

Cabinet

Tuesday 7 December 2021

11.00 am

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

Appendices

List of Contents

Item No.	Title	Page No.
8.	Gateway 1 - Procurement Strategy Approval: All-Age Community Drug and Alcohol Early Intervention, Prevention, Recovery and Treatment System Appendices 1 – 4.	1 - 34
10.	Statement of Community Involvement and Development Consultation Charter Appendices A – E.	35 - 158
14.	Gateway 1 - Procurement Strategy for the Borough's Tree Works Programme Appendix 1.	159 - 171
18.	Tustin Estate Low Rise Redevelopment Programme: Update and Phase 1 Compulsory Purchase Order (CPO) Appendices 1 -3.	172 - 179
19.	Ledbury Estate Towers - Future redevelopment update Appendix 1.	180 - 197

Contact

Paula.thornton@southwark.gov.uk; constitutional.team@southwark.gov.uk
Webpage: www.southwark.gov.uk

Date: 29 November 2021

APPENDIX 1Overview of existing services for inclusion in the new contractA: Adult Integrated Drug and Alcohol Treatment System (AIDATS) - 18 years and above

1. Current service provision is commissioned under the AIDATS service contract, delivered by CGLSL, which is currently due to expire on 31 March 2022. A detailed summary of the AIDATS service is outlined in the GW0 report.
2. The AIDATS service comprises a range of community-based Tiers 2 and 3 drugs and alcohol treatment interventions for adult residents aged 18 years and over. Delivery is directed by a detailed service specification, which includes the requirement for evidence-based pharmacological and psychosocial drug and alcohol treatment interventions, underpinned by the most recent national guidance, with a strong focus on recovery and building resilience. There is an overlap between the age criteria for the AIDATS and IHSYP services, with the 18-24 younger adult cohort able to access either service, dependent upon level of need.
3. In addition to specialist pharmacological and psychosocial treatment interventions, the service delivers a range of activities that contribute to reducing inequalities and improving outcomes and the life chances of the borough's residents with drug and / or alcohol support needs, including:
 - facilitated access to support with housing, employment and training opportunities;
 - support to establish new substance free social networks and interests;
 - support for physical and mental ill-health in partnership with a range of local agencies including primary care and community mental health services;
 - working in partnership with the council's commissioned Recovery Support Service (RSS), service users, people with lived experience and stakeholders to build a thriving and visible recovery community in the borough;
 - provision of support for families and carers of people with drug and / or alcohol support needs, and hidden harm support for CYP affected by someone else's substance use.
4. An external review of the adult community drug and alcohol treatment system, undertaken in June 2019, identified a complex treatment population with multiple needs; this was mirrored by the findings of the 'Review of drugs: part two'. This means that local drug and alcohol treatment service provision needs to be holistic, with a wide range of well developed partnerships with housing, social care, health and criminal justice agencies, as well as other local services.
5. The current AIDATS has made some great achievements in supporting a highly chaotic and complex treatment population to tackle their use of drugs and / or alcohol, particularly when faced with the challenges arising from the COVID-19 pandemic and an effective response to providing care and support. It has demonstrated its ability to help new entrants to the treatment system to reduce their drug and alcohol use, and reduce harm to themselves and others.

6. The most recent assessment of financial envelope for the services indicates Southwark's budget was lower than in equivalent boroughs, with a lower cost-per-head for service users, demonstrating that we have been striving to achieve best value within these services throughout the past six years.
7. However, it should be noted that, as Southwark's treatment population is more complex, service users often need to be in treatment for longer, some of whom may cycle through several attempts to cease substance use before they recover, and others who will be retained in treatment for their lifespan in order to reduce harm and keep them safe. As such, measures such as the Public Health Outcomes Framework (PHOF) and National Drug Treatment Monitoring System (NDTMS) successful treatment completion measures cannot be considered in isolation as the most appropriate measures of treatment impact and success for these groups.
8. The key service components detailed within the current AIDATS service specification are:
 - Recovery Navigation (Single Point of Contact, Advice and Information, Assessment, Recovery Planning, Keywork, Case Management and Care Coordination)
 - Structured Psychosocial Interventions (individual / group)
 - Pharmacological Interventions (community prescribing, community detoxification)
 - General Practice Liaison and Support
 - Recovery Community Activities (in partnership with the Recovery Support Service)
 - Harm Reduction Interventions (Needle Exchange, Blood Borne Virus and Health Service)
 - Needs-Led Drug Testing
 - Hospital Liaison and Support
 - Family and Carer Support including hidden harm provision
 - Criminal Justice Pathway
 - Aftercare and Reintegration
9. Since 23 March 2020, adult community drug and alcohol treatment services in Southwark have remained accessible and open to vulnerable residents, many of whom are at greater risk from COVID-19, both in relation to increased infection and transmission risk, and vulnerability to poor health outcomes, which may have worsened during the pandemic. To support the provision of a robust and safe adult drug and alcohol treatment service in the borough, the AIDATS service has managed many situations arising from the pandemic impact on Southwark's communities, including the scenarios outlined by PHE in their guidance¹:
 - interrupted access to medicines through pharmacies that were overwhelmed by demand for their services in 2020;
 - reduced access to illicit drugs resulting in a substantially increased demand for the service, which already evidenced high pre-pandemic caseload numbers;

¹ <https://www.gov.uk/government/publications/covid-19-guidance-for-commissioners-and-providers-of-services-for-people-who-use-drugs-or-alcohol>

- managing 1000+ residents with greater vulnerability to the effects of COVID-19 and an increased risk of non-compliance with social distancing and other measures to reduce transmission risk;
- managing service users at risk of exacerbated breathing impairment from COVID-19 due to use of depressant drugs, which increases the risk of harm and death;
- identifying and managing individuals at increased risk of domestic abuse and violence in the home as people stayed at home, substance use increased and there were less opportunities for professional agencies to identify harm;
- increased risk of harm to children not in school from parental or carer substance use in the home;
- the creation of a 'homeless hotel' at Waterloo and the need for a service response to support vulnerable rough sleepers with drug and alcohol treatment needs that were housed there;
- rapid evolution from a traditional face to face service offer to a primary remote delivery model that had never previously been commonplace for drug and alcohol treatment delivery and the need to ensure that all service users, particularly those receiving prescriptions, were supported to transition to and continue to engage with this new model, including supply of digital devices to assist with this.

10. Opportunities for learning from service delivery during the pandemic have been taken, including seeking service user feedback, and where positive benefits from a different model of provision have been identified, these will be captured and embedded in the future model proposed in this report.

B: Children and Young People's (CYP) drug and alcohol services (10-24 years)

11. Drug and alcohol services for CYP and younger adults up to the age of 24 years are currently delivered under the Integrated Health Service for Young People (IHSYP) – sexual health and substance misuse service; contracted to Brook Young People, a registered charity providing health and welfare services, (with sub-contracting to Change, Grow, Live (CGL) for the drug and alcohol element of the service), which is currently due to expire on 31 March 2022. This service has piloted the integrated model of delivery since 1 December 2017 for the first time in the borough, with a current annual contract value of £437,250, which is fully funded by the Public Health grant.

12. IHSYP is an evidence-based, integrated service that works with partner agencies to meet the drug and / or alcohol and sexual health wellbeing needs of CYP and younger adults aged 10 to 24 years in Southwark. The service offers a range of brief, unstructured and structured interventions to address drug and alcohol and sexual health support needs (including sexually transmitted infections and contraception, focusing on long-acting methods), with needs identified through holistic assessment, and targeted support provided to address the harms of associated risk-taking behaviour. It is predominantly delivered peripatetically through an outreach delivery model in locations where CYP and younger adults meet.

13. The contract comprises a range of local and national indicators that are used to gauge performance. As is the case with the AIDATS, the performance of local authority commissioned drugs and alcohol treatment systems is captured through monthly provider submission to the NDTMS. PHE use these data to monitor drug and alcohol treatment service provision, and how effective it is in supporting CYP to address their substance use.
14. The current service has made some positive achievements in supporting CYP and younger adults with a range of vulnerabilities to address sexual health and / or drug and / or alcohol support needs, including early intervention support to reduce escalation of substance use. During the contractual term to date, it has demonstrated its ability to help the cohort to reduce harm to themselves and others.
15. The closure of schools, and limitations on external agencies being allowed access to school premises, and other places where CYP meet significantly affected the ability of the IHSYP service to identify potential service users, engage with them, and foster relationships with key referral partners. A substantial decline in numbers accessing the service was observed in 2020-21, and this is against a backdrop of declining numbers in recent years, which is more stark in Southwark, than evidenced nationally.
16. A virtual offer was developed and delivered from Autumn 2020, albeit with limited uptake from educational settings. In recent months in 2021, with a relaxation of pandemic restrictions, service delivery has resumed in a number of locations, with an upturn in engagement rates.

C: Needle and Paraphernalia Exchange Coordination Service

17. A needle and paraphernalia exchange coordination service is commissioned with SLaM under a Section 75 agreement between the council and NHS South East London Clinical Commissioning Group (SEL CCG). The 2021-22 cost of the service is £120,600, which is fully funded by the Public Health grant, and the service is in place to support the operation of needle and paraphernalia exchange sites in the borough.
18. The service works with needle exchange providers in Southwark to:
 - supply injecting and other related equipment, including appropriate materials for the safe disposal of injecting equipment, for distribution to injecting drug users;
 - supply adequate levels of health and safety information and education to eliminate all contamination/infection risk to staff and clients participating in this scheme;
 - supply health promotion literature on safe injecting, safer sex and related issues such as blood-borne viruses;
 - arrange and implement safe collection and disposal of all clinical waste generated by the scheme;
 - plan and deliver user-focused awareness campaigns on drug-related health issues
 - provide a rapid advice service to contracted providers in relation to drug-related public health alerts (e.g. contaminated batches of drugs); and

- collate contracted provider data arising from the scheme and provide this to the council to support contract monitoring and enable annual payments to be made.

19. Payments to contracted pharmacies are funded directly by the council, and there is no direct contractual relationship between SLaM and needle exchange providers.
20. The service was not impacted by the COVID-19 pandemic and continued to operate throughout.

D: General Practice Opiate Drug Misuse Service (Shared Care)

21. The general practice shared care (GPSC) opiate drug misuse service has been an established service in Southwark for many years. It operates as a partnership between general practice, the AIDATS, and community pharmacy with the aim of providing an comprehensive opiate drug treatment service, including Opioid Substitution Therapy (OST), for people that are stable and engaged in strengthening their recovery.
22. Through effective partnership working, the service operates as part of the community treatment service offer, and works alongside the AIDATS to support a reduction of harm and inequalities in the service user group, and to improve outcomes.
23. At the present time, nine practices are providing the service to a total of 48 people. In recent years, there has been a significant reduction in the number of people receiving the service, (300 in 2015-16 to 48 in 2021-22) with increasing numbers being transferred to the AIDATS since Q4 2020-21 for a number of different reasons. Until recently, an enhanced prescribing clinic was hosted by Villa Street Medical Centre (VSMC), which provided a shared care prescribing service for people who were suitable for management in primary care, but could not access the service through their own GP. A GP with Special Interest (GPwSI) was also previously commissioned with VSMC to provide shared care leadership.
24. In 2021-22, the budget for the services is £99,500. This comprises a £70k budget for GPSC activity, £24,500 for the enhanced prescribing clinic and GPwSI services, and a £5,000 training budget. GPSC activity is currently funded on a quarterly per-patient basis, with a sliding scale of increased payments to encourage practices to increase the numbers of people that they provide the services for.
25. The service continued to be offered by a number of general practices during the pandemic. However, many practices were unable to continue to deliver the service during this period for a variety of reasons, and transferred participating service users to the AIDATS. This included the transfer of all service users receiving care through the enhanced prescribing clinic as VSMC became a COVID-19 'hot-hub'. The increase in numbers of people transferring from shared care with OST support needs has had an adverse impact on the AIDATS prescribing budget, and has also created capacity issues in the service in relation to medical appointments.

E: Substance Misuse Services in Community Pharmacy – Supervised Consumption and Needle Exchange

26. Supervised consumption and needle exchange in community pharmacy are established services in the borough, and are delivered by a number of providers. Pharmacy services to drug users aim to 'assist the service user to remain healthy, reduce drug related harm, provide service users with regular contact with a healthcare professional and help them access further advice or assistance'.
27. Supervised consumption provides a range of service user, family and community harm reduction benefits and is an integral part of an efficient community drug treatment system. Levels of supervision are decided through risk assessment between the AIDATS and the service user. An appropriate pharmacy is identified that can fulfil the prescription and supervised consumption requirements, and which meets the service user's needs (usually directed by proximity to home or place of work).
28. A total of 218 people receiving an Opioid Substitution Therapy prescription (OST) from the AIDATS accessed the community pharmacy supervised consumption service on at least one occasion in Q4 2020-21. In 2021-22, a budget of £75k is allocated to fund activity, with a set fee of £2 per supervised consumption paid to participating practices.
29. Pharmacy needle exchange services aim to reduce the rate of sharing and other high-risk injecting behaviours by providing sterile injecting equipment and other support as well as ensuring the safe disposal of used injecting equipment. They are accessible to all adult injectors who are using illicit drugs and are not dependent upon resident status.
30. In 2020-21, a total of 12 community pharmacies provided needle exchange services to injecting drug users in the borough, with an estimated total of 10,291 contacts. A budget of £27k is allocated to fund activity in 2021-22, and this includes a sliding fee scale that provides payments in accordance with activity up to a maximum number of contacts, as well as a fee for returns to encourage responsible, safe disposal of injecting equipment and paraphernalia.
31. Pharmacies continued to deliver both services throughout the pandemic. Rates of supervised consumption saw a marked decline in activity as the AIDATS service followed national guidance to reduce, via risk assessment, the number of people using the service to minimise COVID-19 transmission. Whilst numbers have increased in the more recent stages of the pandemic, it is not expected that they will return to pre-pandemic levels as service users report positive benefits of the freedom of not being required to present to pharmacies as frequently.
32. Needle exchange levels dipped for a period of time before returning to a pre-pandemic steady state. During this period, outreach was used to provide additional access to needle exchange provision, with particular reference to the 'homeless hotel' provision that was supported by the AIDATS.

