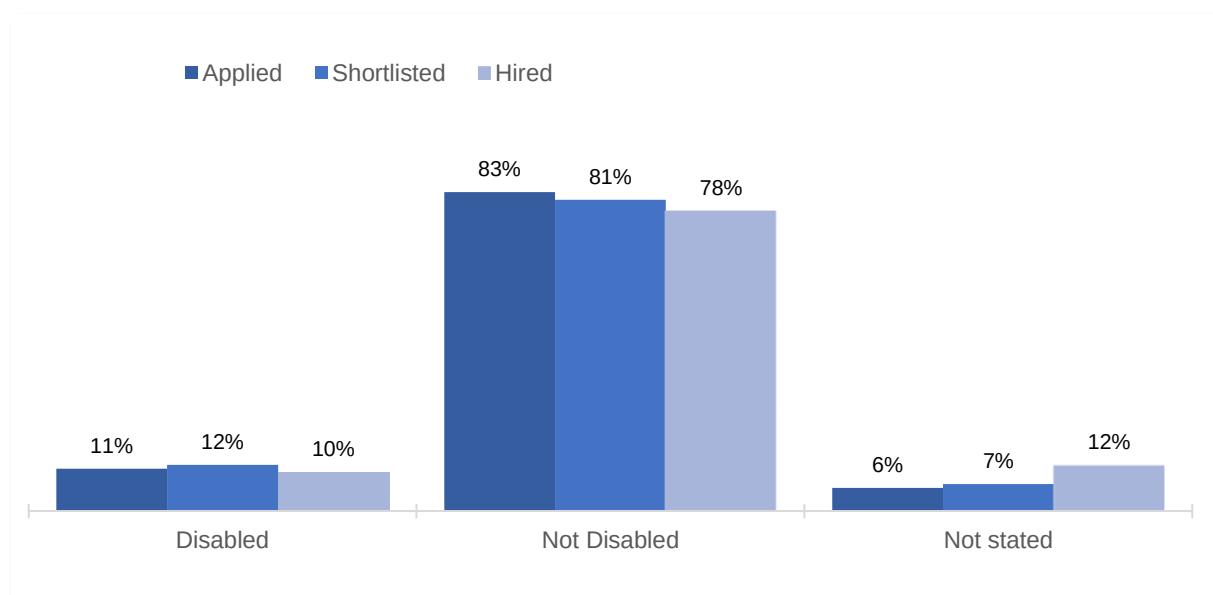
18.3 Overall there were 13,895 people who pursued an application with the council. The Race Profile of applicants is as follows:

Table 2

Asian	Black	Mixed	Other	White	Not Collected	Not Stated	Grand Total
2142	5228	804	597	4340	96	688	13895

18.4 Looking at disability, age and race, the success of people at the hired stage of the recruitment process are in line with the percentages of people who applied, i.e. female / male, not disabled / disabled, (charts 27, 28, 29 and 30).

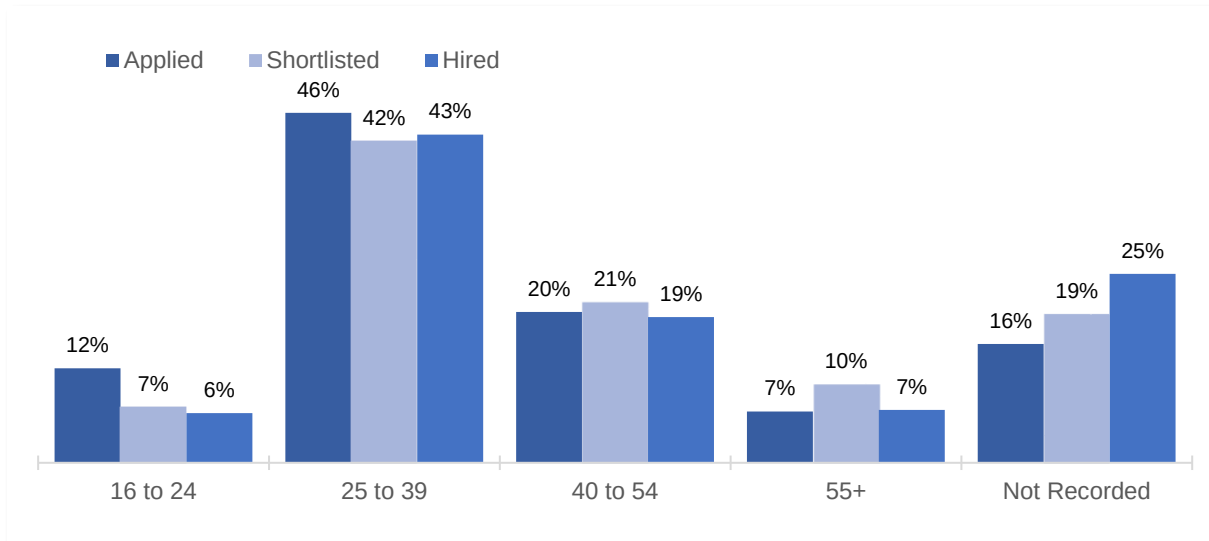
Chart 27* - Applicant Disability status by recruitment stage (total of each stage =100%)



* Hired here means an offer of appointment

18.5 Given that race fields other than disability are not known by those shortlisting, there is no evidence of any form of discriminatory conduct with regard to recruitment in any of the protected groups but there is positive evidence in the area of meeting the disability equality duty.

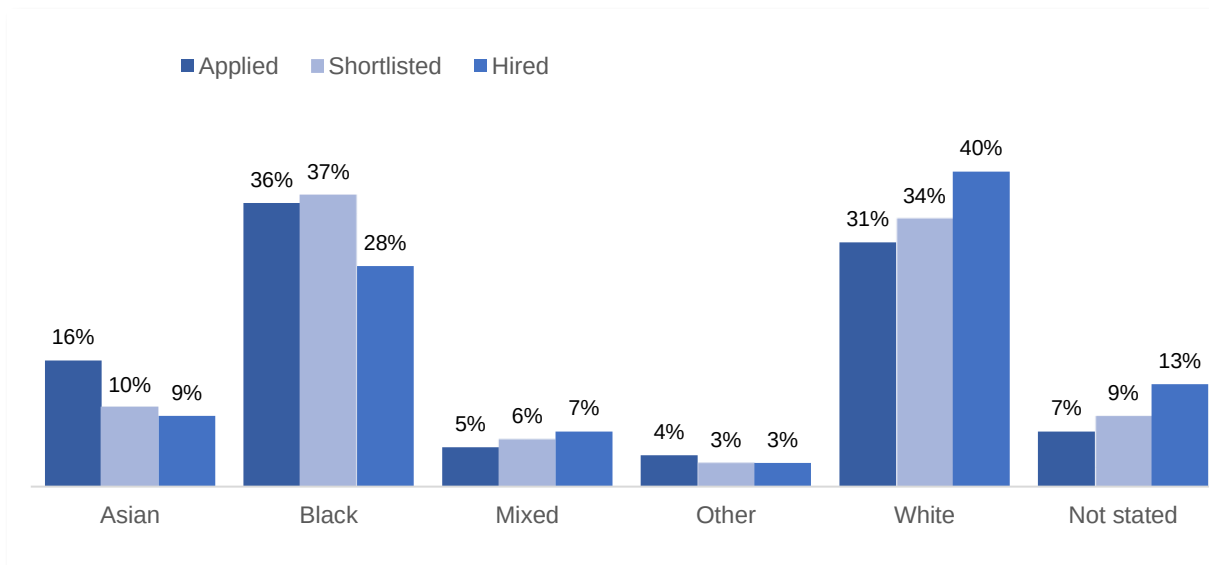
Chart 28* - Applicant Age group by recruitment stage (total of each stage =100%)



18.6 We have an ageing workforce, but data demonstrates we are attracting applicants in the age group below 30. 49% of applicants under 40 age range were shortlisted and 31% of applicants over 40 were shortlisted which takes into account the experience they bring to the role. We also attract applications from the age range 60+ and there were two appointments made from this age range.

18.7 When looking at race (chart 29 below), the success of people at the shortlisting stage is in line with the percentages of people who applied.

Chart 29* - Applicant Broad Race Profile by recruitment stage (total of each stage =100%)

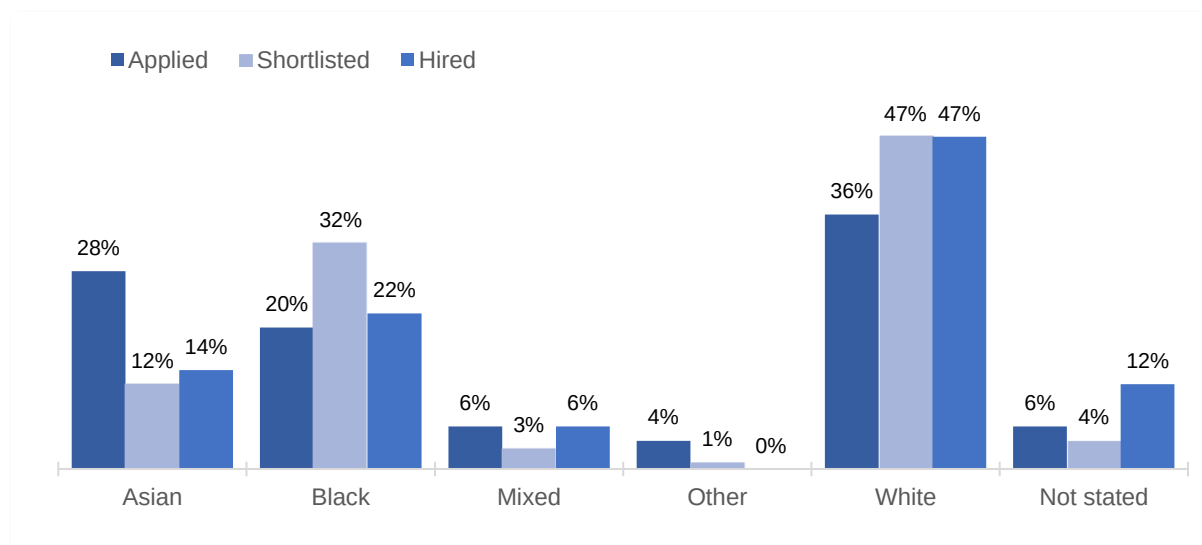


* Hired here means an offer of appointment

18.8 It is worth noting that the 'success rate' of applicants by race has varied over the last few years; however, we do know that there is lower representation of Black, Asian and Minority Ethnic employees in the council at grade 14 and above. With

our Southwark Stands Together programme well underway, this year we have added '*Recruitment by Race at Grade 14*' and chart 30 (below) shows the recruitment stages by race in this respect.

Chart 30* - Recruitment by Race Profile at Grade 14 and above by recruitment stage



18.9 Next Steps:

- Developing the Recruitment Strategy and Policy to re-emphasise the key values and aims of the organisation when it comes to respect and promoting dignity in the workplace;
- Reviewing our procurement process with our EDI consultant on how to engage external recruiters who have a strong track-record of attracting diverse candidates from all sections of the community;
- To deliver Southwark Stands Together (SST) Recruitment & EDI Training ensuring that positive action measures contained within the Equality Act 2010 underpin our recruitment and selection procedures;
- Review how induction is delivered across the organisation with a view to ensure that it remain COVID-19 secure without detriment to the organisation or our new employees;
- Understanding the diversity of our 'front-line' services in order to monitor attraction and retention more closely over the coming months.

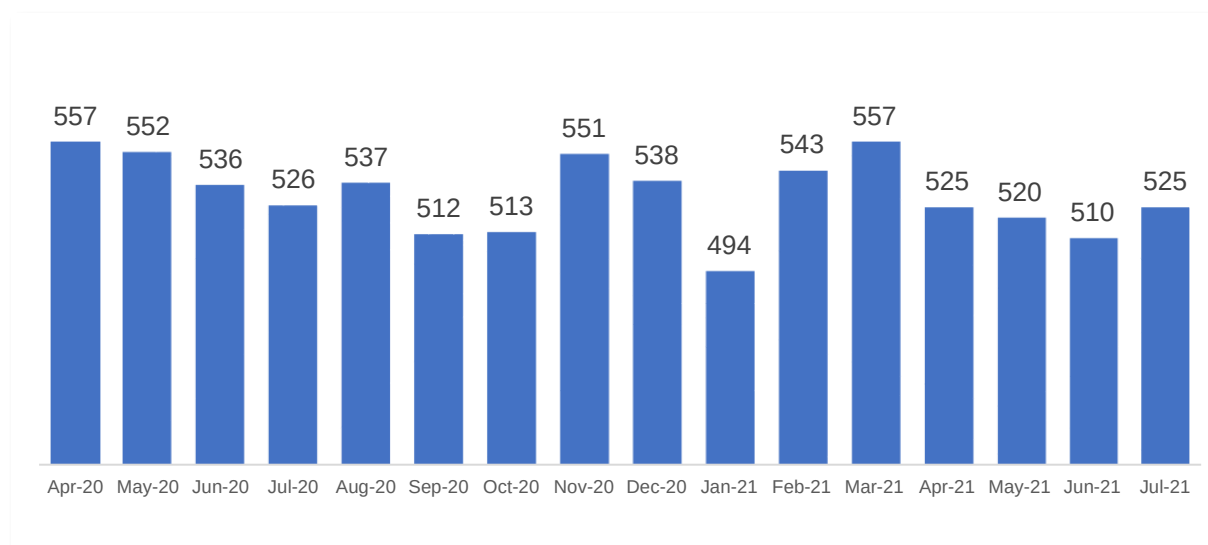
19. Agency Workers

19.1 Agency workers are not employees of the council but are an important resource in the delivery of the council's services. On the first working Monday of each month a snapshot is compiled of agency workers in use. On receipt of the monthly snapshot, HR work with departments to review usage, highlight the areas where resource planning would be beneficial, with a particular focus on long serving agency staff (i.e. anyone engaged for more than 12 months).

19.2 Agency worker assignments are managed by the Council's broker, Comensura. A monthly contract monitoring meeting is also held between HR and Comensura to discuss performance of the contract and agree improvements where necessary.

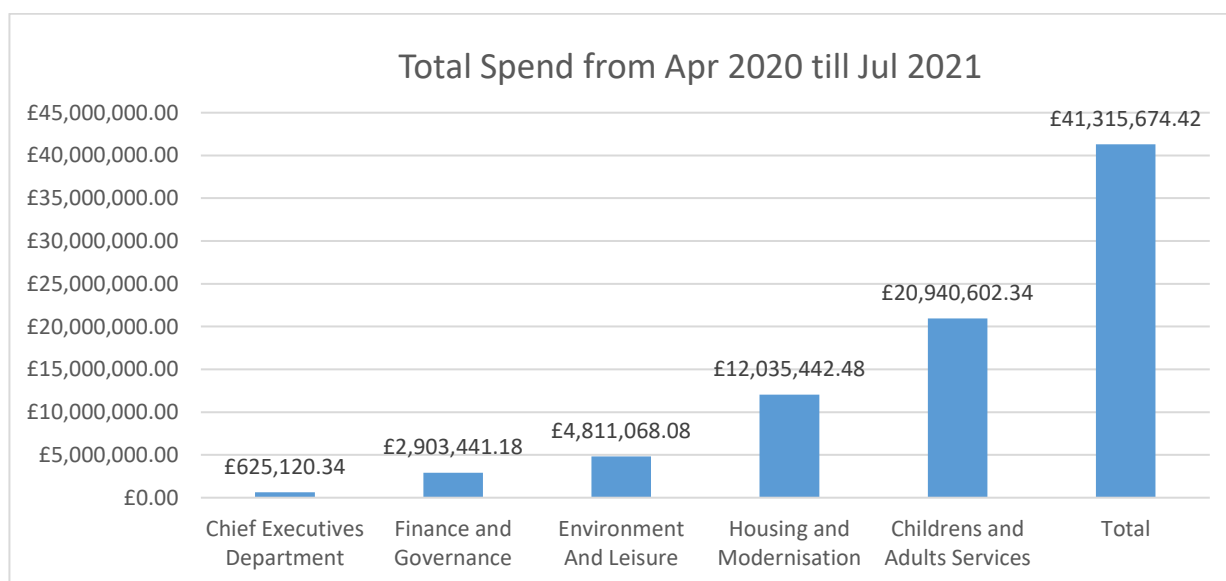
19.3 Monitors over the year 1 April 2020 – 31 July 2021 show that agency numbers ranged between 494 to 557 workers.

Chart 31¹ - Agency Workers – numbers via monthly snapshot 1 April 2020 – 31 July 2021



¹ The numbers of agency workers in use as at the monitoring date, i.e. first working Monday of each month.

Reference chart 32 - Agency Cost – Spend by division from April 2020 to July 2021



19.4 The number of workers fluctuates on a monthly basis and over the period (1 April 2020 – 31 July 2021) averaged 531 workers, an increase from 494 workers in the previous year.

19.5 The increase in agency worker usage during 1 April 2020 – 31 July 2021 can be attributed to a number of factors such as:

- Delivery of the new home's projects within Housing;
- Seasonal work demands within Environment & Leisure, e.g. Arboriculture staff in direct response to the emergency tree project;
- There has also been an increase of £1.7m spend in Children and Adult social care compared to last year due to the pandemic. This led to a higher demand for temporary workers in this area also leading to increase in the hourly rate.

- d. There has also been an increase in specialist skills requirement within Fire safety, Building safety and Digital technology teams.

19.6 Agency conversions include:

- 68 agency staff moved onto permanent roles through the 'Temp to Perm' HR campaign;
- 5 moved onto fixed term contracts without any additional cost to the council.

19.7 All this has led to a total savings of approximately £935,000 which was achieved through the contract terms for 2020-21.

19.8 Next Steps:

- Developing the Agency Strategy to review our agency spend and repeated usage in line with reviewing our Recruitment Strategies;
- Where agency workers are used to cover hard-to-recruit posts, directorates will work with Resourcing Team on alternative strategies to develop a sustainable workforce;
- Progressing the Procurement of the Agency Contract.

20. *Learning and Development*

20.1 Southwark has continued to provide learning and development opportunities for the workforce, during the pandemic. In June 2020, we prioritised and refreshed our corporate workforce development programmes to meet the councils' statutory obligations, to enable our employees to adjust to remote working and support the continued delivery of key services to our communities.

20.2 Learning & Development begins when new starters are welcomed into the organisation and continues either at key parts of the employee life cycle, alongside parallel learning, as individuals see fit for their bespoke career and development plans. We are working to provide consistent learning opportunities and points where employees will access it, so that it is clear what is needed both for their understanding of how Southwark works, including our statutory obligations, health and safety and general culture; also providing development to support growth within their role and further career progression.

20.3 We aspire to provide a range of blended learning, in person (as we return gradually to workplaces) on online, through group webinars, individual e-learner training, in-house training using Teams and on-demand recording of sessions available via Microsoft Stream, which stores videos created within various Microsoft apps.