F: Rough Sleeping Drug and Alcohol Treatment Grant funded outreach team

33. The main aims of the fund are to:
- a. ensure that the engagement that people have had with drug and alcohol treatment services whilst in emergency accommodation is maintained as they move into longer term accommodation (continuity of care);
 - b. support people to access, and engage in, drug and alcohol treatment who have not yet done so (access and engagement);
 - c. build resilience and capacity in local drug and alcohol treatment systems to continue to meet the needs of this population in future years (resilient and sustainable models of care).
34. Funding was awarded for a dedicated outreach team, hosted by CGLSL, comprised of clinical, psychology and keyworker posts overseen by a team leader and with administrative support. This team are in place to address two primary issues:
- i. Significant improvement to treatment retention rates for the rough sleeping cohort as many rough sleepers evidence complex and multiple vulnerabilities and require significant levels of dedicated outreach resources, not available within existing budgets, to support engagement and retain them in treatment and;
 - ii. Increased engagement, through enhanced dedicated engagement and clinical staffing resources, with rough sleeping cohorts that are identified as being under- represented in the AIDATS treatment population and where the council is legally able to commission a service.

APPENDIX 2

Summary of wider policy implications

1. The statutory Community Safety Partnership Plan 2017 – 2020 comprises eight priorities, one of which relates to *‘reducing substance misuse’*. The proposed contract will contribute to achievement of this priority.

To protect individuals, families and communities from the negative impact of drugs and alcohol misuse by:

- *Reducing the number of individuals misusing alcohol, illegal and other harmful drugs and increasing the number of individuals who successfully recover from alcohol and / or drug dependence*
 - *Identifying children and young people affected by parental or sibling substance misuse and taking action to reduce harms and improve life chances*
 - *Increasing the number of individuals who successfully engage with Southwark treatment system following release from custody*
 - *Working collaboratively with partner agencies to prevent or reduce drug related deaths and to reduce the transmission of blood borne viruses*
 - *Restricting the supply of drugs and identifying and prosecuting those involved in the drug trade*
2. The Southwark Joint Mental Health and Wellbeing Strategy Refresh 2021-24¹ is focused upon promoting the mental health of Southwark residents by improving the range and access to services and delivering good outcomes and value for money. The Strategy details 16 priority areas (workstreams) for delivery, including a specific workstream for ‘Drug and Alcohol Use and Mental Health (including Dual Diagnosis)’.
 3. The HM Government Drug Strategy 2017² detailed two overarching aims: *“to reduce all illicit and other harmful drug use, and increase the rate of individuals recovering from their dependence.”* The service will support the delivery of both of these aims, with a focus on both *reducing demand* and *building recovery* in Southwark’s communities as follows:
 - *Reducing demand* – the services will seek to prevent an escalation of substance use across the life course, including targeted intervention and support offers for the most vulnerable individuals.
 - *Building recovery* – the council and provider(s) will work closely together throughout the duration of the contractual term to improve the quality of treatment and outcomes for a range of user cohorts. There is a focus on working collaboratively with partners and other commissioning bodies to ensure integrated care pathways, and access to a range of services are in place to support all residents in Southwark to live a life free from substance misuse or dependence.

¹ <https://moderngov.southwark.gov.uk/documents/s101396/Report%20-%20Joint%20Mental%20Health%20and%20Wellbeing%20Strategy%202021-24%20Update.pdf>

² <https://www.gov.uk/government/publications/drug-strategy-2017>

4. The HM Government Serious Violence Strategy 2018³ identifies four key themes, one of which is '*tackling county lines and misuse of drugs*', operating from a premise of strong evidence that illicit drug markets are a driver of serious violence. There is an identifiable overlap between this Strategy and the Drug Strategy 2017 in relation to the need for an enhanced understanding of the cohorts that are using drugs, and the need for access to high quality treatment provision to support individuals with addressing their misuse, which will be delivered through the proposed services.
5. In 2019, the council committed to implementing the recommendations from an Extended Learning Peer Review undertaken by the Home Office's Violence and Vulnerability Unit which identified key linkages between the violence, vulnerability and exploitation of children and vulnerable adults in drug market activity. This is incorporated within the 'Community Harm and Exploitation Reduction Plan 2020-21'.⁴ The proposed service will play an essential role in reducing demand for drugs in the borough, working in partnership with the community harm and exploitation hub, thus helping to reduce the criminal exploitation of vulnerable people in drug supply chains, through the provision of high quality services.
6. In Summer 2021, the government published an initial response⁵ to the 'Independent Review of Drugs: Part Two'⁶ report that was published in July 2021. This included a commitment to publishing a new national addictions strategy within the financial year in addition to developing a Commissioning Quality Standard and National Outcomes Framework, all of which will have implications for the proposed service.

³ <https://www.gov.uk/government/publications/serious-violence-strategy>

⁴

<https://modern.gov.southwark.gov.uk/documents/s88365/Report%20Community%20harm%20and%20exploitation%20reduction%20plan.pdf>

⁵ <https://www.gov.uk/government/publications/independent-review-of-drugs-by-dame-carol-black-government-response/government-response-to-the-independent-review-of-drugs-by-dame-carol-black>

⁶ <https://www.gov.uk/government/publications/review-of-drugs-phase-two-report/review-of-drugs-part-two-prevention-treatment-and-recovery>

APPENDIX 3

Equality Impact Assessment: All-age community drug and alcohol early intervention, prevention, treatment and recovery service contract.

A brief description of the function, policy or service being assessed

This EIA provides an assessment of the equalities impact of the proposals included in a GW1 procurement strategy report recommending approval to commission a new all-age community drug and alcohol early intervention, prevention, treatment and recovery service contract.

This EIA is underpinned by information and intelligence from the following sources:

- i. National Drug Treatment Monitoring System (NDTMS) ViewIt data (publically available at ndtms.net)
- ii. 2020-21 contract monitoring data from the council's commissioned community drug and alcohol treatment providers for adults and CYP
- iii. Public Health Joint Strategic Needs Assessment
- iv. The previous EIAs for adults and CYP (drug and alcohol specific), and rough sleeping.

References to additional published documents will be cited throughout.

The scale of drug and alcohol use in England and Wales, and local prevalence and treatment engagement in Southwark

The Crime Survey for England and Wales 2019-20¹ reported:

- An estimated 1 in 11 adults aged 16 – 59 years had taken a drug in the last year (9.4%), with an estimated 1 in 5 adults aged 16 -24 years having taken a drug in the last year (21%)
- 3.4% of adults aged 16 – 59 years had used a Class A drug in the last year, rising to 7.4% of adults in the 16 – 24 age bracket
- Cannabis continues to be the most commonly used drug in both adults aged 16 – 59 (7.8%), and the segmented 16 – 24 age bracket (18.7%), followed by powder cocaine (2.6%) in the 16 – 59 age bracket, and nitrous oxide in the 16-24 bracket (8.7%)
- The ONS² summarised the national position as a stable position for rates of overall drug use, but with differences between age groups with drug use much more common amongst younger adults aged 16 - 24 years, although this was also stable when compared to the previous year.

Cohort	Most recent prevalence	Local unmet treatment need	National unmet treatment need

¹ <https://www.crimesurvey.co.uk/en/SurveyResults.html>

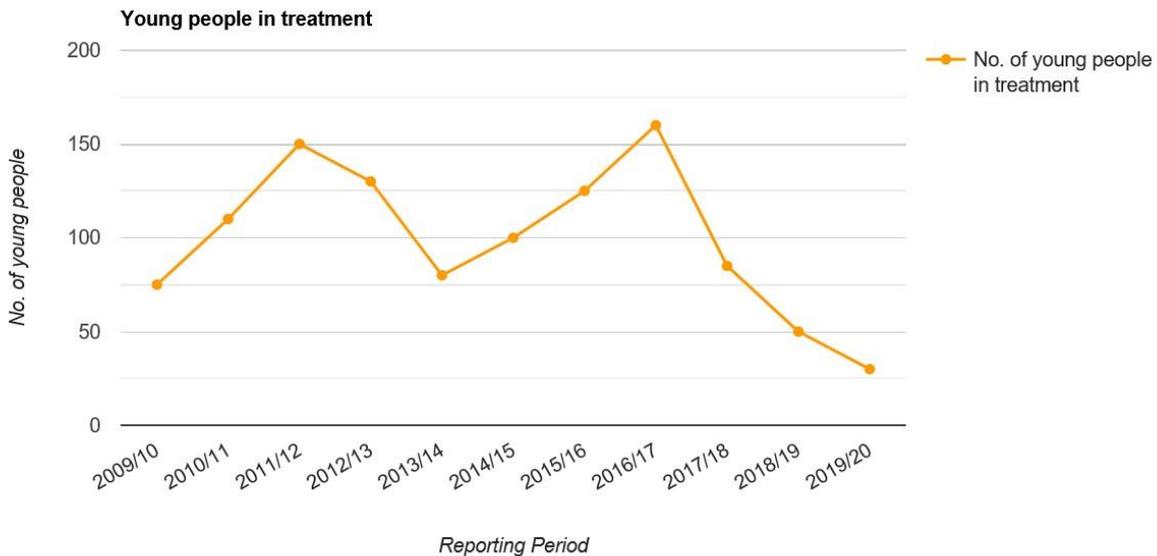
² <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/drugusealcoholandsmoking>

	estimate (2016-17)		
Opiate	1980	55%	46%
Crack cocaine	1635	59%	61%
Opiate and crack cocaine	2492	61%	53%
Alcohol only	3729	85%	82%

The most recent publically available prevalence estimates, including unmet treatment need, for opiate, crack cocaine and alcohol users in Southwark are as detailed in the table. Unmet treatment need has a significant impact on crime, including as a driver of drug markets through creating demand for drug supply, unemployment, homelessness and rough sleeping, safeguarding children and long term health resilience and reducing the risk of drug misuse death. There is a need to address this by actively identifying people that are not in treatment, and making attempts to engage them with the borough's treatment services; this will continue to be a key priority for the new service contract with a view to reducing risk of drug related death and improving wellbeing.

Substance Category	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
Opiate	1325	1265	1225	1140	1115	1090	1035	955	905	890	880
Non-opiate only	170	155	175	195	230	235	230	135	160	210	165
Alcohol only	415	415	390	385	405	435	400	275	320	360	365
Non-opiate & alcohol	395	360	295	310	310	280	245	195	235	295	280

The number of adults accessing treatment has declined over the past ten years, with this downward trend mostly driven by reducing numbers of opiate users engaged with local treatment services. This is of concern when considering the prevalence of unmet need amongst problem drug users in the borough, and it is essential for future services to be commissioned to support an increase in the number of adults with drug and / or alcohol support needs accessing treatment and receiving appropriate care, although it is acknowledged that this is challenged by the existing financial situation, which has seen budgets reduced by 40% since 2014-15.



The number of under 18s accessing structured treatment in the borough has also reduced over time, and as of 2019-20, this represented the lowest rates of uptake since a specialist young person's substance misuse service was first commissioned in Southwark in 2010. The reasons for this are not straightforward. Nationally, the rate of under 18s accessing structured treatment has been declining since 2009-10, but the rate of decline in Southwark is more stark. Many under 18s do not evidence levels and patterns of use that require a structured treatment episode under NDTMS, with their needs met by a lower threshold intervention that is not NDTMS reportable. However, a prudent approach is taken locally by commissioners, with a view that declining rates of engagement are a serious concern and may reflect that CYP drug and / or alcohol structured support needs are not being identified and addressed.

Users of the proposed service

The service will engage with any individual of any age with illicit drug and / or alcohol support needs in the London Borough of Southwark, regardless of protected characteristic or immigration status.

People with drug and / or alcohol misuse and dependence experience some of the most severe health inequalities, and evidence much poorer health than the general population. The extent of inequality is most profound in sub-groups of people with drug and / or alcohol support needs such as rough sleepers. Users of the proposed service are likely to be facing significant difficulties in multiple areas including:

- Physical ill-health, including positive blood borne virus status and issues arising from exposure to poor living conditions
- Difficulty in maintaining personal hygiene
- Poor nutrition
- Mental ill-health, including dual diagnosis (concurrent drug and / or alcohol use and mental ill-health), trauma and high levels of stress
- Problematic drug and / or alcohol use
- Insecure accommodation, or rough sleeping
- Legal issues, including involvement with the Criminal Justice System

- Limited literacy skills
- Language barriers
- No recourse to public funds
- Stigmatisation and discrimination
- Domestic abuse
- Social exclusion
- Safeguarding
- Difficulties engaging with support services
- Difficulties in retaining suitable accommodation
- Lack of support network
- Exploitation
- Adverse childhood experience

Equalities analysis

People who fall within a number of the identified protected characteristics groups are key users of the service. However, data and intelligence does not capture a breakdown of service usage for all of the protected characteristics. Available data includes:

- Age
- Race
- Sex (Gender)
- Disability
- Religion and belief
- Pregnancy and maternity
- Sexuality

There is no systematic recording of marriage and civil partnership or gender reassignment. Information about service users falling within these protected characteristics may be available to the current services where there is self disclosure, but this is not currently monitored.

Race

ethnicity	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
White	1570	1475	1405	1350	1385	1355	1300	1070	1140	1275	1245
Multiple ethnic group	90	90	80	75	80	70	60	70	75	85	75
Asian British	40	45	45	40	40	40	35	35	45	50	40
African/Caribbean/Black British	265	225	230	250	250	225	230	185	205	270	245
Other ethnic group	70	45	45	45	45	50	35	10	15	30	35

Between 2009-10 and 2019-20, most adults aged 18 years + at treatment start in Southwark were white, followed by people of African / Caribbean / Black British ethnicity, mirroring the national trend. In 2019-20, white people reflected 75.91% of treatment starts, with African / Caribbean / Black British second at 14.94%, multiple ethnic groups (4.57%), Asian / Asian British (2.44%) and other ethnic groups (2.13%).

Publically available data pertaining to race for children and young people under 18 years is not available on NDTMS.net.

The previous EIAs provide an overview of race in relation to drug and alcohol treatment engagement and prevalence in the rough sleeping population, the contents of which are relevant to this EIA update.

Research shows that Black Asian and Minority Ethnic groups, such as African, Caribbean, Chinese and Vietnamese ethnicities, are under-represented by 'mainstream drug and alcohol services'³. The most recent publically available data in Southwark could indicate this, with 75.91% of the adult caseload in 2019-20 identifying from a white ethnic group, and 24.09% self-reporting from a Black Asian and Minority Ethnic group.

Black Asian and Minority Ethnic people may be less likely to present for drug and alcohol treatment for a number of reasons. Firstly, some believe there is less awareness in such groups of the impacts and risks of drug and alcohol use. Stigma associated with illicit drug use can be the biggest barrier to accessing treatment. People from Black Asian and Minority Ethnic backgrounds are more likely to disclose cannabis use, in addition to crack, Khat and amphetamine use. As such, the needs presented by Black Asian and Minority Ethnic people can differ from white ethnicities, and so treatment requires culturally appropriate and nuanced offer to effectively engage people in treatment, and to reduce barriers to care. Additionally, more intensive engagement may be required to build up trust and recovery capital within these groups.

As a result of this, consideration in relation to approach and offer is required by drug and alcohol services to engage with people from a Black Asian and Minority Ethnic background e.g. using an assertive outreach model. Whilst prevalence of drug and / or alcohol use and dependence is lower in Black Asian and Minority Ethnic groups, 50% of Southwark's resident population represent a Black, Asian or Minority ethnic group, reflecting a disproportionality when considering the local treatment rates of around a quarter identifying from these groups.

Throughout the life of the current community contracts, there has been a focus on efforts to continuously improve the local treatment offer for people from Black Asian and Minority Ethnic communities, and to improve rates of engagement, with some of the key activities outlined in the previous EIA.

The impact of the proposed service is considered to be positive in terms of race as follows.

- Clear resources for assertive outreach provision in the future treatment system model will provide greater coverage in non-treatment hub settings, thus increasing opportunities to access treatment for individuals and groups that are less likely to self-present (including Black Asian and Minority Ethnic people).
- Fixed contract price defined by the successful provider, with no performance related pay aspect, will better enable the funding of substantive posts, creating additional capacity to work with service users on an ongoing basis.

³ <http://www.nta.nhs.uk/publications.aspx?category=Equality+and+Diversity>

- The Recovery Support Service (RSS) continues to be commissioned at the time of writing, and continues to work with faith based organisations to publicise the treatment offer
- Service design in partnership with community groups through the RSS contracted provider Janus to ensure potential barriers are addressed prior to service delivery, plus review mechanisms in place to address changing needs
- Proposal to include a requirement for the successful provider to develop effective partnerships with Black Asian and Minority Ethnic-led organisations in the borough and London to increase the representation of these groups in treatment
- To undertake further qualitative analysis of substance groups and support needs, such as mental health and rough sleeping vulnerability, aligned with ethnicity to establish an improved understanding of the race demographics of people using illicit drugs and / or alcohol in Southwark, and for this to be a continuous conversation throughout the life of the contract

Age

Age Group	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
18-29	365	315	290	300	275	255	240	190	170	200	185
30-49	1585	1505	1420	1325	1330	1240	1105	870	885	930	900
50+	355	370	380	400	455	545	565	500	570	630	605

Age (young people)	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
Under 14	5	5	5	5	5	5	15	20	15	0	0
14-15	35	40	55	35	25	45	55	65	30	20	15
16-17	40	65	90	90	50	50	55	80	45	30	20

In 2019-20, the largest cohort of adults aged 18 years + in treatment were in the 30-49 bracket (53.25%), followed by 35.80% in the 50 + category, and 10.95% in the 18 – 29 category. When considering the reduction in numbers of people entering treatment across the years, this has been reflected in the 18 – 49 age bracket, with a year-by-year increase in the numbers of over 50's in treatment. This reflects the national trend of an ageing cohort of older users.

In 2018-19 and 2019-20, no CYP under the age of 14 years started structured treatment, representing a downward trend when compared to 2016-17 and 2017-18. This data only reflects structured treatment starts, with brief interventions not reportable to NDTMS, therefore it cannot be considered as indicative of no under 14s in the borough with a drug and / or alcohol support need. 2019-20 reflected the lowest number of CYP under 18 years receiving structured treatment support; again, this may be because their needs were met by a non-NDTMS reportable intervention. However, this does raise concerns of unidentified drug and / or alcohol structured support needs in the under 18 cohort in the borough.

The previous EIAs provide an overview of age in relation to drug and alcohol treatment engagement and rough sleeping, the contents of which are relevant to this EIA update.

Older drug and alcohol users with long term patterns of use are more likely to present to treatment with complex, multiple health and social care needs. Many entrenched substance users in their 40s and 50s present with the health and social care needs of people in their 60s and 70s, but are ineligible for older people's services. Support needs include, but are not limited to:

- Complex health care needs – such as Chronic Obstructive Pulmonary Disease (COPD)
- Mobility Issues – some requiring home visits, support picking up Opiate Substitute Treatment or escorting to hospitals and other appointments
- Significant social care needs – such as difficulty managing toilet needs, keeping a habitable home environment, developing and maintaining personal relationships, managing nutrition and/or maintaining personal hygiene.
- Grief management, loneliness support

Locally, over 70% of the adult caseload in 2018-19 were aged 40 years +, with opiates as a primary drug of choice, presenting challenges for the future delivery of the services in order to meet their needs against a financial envelope that has seen a 40% reduction since 2014-15, and with no long term additional funding identified to boost capacity.

In 2020, the highest rates of drug misuse deaths in England and Wales were reflected in the 45 – 49 age bracket, and this warrants careful consideration in relation to appropriate risk management of opiate users in this age group, and activities to reduce drug related death, such as naloxone programmes.

Younger people are more likely to be using other substances, such as cannabis, cocaine, novel psychoactive substances, club drugs and alcohol. Patterns of use that become problematic, but that do not reflect dependence, require a different approach. This poses challenges for services in terms of providing an appropriately attractive support offer that engages younger substance users as well as the more 'traditional' treatment population. This is particularly important in Southwark due to the younger demographic of the resident population, and increasing rates of prevalence in the use of cocaine and ecstasy in the 16 -24 cohort, that is not reflected in local treatment uptake.

Throughout the life of the current community contracts, there has been a focus on efforts to continuously improve the local treatment offer for people of all ages, and to improve rates of engagement, with some of the key activities outlined in the previous EIA.

The impact of the proposed service is considered to be positive in terms of age.

- Defining the proposed delivery of the service into four age-related pathways will ensure a priority focus of the provider on ensuring an appropriate support offer for each age cohort in alignment with the substances used and other engagement needs, such as opening times and locations
- Clear branding of pathways in the new contract that delineates provision for CYP in order that the service remains bespoke within the all-age provision.

- The new contract will specify requirement around out of hours opening to ensure that a comprehensive treatment offer, comparable to that provided during business hours, is available for people in education, training and employment
- Proposal to include a requirement for the successful provider to develop effective partnerships with organisations that cater for people with different support needs in different brackets in the borough and London to increase the representation of these groups in treatment
- To undertake further qualitative analysis of substance groups and support needs aligned with age to establish an improved understanding of the age demographics of people using illicit drugs and / or alcohol in Southwark, and for this to be a continuous conversation throughout the life of the contract
- Fixed contract price defined by the successful provider, with no performance related pay aspect, will better enable the funding of substantive posts, creating additional capacity to work with service users on an ongoing basis.
- A continued focus on improving naloxone access rates in the borough, with all opiate users being offered this regularly as part of their treatment package, and with a particular focus on people aged 45 years +
- Working in partnership with other services to plan for the care of younger people in treatment with the health and care needs of older people, but who are ineligible for care from older people's services

Gender

Sex	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
Male	1590	1530	1475	1425	1445	1445	1330	1075	1140	1245	1220
Female	715	660	610	605	615	595	580	485	480	515	470

Sex (young people)	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
Female	25	35	40	30	5	15	20	35	20	10	5
Male	50	75	105	100	75	85	105	125	65	40	25

NDTMS data reflects male and female only with no other gender categories.

Mirroring the national trend, a much higher proportion of males accessed treatment services in the borough throughout the last 11 years, reflecting the disproportionality of drug and alcohol use and dependence on this gender. In 2019-20, 72.2% of adult treatment starts were male compared with 27.8% of females, and 83.3% of under 18s starting treatment were male compared with 16.7% of females. There is no further breakdown of gender available.

Despite making up half of Southwark's population, less than a third of people in adult treatment in 2019-20 were female, falling to a much lower percentage when considering under 18s⁴. This may reflect prevalence estimates which show that females are less likely to use or have a problematic relationship with drugs and/or

alcohol. However, there is considerable evidence, including learning from local service delivery, that suggests that females need special consideration in relation to the service approach and offer to reduce barriers to seeking support. Many females with parental responsibilities fear that identifying themselves as substance users may lead to children being removed from their care, and this acts as a significant deterrent to accessing support.

Females are particularly vulnerable in relation to gender-based violence, and some in particularly vulnerable groups such as those sleeping rough, experience additional risks to personal safety, or having their needs met. The rough sleeping EIA explores this in more detail in relation to female rough sleepers.

There is a disproportionate gender effect in relation to drug poisoning deaths nationally, with men dying at much higher rates than women (3108 vs 1453 in 2020). This was also mirrored within the proportion of drug poisoning deaths that relate to drug misuse (the underlying cause is drug abuse or dependence, or any of the substances are controlled under the Misuse of Drugs Act 1971) where 2165 deaths were of male and 831 deaths were of female. The gender disparity may reflect the fact that almost half of all drug poisonings involve an opiate, and men are more likely to use opiates than women. The rates of cocaine related deaths continued to rise for the ninth year running in 2020, with a particularly high increase in women.

Locally, drug and alcohol treatment services have developed specialist provision that recognises a gender-sensitive approach, including female and male support groups.

The impact of the proposed service is considered to be positive in terms of gender.

- The new contract will continue to offer gender-specific groups and services, where appropriate.
- Fixed contract price defined by the successful provider, with no performance related pay aspect, will better enable the funding of substantive posts, creating additional capacity to work with service users on an ongoing basis.
- The provider will be required to use learning from the Rough Sleeping Drug and Alcohol Treatment Grant outreach team project to ensure that a bespoke engagement offer is available to female rough sleepers, which takes into account the particular challenges and vulnerabilities in this group
- Proposal to include a requirement for the successful provider to develop effective partnerships with organisations that cater for people of different genders with different support needs in the borough and London to increase the representation of these groups in treatment
- To undertake further qualitative analysis of substance groups and support needs aligned with gender to establish an improved understanding of the gender demographics of people using illicit drugs and / or alcohol in Southwark, and for this to be a continuous conversation throughout the life of the contract
- A continued focus on improving naloxone access rates in the borough, with all opiate users being offered this regularly as part of their treatment package, and with a particular focus on men aged 45 years +

Disability

Disability	2016/17	2017/18	2018/19	2019/20
Behaviour and emotional	20	50	80	140
Mobility and gross motor	15	25	50	45
Learning disability	5	15	30	35
Not stated	5	25	120	25
Other	10	25	15	25
Sight	0	5	5	10
Personal, self-care and continence	0	0	0	5
Progressive conditions and physical health	10	5	10	5
Hearing	0	5	10	5
Manual dexterity	5	0	0	0
Perception of physical danger	0	0	0	0
Speech	0	0	0	0

Disability data for CYP under 18 is not recorded, with NDTMS updated to report a breakdown of disability in the adult treatment population since 2016-17. In 2019-20, behaviour and emotional reflected the highest prevalence of disability (8.3% of adult treatment starts), and evidenced a significant increase when compared to the previous year. However, this may reflect improved data recording, as there was a substantial decline in the rates of 'not stated' between 2018-19 and 2019-20. 2.7% of the 2019-20 adult treatment population reported a disability categorised as 'mobility and gross motor', with 2.1% reporting a learning disability, and smaller prevalence rates for other disabilities linked to sight, personal, self-care and continence, hearing, progressive conditions and physical health, and not stated / other. This provides evidence of a range of disabilities in people with drug and / or alcohol support needs that require consideration in relation to an appropriate service offer that overcomes barriers to care that people with disabilities may face.

Just under half of adults entering treatment in 2019-20 reported a mental health support need. The small numbers of CYP engaged in structured treatment with an identified mental health support need mean that this cannot be documented in a public facing report.

Mental ill-health can be both a cause and a consequence of drug and / or alcohol use. Use of drugs and / or alcohol can result in poorer mental health in relation to anxiety, depression, and episodes of drug-induced psychosis. Some evidence exists that using some drugs can result in a first episode of mental ill-health being experienced. People with pre-existing mental ill-health may use substances to self-medicate or for symptom management. For some sub-groups of drug and alcohol users, such as people sleeping rough, there is a higher prevalence of concurrent drug and alcohol use and mental ill-health, which has a profound impact on the person and can impede their ability to access care.

There is limited evidence pertaining to the health of the hidden majority of people with learning disabilities who don't access services. Evidence suggests that people with learning disabilities are less likely to misuse drugs and / or alcohol than the general population. However, as more people with learning disabilities are supported with independent living in their community, access to substances increases, as does potential vulnerability to drug-related exploitation. People with learning disabilities are

an increased risk of substance misuse if they are young males with mental health conditions, and borderline to mild learning disabilities. There is evidence to suggest that children with learning disabilities are more likely to use alcohol to potentially harmful levels at a younger age.

Disability can increase the risk of drug and alcohol problems where inequality exacerbates use; for some people, services will be less accessible and their support needs will not be met. The lack of research in relation to levels and patterns of use in disabled people, as well as people with disabilities often being considered as a homogenous group, creates difficulties in services being able to provide an appropriate offer. However, there has been extensive efforts in Southwark over the past few years to increase the number of people with disabilities into treatment, with physical solutions to buildings implemented, as well as consideration of approach and offer.

The impact of the proposed service is considered to be positive in relation to disability.

- The future service will be required to respond to every person presenting to the service as an individual, particularly those with identified disabilities, and to provide an appropriate support offer to meet their needs. Physical hubs must be accessible to people with physical disabilities and disability friendly, with home visits and a digital offer provided to those that cannot access building space.
- A significant work programme is currently underway improve the borough's dual diagnosis pathway and service user experience. The future service will be required to work to improve partnerships and treatment pathways with local mental health teams, which will, in turn, improve outcomes for these service users.
- An age-appropriate approach will be adopted, aligned with the four pathways, and this will ensure that CYP benefit from mental wellbeing support via GPs and The Nest as part of the model.
- The new contract specification will detail a specific focus on dual diagnosis, with an appropriate treatment offer that takes into account ability to access hub based services and outreach provision. Care for adults with dual diagnosis will also be considered in partnership with social care and mental health.
- Fixed contract price defined by the successful provider, with no performance related pay aspect, will better enable the funding of substantive posts, creating additional capacity to work with service users on an ongoing basis.