Table 3

All employees	Bespoke Learning and Development fitting the needs of services and individual roles (Examples)
Induction • Health & Safety • Fire training • COT Induction • GDPR • Scheme of Delegation (for officers who require this knowledge)	• Learning and Development may include: • Continued Professional Development • Usually for roles where a set number of hours per year is mandated to maintain professional knowledge and changes in law and practice. • Governance training • As new policies are introduced • Report Writing • Digital Skills
First 90 days in post • Clear objectives and pathways to achieve these	
Regular one to ones A mix of task-based and performance focused one to ones, allowing time to identify what further training, support may be needed for specialist pieces of work or general self-management development	
Performance review appraisals (April and November) Where a focus on career objectives can be aligned with appropriate goals and training	
Exit interviews – a good opportunity to appraise us as an employer and hear how employees feel Southwark has developed their careers through their employee lifecycle	

20.4 During the pandemic we pivoted to provide online versions for training sessions that were previously carried out with attendees in the same physical space. Increased online training provisions further familiarised employees with a digital learning infrastructure and the new skills that go alongside virtual training provision and the etiquette of group discussions. This coincided with the widest laptop roll out, to date, across the council and widespread use of Microsoft Teams, which we will continue to embed enabling how we deliver training more broadly.

20.5 These were significant changes for a workforce who are at the beginning of their Microsoft 365 journey and who were mainly unfamiliar with the technology, the devices they access it through and the idea of wider scale remote working.

20.6 In addition, a wider M365 Training offer is part of our recommendations to prepare employees for an increasingly digital world, ensuring we have skills to use the technology being allocated.

Employee engagement and access to learning and development

20.7 Workforce data shows that employees actively engage with learning and development programmes delivered through our established Learning Management System (LMS).

20.8 Over the last 18 months:

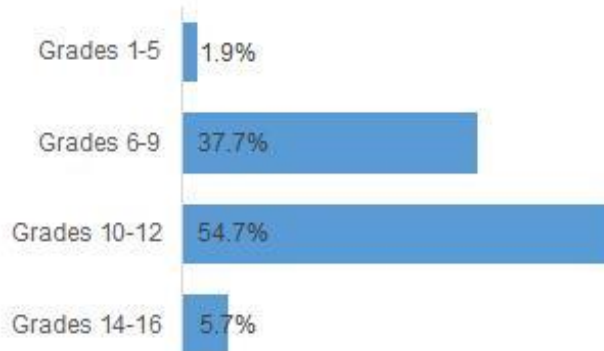
- 52% of employees (2,284 employees) engaged in some form of learning and development;
- This is up 6% from the previous year with 2,139 employees engaging with workforce development activities.

Professional Qualification Scheme (PQS)

20.9 Employees participating in the Professional Qualifications Scheme are shown below, by grade. Employees at grades 1-5 represent only 1.9% in comparison to other grade groups. Further analysis is required around the types of qualifications PQS participants are undertaking, including:

- Identifying factors to address the low representation of PQS applications at grade 5 and below;
- Understanding what the correlation is between employees who have undertaken PQS and those who have moved up through the grades;
- Being clear about legacy qualifications that PQS participants hold and a more consistent and transparent rationale to how these are allocated.

Chart 33 - Professional Qualification Scheme approvals by employee grade group (total employees= 100%)



Digital Inclusion across Southwark's Workforce

20.10 Inequality of opportunity to learning and development creates a two-tiered system across our workforce. We currently run parallel processes for communicating and engaging frontline workers in learning and development but acknowledge this area needs to be aligned to the rest of the council community to ensure equity of opportunities for all employees.

- 20.11 Last year we brought forward a rollout of laptop devices, in response to the pandemic, enabling employees who are able to carry out their roles remotely, to do so.
- 20.12 We are still in the early stages of providing a fully digitally enabled workforce. The council are committed to creating a robust IT and Digital strategy that encompasses this element alongside:
- Future proofing our technology infrastructure.
 - Training employees in digital skills so that they are literate and ready to adapt smoothly as technologies progress.
 - Offer more user-friendly interfaces that residents, employees and partners find easier to engage with.
 - Ensure we improve accessibility across digital platforms so that differently abled users are not excluded.

Equality of opportunities for learning and development

- 20.13 Southwark Stands Together (SST) is the council's proposed programme of activities to address racism and inequality within the organisation and across the borough. Race data shows a clear decrease in employees from Black, Asian and Minority Ethnic roles, from grade 14. This aligns with anecdotal testimony from employees from the same group, who took part in a series of SST Listening Circles last year. Participants spoke of a perceived lack of opportunities in comparison to white counterparts. Again, further analysis is required to understand discrepancies in race and sex in our data.
- 20.14 Black and Asian Minority Ethnic men are under-represented in accessing and undertaking professional development, which could be linked to the lack of Black and Asian Minority Ethnic male representation to senior levels of the organisation. Although there is a consistent lack of progression for both Black, Asian and Minority Ethnic men and women, men are more significantly under-represented.

Initiatives in Progress

Using Positive Action for Career Progression

- 20.15 As part of SST, we are guiding managers in the application of Positive Action to promote career progression opportunities. At Southwark, we are using Positive Action to mark out development opportunities (including secondments, training, work shadowing and PDQs) for employees who come from under-represented groups, covered by Equality Act 2010. Utilising Positive Action in this way helps upskill our leaders in using more creative means to create career progression and provides opportunities that are more accessible to all. Across the board, this makes for higher performing teams, where employees are better invested in progressing and the organisation benefits from a workforce who are continuing to develop and evolve.

Professional Development Qualifications

20.16 We are in the process of launching the newly updated EDI training for our leaders, managers, and employees to support them to learn about how to tackle inequality and the role they can all individually play in the development of a culture of inclusion. We acknowledge that there is more to do, and we will continue to work with our EDI partner to review other supplementary programmes such as the career development portal and professional qualification sponsorship scheme. We will develop bespoke development programmes for our Black, Asian, and Minority Ethnic employees, in line with positive action, to ensure equality of access to continued professional development.

Leadership development programmes

20.17 Our Leadership Development programmes are designed to embed the technical and behavioural skills required for our emerging, new and existing managers to lead effectively. The programmes are accredited through Institute of Leadership and Management (ILM).

20.18 Data highlights these programmes continue to be well received, but participation from Black, Asian and Minority Ethnic employees continues to be disproportionate to the make-up of our overall workforce. This correlates with the findings in the data outlined above where Black, Asian and Minority Ethnic employees are under-represented in accessing learning and professional development. This also correlates to the lack of representation at senior levels of the organisation.

Chart 34 - Managers partly through their ILM studies by employee sex and ethnic group (total employees= 100%)

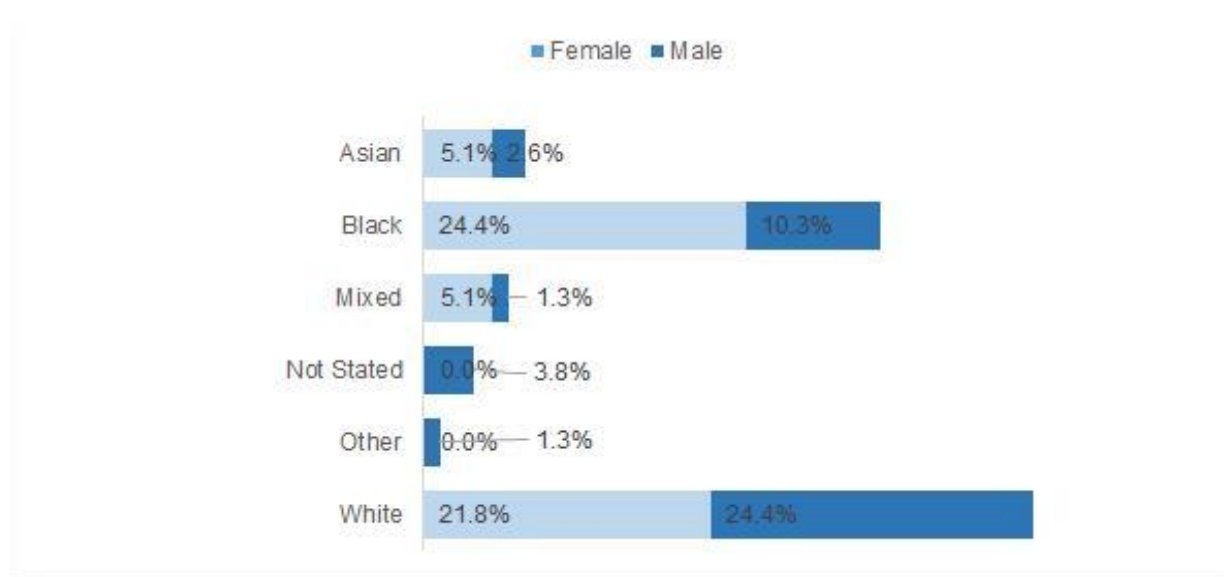
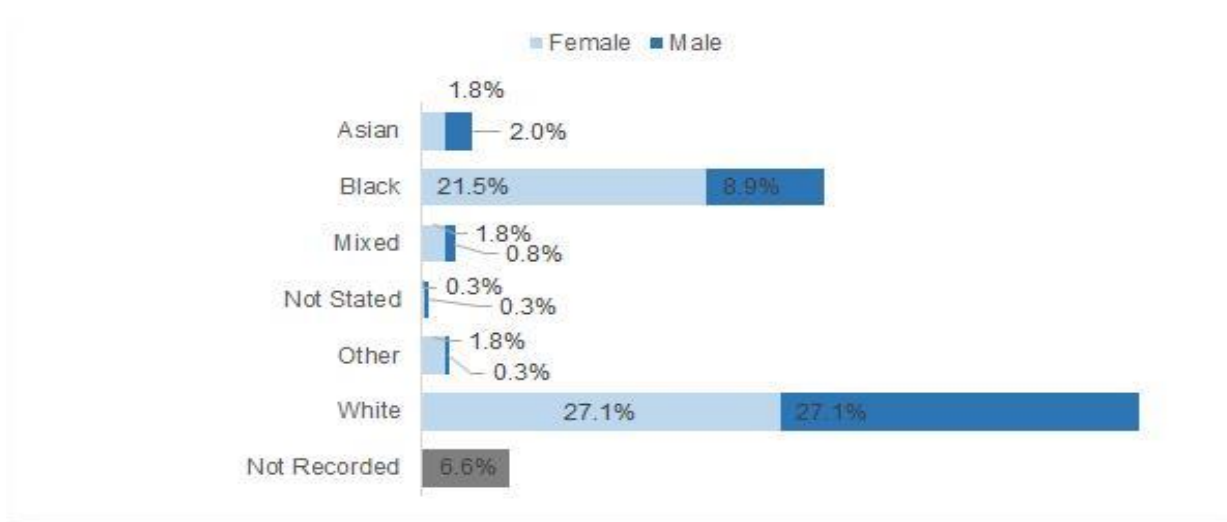


Chart 35 - Managers having completed an ILM programme since 2014 by employee sex and ethnic group (total employees= 100%)



20.19 Next Steps:

- Providing a clear L&D Programme from new starter to exit level, clearly tied Southwark's values and behaviours;
- Embed a one entry point online entry for Learning and Development content across the whole council, that aligns with our Microsoft digital infrastructure - with the aspiration of working towards a single sign on portal that makes learning easier for employees to access on line;
- Work alongside ITs Technical Transformation Workstream to roll out a wide-spread Teams training across the organisation and to provide a scaled version for employees without email addresses;
- Inclusive Mentoring – following a pilot in Children and Adults Services, whereby a leaders are partnered with more junior employees for a 3-month period of co-mentoring, the programme will be rolled out across the wider organisation, during autumn 2021;
- Provide monthly updates, as part of Southwark Stands Together around L&D offer uptake and outcomes, alongside where participants have made significant steps as a result of more focused L&D; for example, beginning a PQS, or moving to a more senior role;
- Further qualitative surveying and focus groups around the themes raised here so that we have a more accurate picture of causes for disparities in data, in order to adequately address them;
- Flag incomplete mandatory employees training so that we safeguard organisational health and safety, governance etc.

Summary

20.20 We have made a good start in employees' engagement, as part of Southwark Stands Together and Organisational Development outputs, to understand what both want and need in terms of learning and development, as well as their experiences today. As shown in the next steps below, we can improve our offer by providing a transparent, consistent, and equitable offer that casts opportunities more widely than they are currently being distributed.

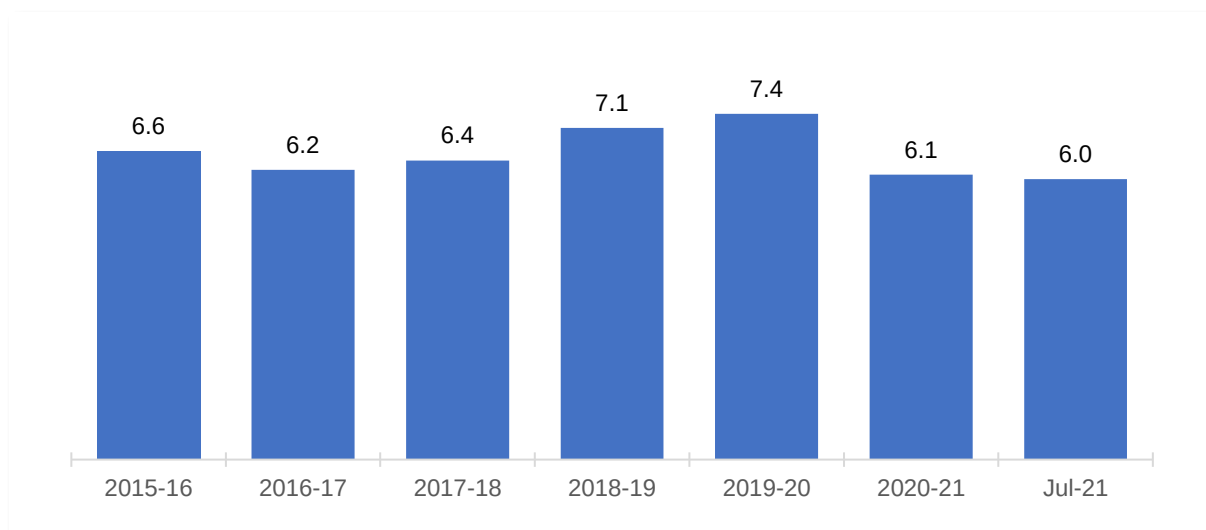
20.21 Continued employee engagement and joint up working across the wider organisation, coupled with strong strategic HR support and succession planning that helps define learning opportunities, will make increase our skills, knowledge, and experience across the organisation. As we become more ambitious about our learning aspirations, we will become a more competitive employer and be better placed to deliver high quality services and expertise to our residents.

21. **Sickness**

21.1 The latest data shows that the average number of sick absence days per person is 6.04 days (12 months to July 2021), which is a decrease of 1.38 days per person since last year (chart 36). This is lower than the average sickness across London boroughs of 8.6 days ([Section 4](#)) and public sector average of 8.8 days (LGA, 2020).

21.2 There is a marked reduction compared to last year's figure of 7.43 days, which has stopped the trend of increasing over the past four years.

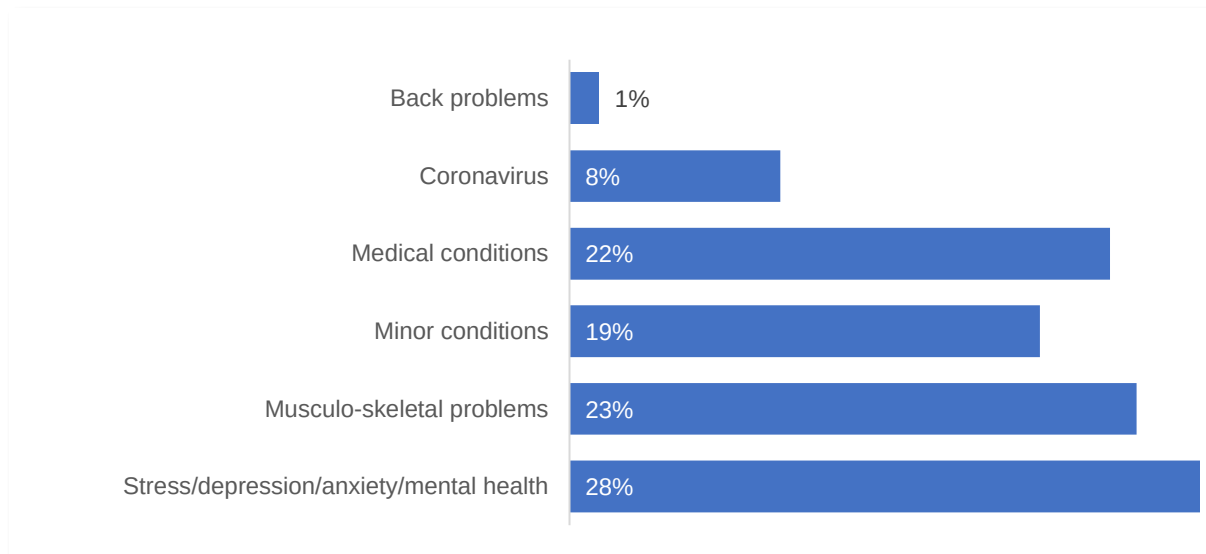
Chart 36 – Average days' sickness absence per person per year



21.3 According to the ONS, measures such as social distancing, shielding and increased homeworking due to Covid-19 appear to have helped reduce the levels of sick absence nationally. This can be seen with "Minor conditions" having a reduction of 11% during 2020-21. Covid-19 itself accounts for 8% of sick absence as outlined on the chart below (chart 37).

21.4 There are a significant proportion of employees who had no sickness absence during the 12 months to July 2021 (68%), which is an increase of 17% compared to last year.

Chart 37 – Grouped reasons for sickness absence 2020-21



21.5 According to the Health and Safety Executive, in 2019-20 stress, depression or anxiety accounted for 51% of all work-related ill health cases and 55% of all working days lost due to work-related ill health within the UK. Stress, depression or anxiety is more prevalent in public service industries, such as education, health and social care, public administration and defence. By occupation, professions that are common across public service industries (such as healthcare workers; teaching professionals and public service professionals) show higher levels of stress as compared to all jobs.

21.6 This is consistent with our findings as the largest category for the grouped sickness absence reasons is 'stress/depression/anxiety/mental health'. This is an increase of 2% to 28% in the last 12 months (chart 37). This is a slight decrease compared to the first 12 months of the pandemic, which showed as 29% for this category.

21.7 In addition to this, occupational health data suggests that a high proportion of referrals (45%) were related to mental health conditions compared to 31% for the previous year. The increase may be attributed to the effects of the pandemic as there have been additional pressures placed on employees which may have impacted on their mental health.

21.8 However, this may have been minimised by the council's commitment to provide support to employees across the workforce to help maintain resilience and a healthy work-life balance to find strategies to cope with increased challenges as a result of the pandemic.

21.9 Over the past 12 months there has been a range of health and wellbeing events and initiatives for employees. A summary of these activities is in the table below (Table 4).

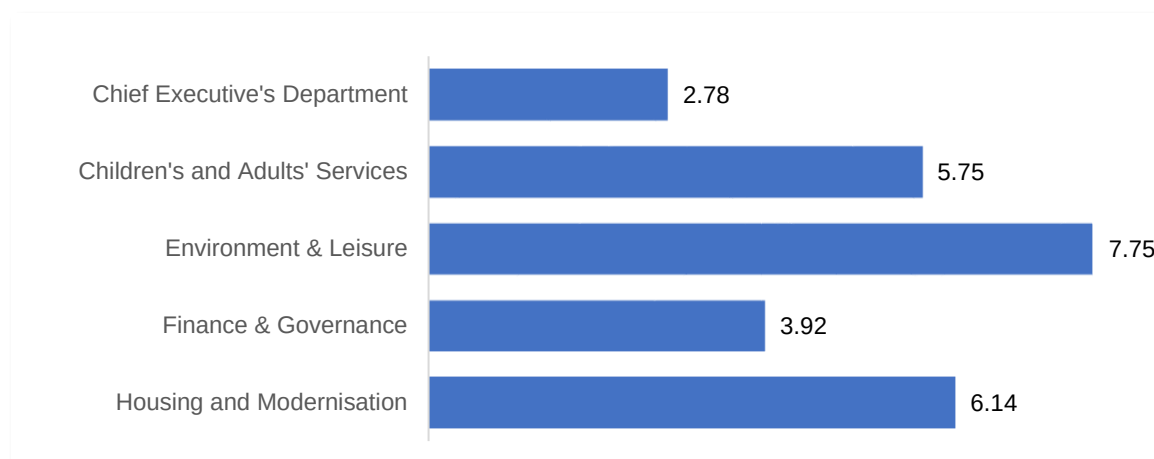
Table 4 – A summary of health and wellbeing activities over the past 12 (or 16) months

Summary of Health and Wellbeing activities over the past 12 months	
Wellbeing Toolkit and Wellbeing plan – available in a variety of medias that can be accessed on personal devices. This included a Winter Wellbeing Toolkit to support employees through that season	Mental health initiatives and awareness campaigns were held to help tackle the stigma of mental health
Ongoing engagement with NCompass, the disability staff network on a range of initiatives, such as, providing feedback to the Smart Working programme and providing advice and guidance to the Cycle to Work re-procurement process	Wellbeing webinars were arranged for employees on a range of topics to support positive mental wellbeing
COVID-19 – Regular updates, guidance and information was provided to support employees, including managers, during the pandemic	Promoting Health and Wellbeing awareness days to increase understanding and awareness of initiatives
The launch of new policies such as the Menopause and Domestic Abuse policies to help support the wellbeing of our workforce	Refreshed Mental Health guidance in light of the pandemic

Analysis of the departments

21.10 Chart 38 (below) shows the average number of sickness days broken down by department. There is a wide variation ranging from 2.78 days in the Chief Executive's Department to 7.75 days for Environment and Leisure. The highest figure (7.75 days) is still below the average across London councils (8.6 days). The two lowest figures are in the Chief Executive's (2.78 days) and Finance and Governance (3.92 days) departments. These two departments have minimal front line employees and the majority have been working from home during the pandemic, which may account for the difference. As indicated above, research suggests that increased homeworking may have contributed to reduced sickness levels.

Chart 38 – Average days sickness absence per person 12 months to 31 July 2021
(total employees = 4380)



21.11 Although the absence days are not over the sector average, any days lost to sickness have a cost. This is not just monetary, e.g., higher agency spends, as this can result in increased workloads for employees, affecting morale and productivity. Therefore, we continue to ensure that sickness is monitored to reduce the impact on service delivery to our residents.

21.12 Work is underway to develop a council wide Sickness strategy which will provide a consistent and supportive approach to managing sickness and wellbeing. This must include the flexibility to provide support and interventions tailored to each department's specific needs.

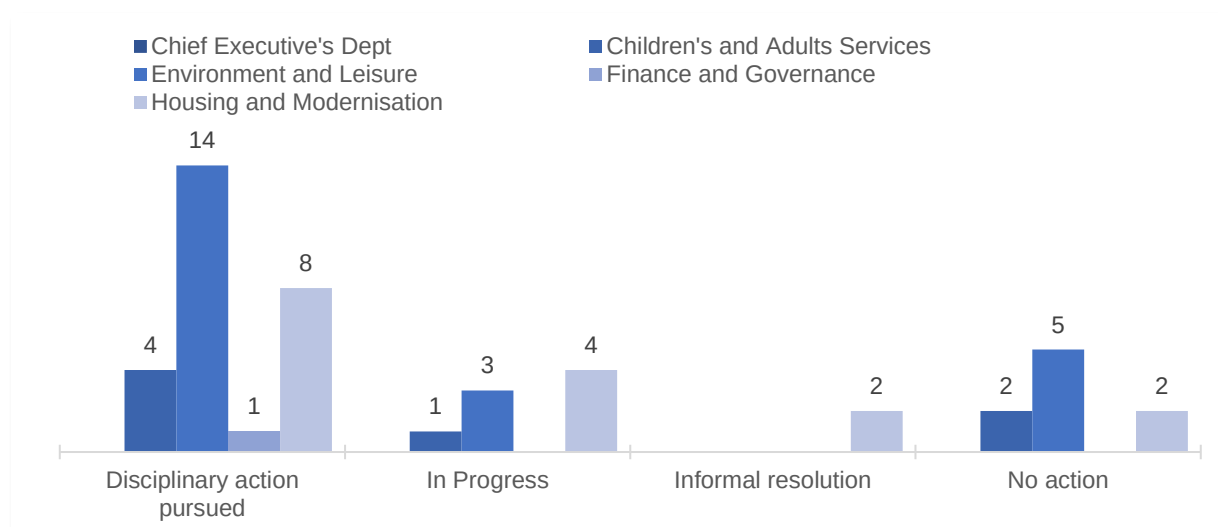
21.13 Next Steps:

- The work to promote and develop wellbeing and mental health support for all employees, which includes guidance for those managing employees, will continue. A Wellbeing Strategy will be created to provide a direction and focus for our wellbeing initiatives;
- A council wide sickness strategy is being developed in order to provide strong absence management with a holistic approach to wellbeing at work. This is especially important in light of a significant proportion of employees returning to the workplace over the coming months and the lifting of a number of COVID-19 restrictions nationally.

22. *Disciplinary Investigations and Outcomes*

22.1 It is usual within a Local Authority to have a small percentage of employees who were subject to disciplinary investigation. In this reporting period Southwark had 1% of the workforce who have been subject to disciplinary proceedings (chart 39 & Key workforce data). When disciplinary proceedings do occur, it has a great impact on those individuals. Ensuring no employee is adversely affected due to discrimination, during this process, is paramount and the rationale for monitoring disciplinary action by protected characteristic.

Chart 39 – Disciplinary Investigations by department (total investigations = 46)

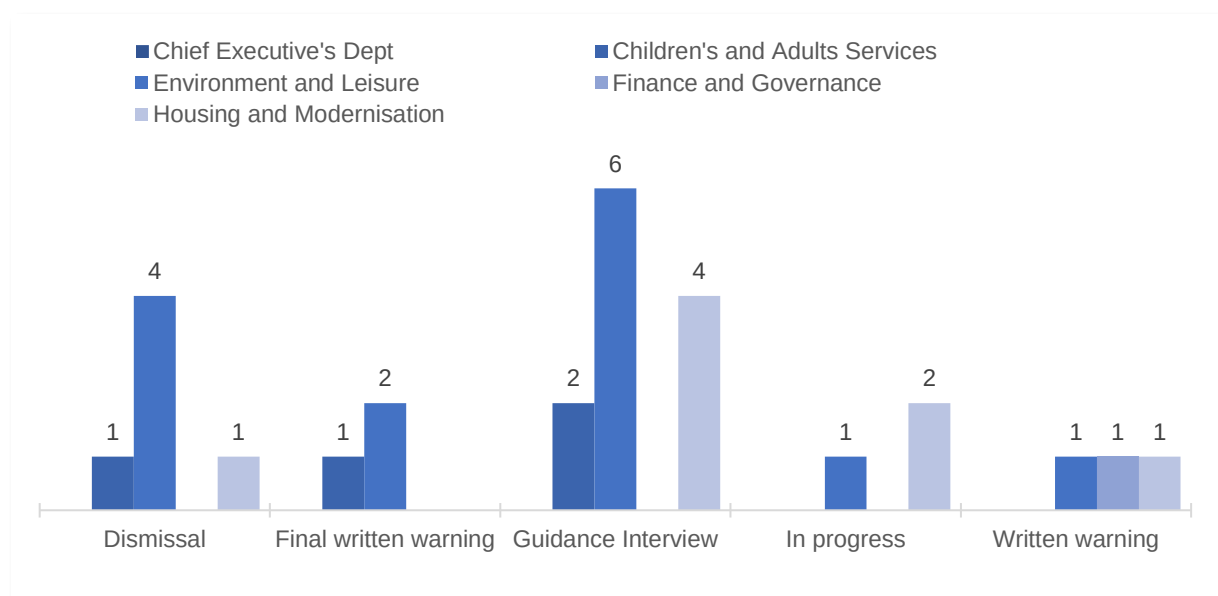


22.2 There were 46 disciplinary investigations recorded in this period, and chart 39 above states the outcome of those investigations. 9 of the investigations required no further action, 2 were resolved informally and 8 continue to be investigated. 27 cases disciplinary action were pursued and brought to a conclusion.

22.3 Environment & Leisure had 48% of the disciplinary (22 cases), with Housing and Modernisation having 35% (16 cases), Children's & Adults having 15% (7 cases), 1 case in Finance & Governance and none in Chief Executives.

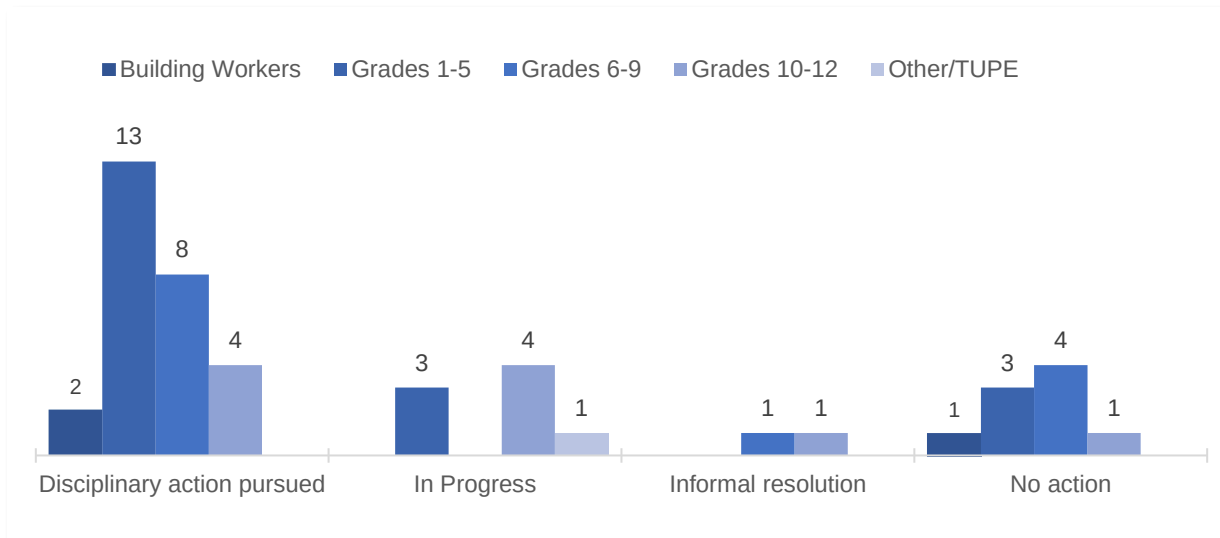
22.4 Of those 27 investigations pursued, 6 employees were dismissed, 3 received a final written warning, 3 a written warning, 12 a guidance interview and 3 remain under investigation (chart 40 below).

Chart 40 – Disciplinary Action Outcomes by department (total investigations = 27)



22.5 Traditionally the majority of disciplinary cases occur more in our lower graded posts (grades 1-9) and this year is no different with 76% (35 cases) occurring within grades 1-9 (including 3 in building workers grades). Only 25% of disciplinary issues (11 cases) were in grades 10-12 with no cases at grade 14+ which demonstrates that those employees who are guided by professional/managerial/technical standards are less likely to be subject to disciplinary proceedings than those in frontline and manual roles.

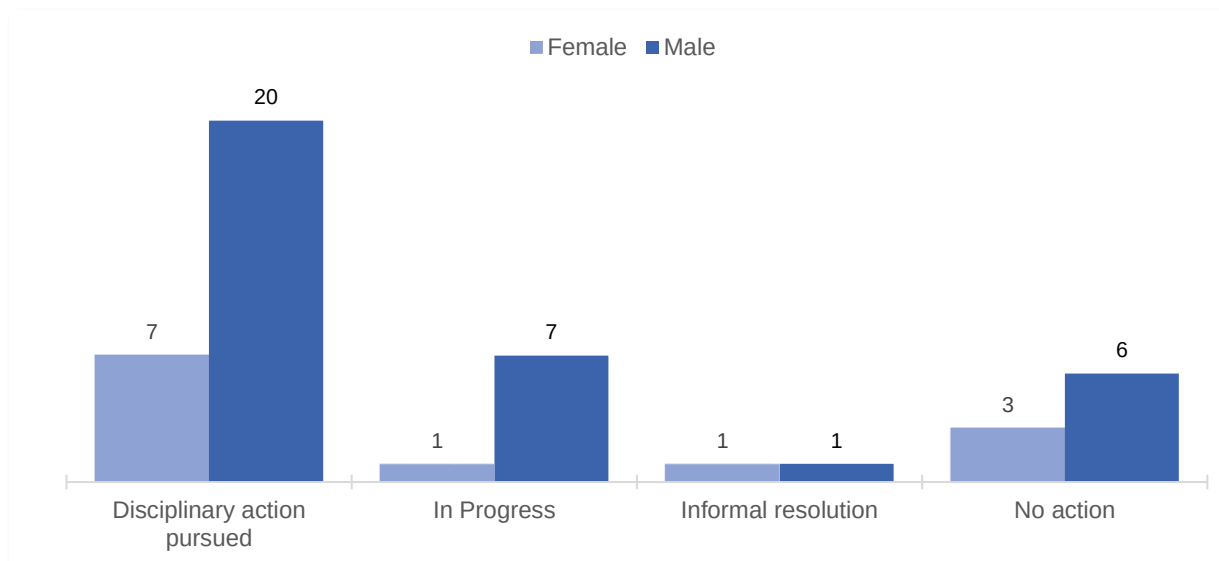
Chart 41 – Disciplinary Investigations by grade group (total investigations = 46)



22.6 Three of the employees' subject to disciplinary investigations were recorded as disabled. The disciplinary process does take account for considering reasonable adjustments for people with a disability during disciplinary processes to ensure that they are not disadvantaged. An example of this could be translation services for an employee who is partially sighted or additional breaks for a person with diabetes to ensure their energy levels can be maintained. The impact of a person's disability also needs to be carefully considered when a disciplinary is undertaken to ensure the actions being investigated are in anyway as a result of someone's disability.

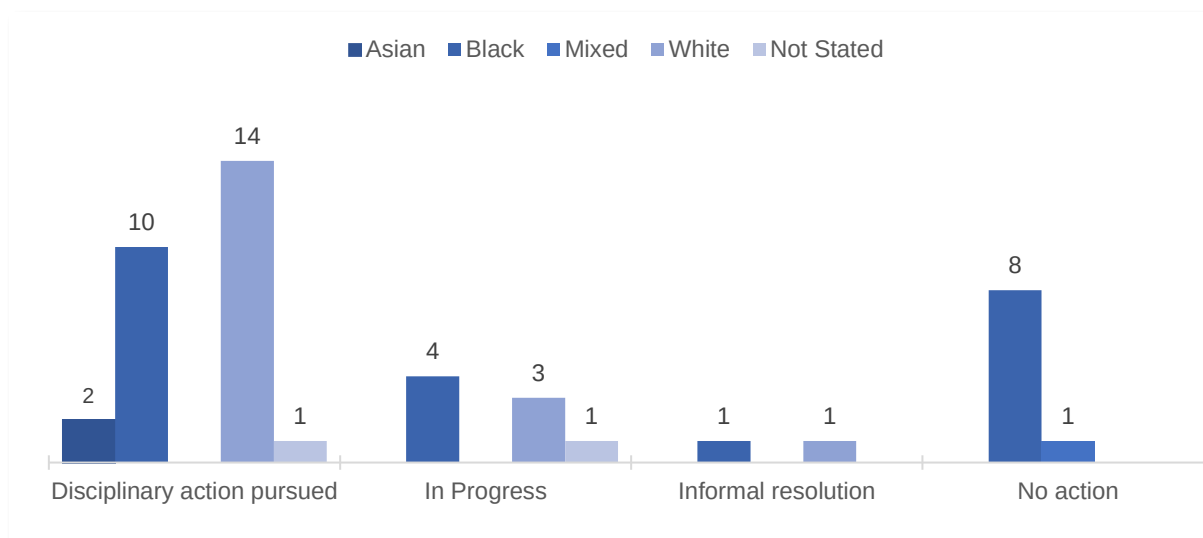
22.7 From chart 44 we know more male employees were subject to disciplinary proceedings than women and all the dismissal were men. In reviewing the data in chart 40 the majority of disciplinary occurred in the Environment and Leisure Department where they have a greater number of male employees than female employees.

Chart 42 – Disciplinary Investigations by sex (total investigations = 46)



22.8 When looking at the chart 43 we can also identify that more white employees were subject to disciplinary proceedings than colleagues from black, Asian, or other ethnic minority communities.

Chart 43 - Investigations by broad Race Profile (total investigations = 46)



22.9 On 6 occasions disciplinary action was implemented in the form of written warnings. In 6 cases the employee was dismissed. Those subject to such actions is less than 0.3% of all employees (Key workforce data). All the employees who were dismissed as a result of disciplinary action in this period were recorded as male and of white ethnicity and race.