Religion and Belief

Religion	2016/17	2017/18	2018/19	2019/20
None	295	285	455	440
Christian	200	255	255	205
Unknown	10	30	50	40
Decline	5	20	30	30
Muslim	25	35	25	25
Other	25	20	30	20
Pagan	0	0	5	5
Jewish	5	0	5	5
Buddhist	0	5	5	5
Bahai	0	0	0	0
Hindu	0	0	0	0
Jain	0	0	0	0
Sikh	0	5	0	0
Zoroastrian	0	0	0	0

No data on religion is reported for CYP under 18. For 2019-20, the data indicates that this may not always be asked as a question of adult treatment entrants as the numbers do not equate to the number of people that started treatment in 2019-20. The majority of people that reported their religion stated they had no religion, with a range of other religions reported by smaller numbers of people.

The impact of the proposed service is continued to be positive in terms of religion and belief.

- Sufficient resources for assertive outreach provision in the future treatment system model will provide greater coverage in non-treatment hub settings, thus increasing opportunities to access treatment for people that are less likely to self present.
- Fixed contract price, defined by the successful provider, with no performance related pay aspect, will better enable the funding of substantive posts, creating additional capacity to work with service users on an ongoing basis.
- The RSS continues to be commissioned at the time of writing, and continues to work with faith based organisations to publicise the treatment offer
- The council and service will continue to work with our peer support and service user community service to address barriers to access
- Proposal to include a requirement for the successful provider to develop effective partnerships with organisations that cater for people of different faiths with different support needs in the borough and London to increase the representation of these groups in treatment

Sexuality

Sexual Orientation	2016/17	2017/18	2018/19	2019/20
Heterosexual	515	575	760	670
Gay/Lesbian	30	45	50	45
Bisexual	5	15	15	20
Not stated	15	20	15	15
Client asked and does not know or is not sure	0	5	0	5
Other	0	0	0	0

The vast majority of adults aged 18 years + that started treatment in 2019-20 self-reported as heterosexual, with smaller numbers of people self-reporting as gay / lesbian, bisexual and not stated or unsure. This reflects a continuation of the prevalence rates for the borough identified by the Official for National Statistics (detailed in the previous EIA). No data is available on local rates of people known to treatment self-reporting as transgender.

The rough sleeping EIA explored a range of issues facing LGBTQ+ people that are of relevance to protected characteristics in the context of drug and alcohol treatment, and this should be considered alongside this update.

People identifying as LGBTQ+ face discrimination and stigma not experienced by heterosexual people, as well as increased vulnerability to abuse and violence due to their sexuality. Barriers to accessing support for drug and / or alcohol use for females identifying as lesbian can arise from a disproportionate service focus on men who have sex with men. Additionally, a lack of access to mainstream services and LGBTQ+ specific services can also affect engagement rates.

Chemsex (use of drugs as part of sexual experience) is most common to gay and bisexual men, and presents additional risks to those that partake in this practice, including risks associated with injecting drugs, unsafe sex, and risks from mixing a range of substances.

The impact of the proposed service is considered to be positive in terms of sexuality.

- The future service will continue to provide a comprehensive chemsex pathway
- Sufficient resources for assertive outreach provision in the future treatment system model will provide greater coverage in non-treatment hub settings, thus increasing opportunities to access treatment for individuals and groups that are less likely to self-present.
- Fixed contract price, defined by the successful provider, with no performance related pay aspect, will better enable the funding of substantive posts, creating additional capacity to work with service users on an ongoing basis.
- The new contract will specify requirement around out of hours opening to ensure that a comprehensive treatment offer, comparable to that provided during business hours, is available for service users in education, training and employment
- Continue to work with our peer support and service user community service to address barriers to access

- The council and service will continue to work with our peer support and service user community service to address barriers to access
- Proposal to include a requirement for the successful provider to develop effective partnerships with organisations that cater for people of different sexualities with different support needs in the borough and London to increase the representation of these groups in treatment, including the development of an appropriate support offer for lesbian women.

Marriage and Civil Partnership

There is no recorded data on rates of marriage and civil partnership in the local treatment population. The current and future service offers are accessible to any person with drug and / or alcohol support needs resident in Southwark, and this includes those that are married or in a civil partnership.

Pregnancy and maternity

Very small numbers of adults aged 18 years + presented to treatment services whilst pregnant in 2019-20. This number is even rarer in the under 18 cohort. The use of illicit drugs and alcohol during pregnancy carries the risk of serious adverse effect on unborn children, including problems with the placenta, miscarriage and stillbirth, and pre-term labour as well as problems with fertility. Babies born to mothers using drugs and alcohol during pregnancy can experience low birth weight, birth and heart defects, blood borne virus infections and neonatal abstinence syndrome. Later in life, these children may develop other problems including issues with behaviour and learning, slower than normal growth, and the effects of foetal alcohol syndrome.

It is imperative that services provide an appropriate support offer to assist with the early identification of pregnant service users, and work in partnership with a range of services to provide care and support.

The impact of the proposed service is considered to be positive in terms of pregnancy and maternity.

- The new service contract will require partnership working with health, maternity and children's social care services.
- Fixed contract price defined by the successful provider, with no performance related pay aspect, will better enable the funding of substantive posts, creating additional capacity to work with service users on an ongoing basis.
- The council and service will continue to work with our peer support and service user community service to address barriers to access
- Sufficient resources for assertive outreach provision in the future treatment system model will provide greater coverage in non-treatment hub settings, thus increasing opportunities to access treatment for people that are less likely to self present.

APPENDIX 4

Equality Impact Assessment: Street Outreach Service for Rough Sleepers

A brief description of the function, policy or service being assessed

This EIA provides an assessment of the equalities impact of the proposals included in a GW1 procurement strategy report recommending approval to commission a new Street Outreach Service for rough sleepers service contract.

This EIA is underpinned by information and intelligence from the following sources:

- i. 2020-21 data from the Combined Homelessness and Information Network (CHAIN)¹, a multi-agency database that holds information about people sleeping rough and the wider street population in London. CHAIN is commissioned and funded by the Greater London Authority (GLA) and is coordinated by St Mungo's, a registered charity providing services for homelessness and rough sleeping.
- ii. 2020-21 contract monitoring data from the council's commissioned Street Population Outreach Team service contract delivered by St Mungo's and providing the scope of services to be recommissioned
- iii. Evidence gathered from market engagement in 2018-19
- iv. Public Health Joint Strategic Needs Assessment²

References to additional published documents will be cited throughout.

The scale of rough sleeping in Southwark in 2020-21

567 people were seen sleeping rough in Southwark in 2020-21. This represents a 3% increase when compared to 2019-20, and a 56% increase when compared to 2017-18. Of the 567, 62% (351) were new rough sleepers who had never been seen sleeping rough before 2020-21, 27% (152) had been seen sleeping rough over a period of two consecutive years and 11% (64) were returners to the streets having first been identified prior to 2019-20, but not during 2019-20, before being seen in 2020-21.

279 (49%) of the people sleeping rough in Southwark in 2020-21 were seen on only one occasion. Of those new rough sleepers in 2020-21, 61% were seen on only one occasion during the financial year.

Users of the proposed service

The service will engage with any individual sleeping rough in the London Borough of Southwark, regardless of protected characteristic or immigration status.

Rough sleepers are a group of people that experience some of the most severe health inequalities and evidence much poorer health than the general population. Users of

¹ <https://data.london.gov.uk/dataset/chain-reports>

² <https://www.southwark.gov.uk/health-and-wellbeing/public-health/health-and-wellbeing-in-southwark-jsna/population-groups-and-communities?chapter=5>

the proposed service are likely to be facing significant difficulties in multiple areas including:

- Physical ill-health, including positive blood borne virus status and issues arising from exposure to poor living conditions
- Difficulty in maintaining personal hygiene
- Poor nutrition
- Mental ill-health, including dual diagnosis (concurrent drug and / or alcohol use and mental ill-health), trauma and high levels of stress from living on the streets
- Drug and / or alcohol use
- Legal issues, including involvement with the Criminal Justice System
- Limited literacy skills
- Language barriers
- No recourse to public funds
- Stigmatisation and discrimination
- Domestic abuse
- Social exclusion
- Safeguarding
- Difficulties engaging with support services
- Difficulties in retaining suitable accommodation
- Lack of support network

Equalities analysis

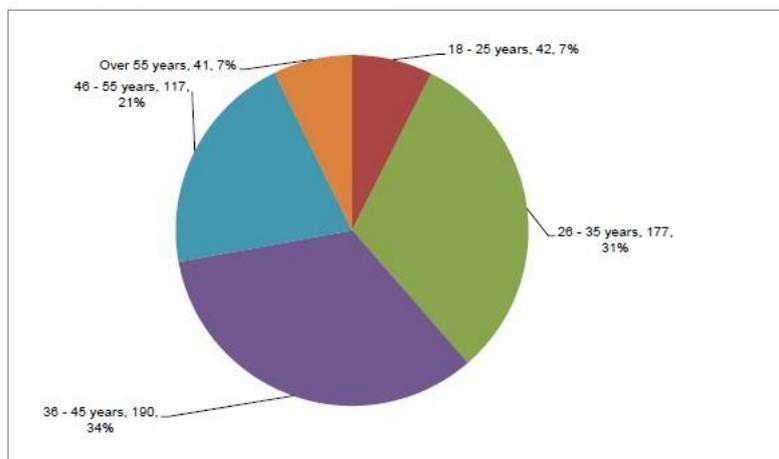
People who fall within a number of the identified protected characteristics groups are key users of the service. However, data and intelligence does not capture a breakdown of service usage for all of the protected characteristics. Available data includes:

- Age
- Race
- Sex (Gender)
- Disability (some impairments)

There is no systematic recording of wider disability, religion and belief, gender reassignment, marriage and civil partnership, pregnancy and maternity or sexual orientation for rough sleepers. Information about service users falling within these protected characteristics is available to the current service where there is self disclosure, but this is not currently monitored via the CHAIN database or other systems.

Age

People seen rough sleeping in the year, by age.



Base: 567

Source: CHAIN database, Southwark annual report 2020-21

People sleeping rough experience the most severe health inequalities with higher rates of premature mortality. Whilst recorded data does not correlate support needs against age, in 2020-21, 45% of people seen sleeping rough had a mental health need, 37% had a drug treatment need, 28% had an alcohol treatment need and 34% had more than one of an alcohol, drug or mental health need. Not only do drug and / or alcohol use and mental ill-health bring a range of adverse health impacts, they are also a cause and consequence of rough sleeping as people struggle to retain suitable accommodation and maintain relationships with others.

Extended periods of rough sleeping can bring on premature ageing and result in the earlier development of age-related health conditions, such as frailty. The average age of mortality amongst the rough sleeping population is 47 for males and 43 for females³, compared to 77 amongst the general population. There is a significantly increased risk to health and wellbeing as a result of a life on the streets, and later life for the rough sleeping population, particularly those entrenched rough sleepers that have been on the streets for extended periods, is much earlier than for the general population.

21% of people seen sleeping rough in the borough in 2020-21 were over the age of 46 years; although not classed as older people⁴ due to their younger age, they may have support needs commensurate with services for older people, but do not meet the criteria as they are too young. Older homeless people, and arguably those with premature ageing, experience a wide range of challenges⁵ including:

- i. lack of specialist services and accommodation options that recognise their complex support needs;
- ii. increased vulnerability to abuse, exploitation, and bullying;
- iii. acceleration of poor health issues

³ <https://www.gov.uk/government/publications/health-matters-rough-sleeping/health-matters-rough-sleeping>

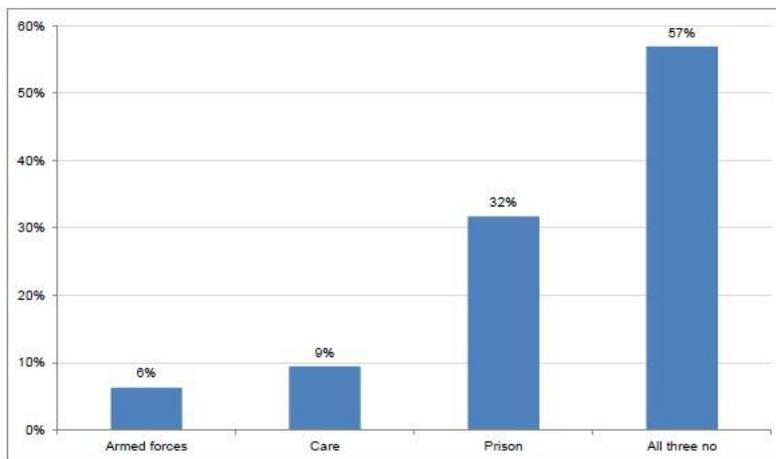
⁴ Age UK define older homelessness as people aged 55 years and over

⁵ https://www.ageuk.org.uk/globalassets/age-uk/documents/policy-positions/housing-and-homes/ppp_older_homelessness_england.pdf

- iv. hospital discharges onto the streets without linkage to appropriate support services;
- v. high prevalence of mental ill-health, sometimes in concurrence with drug and / or alcohol use;
- vi. identification and treatment of depression and dementia
- vii. social isolation

When considering rates of people seen sleeping rough in Southwark in 2020-21, by experience of institutional history, 32% had been to prison, and 57% had experience of the armed forces, care and prison. Whilst data is not available to correlate institutional history with age, older people are more likely than younger people to be homeless when released from prison, and this is compounded by all of the challenges that older people face.

People seen rough sleeping in the year, by experience of armed forces, care or prison.



Base: 413. Note that the base figure for this chart excludes people for whom none of the three institutional histories were recorded (154).