Chart 44 – Disciplinary action outcomes by sex(total investigations = 27)

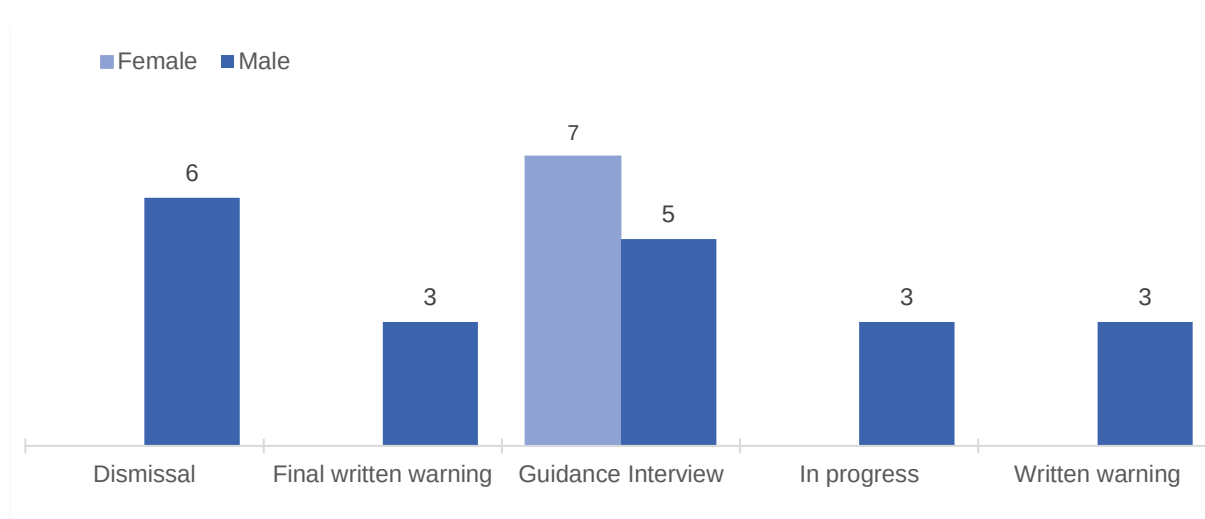
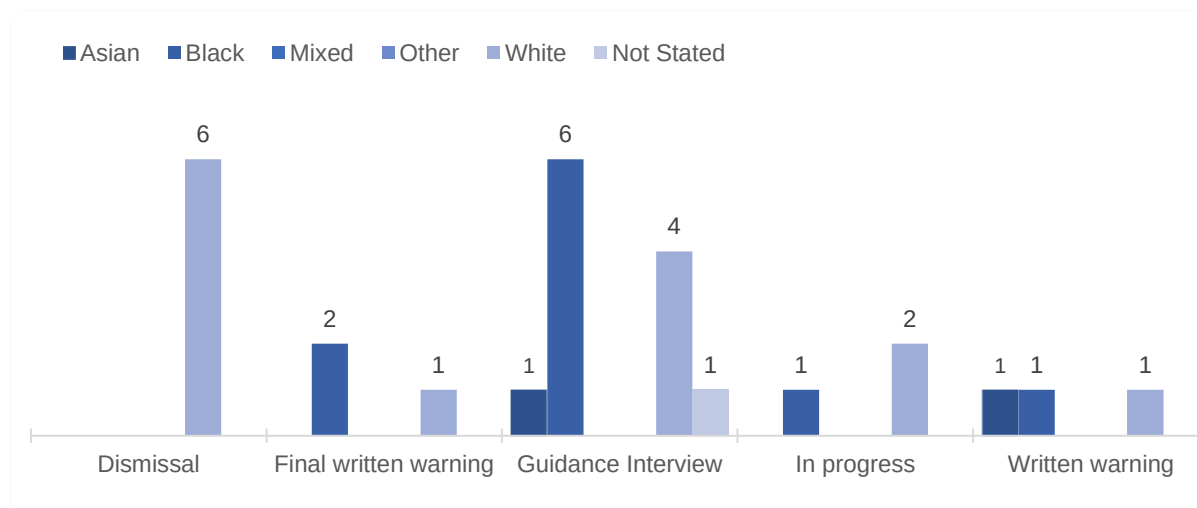


Chart 45 – Disciplinary action outcomes by broad Race Profile (total investigations = 27)



22.10 It is essential that disciplinary investigations are reviewed and monitored. Identification of higher cases within both Environment & Leisure and Housing & Modernisation departments, renders a trend analysis to understand the cause for the spike of cases in each area and recommended interventions to mitigate future numbers. Such analysis, will support the council in recognising potential causes and address behaviours through targeted training and development. In addition, better managerial guidance and direction on any specific reoccurring themes could be implemented. The HR Business Partnerships Team with the Employee Relations/Industrial Relations Specialists will work on completing the trends analysis and developing local preventatives solutions with service managers, where possible.

22.11 Next Steps:

- A trend analysis to be conducted to see what lead to the higher number of disciplinary cases within these areas and what interventions could be implemented to avoid repeat behaviour that leads to disciplinary action.

23. *Capability and outcomes*

- 23.1 Managing performance and sickness absence management is essential within a local authority. In the majority of cases most employees will never need to have their performance or sickness managed via the capability policy. However, when there are concerns about work performance and attendance management of the issues would appropriately be subject to the capability process. It should not be seen as solely punitive, it aims to encourage individual improvement and the raising of standards.
- 23.2 There were 23 capability investigations (which includes 18 (78%) relating to performance and 5 (22%) relating to sickness absence management action) recorded in this period. Of those, 6 were “in progress”, so had not yet reached their conclusion, 15 had concluded with no further action, or were withdrawn, and 1 is recorded as having led to monitoring. No further action taken usually means a positive resolution to the concerns that led to capability being invoked was achieved.
- 23.3 The numbers subject to capability investigation represent a small percentage of all employees, 16 concluded cases represent less than 0.5% all employees (Key workforce data). Where there are such small numbers, drawing trends based on more detailed levels e.g., sex, ethnic profile or disability is difficult.
- 23.4 We are able to understand that as per chart 46, 11 of the employees in this section were recorded as male and 12 as female. When considering ethnicity and race chart 46 shows that more white employees were subject to capability proceedings than colleagues from Black, Asian and Minority Ethnic communities.
- 23.5 As per chart 47 the Children’s and Adults Department had the highest number of capability cases accounting for 39% of all cases, Chief Executives and Finance and Governance Departments accounted for 17% of cases and Environment and Leisure 13% of cases.
- 23.6 In chart 48 61% of the capability cases were for employees in grades 1-9 in comparison to 39% within grades 10-12. There were no cases of capability management in grades 14+.
- 23.7 It is essential that all cases are reviewed and monitored. Following identifying the higher number of cases occur within the Children’s and Adult departments it is important for a trend analysis to be conducted to see what lead to the higher number of capability cases within these areas and across the council to identify what interventions could be implemented to avoid further employees to require capability management. By undertaking this analysis, the Council would aim to identify the potential causes that could be addressed by undertaking training and development or where better managerial guidance and direction on any specific reoccurring themes could be implemented. The HR Business Partnerships Team with the Employee Relations/Industrial Relations Specialists will work on

completing the trends analysis and developing local preventative solutions with service managers, where possible.

Chart 46 - Capability investigations by sex (total employees = 23)

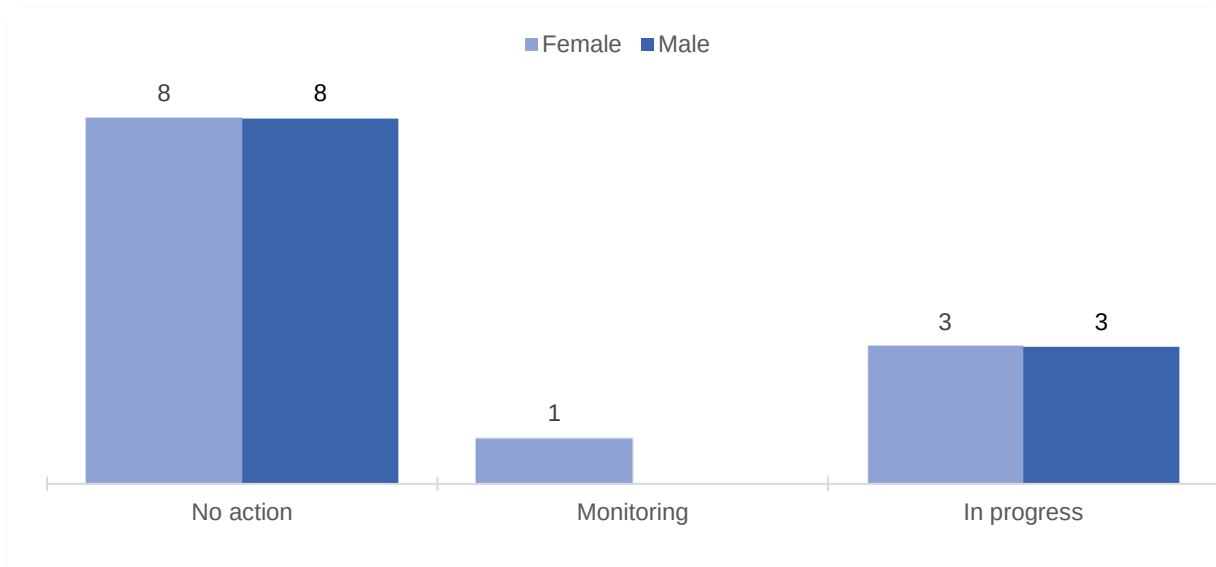


Chart 47 – Capability investigations by broad Race Profile (total employees = 23)

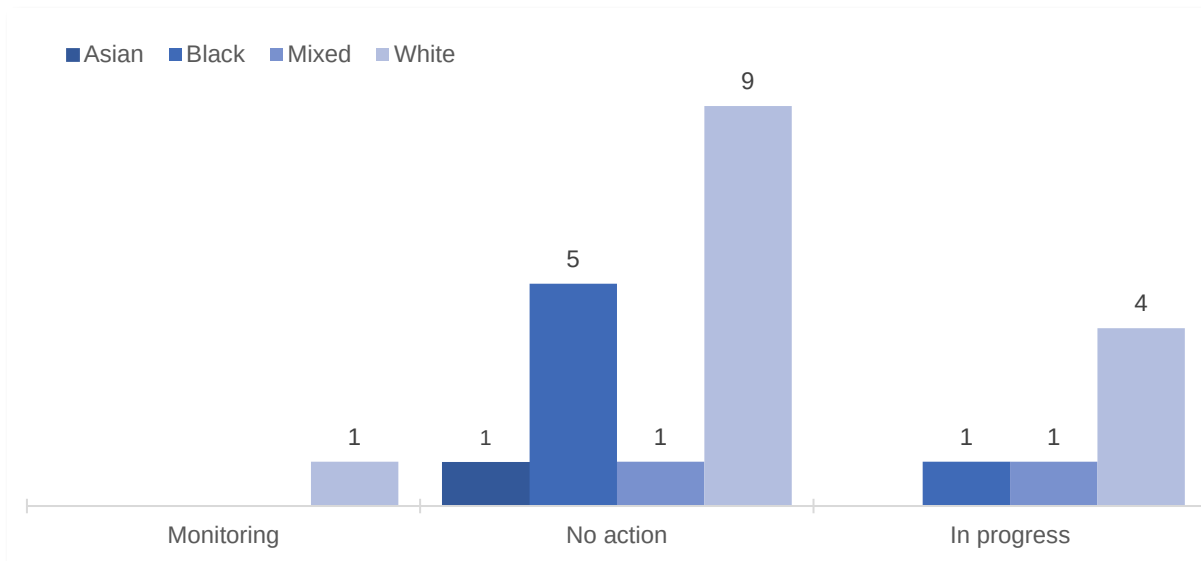


Chart 48 – Capability investigations by department (total employees = 23)

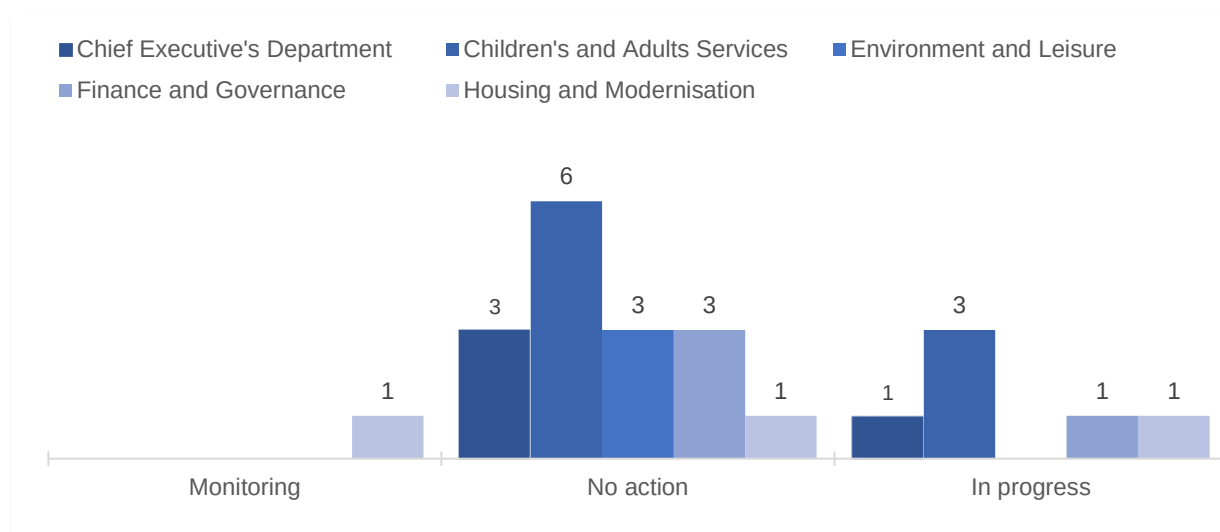
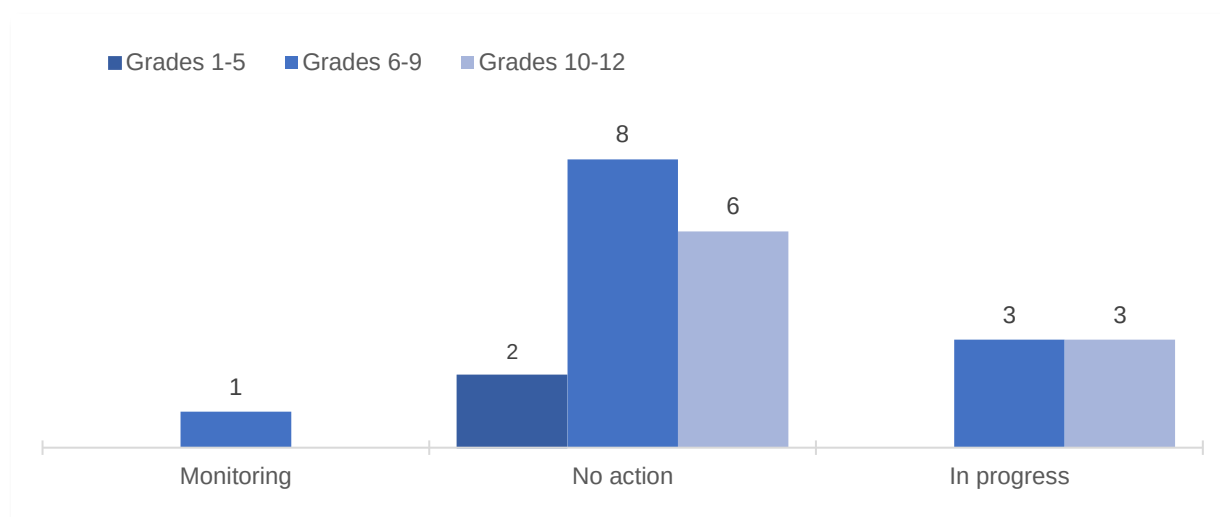


Chart 49 – Capability investigations by grade group (total employees = 23)



23.8 Next Steps:

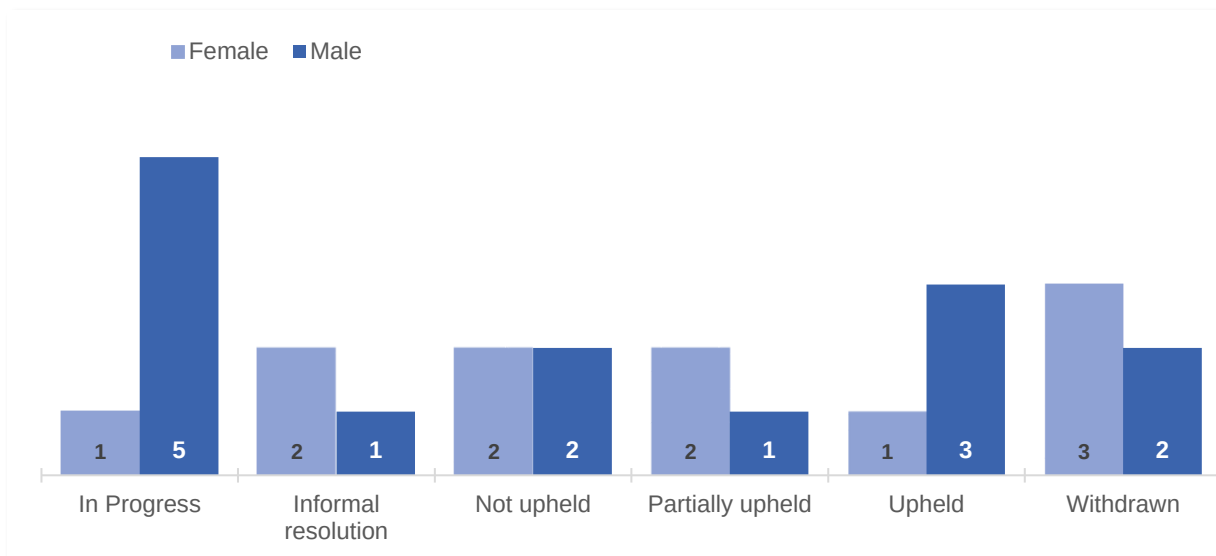
- Following identifying the higher number of cases occur within the Children's and Adult departments it is important for a trend analysis to be conducted to see what lead to the higher number of capability cases within these areas and across the council to identify what interventions could be implemented to avoid further employees to require capability management.

24. Employee Complaints

24.1 This section relates to individual employee complaints that required a formal process to resolve. Most employee complaints are resolved informally and quickly or through mediation; these are not recorded in this section. Employees and managers are encouraged to pursue such actions to resolve matters as a first step, prior to moving into a formal process.

- 24.2 There were 25 employee complaints recorded in this period which represents 0.5% of the workforce (Key workforce data). Most (18) of these cases were resolved, or withdrawn, during the Stage 1 (informal) part of the process.
- 24.3 Of the 25 employee complaints submitted seven complaints moved to stage two. Stage 2 complaints are those where the employee is not satisfied with the outcome at Stage 1 and exercise their right of appeal to the later stage.
- 24.4 Of the 25 cases (stage 1) 11 were from employees recorded as female, and 14 from employees recorded as male and in stage two, 3 were female and 4 were male.

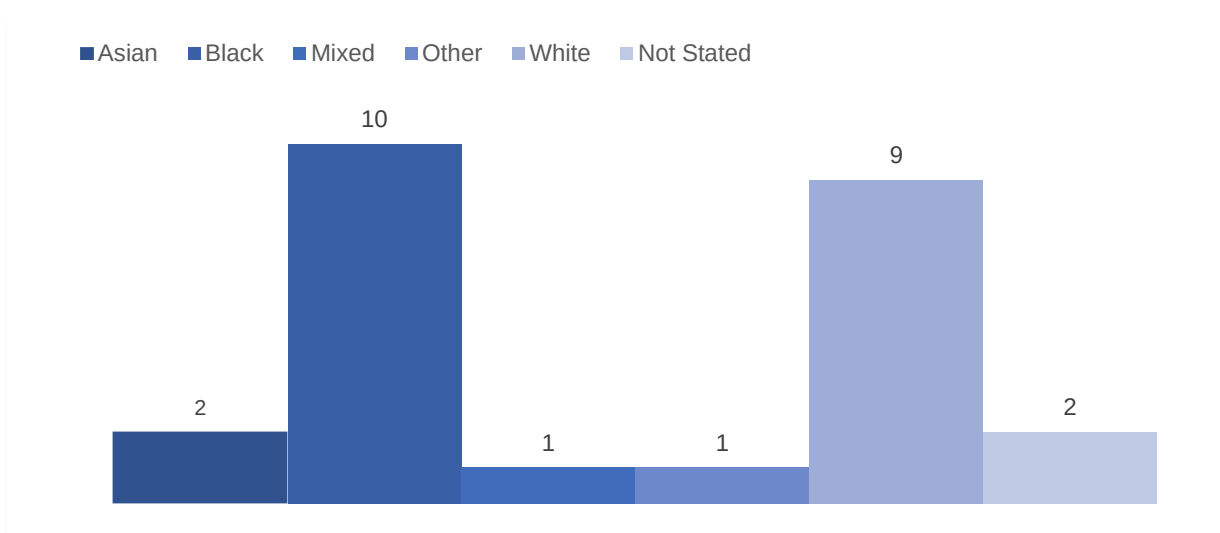
Chart 50 Employee complaints by sex (total employees = 25)



24.5 Four (16% of capability cases) of the employees who had submitted a complaint are recorded as disabled, seven (28%) as not disabled and 14 (56%) records do not record this status. The complaints process does take account for considering reasonable adjustments for people with a disability during the processes to ensure that they are not disadvantaged. An example of this could be translation services for an employee who is partially sighted or additional breaks for a person with diabetes to ensure their energy levels can be maintained during the investigation process. The impact of a person's disability also needs to be carefully considered when complaints are investigated to ensure the actions being investigated are not in any way as a result of someone's disability and if they are what reasonable adjustments can we support the employee with to mitigate the concerns.

- 24.6 Slightly more complaints were received by employees who identify as Black (10 cases) than any other race, 9 complainants identify as White, 2 identified as Asian, 2 as mixed other and 2 did not share their race as shown in chart 51.

Chart 51 - Employee complaints by broad race (total employees = 25)



24.7 Once investigated at stage 1 or 2 white colleagues were more likely to have their complaints upheld or partially upheld (4 employees) in comparison to (2 black employee's) as shown in chart 52.

Chart 52 Employee complaints by broad race and stage (total employees = 25)

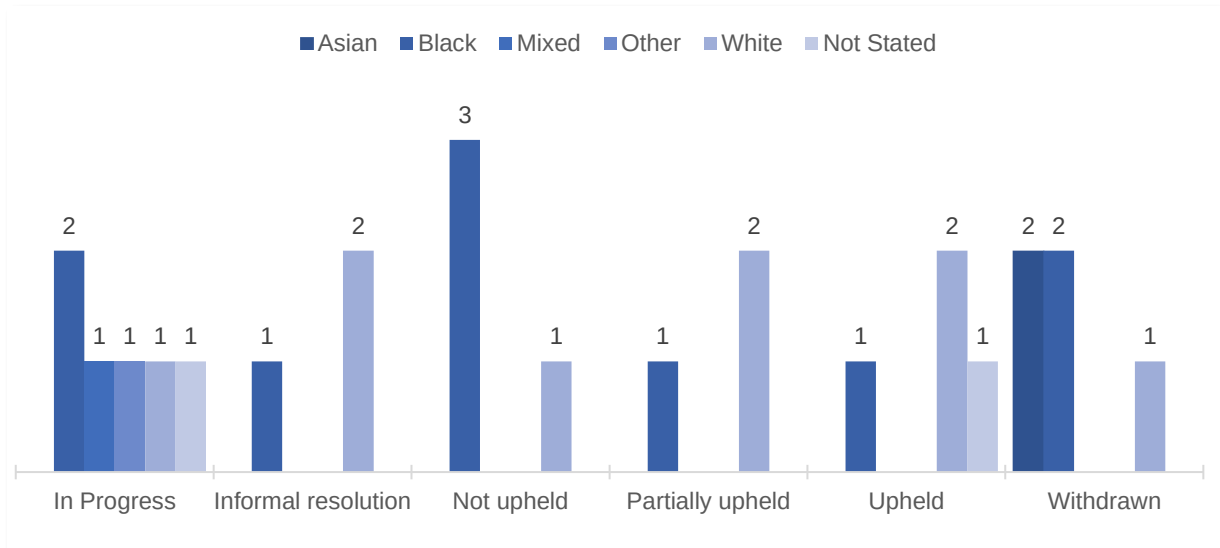


Chart 53 - Stage 2 complaints by sex (total employees = 3)

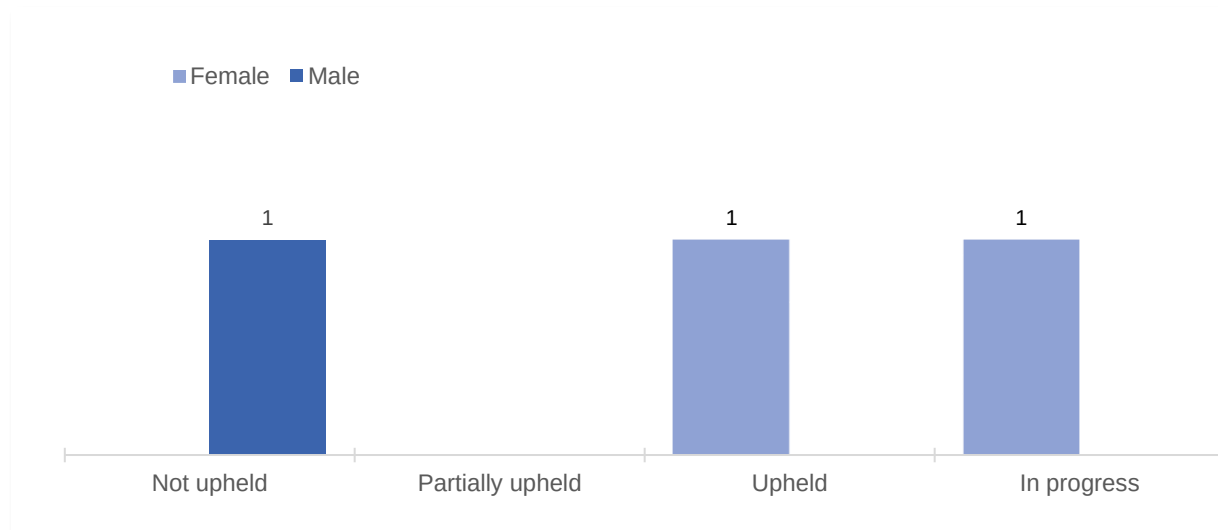
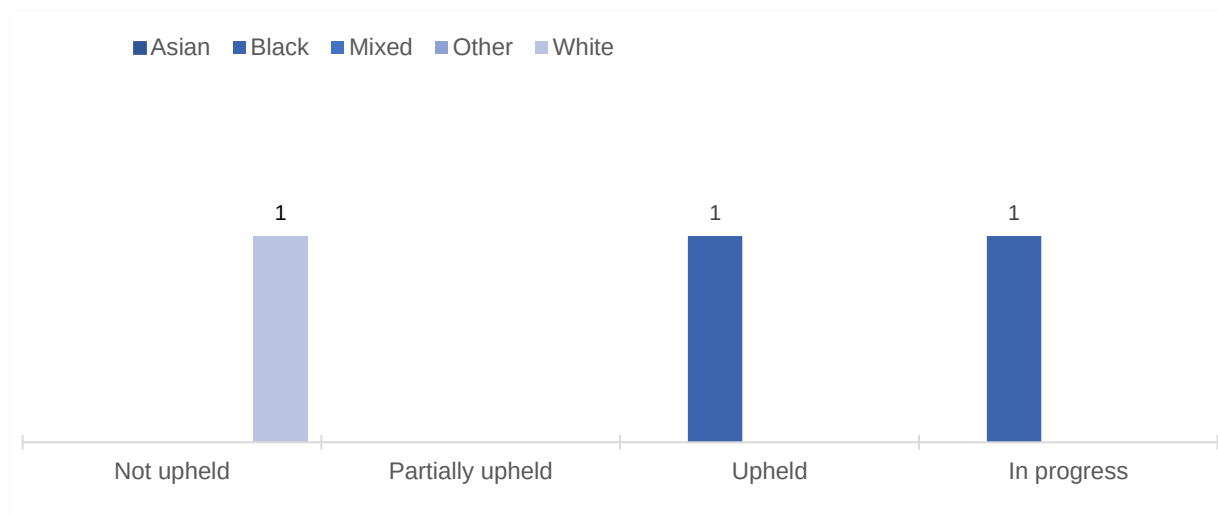


Chart 54 - Stage 2 complaints by broad Race Profile (total employees = 3)



24.8 An employee complaint highlights a problem, whether that's a problem with your manager, colleagues, or internal processes, and by hearing these problems directly from your employees, you can investigate and improve to prevent further complaints in the future. Therefore, it is important that we monitor the complaints received and undertake a 'deep dive' into the reasons for complaint and review that those areas where problems exist, potential solutions are identified, and key action is taken to address the areas of concern. This will be completed by the HR Business Partner Team with the Industrial/Employee Relations Specialist.

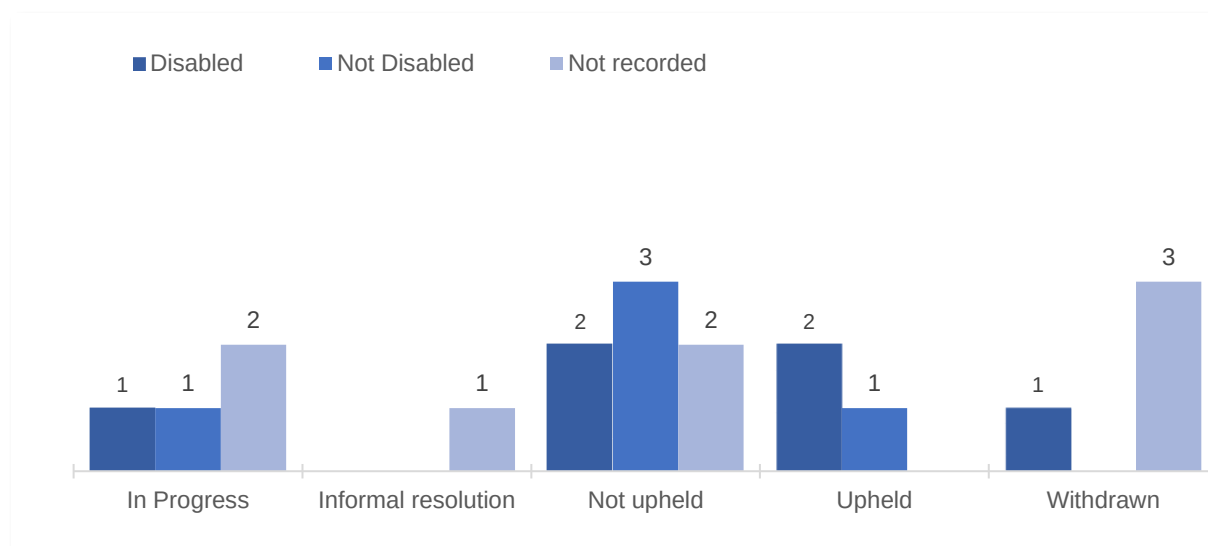
24.9 Next Steps:

- Monitor the complaints received and undertake a 'deep dive' into the reasons for complaint and review those areas where problems exist, potential solutions are identified and key action is taken to address the areas of concern.

25. *Respect at Work*

- 25.1 In addition to the employee complaints in the previous section, 19 employees (charts 55-57 and Key workforce data) who represent less than 0.4 % of the workforce, have raised complaints under the Respect at Work procedure, so related to perceptions/experiences of harassment or bullying in the workplace.
- 25.2 Where there are such small numbers drawing conclusions at a more detailed level, e.g., sex, ethnic profile or disability is questionably valid.
- 25.3 We can review the data to identify any trends and areas for future focus. 6 disabled employees made formal complaints under the Respect at Work procedure which, although a small number, is worth investigation to determine if the complaints, for example, related to the protected characteristic of being disabled. 5 recorded themselves as not disabled, and 8 have not completed that field.

Chart 55 - Respect at Work complaints by disability status (total employees = 19)



- 25.4 Of the 19 Respect at Work cases 51% were female and 49% were male chart 56. 74% of Respect at Work complaints were received from employees who identify as Black or Asian and 21% were identified as white as per chart 57, in addition to this more- Black employee's complaints were not upheld than any other race and more complaints from Asian colleagues were withdrawn than other ethnicities.

Chart 56 - Respect at Work complaints by sex (total employees = 19)

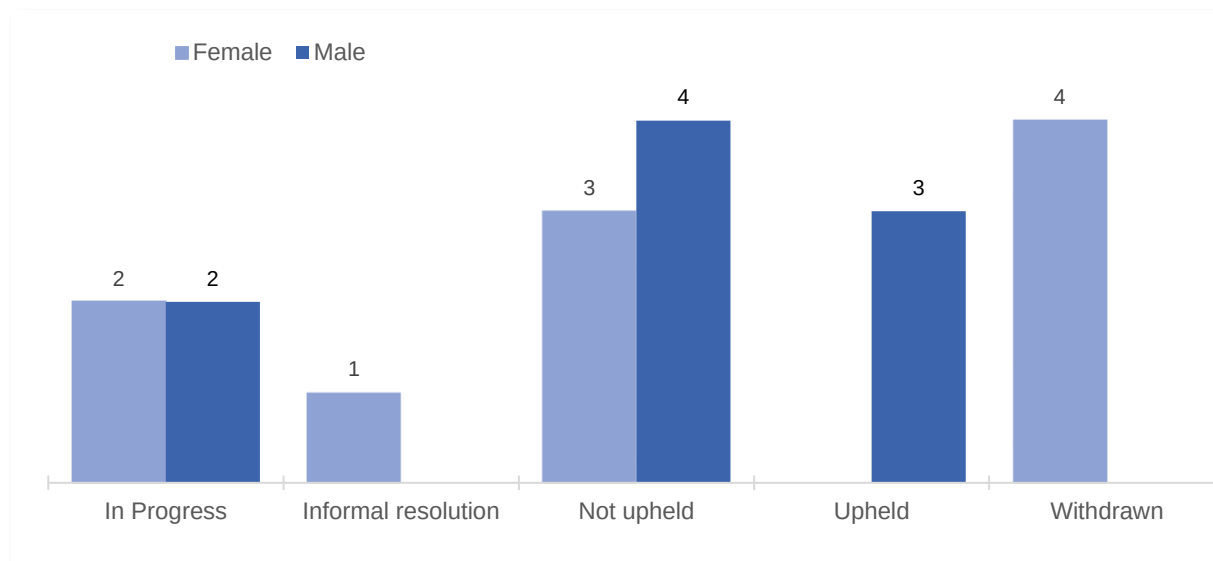
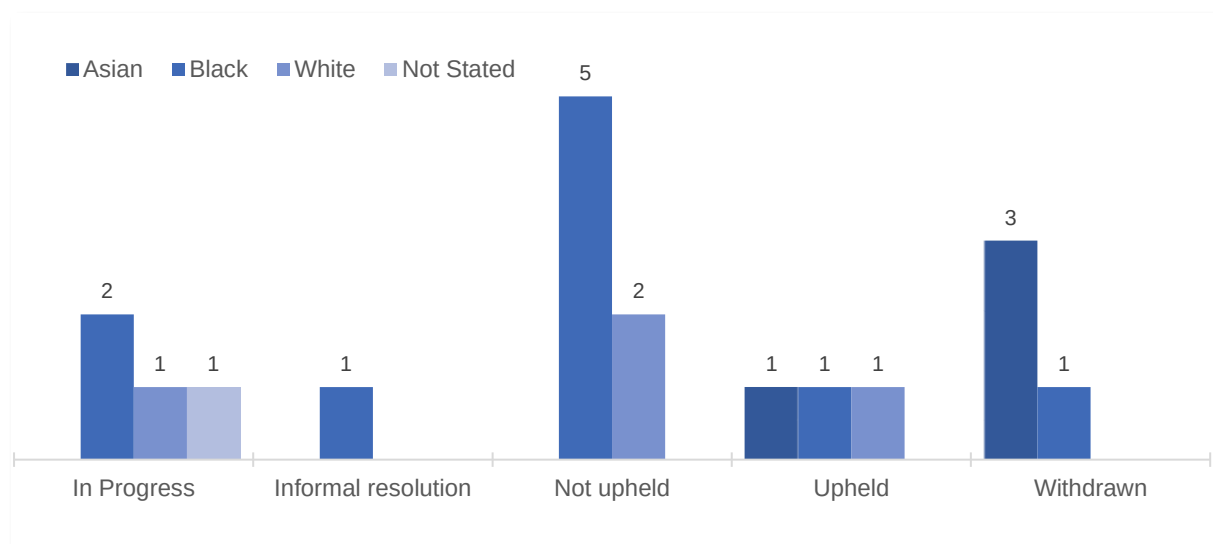


Chart 57 - Respect at work complaints by broad Race Profile (total employees = 19)



25.5 Southwark Council does not tolerate bullying or harassment in the workforce and under the Southwark Strands Together, are committed to ensure the review of historical complaints. The monitoring of this data to identify any trends is essential if we are to deliver our two equalities values as a council. The implementation of the new Equalities, Diversity and Inclusion statement and re-education programme is seeking improve our wider understanding of equalities specifically regarding race.

25.6 As we have also identified the potential for areas of concern surrounding disability and RAW complaints, we will continue to monitor the complaints received and undertake a 'deep dive' into the reasons for complaint and review where problems exist, potential solutions are identified, and key actions are taken to address the areas of concern. This will be completed by the HR Business Partner teams with the Industrial/Employee Relations Specialist in collaboration with local departmental management.

25.7 Next Steps:

- The monitoring of this data to identify any trends is essential if we are to deliver our two equalities values as a council. The implementation of the new Equalities, Diversity and Inclusion statement and re-education programme is seeking improve our wider understanding of equalities specifically regarding race.
- As we have also identified the potential for areas of concern surrounding disability and RAW complaints we will continue to monitor the complaints received and undertake a 'deep dive' into the reasons for complaint and review where problems exist, potential solutions are identified and key actions are taken to address the areas of concern. This will be completed by the HR Business Partner teams with the Industrial/Employee Relations Specialist in collaboration with local departmental management.