Nationality of rough sleepers with experience of armed forces:

Nationality	No.	%
UK	7	2%
Non-UK	19	5%
Total with armed forces experience	26	6%
Base (total assessed)	413	

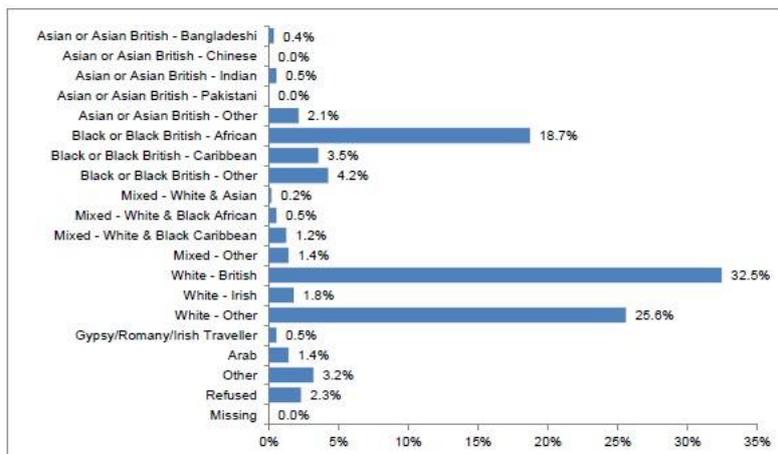
Source: CHAIN database, Southwark annual report 2020-21

Whilst the number of young people seen sleeping rough during the period is relatively low, special consideration is warranted in terms of the particular challenges that homeless young people may face, including increased exposure to abuse and exploitation.

The impact of the proposed service is considered to be positive for all age groups. Early identification and intervention for people new to the streets and a rapid response to facilitating access to appropriate support pathways and suitable accommodation will help to prevent and reduce the adverse health implications of extended periods living on the streets. Effective partnership working arrangements will be developed with a range of agencies and services, including those supporting people within specific age groups, such as children's social care and older people services, to ensure age-appropriate care and support is accessible.

Race

People seen rough sleeping in the year, by ethnicity.



Base: 567

In order to bring CHAIN recording into line with usage in the national census, the previously employed category 'Chinese' has been renamed as 'Asian or Asian British - Chinese'.

Nationality	Flow	Stock	Returner	Total	
	No.	No.	No.	No.	%
UK	164	78	34	276	51.8%
Bulgaria	0	4	0	4	0.8%
Czech Republic	1	3	3	7	1.3%
Estonia	0	0	0	0	0.0%
Hungary	4	3	1	8	1.5%
Latvia	6	2	2	10	1.9%
Lithuania	3	7	0	10	1.9%
Poland	14	15	2	31	5.8%
Romania	13	11	4	28	5.3%
Slovakia	2	1	1	4	0.8%
Slovenia	1	0	0	1	0.2%
CEE subtotal	44	46	13	103	19.3%
Portugal	7	2	0	9	1.7%
Italy	5	4	1	10	1.9%
Ireland (Republic of)	1	3	1	5	0.9%
France	3	0	0	3	0.6%
Spain	1	1	2	4	0.8%
Other European (EEA) countries	1	1	2	4	0.8%
Other Europe (EEA) subtotal	18	11	6	35	6.6%
Other Europe (Non-EEA)	1	0	1	2	0.4%
Other Europe (Not known)	3	0	0	3	0.6%
Eritrea	27	0	0	27	5.1%
Somalia	3	2	0	5	0.9%
Sudan	3	0	0	3	0.6%
Nigeria	14	1	0	15	2.8%
Other African countries	29	5	5	39	7.3%
Africa subtotal	76	8	5	89	16.7%
India	0	1	1	2	0.4%
Afghanistan	7	0	0	7	1.3%
Iran	0	0	0	0	0.0%
Other Asian countries	3	0	0	3	0.6%
Asia subtotal	10	1	1	12	2.3%
Americas	6	3	2	11	2.1%
Australasia	2	0	0	2	0.4%
Not known	27	5	2	34	6.4%
Total (excl. Not known)	324	147	62	533	100.0%
Total (incl. Not known)	351	152	64	567	

Note: Total excluding not known is used as base for percentages.

Source: CHAIN database, Southwark annual report 2020-21

Most people sleeping rough in Southwark in 2020-21 were white (59.9%), with 32.6% identifying as white-British. Over a quarter (26.4%) identified as black or black British ethnicity. A breakdown of the nationalities of the rough sleeping cohort in 2020-21 evidences a wide range of countries and continents of origin. The highest number of non-UK rough sleepers new to the borough's streets in 2020-21 originated from African countries, with very low numbers of African people sleeping rough in 2019-20, or as returners from pre-2019-20. Language barriers may affect engagement with non-

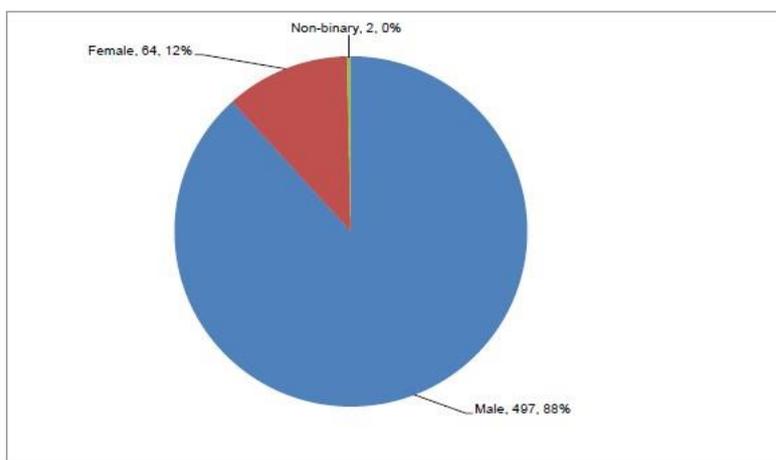
UK rough sleepers, as well as a distrust of services for people concerned about their immigration status and potential reconnection to their area or country of origin. No recourse to public funds also poses challenges in terms of the limitations of being able to access care and support where rough sleepers do not meet the eligibility criteria. Additionally, the underlying causes of rough sleeping may be different for these groups, and their engagement with services may be affected by discrimination and racism.

Sub-groups of European Economic Area (EEA), non-EEA, and African communities include people identified as asylum seekers, refugees and migrants, all of which can be considered to increase vulnerability in relation to homelessness status. Discrimination and stigma may contribute to challenges in accessing care and support options in addition to the impact of no recourse to public funds impacting on eligibility for services. For those people that have escaped to the UK from a traumatic situation in their country of origin, they may have significant support needs in relation to the effects of trauma and may not be able to access an appropriate tier of care and support to sufficiently address the impact of trauma.

The impact of the proposed service is considered to be positive in terms of race. The service will be required to provide an equalities, diversity and inclusion informed approach in its delivery to all rough sleepers, which is culturally appropriate and which recognises that a different response may be needed. This will be monitored as part of the contract review process. In order to safeguard against inappropriate or insufficient care for Black, Asian and Minority Ethnic people sleeping rough, and to ensure that the council has assurance in this regard prior to an award of contract, the tender will include assessment of equality, diversity and inclusion as a pass/fail requirement.

Sex (Gender)

People seen rough sleeping in the year, by gender.



Base: 563 people seen rough sleeping whose gender was known. This excludes 4 people whose gender was not known.

Source: CHAIN database, Southwark annual report 2020-21

The vast majority of people sleeping rough in Southwark in 2020-21 were male (88%), reflecting the national picture of a disproportionate effect on this gender. Rough sleeping carries a number of risks and threats for all genders. Whilst females represented 12% of rough sleepers during the period, they have the added risk of

gender-based vulnerability and violence, including sexual violence. There are concerns that females on the streets make efforts to hide themselves, or their gender, in order to feel safe, and that this means that their needs are less well known as they are not always readily visible to services, and are not identified and engaged with support. As detailed in the age section, the average age of mortality for female rough sleepers at 43 years is lower than for male rough sleepers. Female rough sleepers experience higher rates of mental ill-health, including trauma and self-injury, and this cohort are more likely to experience sustained rough sleeping⁶. Their sexual and reproductive health may be poorer through lack of engagement with services, and be affected by the increased vulnerability presented by pregnancy or separated from their children.

The impact of the proposed service is considered to be positive in terms of sex (gender). The service will be required to provide a sensitive gender-appropriate approach in its delivery to all rough sleepers, which recognises that a different response may be needed when engaging with females. In order to try to increase the numbers of female rough sleepers receiving care, the provider will be asked to work with women-focused organisations and charities in contact with females with lived experience of rough sleeping, and to identify barriers to care for this vulnerable cohort, and to seek resolutions.

Disability

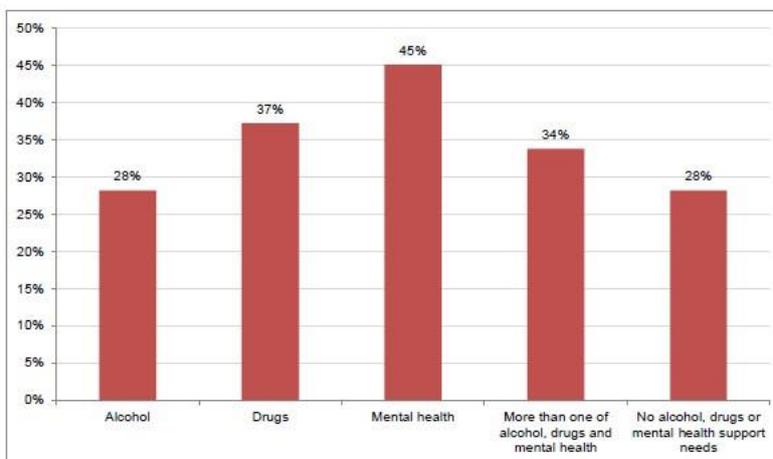
Under the Equality Act 2010, disability is a 'physical or mental impairment that has a substantial and long-term negative effect on your ability to do normal daily activities. Disabilities arise from a wide range of impairments including learning disabilities, mental health conditions and mental ill-health. Addiction to, or dependence on, drugs and / or alcohol is not included in the scope of the Equality Act 2010 definition of disability with the exception of where the substance is prescribed by a medical practitioner. However, conditions arising from addiction or dependency on a non-prescribed substance such as mental ill-health or liver failure would count as an impairment and would lead to protection as a disabled person under the Act. People with HIV are referenced as disabled under the Act and this is of relevance to the proposed service in that rough sleepers that inject drugs may become infected with HIV as a result of sharing equipment.

In relation to rough sleepers, there is a wealth of data pertaining to prevalence of mental ill-health and substance use. Whilst substance use in itself does not meet the definition of disability, entrenched long term use of drugs and / or alcohol is often accompanied by mental ill-health and physical health impairments. Although data does not exist in relation to impairments arising from substance use in the rough sleeping population, prevalence of substance use will be considered in this section as it is indicative of the extent of potential associated impairments that could define the cohort as disabled under the Act. Anecdotal data exists in relation to an awareness of increasing rates of blood borne virus infection, including HIV, in the local rough sleeping population, but this is not recorded on CHAIN. People sleeping rough with drug and / or alcohol treatment needs are referred to the council's commissioned adult integrated drug and alcohol treatment provider to meet this support need and can

⁶ <https://www.gov.uk/government/publications/health-matters-rough-sleeping/health-matters-rough-sleeping>

access intervention for blood borne viruses, including HIV testing and referral for treatment, but this will only capture those that are referred to the service and engage, and cannot be considered to represent the HIV status of all people sleeping rough in the borough, which is unknown. Data on wider impairments under the Act, including learning disability, is not recorded.

PHE⁷ reports that common mental health conditions are over twice as high in homeless people when compared to the general population. 80% of rough sleepers that died in London in 2017 had mental health support needs, increasing from 3 in 10 in 2010. People are over 50% more likely to have spent in excess of 12 months on the streets if they have a mental health support need compared to rough sleepers without mental ill-health. People experiencing mental ill-health, substance use and insecure accommodation are less likely to successfully engage with treatment and complete it. Females sleeping rough also have higher rates of mental ill-health.



Base: 433. Note that the base figure for this chart excludes people for whom none of the three support needs were known or assessed (134).

Support Needs	No.	%
Alcohol only	34	8%
Drugs only	40	9%
Mental health only	73	17%
Alcohol and drugs	24	6%
Alcohol and mental health	25	6%
Drugs and mental health	58	13%
Alcohol, drugs and mental health	39	9%
All three no	122	28%
All three no, not known or not assessed	18	4%
All three not known or not assessed	134	
Total (excl. not assessed)	433	100%
Total (incl. not assessed)	567	

Note: Total excluding not known or assessed is used as base for percentages.

The support needs of people sleeping rough in Southwark in 2020-21 are detailed in the diagrams above. The support needs of 23.6% of the 567 were not known or not assessed, which means that the prevalence of support needs is not fully assured. It may be that there is a clear rationale for why the support needs were unable to be established, including people choosing not to disclose these to the service, but this should be explored more fully as it has implications in terms of increased vulnerability through needs not being met. 28% reported no mental health, drugs or alcohol support needs to the service; however, this may not be accurate as people choose not to disclose for a variety of reasons. 17% reported a mental health support need in the

⁷ <https://www.gov.uk/government/publications/health-matters-rough-sleeping/health-matters-rough-sleeping>

absence of drugs and / or alcohol use, with a further 19% reporting a mental health need in combination with either drugs (13%) or alcohol use (6%), and a further 9% reporting mental health, drugs and alcohol support needs. In total, 45% of the 433 that were assessed for support needs in 2020-21 reported a mental health need, and could potentially be classed as disabled under the Act. Mental ill-health could be both a cause and a consequence of people sleeping rough, and could extend or perpetuate the cycle of rough sleeping and its harms, making it more difficult to access and engage with support services, and potentially increasing vulnerability to abuse and exploitation.

The impact of the proposed service is considered to be positive in relation to disability. The service is required to engage with any person sleeping rough in Southwark, and to provide an appropriate support offer. Effective partnership working with mental health and substance use services will be of paramount importance in relation to meeting support needs; locally, there are specialist services for rough sleepers with mental ill-health (SLaM START) and substance use (CGL Rough Sleeper Outreach Team) as well as the GSTT health inclusion team providing access to support around blood borne viruses, including HIV.

Religion and belief

There is no available information in relation to religion and belief.

Marriage and civil partnership

There is no available information in relation to marriage and civil partnership.

Gender reassignment

There is no available information in relation to gender reassignment. Stonewall Housing has reported higher rates of homelessness in the trans community⁸.