Section 3:

Pay Gap Reporting

26. Pay Gaps

- 26.1 The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 includes a mandatory annual reporting and publishing on our gender pay gap. This data compares differences in pay between employee groups based on gender. We use the same approach to produce an Ethnicity and Disability Pay Gap.
- 26.2 Data is taken at a specific period, March 2021 and pay includes basic pay, certain allowances, and shift payments. Overtime payments are excluded. Bonus payments includes the gross bonus payments in a 12-month period i.e., April 2020 to March 2021.
- 26.3 We use 6 calculations to analyse the following:
- 1) Median pay gap – the difference between the median (middle) hourly rates of pay. By ranking all hourly rates, you can compare the middle of each for the employee groups.
 - 2) Mean pay gap – the difference between the mean (average) hourly rates of pay, which is done by adding all the hourly pay rates for each employee group and dividing by the number in that group.
 - 3) Median bonuses pay gap – the difference between the median (middle) bonus pay.
 - 4) Mean bonus pay gap – the difference between the mean (average) bonus pay.
 - 5) Bonus proportions – the proportion of employee groups who were paid a bonus.
 - 6) Quartile pay bands – the proportion of employee groups in the lower, lower-middle, upper middle and upper quartiles bands. Quartile pay brackets represent the workforce divided into quarters in ascending rates or pay.
- 26.4 Organisations who employ 250+ staff must report the mean and median pay gender gap data, as well as the proportion of men and women in each quartile pay band. The mean pay gap is a useful overall indication of the gender pay gap, but very large or very small pay rates can distort the figure. The median pay gap is useful indicator of the 'typical' situation in the middle of an organisation and is not distorted by very large or very small pay rates.

27. Gender Pay Gap

- 27.1 The gender pay gap is the difference in the average hourly wage of all men and women across a workforce. A positive percentage figure shows that overall, female employees receive lower pay than male employees and a negative percentage figure shows that overall, male employees receive lower pay than female employees.
- 27.2 Bonus includes gross bonus payments in a 12-month period i.e., April 2020 to March 2021 includes bonus payments received by building and trades employees in Building Services and Asset Management. They are paid on a productive pay system (in place since 1994). It is based on output for work generated over and above the required level, over a specified period. This accumulates to a bonus

payment. As of April 2021, new terms and conditions of service were negotiated and implemented removing the bonus scheme and ensuring all building workers are on a salaried based pay and reward model.

- 27.3 **The mean Gender pay gap:** Southwark council has a mean gender pay gap of minus 5.99%, a slight decrease from minus 6.62% % last year. This indicates that on average Southwark male employees are paid lower than Southwark female employees by approximately 5.99%. For every £10 a male employee is paid, females is paid £10.59. This is due to the larger number of male workers in lower paid roles within the waste and cleansing services. The narrowing of the gap is a positive trend towards parity.

Gender Pay Gap Indicator	April 2021	April 2020	April 2019
Difference in mean hourly rate of pay	-5.99%	-6.62%	-6.43%

- 27.4**The median Gender pay gap:** Southwark council has a median gender pay gap of minus 10.29% which suggests that typically Southwark male employees are paid 10.29% lower than Southwark female employees. The hourly median pay for females is £21.14 compared to £19.91 for males. Compared to last year, the gap between the hourly rate of pay has slightly increased.

Gender Pay Gap indicator	April 2021	April 2020	April 2019
Difference in median hourly rate of pay	-10.29%	-10.02%	-12.62%

- 27.5 **Bonus pay gap:** Southwark Council has a mean bonus gender pay gap of 93.52%. In the period, approximately 5.06 % of Southwark male employees were paid a bonus payment compared to 1.42% of Southwark female employees. The data is based on long service awards and the only relevant operational bonus scheme for building and trades employees in Building Services and Asset Management. This is a local longstanding scheme (since 1994) rooted in national conditions. The bonus scheme has been reviewed and a new pay and grading structure has been implemented from 1 April 2021.

Gender Pay Gap indicator	April 2021	April 2020	April 2019
Difference in mean bonus pay	93.52%	91.84%	90.93%
Difference in median bonus pay	89.86%	90.68%	82.83%
Proportion of male employees who were paid a bonus	5.06%	4.53%	5.02%
Proportion of female employees who were paid a bonus	1.42%	1.21%	1.18%

27.6 The proportion of male and female employees in each quartile pay band: The distribution of men and women through the pay bands by quartile, as shown below, does not reflect the overall gender composition of the workforce, which is 50% male and 50% female. Notably, the proportion of men and women in the lower quartile is the furthest from the overall gender composition of the workforce at 46.83% female, 53.17% male. A review of the data highlights that for the quartile, there were 1,072 employees, 554 of which work in Waste and Cleansing (a male dominated area); 516 of the 554 employees were male.

Gender Pay Indicator – Quartile Distribution	Female	Male
Quartile 1 (lowest average pay per hour)	46.83%	53.17%
Quartile 2	54.75%	45.25%
Quartile 3	53.13%	46.87%
Quartile 4 (highest average pay per hour)	52.91%	47.09%

27.7 Next Steps:

- Ensure all our recruitment advertising is conducted in a gender neutral way and advertising campaigns do not contain gender bias.
- Target male dominated roles within teams and services to recruit women into underrepresented areas of the business.
- Ensure local facilities within male dominated departments are welcoming for women e.g. toilets and changing facilities.
- Promote best practice approaches to flexible working across the business to make jobs more flexible.
- Raise awareness of our flexible working policies and engage the workforce to suggest different ways of working to maintain work-life balance.
- Encourage greater take-up of paternity leave and shared parental leave; create a culture where people feel comfortable and confident to request paternity leave and shared parental leave.

28 Ethnicity Pay Gap

28.1 The mean Ethnicity pay gap: Southwark council has a mean ethnicity pay gap of 14.68%. This indicates that on average, for every £10 a Black, Asian, and Minority Ethnic employee earns, White employees earn £11.47, which is a small increase on last year.

Ethnicity Pay Gap indicator	April 2021	April 2020	April 2019
Difference in mean hourly rate of pay	14.68%	14.67%	15.15%

28.2 The median Ethnicity pay gap: Southwark council has a median ethnicity pay gap of 13.51%, which suggests that typically Southwark White employees are paid at around 13.51% more than Southwark's Black, Asian and Minority Ethnic employees. The hourly median pay for white employees is £21.58 compared to £18.67 for Black, Asian and Minority Ethnic employees, which is a slight increase in the gap from last year.

Ethnicity Pay Gap indicator	April 2021	April 2020	April 2019
Difference in median hourly rate of pay	13.51%	11.34%	12.02%

28.3 The Bonus pay gap: Southwark Council has a mean bonus ethnicity pay gap of 50.21%. In the period, approximately 4.69% of Southwark White employees were paid a bonus payment compared to 2.12% of Black, Asian and Minority Ethnic employees, a slight reduction from last year. The data is based on long service awards and the only relevant operational bonus scheme for building and trades employees in Building Services and Asset Management. As of April 2021, new terms and conditions of service were implemented removing the bonus scheme and ensuring all building workers are on a salaried based pay and reward model.

Ethnicity Pay Gap indicator	April 2021	April 2020	April 2019
Difference in mean bonus pay	50.21%	54.13%	49.96%
Difference in median bonus pay	74.01%	71.46%	69.59%
Proportion of White employees who were paid a bonus	4.69%	3.69%	4.14%
Proportion Black, Asian and Minority Ethnic employees who were paid a bonus	2.12%	2.35%	2.26%

28.4 The proportion of white and Black, Asian and Minority Ethnic employees in each quartile pay band: The distribution of employees through the pay bands by quartile, as shown below, does not reflect the overall ethnicity race composition of the workforce which is 49% white and 51% Black, Asian and Minority Ethnic:

- In the lower two quartiles, there are more Black, Asian and Minority Ethnic employees than the overall ethnicity composition.
- In the second quartile (the second lowest), it is the closest, with 49.43% Black, Asian and Minority Ethnic employees.

- In the top quartile, 32.74% of employees were Black, Asian and Minority Ethnic and 67.26% were white.
- These are slight improvements across all quartiles compared to last year.

Ethnicity Pay Indicator – Quartile Distribution	Asian	Black	Mixed	Other	Black, Asian and Minority Ethnic	White
Quartile 1 (lowest average pay per hour)	6.51%	42.39%	4.78%	3.49%	57.18%	42.82%
Quartile 2	7.16%	35.46%	3.89%	2.92%	49.43%	50.57%
Quartile 3	4.58%	31.36%	3.05%	2.88%	41.86%	58.14%
Quartile 4 (highest average pay per hour)	3.14%	25.11%	1.35%	3.14%	32.74%	67.26%

28.5 Next Steps:

- Review recruitment policies and practices to ensure they good practice around EDI is embedded;
- Set local departmental targets for improvement to address under representation;
- Ensure recruitment practices are consistently bias and discrimination free:
 - Ensuring recruitment panels are diverse and reflective of the community we serve;
 - Ensures that job description, person specifications and advertising material does not inadvertently discriminate particular groups.
 - Advertise is specific media to attract people from under represented communities;
 - Introduce stakeholder panels for senior appointment (grade 14 and above) to ensure that all applicants can actively demonstrate they adhere to the council's 7 values with specific emphasis on the two new equalities values.
- Provide targeted career development programmes for Black, Asian and ethnic minority employees to support career development including a coaching and mentoring offer.
- Promote the successful careers of our senior Black, Asian and colleagues from minority ethnic community's leaders through career conversations.

29 Disability Pay Gap

29.1 The mean Disability pay gap: Southwark council has a mean disability pay gap of 2.24%. This indicates that on average, for every £10 a not disabled employee earns, a disabled employee earns £9.77.

Disability Pay Gap indicator	April 2021	April 2020	April 2019
Difference in mean hourly rate of pay	2.24%	1.52%	0.68%

29.2 The median Disability pay gap: Southwark council has a median disability pay gap of minus 0.17%, which is a 4p difference in hourly rate, suggests that typically Southwark disabled employees are paid almost the same as Southwark's non-disabled employees. The hourly median pay for all employees is £19.51.

Disability Pay Gap indicator	April 2021	April 2020	April 2019
Difference in median hourly rate of pay	-0.17%	1.49%	0.87%

29.3 Bonus pay gap: Southwark Council has a mean bonus disability pay gap of 69.78%. As previously identified, this is due to the specific bonus scheme in place within Traded Services which has been re-negotiated and a new set of terms and conditions have been implemented on a salaried based model removing the bonus scheme.

Disability Pay Gap indicator	April 2021	April 2020	April 2019
Difference in mean bonus pay	69.78%	62.52%	45.79%
Difference in median bonus pay	84.26%	88.66%	81.90%
Proportion of Not Disabled employees who were paid a bonus	3.20%	2.79%	3.07%
Proportion of Disabled employees who were paid a bonus	3.76%	3.37%	2.87%

29.4 The proportion of disabled and not disabled employees in each quartile pay band: The distribution of disabled and non-disabled employees through the pay bands by quartile, as shown below, is generally reflecting the overall disability composition of the workforce which is 93.62% not disabled and 6.38% disabled. Quartiles 3 and 4 are further from the overall proportion.

Gender Pay Indicator – Quartile Distribution	Shared disabled	Not shared as disabled
Quartile 1 (lowest average pay per hour)	6.29%	93.71%
Quartile 2	6.71%	93.29%
Quartile 3	5.25%	94.75%
Quartile 4 (highest average pay per hour)	7.62%	92.38%

29.5 Next Steps:

- Review our commitment to the DWP Disability Confident Scheme and work with our key stakeholders to review how we could move to Disability Leader status.
- Increase reporting on disabilities through 'share not declare' initiative to be recorded on our Employee Self Service platform.
- Provide specific career development programmes for employees with a disability to support their career development through our partners such as Business Disability Forum.
- Promote the successful careers of employees who have a disability through career conversations across the workforce.
- Ensure that managers have had training in reasonable adjustments, access to work and know how to best support colleagues with a disability in the workplace.
- Managers and employees with a disability can easily find the links to access how the organisation can help them from the intranet under designated pages offering support and advice.

Conclusion

27.9 Ideally an organisation would strive to have a zero pay gap across all three areas; Gender, Ethnicity and Disability. Therefore, we are striving to achieve neutral pay gaps to ensure all employees are paid equally. To achieve this, we will develop a new Pay Gap Strategy which will incorporate the 'next steps outlined above (section 3 of the report) as part of our overall approach to addressing issues in relation to achieving a neutral pay gap across Gender, Ethnicity and Disability.

30 Summary of Next Steps

30.1 The next steps are a summary of the actions we will take forward in the council's Workforce Equality Action Plan as a result of the information shared in this report. The new Employee Experience Strategy will provide the foundation for the development of related / supporting strategies:

- **Employee Experience Strategy** – which will provide a high-level overview of the direction of travel to realise our ambitions and demonstrate our commitment to developing and supporting our people. This will include the transformation of the previous HR and Organisational Transformational Service to Employee Experience.
- **Equality, Diversity & Inclusion Strategy** – embedding our on-going commitment to the SST programme
- **Well-being Strategy** – supporting the health and well-being of our workforce particularly as we transition out of the pandemic with a focus on mental health and resilience
- **OD Strategy** – building capacity and capability in our leaders and managers to support their teams to maintain high performance including support around service redesign and employee development, including *Workforce Planning* to understand the make-up of our workforce to improve diversity and under-representation and support career progression through talent management and succession planning
- **Employment Opportunity Strategy** – promoting and providing employment opportunities for our local communities.

	Area	Issue	Key Deliverables	Timeframe
1a	Age	A workforce planning strategy will be developed. This will support the council to understand and anticipate current and future workforce needs, including considerations relating to the age profile. This includes support from the Employee Experience Division to design structures and roles with defined career progression pathways, innovative and tailored recruitment and attraction programmes, plus comprehensive training and development plans.	• Develop new Employee Experience Strategy	• Jan – May 2022

1b		Succession planning for key roles and functions within the council will be a critical focus.		
1c		Utilise the Employment Opportunities Pathways strategy once developed and increase the age profile for employees under 25.	Develop a new employment opportunity pathway strategy	Feb – May 2022
2	Sex	Review areas of the council where there are gender based roles and, as part of workforce planning, develop initiatives that aim to increase gender diversity and measure progress.	Develop new Pay Gap Strategy	Feb – Jun 2022
3	Disability	In order to increase the number of employees who share they have a disability, there will need to be a drive across the council to encourage existing employees to share their disability status. Before this can take place, we will need to engage with employees, including those with disabilities and managers to explore further, aiming to minimise or remove any barriers or stigma that may prevent people from sharing their status.	Promote share not declare to improve equalities to improve disability reporting	Ongoing
4	Race	Please see Southwark Stands Together, Race and Ethnicity Pay Gap Reporting next steps.	N/A	N/A
5	Religion or Belief	As part of the Council's Equality, Diversity and Inclusion plan we will need to ask colleagues to share their religion/belief with us to make sure that we can best support our workforce and ensure there is no issue of discrimination based on this protected characteristic. We will do this by reassuring our workforce that if they 'share not declare' this information it will enhance how we can best support all our employees to feel more inclusive at work. We will also ensure that all new starters are asked to complete the religion and	Promote share not declare to enable Religious / Belief reporting	Ongoing

		belief data set as part of our equal opportunities monitoring. All actions will be included within our Equality, Diversity and Inclusion Action Plan.		
6	Sexual Orientation & Gender Reassignment	As part of the Council's Equality, Diversity and Inclusion plan we will need to ask colleagues to share this information with us to make sure that we can best support our workforce and ensure there is no issue of discrimination based on this protected characteristic. We will do this by reassuring our workforce that if they 'share not declare' this information it will enhance how we can best support all our employees to feel more inclusive at work. We will also ensure that all new starters are asked to complete the Sexual Orientation and Gender Reassignment data sets as part of our equal opportunities monitoring. All actions will be included within our Equality, Diversity and inclusion Action Plan.	Promote share not declare to enable sexual orientation & gender reassignment reporting	Ongoing
7	Marriage and Civil Partnership	As part of the Council's Equality, Diversity and Inclusion plan we will need to ask colleagues to share this information with us to make sure that we can best support our workforce and ensure there is no issue of discrimination based on this protected characteristic. We will do this by reassuring our workforce that if they 'share not declare' this information it will enhance how we can best support all our employees to feel more inclusive at work. We will also ensure that all new starters are asked to complete the marriage and civil partnership data set as part of our equal	Promote share not declare to improve equalities workforce data	4 times a year

		opportunities monitoring. All actions will be included within our Equality, Diversity and inclusion Action Plan.		
8	Pregnancy and Maternity	There is further work to do across the council to modernise and promote our family friendly policies and procedures to all colleagues across the council so our workforce is aware and can utilise the support available. It is important for all of our Southwark workforce male or female to know that they are supported as a working parent and what those support mechanisms are. A full review of our family friendly policies and procedures during 2021-22 will ensure that we are supporting our working parents. This is an important element of ensuring we maintain a positive gender pay gap and do not disadvantage people with parental responsibilities within our workforce.	Develop a new Family Friendly offer to promote across the council	Dec 21
	Work-stream	Next steps	Key Deliverables	Timeframe
9	Career Progression	Employee career offer to be offered to Black, Asian and Minority Ethnic employees to support career progression	New offer available for Black Asian and Minority Ethnic employees	Nov – Dec 21
10	Corporate Training	Review of current offers and improvements where appropriate, will be designed alongside an Employee Value Proposition (EVP)	Improve the range of current training offers	Sept – Dec 21
11	Culture Change	Activities from ensuring all employees understand council values included in Southwark's overall	Embedding the two newest EDI values	Ongoing

		corporate values with particular focus on embedding two EDI values to begin focus group discussions to define a corporate language of inclusion to describe different groups.	as part of transformational culture change	
12	Employee Experience	Rebranding our HR service to become an Employee Experience Service which focuses on the areas where the experience of each employee is at its centre to help them grow and create an environment where everyone feels a sense of belonging.	Rebranding our new Employee Experience service through engagement sessions across the workforce with feedback from the workforce on areas of focus as part of the transformation of the service	Nov 2021 – Feb 2022
13	Engagement and Re-education	Continuing conversations about race and equality with employees, ensuring senior leaders hear from employees who have had bad experiences and building ways to support managers in having difficult conversations.	Continued support for managers to give them the confidence to discuss race and equality with employees	Minimum of 4 conversations a year
14	Policy	Revising current policies and agreeing an annual policy schedule with Chief Officer Team.	Implementing an annual policy schedule	Feb - March 2022
15	Recruitment	Developing inclusive approaches to recruitment (including how we advertise, assess, reflect our community in our interview panels); Using Positive Action when recruiting to roles where Black Asian Minority Ethnic Employees are underrepresented at Grade 14 and above.	Development of an inclusive recruitment approach	Oct 21 – Jan 22

		Ensure that all recruitment practices are bias and discrimination free at all levels within the organisation e.g.: - o reviewing the results of recruitment decision; - o ensuring recruitment panels are diverse and reflective of the community they service; - o when advertising of roles ensures the job description and person specification or advertising material is not inadvertently discriminatory or unlikely to be attractive to people from non-white communities; - o advertise is specific media to attract people from under represented communities; - o introduce stakeholder panels to assess cultural 'add' and ensure that all applicants can actively demonstrate they adhere to the 7 values and especially the two new equalities values.		
16	Leadership and Management	Focusing on upskilling our leaders and managers in the space of EDI and making sure they have the right skills to lead an inclusive and diverse workforce and to challenge colleagues and the people they lead.	• Development of a new Leadership EDI programme	• Apr 22
	Area	Issue	Key Deliverables	Timeframe
17a	Starters	Developing and reshaping the Corporate and Departmental Induction programmes for all new starters as part of the Employee Experience Strategy and Recruitment Strategy, to ensure new starters are inducted as early as possible.	• Re-development of the existing induction programmes	• Feb – May 22

17b		Recruitment Employee Life Cycle incorporating an engaging on-boarding experience.	Improving the on-boarding experience	Feb – May 22
18	Leavers	Developing the exit strategy for leavers. Exit questionnaires' will form part of the action plan for the Business Partnering Team in line with the workforce strategy with in-depth analysis of exit questionnaires	Developing the exit strategy for leavers	Nov – Dec 22
19a	Recruitment	Developing the Recruitment Strategy and Policy to re-emphasise the key values and aims of the organisation when it comes to respect and promoting dignity in the workplace.	Development of a Recruitment Strategy	Nov – Feb 22
19b		Deliver Southwark Stands Together (SST) Recruitment & EDI Training ensuring that positive action measures contained within the Equality Act 2010 underpin our recruitment and selection procedures.	Delivery of SST Recruitment and EDI Training	Apr – Jul 2022
20a	Agency Workers	Developing the Agency Strategy to review our agency spend and repeated usage in line with reviewing our Recruitment Strategies, where agency workers are used to cover hard-to-recruit posts, directorates will work with Resourcing Team on alternative strategies to develop a sustainable workforce.	Development of the Agency Reduction Strategy, including: Developing a strategy to consolidate vacancies and recruit to roles to reduce agency spend	Jan - Apr 2022
20b	Agency Workers	Progressing the Procurement of the Agency Contract	Procurement of a new fit for purpose agency contract	Sept – Oct 22

21a	Learning and Development	Single point employee pathway from day of joining that outlines individual learning objectives, throughout the employee life-cycle	Development of the OD Strategy which will include a review of learning and development	Jun - Sept 22
21b		Inclusive Mentoring – following a pilot in Children and Adults Services, whereby leaders are partnered with more junior employees for a 3 month period of co-mentoring, the programme will be rolled out across the wider organisation, during autumn 2021.	Roll-out of Inclusive Mentoring	Nov – Dec 22
21c		Provide as part of Southwark Stands Together quarterly updates around the L&D offer uptake and outcomes; for example beginning a PQS, or career progression of participants.	Provide quarterly updates around the L&D offer as part of the OD Strategy	Apr 22
21d		Flag incomplete mandatory employee training so that we safeguard organisational health and safety, governance etc. Provided all mandatory EDI training in order that we safeguard against non-compliance and meet legislative requirements	Quarterly reports to strategic directors on uptake of mandatory EDI training.	Dec 22
22a	Sickness	The work to promote and develop wellbeing and mental health support for all employees, which includes guidance for those managing employees, will continue. A Wellbeing Strategy will be created to provide a direction and focus for our wellbeing initiatives.	Develop a Wellbeing Strategy	May 22
22b		A council wide sickness strategy is being developed in order to provide strong absence management with a holistic approach to wellbeing at work. This is especially important in light of a	Sickness Strategy to manage sickness absence	May – Jul 2022

		significant proportion of employees returning to the workplace over the coming months and the lifting of a number of COVID-19 restrictions nationally.	with a link to wellbeing.	
23	Disciplinary Investigations and Outcomes	For a trend analysis to be conducted to see what lead to the higher number of disciplinary cases within these areas and what interventions could be implemented to avoid repeat behaviour that leads to disciplinary action.	Conduct casework trend analysis with action to identify and address areas of concern	Quarterly Monitoring
24	Capability and outcomes	Following identifying the higher number of cases occur within the Children's and Adult departments it is important for a trend analysis to be conducted to see what lead to the higher number of capability cases within these areas and across the council to identify what interventions could be implemented to avoid further employees to require capability management.		
25	Employee Complaints	Monitor the complaints received and undertake a 'deep dive' into the reasons for complaint and review those areas where problems exist, potential solutions are identified and key action is taken to address the areas of concern.		
26a	Respect at Work	The monitoring of this data to identify any trends is essential if we are to deliver our two equalities values as a council. The implementation of the new Equalities, Diversity and Inclusion statement and re-education programme is seeking improve our wider understanding of equalities specifically regarding race.		
26b		As we have also identified the potential for areas of concern surrounding disability and RAW		

		complaints we will continue to monitor the complaints received and undertake a 'deep dive' into the reasons for complaint and review where problems exist, potential solutions are identified and key actions are taken to address the areas of concern.		
26c		Ensure all our recruitment advertising is conducted in a gender-neutral way and advertising campaigns do not contain gender bias.	Gender-neutral recruitment advertising to be included in the Recruitment Strategy	Nov – Feb 22
26d		Target male dominated roles within teams and services to try to recruit women into that area of the business and vice-versa.	Tackle gender under-representation in business areas – will form part of the gender pay gap strategy	July 22
26e		Encourage greater take-up of paternity leave and shared parental leave quarterly; create a culture where people feel comfortable and confident to request paternity leave and shared parental leave.	To be included in the socialisation of the new Family Friendly Policy.	4 times per year
27a	Ethnicity Pay Gap	Analyse departmental workforce demographics to identify at a local level, areas of underrepresentation and devise locally appropriate action plans to proactively recruit more people from Black, Asian and other ethnic minority communities. Set local targets for improvement.	- Development of new Pay Gap Strategy to include address under-representation in departments - Set local targets for improvement	July 22

27b		Ensure all departments are reminded to advertise secondment opportunities across the organisation so a wider pool of people are have the opportunity to develop their skills and experience. Chief Officers will monitor this.	• Secondment opportunities across the council to aid employee development	• Nov 2021
27c		Review and re-write the Recruitment and Selection Policy is to ensure the 'good practice' to address race inequality.	• Recruitment Strategy as above	• Oct 21 – Jan 22
27d		Look for 'positive action' opportunities to help people from Black, Asian and ethnic minority communities' access employment with Southwark.	• Development of new Positive Action Strategy to seek positive action opportunities for Black, Asian and minority ethnic communities	• Mar 22
27e		Offer and report training on what micro-aggressions are and how to challenge and deal with them if they do occur to ensure this is not tolerated.	• Design and start delivery of EDI training to include micro-aggressions and unconscious bias training	• Nov 2021
27f		Ensure that all managers are trained on unconscious bias and how to be actively anti-racist as well and recruitment and selection training.		
27g		Provide specific career development programmes for Black, Asian and ethnic minority employees to support their career development.	• To be developed under the Positive Action Strategy	• Mar 22
27h		Promote the successful careers of our senior Black, Asian and colleagues from minority ethnic communities' leaders so others within our	• Career stories of senior Black, Asian and minority ethnic	• Deliver minimum of 4 per year

		workforce can see people who they can identify with in Senior Management Positions.	colleagues to inspire our workforce	
27i		Implement an active coaching and mentoring scheme with specific support for colleagues from underrepresented communities to access these key developmental roles.	New EDI strategy to include the development and launch of bespoke coaching and mentoring scheme for Black, Asian and minority ethnic colleagues	Apr - Jul 2022
28a	Disability Pay Gap	That the JE Scheme is reviewed and assessed to consider if it is fit for purpose with a full Equalities Impact Assessment taken into consideration at the point of the review.	Review Job Evaluation Scheme	Jan – Mar 2022
28b		Review our commitment to the DWP Disability Confident Scheme and work with our key stakeholders to review how we could move to Disability Leader status.	Working towards Disability Leader Status	Apr – May 2022
28d		Look for 'positive action' opportunities to help people with a disability access employment with Southwark.	Pay Gap Strategy to include positive action opportunities to employees with disabilities	July 22
29g		Ensure that managers have had training in reasonable adjustments, access to work and know how to best support colleagues with a disability in the workplace.	Reasonable adjustments training for our managers to better support colleagues	Minimum of 2 engagement events per year

29h		Update Employee Experience pages on the Source to help employees navigate designated pages offering support and advice, starting with disability pages.	Putting in place a schedule to update the Employee Experience pages on the Source. Review and development of the Disability pages on the Source to provide one source of all disability information	Jan 2022
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31 Conclusion

- 31.1 This has been a challenging year for our workforce. We are slowly recovering from the pandemic and adjusting towards business as usual. We are proud of what our organisation has achieved despite all the difficult challenges and, most importantly, our contribution to helping residents and communities through one of the most testing times in recent memory.
- 31.2 We understand a percentage of our workforce are also resident and that we must continue to support them in their roles, alongside personal challenges inadvertently affecting our communities. Each of us are part of the community we live in and that of where we work. We know we can only achieve sustainable change by working together through increased levels of engagement, with our workforce and beyond, deepening our understanding of where we are doing well and where we need to improve.
- 31.3 Finally, we would like to take this opportunity to thank all our staff for their hard work, dedication and commitment to ensuring that Southwark is a place of opportunity, growth and development. We make this commitment to continue working through actions outlined in this report, as a wider community of employees, residents, partners, businesses and other stakeholders.

Section 4:

Equality, Diversity & Inclusion

Workforce Action Plan

Equality, Diversity & Inclusion Workforce Action Plan

Southwark Councils Equality, Diversity and Inclusion Action Plan 2021-22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
1.	Develop a new Employee Experience Strategy	New Employee Experience Strategy	Council-wide	Develop a new Employee Experience Strategy in consultation with key stakeholders (including the workforce) to set a new refreshed direction for the workforce	Director Employee Experience	Jan – May 22
2.	Develop a new Equality, Diversity & Inclusion strategy which encompasses and recognises all protected characteristics and intersectionality with a specific focus on race	New Employee Experience Strategy	Council-wide	Our EDI strategy will set out how we intend to meet our targets and goals in the wider EDI space.	Director Employee Experience	Jan – May 22
3.	Development of Pay Gap Strategy and Action Plan	New Pay Gap Strategy	Bespoke	Increased emphasis on the importance of career development conversations as part of appraisals	Strategic Lead for HR Policy	Feb – Jun 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
	which will include the next steps listed in the Annual Workforce Report 2020-21			and encourage coaching and mentoring to support disabled employees' career progression	and Projects	
4.	Develop a Positive Action strategy to address areas of under-representation across the council	New Employee Experience, and Recruitment Strategies	Employee Experience, Career Progression and Recruitment	We will identify areas of focus to address under representation. Our positive action strategy will set out how we intend to meet our targets and goals in relation to SST, which includes using positive action when recruiting to roles where Black, Asian, and Minority Ethnic employees are underrepresented.	Strategic Lead for Policy and Projects	Jan – May 22
5.	Develop a talent management strategy which includes a clear plan for succession planning	New Recruitment Strategy	Council-wide	The new strategy will cover how the council intends to "grow our own" so there is a greater focus on internal recruitment and career progression.	Strategic L& D Partner	Oct 21 – Jan 22
6.	Develop an Agency Worker reduction strategy to reduce the reliance on Agency Workers & to consolidate the workforce.	New Recruitment Strategy	Council-wide	Including managing Agency tenure and maximise social value, particularly social mobility by the contract provider investing in the local community.	Strategic Lead for Resourcing and Business Change	Oct 21 – Jan 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
7a	Develop a new Wellbeing Strategy for the workforce covering 2021-23	New Employee Experience Strategy	Council-wide	A Wellbeing Strategy will be created to provide a clear direction and focus for our wellbeing initiatives.	Strategic Lead for HR Policy and Projects	Nov 21 – Jan 22
7b			Council-wide	Implementation of a new Stress Policy and stress risk assessment	Strategic Lead for HR Policy and Projects	
7c			Council-wide	Deliver bespoke mental health support workshops for specific protected characteristics including publishing Mental Health Awareness articles throughout the year. This will include additional mental health support for Black, Asian and Minority Ethnic colleagues.	Strategic Lead for HR Policy and Projects	
7d			Council-wide	The strategy will continue to consider synergies, especially around disability and mental health in particular. Focussing on health conditions that affect certain groups of staff e.g. women, Black, Asian & minority ethnic employees	Strategic Lead for HR Policy and Projects	
7e				The launch of the Headspace for Work app for all staff. This is a science-based mental health solution that creates healthier workplaces from the inside out. This	Strategic Lead for HR Policy and Projects	