Pregnancy and maternity

There is no available information in relation to pregnancy and maternity. St Mungo's has developed a 'Homeless pregnancy toolkit'⁹ to assist with the improvement of health outcomes for homeless women and their babies.

Sexual orientation

There is no available information in relation to sexual orientation. Stonewall Housing undertook a commissioned project 'Finding safe spaces'¹⁰ in 2014, with a focus upon understanding the experiences of lesbian, gay, bisexual and trans rough sleepers. Their report found:

⁸ https://stonewallhousing.org/wp-content/uploads/2018/09/FindingSafeSpaces_StonewallHousing_LaptopVersion.pdf

⁹ <https://www.mungos.org/publication/homeless-pregnancy-toolkit/>

¹⁰ https://stonewallhousing.org/wp-content/uploads/2018/09/FindingSafeSpaces_StonewallHousing_LaptopVersion.pdf

- i. Homelessness can arise from a range of different factors, but is often related to sexual orientation or gender identity, with a severely detrimental impact on support networks and potential mental ill-health where support networks withdraw from a person due to their sexual orientation or gender identity;
- ii. Multiple discrimination was cited as a key factor in influencing new rough sleeping, including from support networks, housing providers and those in authority
- iii. LGBT* (aligned with Stonewall report) rough sleepers reported similar support needs to heterosexual and cisgendered people, but for different reasons, including the need for services to have an awareness of the needs of LGBT* people and an awareness of targeted support services as well as places to be safe;
- iv. All consultees felt that the streets were unsafe, with particular concerns about violence and exploitation, and use of drugs or alcohol and transactional sex work was identified as a means to accommodation, all of which increase vulnerability to an individual
- v. A wide range of barriers to accessing services was identified including distrust of services and institutions, accommodation not sensitive to LGBT* people's needs and 'phobia' experienced as a result of sexual orientation as well as invisibility within services.



STATEMENT OF COMMUNITY INVOLVEMENT
DECEMBER 2021
DRAFT FOR CONSULTATION

APPENDICES

No.	Title
Appendix A	Statement of Community Involvement (SCI)
Appendix B	Development Consultation Charter (DCC)
Appendix C	Consultation Report
Appendix D	Consultation Plan
Appendix E	Equalities Impact Assessment

STATEMENT OF COMMUNITY INVOLVEMENT

CONSULTATION DRAFT
DECEMBER 2021

TABLE OF CONTENTS

Executive Summary	3	Post planning and exceptional circumstances	
Community Engagement	4	Post Planning	29
Engagement principles in Planning	5	Consulting in exceptional circumstances	30
How to find out about Planning	6		
Planning Policy and Plan-Making		Equality and Diversity	
Planning Policy documents	9	Equality and Diversity	32
Supporting documents in plan-making	10	Public Sector Equality Duty	33
Consultation in plan-making	11		
Required consultation in plan-making	12	Digital Strategy	
Additional consultation in plan-making	13	Digital Strategy	35
Consultation on plan-making process	14		
Neighbourhood planning	16	Additional Information	
Monitoring and feedback in plan-making	19	Engaging with us: Find out more	38
		Glossary	39
Planning Applications and Development Management			
Involving you in planning applications	21		
Pre-applications	22		
Consultation on planning application	23		
Making comments on a planning application	25		
Planning Committees	26		
Appealing a planning decision	27		

EXECUTIVE SUMMARY

What is the Statement of Community Involvement?

The Statement of Community Involvement (SCI) is an important planning document that defines how and when local residents, community groups and stakeholders can be involved in the planning process; both when we write new planning policy documents and when we consult on planning applications for new development.

Being part of these processes means that our diverse communities can play an active and visible role in shaping our neighbourhoods and have a say in our decision-making processes.

This SCI sits alongside the council's [Approach to Community Engagement](#). This council-wide document outlines our vision and principles for how we will engage and consult on our council services. It provides a definition of community engagement and explains how we talk, listen, and meet our legal obligations in the Public Sector Equality Duty and our duty to consult.

In order to ensure accountability, we will monitor and provide feedback on planning policies, planning application data, and planning decisions. We will ensure our planning data is easily accessible and regularly updated on our website. We will prepare Authority Monitoring Reports on the work we deliver within the planning division and keep the SCI and supporting guidance up-to-date to ensure it is effective.

National legislation requires us to prepare an SCI. This is set out in Section 18 of the Planning and Compulsory Purchase Act (2004) (as amended).

Key consultation measures for planning policy and planning application consultation are also explained within this SCI including;

- Information on how to view and comment on planning policy documents and planning applications
- The ways we will consult and engage to ensure everyone is heard
- The length of each type of consultation
- The way we will respond to the consultation responses we receive

What is planning?

Planning is how we use and develop land to deliver new homes and jobs in a way that is environmentally, socially and economically sustainable. It covers how we will tackle climate change, protect our historic buildings and places, and encourage walking and cycling.

We write planning policy documents, such as our local plan, the Southwark Plan, to deliver these objectives. These documents contain policies and guidance that are used by the council to decide whether planning applications for new development like an extension to a house or a new office block is approved.

We often negotiate with applicants to ensure that new development delivers best outcomes for the borough.

A digital planning service

We are leading the way to make our planning service a digital service. This means we are improving the service we provide by introducing new digital processes and tools that deliver an excellent customer experience, accessible data, provide new methods of engagement, and a more efficient, transparent service. We aim to make planning more understandable and straightforward for applicants and people who are part of the consultation process.

COMMUNITY ENGAGEMENT

Our community

Southwark is a young, growing and diverse inner London borough, with people from a wide range of ethnicities and backgrounds. Over 120 languages are spoken here, and 11% of households have no members who speak English as a first language. Just over half (54%) of Southwark's population is of white ethnicity, a quarter (25%) black and a third of Asian (11%) or other (10%) ethnicities.

Stakeholders in Southwark

Our stakeholders have a role to play in shaping our places and services and contributing to the delivery of equality and fairness for all within the borough and include:

- Our residents
- Community organisations
- Voluntary sector organisations
- Communities of faith
- Businesses of all sizes and people who work in the borough
- Cultural institutions
- Government departments and authorities, including those who work in health, transport and housing
- Students

Why engage with the Planning Process?

Engaging with the planning process means that you can get involved in shaping the future of where you live. Engagement can make sure that the needs of the community are responded to, and can empower the community and make a difference to how development happens in the borough

Promoting equality

We are committed to positively promoting equality through consultation, engagement and the delivery of sustainable development.

We will work collaboratively to remove or minimise disadvantages suffered by those due to their protected characteristics, as well as taking steps to meet the needs of people from protected groups. We will also encourage people from protected groups to participate where their participation is disproportionately low.

The SCI, and our additional work around consultation and engagement support the wider objectives of **Southwark Stands Together**, a council-wide, long-term programme of positive action, education and initiatives working with staff and the community to tackle racism, injustice and inequalities.

The SCI also builds on our **Fairer Future Principles and Values**, and seeks continuous engagement with residents and the wider community in the planning process.

ENGAGEMENT PRINCIPLES IN PLANNING

The Council's new [Approach to Community Engagement](#) sets out how we engage and consult as a Council which includes planning. How we will implement these principles is set out below. The benefits of implementing these 12 principles are an inclusive planning process that ensures development has a positive impact for local people and our community.

Built on trust

The SCI sets out how we will consult on plan-making and planning applications in a clear and consistent way that is easily understood by the public.

Reflective

We will review the SCI regularly to ensure that it responds to the needs of our communities.

Responsive

We will provide feedback on policy documents in the 'You Said/We Did' format. Planning officers will be available for queries on the planning applications they process.

Clear & informative

We will provide consultation materials that are clear and to the point. Access to consultations will be clear and straightforward.

Collaborative

We will work collaboratively with our residents and community groups throughout the plan-making process by using a variety of inclusive consultation methods.

Simple & accessible

We will ensure that all consultation materials are provided in plain English and that consultation events are available and accessible to all.

Inclusive

We will engage with as many people as possible that reflect our diverse community and ensure that the events we hold respond to people's different needs to enable participation.

Timely

We will provide the necessary information at the earliest possible stage so that the community can be fully informed before engaging with consultations. We will consult the public and be clear on the timeframes for submitting responses.

OUR PRINCIPLES

and how we will achieve them

Evidence based

Any policy or development proposal we put forward will be founded on a transparent justification that will be made available on the council's website.

Proportionate

The level of engagement that takes place will be proportionate to the nature and scale of the document or application that is being consulted on.

HOW TO FIND OUT ABOUT PLANNING

Finding out about plan-making:

Sign up to [MySouthwark](#) to stay informed about the council's planning policy consultations such as the consultation on the local plan.

An email will be sent via MySouthwark when a plan or policy document goes out to consultation. The email will provide information on how to register comments for the consultation and the date when these comments need to be received.

How to set up a [MySouthwark](#) account:

1. Follow this [link](#)
2. Click the green 'Register' button
3. Follow the five simple steps to create your account
4. Make sure to **select 'Planning Policy Consultations'** on step 4 to receive planning policy specific updates

The screenshot shows the 'Step 4: Your news, alerts and notifications settings' page on the MySouthwark website. The page is divided into two main sections: 'Council publications & news' and 'Emails & notifications'. Under 'Council publications & news', there are two checkboxes: 'Southwark Life E-Newsletter' and 'Southwark Life Housing News', both of which are currently unchecked. Under 'Emails & notifications', there are three checkboxes: 'Updates on MySouthwark' (unchecked), 'Planning policy consultations' (checked), and 'Other council services, news and events' (unchecked). At the bottom of the page, there is a blue-bordered box with the text 'Give us your views' and a link 'Online Survey >'.

HOW TO FIND OUT ABOUT PLANNING

Finding out about planning applications:

Planning Register

Comments can be submitted via the planning register. The planning register also lets you set up alerts for planning applications in your area or track applications you are interested in following.

How to submit comments using the planning register

1. Follow this [link](#)
2. Search the address or application number of planning application you want to comment on
3. Click make a comment
4. Complete form

How to set up alerts on the planning register.

5. Create an account on the Planning Register
6. Select 'advanced search'
7. Under 'application details' select criteria that are important to you (for example this could be a ward such as 'Peckham Rye' or the area as well as a certain type of application such as 'prior approval')
8. Select 'search' (this will present you with all applications that fit your search criteria, present and historic)
9. Select 'save search'
10. Under 'saved search options', check the box next to 'notify me via email about new search results' and then 'save'

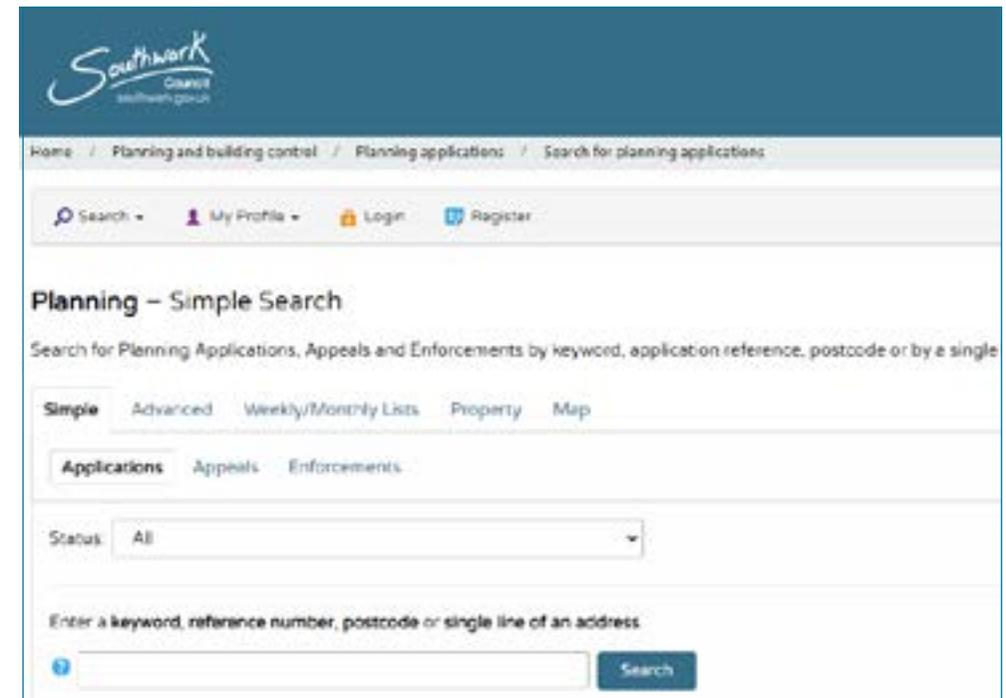
If you are interested in following the progress of a specific planning application, you can 'track' the application. Whenever one of your tracked applications is modified or decided, you will receive an email notification. You can stop tracking an application at any time by removing it from your Tracked Applications list.

Southwark Maps

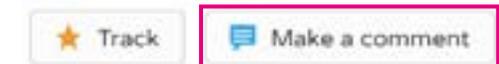
Planning applications in your area can also be found via [Southwark Maps](#). Current and decided applications as well as any appeals can be found through this service.

How to view planning applications using Southwark Maps

1. Follow this [link](#)
2. Search the address
3. Select 'Planning applications and appeals' layer

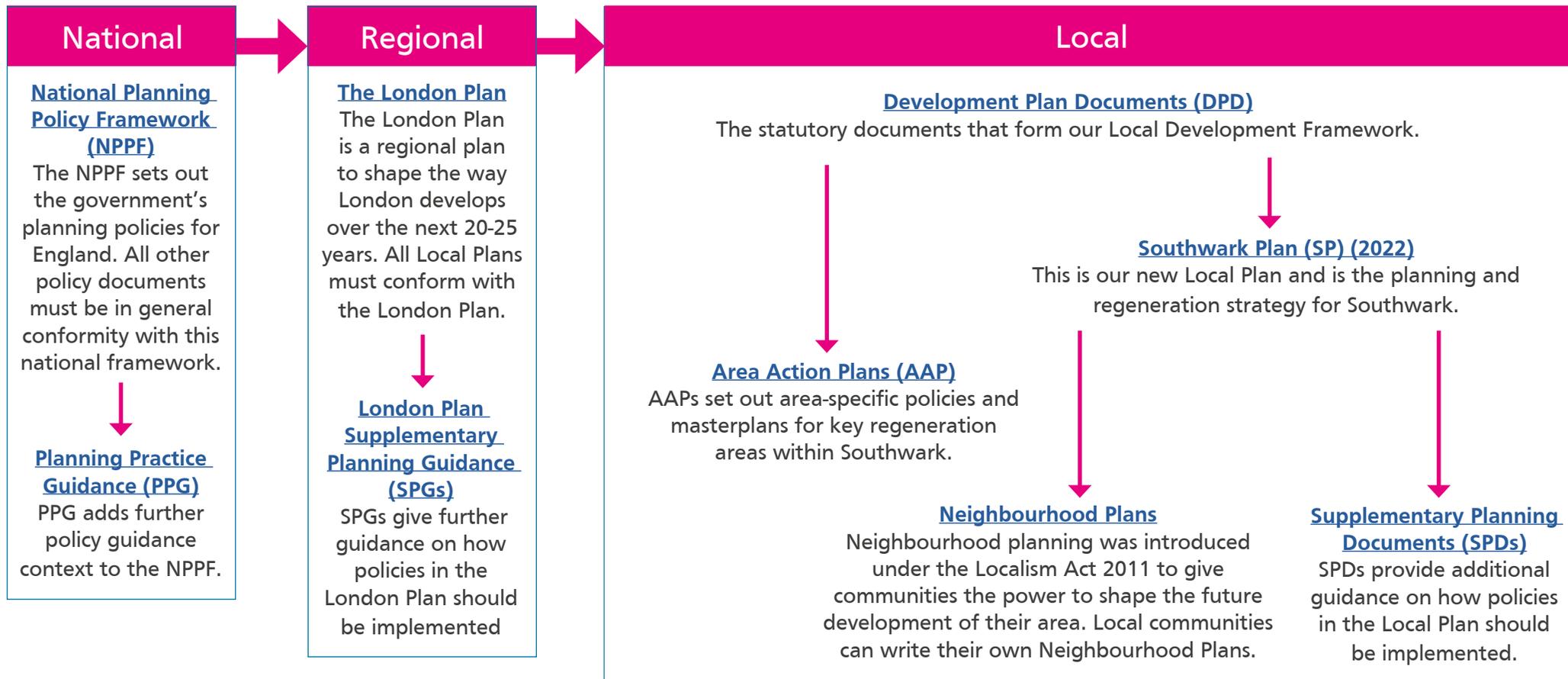


The screenshot shows the Southwark Council website's planning register search page. At the top is the Southwark Council logo and navigation links: Home, Planning and building control, Planning applications, and Search for planning applications. Below the navigation is a search bar and links for My Profile, Login, and Register. The main heading is 'Planning - Simple Search'. Below this is a search prompt: 'Search for Planning Applications, Appeals and Enforcements by keyword, application reference, postcode or by a single'. There are tabs for 'Simple', 'Advanced', 'Weekly/Monthly Lists', 'Property', and 'Map'. Under the 'Simple' tab, there are sub-tabs for 'Applications', 'Appeals', and 'Enforcements'. A 'Status' dropdown menu is set to 'All'. Below this is a search input field with the placeholder text 'Enter a keyword, reference number, postcode or single line of an address' and a 'Search' button.



**PLANNING
POLICY AND
PLAN-MAKING**

PLANNING POLICY DOCUMENTS



Click on the links to find out more information about different plans and our planning documents

Statutory Documents

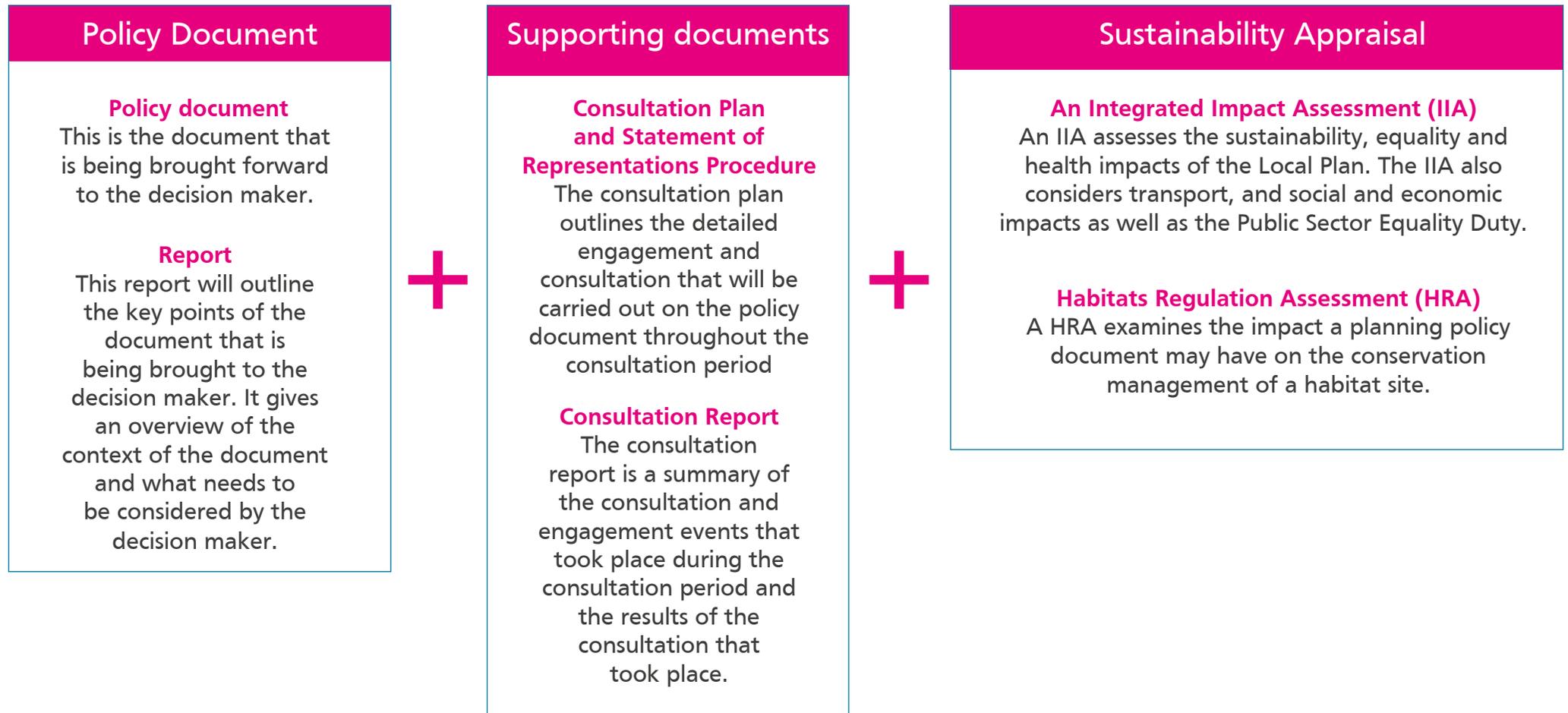
[Statement of Community Involvement \(SCI\)](#)
The SCI sets out how local residents, community groups and stakeholders can be involved in the planning process.

[Local Development Scheme \(LDS\)](#)
The LDS is our timetable for producing planning documents.

[Authority Monitoring Report \(AMR\)](#)
The AMR summarises the development that has taken place in the borough every year.

SUPPORTING DOCUMENTS IN PLAN-MAKING

When development plan documents are considered by the decision maker - for example by Cabinet or the Planning Inspectorate - they are accompanied by a number of supporting documents. The policy documents are supported by a set of evidence base documents, supporting documents and an assessment of the sustainability of the policy document. These include:



CONSULTATION IN PLAN-MAKING

Timescales for consultation

- We will undertake public consultation for set periods of time depending on the type of planning document or plan. Whenever it is necessary, we may extend the time period depending on the type, size and nature of the project and who will be impacted.
- Consultation on planning policy documents may also be extended to take into account holiday seasons.
- Documents will be made available for at least two weeks before consultation begins as they go through the decision making process so that they are available for eight weeks before the consultation closes.

Consultation Plans

The quality of consultation is important, so the detailed Consultation Plans that we prepare will be informed by the council's Approach to Community Engagement and will:

- Ensure that our engagement reflects the diversity and demographics of people who live and work in the borough
- List all meetings and highlight specific consultation methods that are based on our understanding of the lifestyle and needs of the people we want to reach, and encourage greater participation.
- Be agreed by Cabinet or an Individual Decision Making (IDM) decision

Consultation Methods

Will be:

- Specific to individual policy documents
- Innovative, utilising digital tools to reach a wider audience
- Accessible, easy to understand and informative, and will include more active engagement such as drop-in information sessions and collaborative workshops where possible.
- Continuously reviewed to consider whether all of the different protected characteristics and communities who should be involved are responding. Where they are not responding, consultation will be focused to address lack of representation.

Types of decision making in plan-making process

Council Assembly

The Council Assembly is the meeting of all 63 elected councillors sitting on the council. It is the decision making level for adopting and changing the constitution, approving policy frameworks and documents

Cabinet

The Cabinet is made up of a Leader, a Deputy Leader and up to 10 councillors appointed by the Leader. Each holds a special portfolio of responsibility. The role of the Cabinet is to take decisions on resources and priorities, and to deliver and implement the budget and policy framework as approved by council assembly. It also agrees consultation on the council's policy frameworks, key strategic documents and decisions.

In the five days following a decision made by the Cabinet, there's an opportunity for the decision to be reviewed by the Overview and Scrutiny Committee. This is known as a call-in. If the Chair or Vice-Chair and three other members of the Committee request that a decision be called-in, then it cannot be implemented until the Committee has considered it.

Individual Decision Making (IDM)

Individual cabinet members are able to take decisions on areas that fall within their responsibility. Under the council's constitution, all key decisions taken by individual cabinet members are listed on the Forward Plan. The council publishes key decisions on the website five working days before the individual cabinet member can consider the decision (publishing period). Most decisions taken by individual cabinet members are subject to a five working day call-in period.

REQUIRED CONSULTATION IN PLAN-MAKING

Town and Country Planning (Local Planning) (England) Regulations 2012

The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the legal requirements for consultation on a Local Plan.

As a minimum we must complete the following steps for consultations on plans:

Notification of consultation

Invite people to make representations

We will mail out to all local consultees as listed under Regulation 2 (1). This includes people living within Southwark or businesses which operate in the area.

An email will be sent to the 15,000+ contacts signed up for planning policy email notifications and updates via MySouthwark. They will be invited to make a comment on the plan that is being consulted on.

Statutory prescribed bodies

We will mail out to all the statutory prescribed bodies and consultees as listed under Regulation 4 (1) and neighbouring boroughs referred to in the Duty to co-operate.

Statutory consultees are signed up to MySouthwark and will receive a notification when a document goes out to consultation.

Availability of documents

Council Website

The plan and accompanying documents will be displayed on the council's website that will be regularly updated. The consultation documents will be available on the council website.

Hard copy

A hard copy of the plan will be available in the council office. Alternative arrangements will be made during exceptional circumstances.

Accepting responses

Letters and Email

Comments will be accepted by email and letter.

Comments can be emailed to planningpolicy@southwark.gov.uk

Comments can be posted to Planning Policy, Southwark Council, PO BOX 645529, London SE1P 5LX

The council is not legally required to provide a method for collecting responses through a website, however we encourage all responses to be made on the **Consultation Hub**.

This is the preferred method, where possible, as we move to more digital modes of consultation.

Further details on the Hub can be found under 'Additional consultation'.

ADDITIONAL CONSULTATION IN PLAN-MAKING

As well as the statutory methods set out, we are also committing to carrying out the following methods of consultation when we consult on our Local Plans. Other consultation methods will be set out in different Consultation Plans for individual planning policy documents.

Notification of consultation

Press notice

We will place a press notice in Southwark News to advertise the start of the formal consultation period.

Consultation posters

We will advertise the consultation through posters in the libraries. Posters will set out where on the website to make a comment on a plan that is out to consultation. Library officers can assist members of the community in using computers and the internet to make comments. Assistance is available in libraries to those who need help making a comment on a plan online.

Social Media

We will advertise consultation on the plan through council social media. We will send out regular updates and reminders through council social media pages letting people know that they can comment on a consultation.

Accepting responses

Consultation Hub and Online Questionnaire

We will display the plan on the council's Consultation Hub with an online questionnaire available for comments. The Consultation Hub will be available for the consultation period.

We encourage all responses to be made on the Consultation Hub, where possible, as we move to more digital modes of consultation. This also enables the comments to be sorted online so that consultees and the community can see who is commenting on each subject.

Feedback

Feedback

We will make sure to feedback the results of any consultation. We will do this by sending a link to MySouthwark users to where you can find the Consultation Report and see how your views were taken into account.

Results of a consultation will be set out in a Consultation Report. The Consultation Plan and Report are reported to the decision maker as part of the decision making process.

We have previously written to many community groups and all Tenants and Residents Associations in Southwark to make them aware of how to sign up to receive email updates on planning policy consultations through MySouthwark. We will continue to encourage new groups to join the mailing list and publicise consultations through our website and where possible through council newsletters, council meetings (where appropriate) and social media. When consultations are open, local groups are welcome to invite us to join their meetings to discuss the consultation.

CONSULTATION ON PLAN-MAKING PROCESS

The flowchart below shows different policy documents and how they are consulted on through different stages. **Pink chevrons** in the flowchart indicate a stage of public consultation, where the public can engage with the process and comment.