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
				includes a meditation, mindfulness and sleep app. The app will be rolled out to employees as part of the Wellbeing Strategy.		
7f			Council-wide	Work with Occupational Health to maximise employee wellbeing, particularly in relation to mental health	Strategic Lead for Policy & projects	
8	Develop and implement a council-wide sickness strategy	Employee Experience Strategy & Wellbeing Strategies	Council-wide	To provide strong absence management with a holistic approach to wellbeing at work. This is especially important in light of a significant proportion of staff returning to the workplace over the coming months and the lifting of a number of COVID-19 restrictions nationally.	Director of Employee Experience	Jan – May 22
9	Creation of an EDI Workforce Equalities statement	New EDI Strategy	Policies and Practice	Development of an EDI statement that sets out the council's ambitions for tackling inequalities within our workforce	Director Employee Experience	Sept – Feb 22
10	Modernise the council's HR policy, procedures & guidance	New Employee Experience Strategy	Policies and Practice	Developing and implementing a new suite of policies through engagement and consultation with key stakeholders, in line with best practice and with an EDI focus as outlined in the agreed principles for drafting new policies	Strategic Lead for HR Policy and Projects	Jan – May 22
11	Develop an offer to Black, Asian &	New EDI & Positive	Career Progression and Policy and Practice	As part of reviewing the performance management policy,	Strategic Lead for	Sept – Feb 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
	minority ethnic employees in relation to their career aspirations	Action Strategy		information will be added to encourage the importance of managers holding career conversations with their employees	Resourcing and Business Change	
12	Support Black, Asian and Minority Ethnic employees by providing reciprocal mentoring	New Employee Experience Strategy	Leadership and management	Roll out coaching and mentoring opportunities. Set up and review the success of the Black on Boards programme.	Strategic L & D Partner	Jan - May 22
13	Develop a performance management framework for leaders with a focus on tackling racial inequality	New EDI Strategy	Leadership and management	Implement and socialise a new corporate performance management framework for leaders	Strategic L & D Partner	Sept – Feb 22
14	Develop a Positive Action Development programme for Black, Asian & minority ethnic colleagues.	New EDI Strategy	Career Progression and Leadership and management	Updating our procedures in relation to career progression as part of our revised performance management policy. Designing and implementing a leadership management programme specifically for Black, Asian and Minority Ethnic employees	Strategic L & D Partner	Sept – Feb 22
15	Delivery and implementation of the SST departmental	New EDI Strategy	Leadership and management and Culture Change	Implementation of a range of tools and mechanisms with support from HRBPs. The Strategic Directors will ensure the action plans are	Strategic Directors for each department	Sept – Feb 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
	action plans for each department			effectively used to identify intervention areas requiring a deeper focus and to address areas of concern with regards to racism and inequalities		
16	Review & quarterly monitoring of SST departmental action plans	New EDI Strategy	Leadership and management	Obtaining a baseline measure of managers performance across each department by using a pulse survey on a quarterly basis	Strategic Directors for each department	Sept – Feb 22
17	Recruit and engage SST Champions to increase employee engagement	New EDI Strategy	Re-engagement and re-education	SST Champions will be given an opportunity to obtain feedback and also sensor check new initiatives from the different Working Groups, as well as helping with cascading information to their teams	Strategic OD Partner	Sept – Feb 22
18	Address the challenges around the language we use to describe diverse groups	New EDI Strategy	Re-engagement and re-education	Engaging different stakeholders including the SST Champions to discuss the language and terms that staff would like to see introduced into our policies, communication and engagement	Strategic OD Partner	Sept – Feb 22
19	Identify and build an ally community within the workforce	New EDI Strategy	Re-engagement and re-education	Develop a specific ally group from the SST Champions group and across the workforce that will receive specific training, so they are confident with calling out discrimination in the workforce as active bystanders	Strategic OD Partner	Sept – Feb 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
20	Improving the council's recruitment practices	New Recruitment Strategy	Recruitment Practice	Review of psychometric testing, EDI recruitment training, etc.	Strategic Lead for Resourcing and Business Change	Oct 21 – Jan 22
21	Improve representation of the workforce at senior management level (grade 14+)	New Recruitment Strategy	Recruitment practices	Review the informal and formal recruitment policy & practices for grades 14+.	Strategic Lead for Resourcing and Business Change	Oct 21 – Jan 22
22	Relaunch of recruitment refresher training for all managers	New Recruitment Strategy	Culture Change and Recruitment Practices	Ensuring that every manager responsible for recruiting undertakes training to embed positive action	Strategic Lead for Resourcing and Business Change and Strategic L&D Partner	Oct 21 – Jan 22
23	Engage with Black, Asian & minority ethnic candidates to understand and improve their experience of the	New Recruitment Strategy	Recruitment practices, Employee Experience	As part of reviewing our Recruitment and Selection policy, we will address concerns that were raised during the solution based conversations in relation to the blockers and barriers to increasing appointments for Black, Asian & ethnic minority employees in the council	Strategic Lead for Resourcing and Business Change	Oct 21 – Jan 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
	recruitment process					
24	Review Agency to Permanent Practices	New Recruitment Strategy	Recruitment practices	Agree a process to move agency workers to permanent appointments, in exceptional circumstances, for nationally recognised hard to recruit posts	Strategic Lead for Resourcing and Business Change	Oct 21 – Jan 22
25	Ensure that all employees receive mandatory EDI training in order that we safeguard against non-compliance and meet legislative requirements	New EDI Strategy	Corporate Training Programme, Leadership & Management	Procure and roll out EDI training specifically for leaders as well as staff using the current provider, Inclusive Employers.	Strategic L&D Partner	Sept – Feb 22
26	Design and implement the use of employee personas, so colleagues across the council can understand and appreciate the lived experiences of our Black, Asian and	New OD Strategy	Culture Change and Employee Experience	We will run a series of persona workshops (minimum of 4)	Strategic OD Partner	Jun 22 – Sept 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
	Minority Ethnic colleagues in order to tackle racism and inequalities within the council					
27	Provide regular communication to update the workforce on progress of the workforce work-stream.	New OD Strategy	Corporate Training Programme	A minimum of 4 communications per year. Share the L&D offer uptake and outcomes, as well as any successes such as those achieved by the PQS	Strategic L&D Partner	Jun 22 – Sept 22
28	Engage the workforce to improve the employee experience in order that they are central in the development of our policies and practices to create a sense of belonging	New Employee Experience & EDI Strategies	Employee Experience	Rebranding our HR service to become an Employee Experience Service	Strategic OD Partner	Jan – May 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
29	Educate and support managers to have the confidence to have conversations around race with their peers	New EDI Strategy	Re-engagement and re-education	Continuing conversations about race and equality with staff, ensuring senior leaders hear from employees who have had bad experiences. A minimum of 4 discussions per year	Strategic OD Partner	Sept 21 – Feb 22
30	Deliver specialist training for recruiters and hiring managers	New Recruitment Strategy	Employee Experience	Review training for recruiters to ensure equality aspects are sufficiently incorporated including diverse shortlisting and diverse recruitment panels in terms of race and gender	Strategic L&D Partner & Resourcing Manager	Oct 21 – Jan 22
31	Attain Disability Leader status - Level 3	New EDI Strategy	Bespoke	Review the feedback from BDF as part of our reaccreditation and take the necessary actions to achieve Leader status	Strategic Lead for HR Policy and Projects	Sept 21 – Feb 22
32	Encourage employees to share their equality data electronically in SAP or completion of a hardcopy form.	New Employee Experience & EDI Strategies	Bespoke	Quarterly reports and reminders for colleagues to be put in place. We will also ensure that all new starters are asked to complete the religion and belief data set as part of our equal opportunities monitoring. Promote share not declare via articles on the Source in the run up to key awareness days, such as, Pride Month, International Persons	Strategic Lead for HR Policy and Projects	Jan – May 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
				with a Disability day and different religious events		
33	Refresh our HR pages on the Source, particularly those related to Equality, Diversity and Inclusion	New Employee Experience Strategies	Bespoke	Update the Source to include details of the support available to colleagues with a disability with input from our specialist advisers at BDF and obtaining feedback from our disability staff network, NCompass.	Strategic Lead for HR Policy and Projects	Jan – May 22
34	More visible LGBTQ+ support and ally ship through training for managers and staff	New EDI strategy	Bespoke	Continue to develop a psychologically safe and supportive environment for staff by facilitating webinars that coincide with key awareness days, such as, Pride month, LGBTQ+ history month, trans visibility day, international day against transphobia, biphobia and homophobia. Review the corporate training offer and obtain input from the LGBTQ+ staff network.	Strategic Lead for HR Policy and Projects	Sept 21 – Feb 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
35	Encourage greater representation of gender in areas where there is under-representation, such as, Traded Services	New Pay Gap Strategy	Bespoke	Raising awareness in the community. Continue to introduce initiatives to improve representation at different grades through improved recruitment practices and measure progress. As well as promoting the council as an employer of choice through open days and a range of other routes.	Strategic Lead for Resourcing and Business Change and Strategic OD Partner	Sept 21 – Feb 22
36	Delivery of a new employment opportunity pathway	New OD Strategy	Bespoke	Employment Opportunities Pathways are being developed to open up the talent pipelines for a variety of functions and roles within the council, which includes focussing on work experience as well as internships, graduate training programmes and apprenticeships.	Strategic Lead for Resourcing and Business Change and Strategic OD Partner	Jun 22 – Sept 22
37	Continue to celebrate diversity within our workforce through a range of initiatives including recognition of different awareness days	New EDI Strategy	Bespoke	Raising awareness in relation to all the protected characteristics. Including celebrating our Black, Asian & Minority Ethnic senior leaders internally and externally through career conversations.	Strategic Lead for HR Policy and Projects	Sept 21 – Feb 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
38	Review and update the options on SAP for recording gender and sexual orientation	N/A	Bespoke	Expand the options that employees can choose from when recording their gender and sexual orientation via Employee Self-Service	Strategic Lead for HR Policy and Projects	Oct-21
39	Introduce gender neutral toilets across the different work sites	N/A	Bespoke	Liaising with Paul Symington, Head of Corporate Facilities Management, to implement gender-neutral toilets across the different sites including Tooley Street.	Strategic Lead for HR Policy and Projects	Nov-21
40	Deliver bespoke workshops to support staff who experience racism or racial inequalities	New EDI Strategy	Bespoke	Working with Optima to deliver regular group support sessions to staff throughout the year.	Strategic Lead for HR Policy and Projects	Sept 21 – Feb 22
41	Revise the Professional Qualification Scheme to encourage colleagues from a Black, Asian and minority ethnic background.	New EDI Strategy	Council-wide	Conduct a full review of the PQS scheme to ensure fairness & equity which includes changing the approval process so decisions are made at the corporate level and not the departmental level.	Strategic L & D Partner	Sept 21 – Feb 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
42	Ensure apprenticeships are well marketed specifically within our borough and implement a range of initiatives to highlight job opportunities, apart from apprenticeships, to school leavers	New OD Strategy	Age	Targeted interventions will be implemented as part of workforce planning including consideration and design of structures and roles which have defined career progression pathways, innovative and tailored recruitment and attraction programmes, plus comprehensive training and development plans.	Strategic OD Partner	Jun 22 – Sept 22
43	Develop the workforce plan for the council	New Employee Experience Strategy	Council-wide	Recognising that succession planning for key roles and functions within the council will be a critical focus by using career progression pathways.	HR Business Partnering Lead (Acting)	Jan – May 22
44	Promote and support our recognised Staff Networks	New EDI Strategy	Council-wide	Continue to meet regularly with the Staff Network Chairs and identify opportunities to collaborate on awareness events. Ongoing promotion of the EDI calendar to raise awareness of different religious festivals including Diwali, Hannukah and Eid. In addition, we will seek volunteers to set up a new multi-faith staff network group.	Strategic Lead for HR Policy and Projects	Sept 21 – Feb 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
45	To ensure that young people within the Borough have employment opportunities within the council and they are not at a disadvantage due to factors, such as, social mobility	New OD Strategy	Council-wide	A collaboration between Organisational Development and the Local Economy teams will involve development of a new strategy, which includes focussing on young people in order to help them with achieving their potential without a low income or lack of qualifications preventing them from securing good work.	Strategic OD Partner	Jun – Sept 22
46	To develop a new recruitment strategy with a key focus on branding, attraction & on-boarding & exiting the organisation taking in consideration the EDI perspective.	New Recruitment Strategy	Council-wide	Developing and reshaping the Corporate and Departmental Induction programmes for all new starters as part of the Employee Experience Strategy and Recruitment Strategy.	Strategic Lead for Resourcing and Business Change	Oct 21 – Jan 22
47	Providing a clear Learning and Development Programme throughout the employee life cycle	New OD Strategy	Council-wide	Providing a comprehensive training offer between the starter and exit stages of the employee life cycle and ensuring this is clearly tied to Southwark's values and behaviours.	Strategic L & D Partner	Jun 22 – Sept 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
48	Developing a corporate approach to implement a centralised learning management system to capture training & development offer across the whole council.	New OD Strategy	Council-wide		Strategic L & D Partner	Jun 22 – Sept 22
49	To roll out wide-spread training on Microsoft Teams across the organisation to encompass those without email addresses to increase inclusivity	New OD Strategy	Council-wide	Work alongside ITs Technical Transformation Workstream to provide Microsoft Teams training for all staff including a scaled down version for those without email addresses.	Strategic L & D Partner	Jun 22 – Sept 22
50	To achieve a more accurate picture of reasons for disparities in the L&D data	New EDI Strategy	Council-wide	By undertaking further qualitative surveying and focus groups around the themes raised in the Annual Workforce Report.	Strategic L & D Partner	Sept 21 – Feb 22

Action No	Deliverable	Related Strategy	Relevant SST Workstream or type of Initiative	Detail	Lead Role	Timescale
51	Undertaking a trend analysis of the disciplinary and capability cases	New Employee Experience and EDI Strategies	Council-wide	To understand the disparities and the reasons for a high number of disciplinary and capability cases within certain areas of the business and to address these.	IR & ER Specialist & HR Business Partnering Lead (Acting)	Jan – May 22
52	Monitoring the complaints including those relating to Respect at Work and identify potential solutions where problems exist.	New EDI Strategy	Council-wide	Undertake a 'deep dive' into the reasons for complaints and implement key actions to address the areas of concern.	IR & ER Specialist & HR Business Partnering Lead (Acting)	Sept 21 – Feb 22
53	Develop and maintain an annual EDI events calendar	New EDI Strategy	Council-wide	Celebrate diversity and promote events at different time of the year to develop a sense of belonging	Strategic OD Partner	Sept 21 – Feb 22

Annex 1 Census and London Council's Data

Information on the community in Southwark & other London Boroughs

Southwark's workforce is drawn from across London and the South-east of England. Approximately 25% of our employees are Southwark residents. It is interesting to look at how the profile of the workforce compares to the Southwark community and, that of other London boroughs.

This Section provides basic information about the Borough drawn from the 2011 census.

It includes key data comparing the council's workforce with other London boroughs, albeit this must be viewed with caution. Increasingly, services provided differ between boroughs. This will, for example, impact on the sex profile where particular services remain male, or female dominated. Service type and organisation size is also known to affect how organisations perform, for example sickness absence tends to be higher in large multi-functional organisations.

Census data - Southwark borough All data drawn from ONS census 2011

Key statistics

1. Population figures, sex & economically active comparisons

	Southwark borough	England
2011 Population: All Usual Residents	288,283	53,012,456
2011 Population: Males	142,618	26,069,148
	49.5%	49.2%
2011 Population: Females	145,665	26,943,308
	50.5%	50.8%
Economically Active; Employee; Full-Time	42%	39%
Economically Active; Employee; Part-Time	9.9%	13.7%
Economically Active; Self-Employed	10.0%	9.8%
Economically Active; Unemployed	6.0%	4.4%
People aged 16 and over with 5 or more GCSEs grade A-C, or equivalent	10.2%	15.2%
People aged 16 and over with no formal qualifications	16.3%	22.5%

2. Occupations of all people in employment, March 2011

	Southwark	England
Managers, directors and senior officials	11%	11%
Professional occupations	26%	18%
Associate professional and technical occupations	17%	13%
Administrative and secretarial occupations	10%	12%
Skilled trades occupations	7%	11%
Caring, leisure and other service occupations	8%	9%
Sales and customer service occupations	7%	8%
Process, plant and machine operatives	3%	7%
Elementary occupations	12%	11%

3. Ethnic Origin

	Southwark Borough (Number s)	(%s)	London Region (%s)	England (%s)
All Usual Residents	288283			
White; English/Welsh/Scottish/Northern Irish/British	114534	39.7%	45%	79.8%
White; Irish	6222	2.2%	2%	1.0%
White; Gypsy or Irish Traveller	263	0.1%	0%	0.1%
White; Other White	35330	12.3%	13%	4.6%
White		54.2%	59.8%	85.4%
Mixed/Multiple Ethnic Groups; White and Black Caribbean	5677	2.0%	1%	0.8%
Mixed/Multiple Ethnic Groups; White and Black African	3687	1.3%	1%	0.3%
Mixed/Multiple Ethnic Groups; White and Asian	3003	1.0%	1%	0.6%
Mixed/Multiple Ethnic Groups; Other Mixed	5411	1.9%	1%	0.5%
Mixed		6.2%	5.0%	2.3%
Asian/Asian British; Indian	5819	2.0%	7%	2.6%
Asian/Asian British; Pakistani	1623	0.6%	3%	2.1%
Asian/Asian British; Bangladeshi	3912	1.4%	3%	0.8%
Asian/Asian British; Chinese	8074	2.8%	2%	0.7%
Asian/Asian British; Other Asian	7764	2.7%	5%	1.5%
Asian		9.4%	18.5%	7.8%
Black/African/Caribbean/Black British; African	47413	16.4%	7%	1.8%
Black/African/Caribbean/Black British; Caribbean	17974	6.2%	4%	1.1%

Black/African/Caribbean/Black British; Other Black	12124	4.2%	2%	0.5%
Black		26.9%	13.3%	3.5%
Other Ethnic Group; Arab	2440	0.8%	1%	0.4%
Other Ethnic Group; Any Other Ethnic Group	7013	2.4%	2%	0.6%
Other		3.3%	3%	1.0%
Totals		100.0%	100.0%	100.0%

Other Boroughs

The following information relates to year 2019/20. The data that is shown is based on no fewer than submissions from 28 London boroughs although not every borough will have submitted data for every area. The London Council's data for 20/21 is unavailable at the time of reporting.

In considering this information:

- The London mean (average) data is shown.
- It must be re-emphasised that there are significant differences in the organisations presenting data, e.g., Islington has reported 4,586 directly employed employees (headcount), and Kingston 1,153 directly employed employees (headcount).
- Organisations collect and define data in different ways, e.g., some councils extrapolate from survey information others such as Southwark rely on actual declarations.
- Only data which links to Southwark's statistics shown in the body of this report is shown.

1. Average Headcount of employees

Year	Average Headcount of employee
2020-21	Not available at time of reporting
2019-20	2685
2018-19	2568

2. Average age

46.13 years. Across London boroughs those in 16-24 years age band are 3.4% of the workforce and those aged 65 and older are 3.7%. (Note there are significant variations in data submitted by boroughs in response to this question, one borough's return being 1.5%, another 7% and 1.9% - 5.8% respectively - which is out of step with all other responses)

Year	Age Average	16-24 % headcount	65+ % headcount
2020-21	Not available at time of reporting		
2019-20	46.05	3.2%	3.7%
2018-19	46.12	3.1%	3.2%

3. Sex profile

Year	% Female	% Male
2020-21	Not available at time of reporting	
2019-20	60.37%	39.59%
2018-19	60.43%	39.69%

4. Disabled employees

Year	% Disabled
2020-21	Not available at time of reporting
2019-20	5.22%
2018-19	6.27%

5. Broad Ethnic Origin

Year	Asian	Black	Mixed	Other	White	Not Known
2020-21	Not available at time of reporting					
2019-20	11.52%	21.74%	3.44%	1.72%	48.54%	13.04%
2018-19	11.2%	21.32%	3.3%	1.93%	50.15%	12.24%

6. Length of Service¹⁷

Year	Less than a year	1 < 2 years	2 < 3 years	3 < 5 years	5 < 10 years	10 < 15 years	15 < 20 years	20 years +
2020-21	Not available at time of reporting							
2019-20	11.27%	10.80%	8.26%	12.70%	17.33%	14.67%	11.54%	13.42%
2018-19	10.83%	9.92%	8.27%	11.44%	17.43%	15.66%	10.94%	13.43%

7. Sickness Absences

Year	Average sickness days per person
2020-21	Not available at time of reporting
2019-20	8.53
2018-19	8.16

8. Turnover

Year	Turnover	Resignations	Less 1yr service
2020-21	Not available at time of reporting		
2019-20	14.42%	7.72%	1.67%
2018-19	16.61%	8.35%	2.07%

Annex 2 Southwark Stands Together Communications

Southwark Stands Together Communications

SOUTHWARK
STANDS TOGETHER

JANUARY 2021

SST Workforce Workstream Microsite

We created the SST Workforce Workstream microsite to share information with employees who are not office based



Southwark Stands Together - Be part of a 'Solution Conversation'

We invited employees from a Black, Asian and minority ethnic background to be part of a 'solution conversation' with our external consultant, DWC

Black on Board

We launched Black on Board - a governance training programme for organisations investing in Black and Minority Ethnic (BAME) staff designed to train and mentor participants onto board positions.

We collaborated with Omlec (the provider for the Black on Boards Programme) and three other local authorities, Islington, Enfield and Richmond & Wandsworth, to run a joint cohort of this programme for our staff groups of all levels

FEBRUARY 2021

Race, Equality, Diversity & Inclusion Week

Southwark Council's EDI week took place from 1 to 7 February 2021. The council marked the occasion with a week-long series of virtual events.

Bespoke workshop - Supporting those who have experienced racism

Career Conversation

A career conversation entitled, 'Talk to Us - How I navigated my career & challenges as a senior manager'. This event was held to support & provide information in relation to career progression



MARCH 2021

Career Conversations Continued

Due to popular demand we broadcast another 'Talk to Us' career conversation to support & inspire our workforce

Unison Black Members Group & EMpower

During this month we promoted the Council's active staff network group for Black, Asian and Minority Ethnic staff which is called EMpower & UNISON's Black Members' Self Organised Group Committee. We also increased awareness of the International Day for the elimination of racism



SST Champions

The council called for employees to be volunteers as SST Champions. Over 40 people responded

Leadership & Management

We are embarking on a leadership engagement initiatives which will take our approach, support and expectations to our leaders – this has begun and will continue to ensure there is an understanding that anti-racism and justice is an embedded part of our leaders' roles



APRIL 2021

Statement from Eleanor on the Racial Disparities Report

The Chief Executive re-affirmed the council's commitment to tackling racial inequalities

Stephen Lawrence Day 2021

22 April was Stephen Lawrence Day, a memorial day first introduced in 2019 on the 25th anniversary of Stephen's death to celebrate his life and legacy.

The council promoted this day to inspire a more equal, inclusive society



MAY 2021

Black, Asian and Minority Ethnic

We have decided to stop using the term 'BAME' in our communities and workforce and we will refer to our people as Black, Asian and Minority Ethnic colleagues going forward.

Shine the Light: Sharing career journeys

We published an article focussing on one of our amazing black managers and their careers, as well as celebrating their contribution to Southwark Council's success.

JUNE 2021

Re-educating our Leaders on positive action

Leaders were asked to explore ways to embed Positive Action to increase appointments of Black, Asian and Minority Ethnic employees to Grade 14 and above

SST Cabinet Update – 1 Year On

We have provided an update to Cabinet on the progress so far of the SST Programme and the Equalities Framework; both reports make reference to workforce updates

Workforce Equality, Diversity and Inclusion Statement

We produced a draft Workforce Equality, Diversity and Inclusion Statement outlining our commitment to our workforce

Workforce Equalities Action Plan

We are developing our new workforce equalities plan which includes bespoke health and wellbeing initiatives to support Black, Asian and Minority Ethnic colleagues



JULY 2021

Southwark Stands Together Champion network relaunched on 28 July

We have 40 champions across the organisation and advertised for others to join the network.

Positive Action

In June's Leadership Network, we ran a workshop on Positive Action and we used it to support Southwark Stands Together pledge that people of all backgrounds can progress within the organisation. In July we scheduled sessions with services to take place in September for the wider workforce to open up the discussion with colleagues on how to embed a Positive Action approach to improve under representation across the council



Reverse Mentoring

Children's & Adults hosted a Reverse Mentoring pilot scheme in January 2021, where a senior manager was paired with somebody in the early stages of their career to share experiences and their career stories. In July we advised employees that in the autumn we're making the initiative more widely available, starting with a briefing event to outline the time commitment over the 3 month mentoring period.

Engagement

As part of the wider engagement with our employees, members of EMpower and SAGE have joined the SST Strategy Board. Their support with the work that we are doing on SST will add immense value as we continue to make progress.

Playback Sessions

Playback sessions on the workforce equalities plan highlighted our achievements over the last 18 months and our plan for the year ahead.

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CABINET APPENDICES DISTRIBUTION LIST (OPEN)**MUNICIPAL YEAR 2021-22**

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