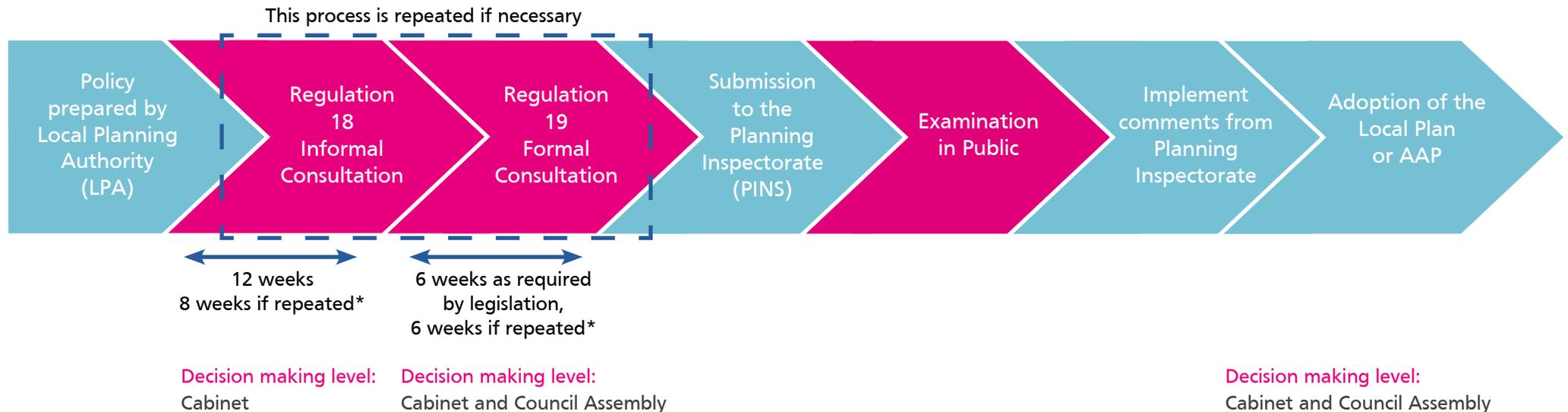
Local Plan - The Southwark Plan

The purpose of The Southwark Plan (2022) is to set out how the different areas of the borough will develop through area visions, site allocations and policies which are used to determine planning applications. It is accompanied by a Planning Policies Map.

Area Action Plan (AAP)

A type of Development Plan Document (DPD) focused upon a specific location or an area subject to conservation or significant change (for example major regeneration).

Process of Local Plan and Area Action Plan Adoption



*Further consultation will only take place where necessary. We will reconsult for 8 weeks at Regulation 18 stage and 6 weeks at Regulation 19 stage following the initial consultation, if changes are proposed that require further consultation.

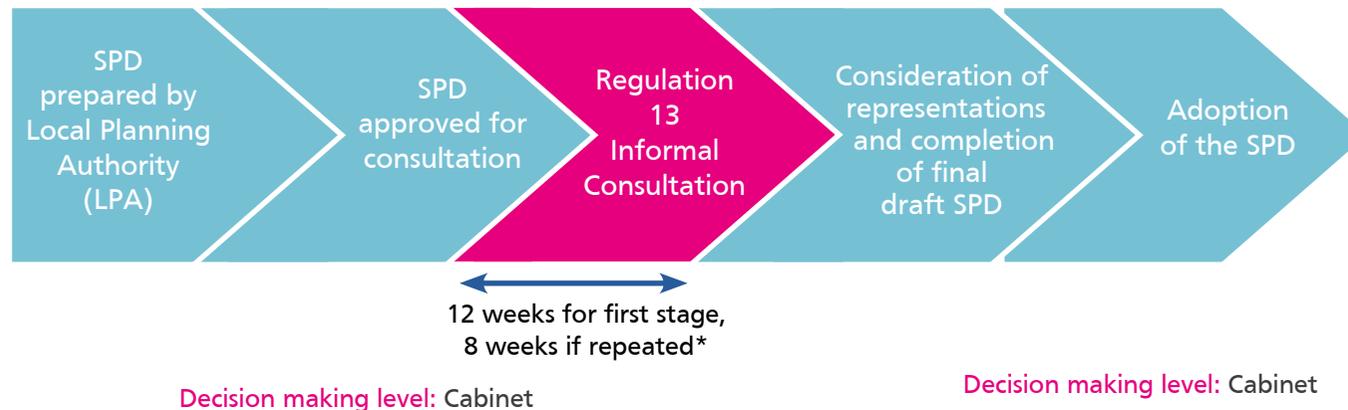
CONSULTATION ON PLAN-MAKING PROCESS

The flowchart below shows different policy documents and how they are consulted on. **Pink chevrons** in the flowchart indicate a stage of public consultation, where the public can engage with the process and comment.

Supplementary Planning Documents (SPDs)

Documents which add further detail to the policies in the Local Plan. SPDs contain guidance that expands on the policies within our development plan, showing how the council expects our planning policies to be addressed by planning applications, and how the policies will be implemented by the council when making decisions on planning applications.

They can be used to provide guidance for development on specific sites, or on particular issues, such as design. SPDs are capable of being a material consideration in planning decisions but are not part of the development plan.



Further consultation will only take place where necessary. We will reconsult for 8 weeks at Regulation 18 stage following the initial consultation, if changes are proposed that require further consultation.

NEIGHBOURHOOD PLANNING

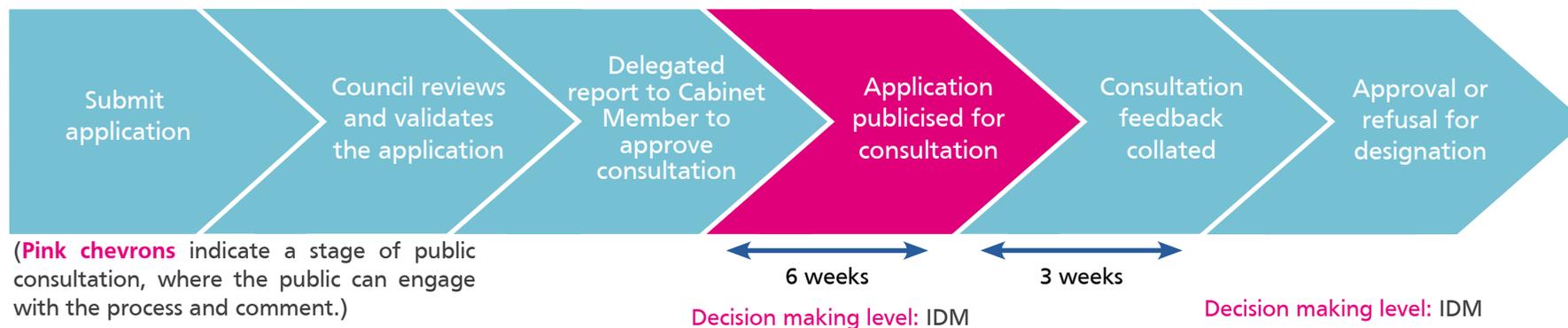
Neighbourhood Planning was introduced under the Localism Act (2011) to give local people more of a hands on role in the planning of their neighbourhoods. It's a process led by the community and supported by the council. Neighbourhood Planning should seek to improve the social, economic and environmental well-being of an area. It cannot be used to block development that is needed across the borough. Policies in neighbourhood plans must be in general conformity with the borough's existing strategic policies. National Planning Policy Guidance (NPPG) provides further guidance on the different stages/requirements of neighbourhood planning, as what is set out in this SCI is a summary.

Getting involved in Neighbourhood Planning

To write a Neighbourhood Plan or a Neighbourhood Development Order, the local community must come together and apply to the council to be formally designated as a Neighbourhood Forum and have a Neighbourhood Area designated. Only one group can undertake neighbourhood planning in a particular neighbourhood.

How to designate a Neighbourhood Forum and Neighbourhood Area

A Neighbourhood Forum should be designated before applying for a Neighbourhood Area, however the steps are the same for both processes.



The council must determine the application within 13 weeks of the application first being publicised. If a Neighbourhood Area application falls within the areas of two or more local planning authorities (i.e. Southwark and one of its adjoining boroughs), then 20 weeks is allowed for determination.

The council/s in which the Neighbourhood Area is located is required to ensure the Forum meets the legal requirements of the relevant legislation and enabling regulations. Where a Neighbourhood Area application falls within the areas of two or more councils (i.e. Southwark and one of its adjoining boroughs), the decision makers responsible from the relevant boroughs will meet to consider whether a joint response can be made to the Forum. Both boroughs must designate the Forum for it to be able to operate within the Neighbourhood Area proposed.

NEIGHBOURHOOD PLANNING

Requirements and considerations for a Neighbourhood Forum

Required application documents:

- Application form (available on our website)
- The name of the proposed Forum
- A copy of the written constitution of the proposed Forum
- The name of the Neighbourhood Area to which the application relates and a map identifying the area
- Contact details of one member of the Forum to be made public
- Submission by an organisation capable of becoming a Neighbourhood Forum.
- Membership of at least 21 members who live or work in the area or are an elected member
- A statement to explain how the forum meets the conditions contained in the Town and Country Planning Act 1990 as amended - This should include whether it is established for the purpose of promoting or improving the social, economic and environmental wellbeing of the neighbourhood.

Requirements and considerations for a Neighbourhood Area

Required application documents:

- A map identifying the proposed Neighbourhood Area
- A statement explaining why this area is considered appropriate to be designated
- A statement that the organisation or qualifying body is relevant for the purposes of the Town and Country Planning 1990 Act (as applied by Section 38A of the Planning and Compulsory Purchase 2004 Act)

Key considerations

- Is membership drawn from different places in the neighbourhood and from different sections of the community?
- Does the purpose reflect the character of the area?
- Is there already a neighbourhood forum for that area?

A local planning authority may withdraw an organisation's designation if they consider that it is no longer meeting the criteria or other criteria that the authority are required to have regard to in making a designation. If this were to be the case the local planning authority has to give reasons.

The Neighbourhood Forum designation expires after five years. If a Neighbourhood Plan is not implemented in this time, the organisation would have to reapply for designation as a forum.

Key considerations

- Is there already a Neighbourhood Plan covering this area?
- How do the boundaries relate to current and proposed planning designations?
- Is the proposed area appropriate?
- Should the area be a business area?
- Would a business referendum be required?

NEIGHBOURHOOD PLANNING

Pink chevrons in the flowchart below indicate a stage of public consultation.

Once the Neighbourhood Forum and Neighbourhood Area has been designated, the preparation of a Neighbourhood Plan or a Neighbourhood Development Order can begin. The council along with any adjoining boroughs (for cross-boundary Neighbourhood Forums and Areas) will support Neighbourhood Forums to achieve this.

Neighbourhood Plans and Neighbourhood Development Orders

A plan for the area can be prepared by the Neighbourhood Forum (made under the Planning and Compulsory Purchase Act 2004). A Neighbourhood Development Order (NDO) means that certain types of development can take place in an area without the need to apply for planning permission.



Requirements for Neighbourhood Plans or Neighbourhood Development Orders

Requirements before submitting:

The Neighbourhood Forum must publicise the following to the people who live, work or use the Neighbourhood Area:

- Details of the proposals/the plan and supporting evidence
- Details of where and when the proposals/the plan may be inspected
- Details of how to make representations and the date by which those representations must be received (at least 6 weeks)
- Consult statutory bodies in Schedule 1 Paragraph 1 of the Neighbourhood Planning (General) Regulations 2012
- Send a copy of the proposals/the plan to the Local Planning Authority

Process of Independent Examination:

The council will appoint an examiner to carry out the examination as soon as possible, It can only do this if the Neighbourhood Forum agrees to the appointment. If no agreement is reached, the Secretary of State may appoint an examiner. The council must consider each of the recommendations made in the examiner's report and decide what action to take in response to each

recommendation.

Criteria at Independent Examination:

- The plan or order must consider national planning policy
- The plan or order must be in general conformity with strategic policies in the development Plans for the local area
- The plan or order must be compatible with EU obligations and human rights requirements
- Consultation requirements must have been carried out

Referendum:

If the council is satisfied that the draft plan or order meets the conditions of a Neighbourhood Plan or order, or that the draft plan or order would meet those conditions if modifications were made to it, a referendum must be held on the making of the neighbourhood plan. If the draft neighbourhood plan relates to an area which has been designated as a business area, an additional referendum must be held. Local planning authorities may decline to consider proposals submitted to them if they consider them to be repeat proposals.

MONITORING AND FEEDBACK IN PLAN-MAKING

Monitoring

We will monitor and review our planning policies and processes. We will provide all of our data on the website which we will update regularly and we will ask different groups how they would like to be consulted.

We will use the principles in our Approach to Community Engagement as indicators to measure the effectiveness of our consultation.

Authority Monitoring Report

We will report back on what our policies are delivering through our Authority Monitoring Report. A summary will also be published through the [Facts and Figures](#) page on the website. This page lets you know our housing and employment figures so that you can keep up to date on what developments are happening in Southwark.

Comments

We will consider all of the comments made by the public and amend the relevant document with any necessary changes.

Feedback

Consultation report

We will produce a Consultation Report which will highlight the changes made to the document as a result of the comments received. The consultation report and comments received will be available online for the public to read.

Where we have not amended a policy in response to comments received we will explain why. We will send you a link to where you can find this report through MySouthwark.

You Said/We Did

We will improve the ways in which we feedback by using a 'You Said/We Did' format which clearly shows how the community helped to shape policy documents.

As well as this, we set up a website and community forums for recent Area Action Plans, such as Old Kent Road, so that the community can stay fully up to date with the progress of the plan.



**PLANNING
APPLICATIONS AND
DEVELOPMENT
MANAGEMENT**

INVOLVING YOU IN PLANNING APPLICATIONS

Development Management deals with planning applications and is the process of making a decision on whether or not to grant planning permission for a development. The process of different planning applications and the stages at which it is possible for the public to get involved are outlined on the next pages.

Before the application is submitted

We will:

Encourage applicants to consult with the community where relevant in line with the Development Consultation Charter

We may:

Liaise with Tenants Resident Associations, Neighbourhood Forums, and Local Community Groups where relevant

Once the application is submitted

We will:

Make planning applications and supporting documents available on the planning register

Consult on planning applications as set out in law and this document

Ensure developers carry out the requirements set out in the Development Consultation Charter

Where necessary, we will:
Display a planning notice near the application site

Post letters to neighbours adjoining the application site

Publish a press notice

Consult with other organisations

During the determination process

We will:

Allow public and statutory consultees 21 days to respond to consultation on an application and 30 days to respond to a consultation where an Environmental Impact Assessment is part of the application.

Re-consult on an amended planning application for a period of 14 days, or 30 days where revised or additional Environmental Impact Assessment information is provided.

We will:

Take into consideration any consultation responses in the officer or committee report.

We will:

Take into account any relevant material considerations such as impact on neighbours or design quality.

When we make a decision

We will:

Publish the decision notice and officer or committee report on the planning register

Clearly outline recommended reasons for approval or refusal in the officer or committee report

Email the applicant with the decision notice

Publish any relevant appeal documents or decisions on our website. The Planning Inspectorate (PINS) website will also publish documents.

We will not directly respond to individual representations received on each case

Monitor the developer consultation process as set out in the Development Consultation Charter

PRE-APPLICATIONS

The flowchart below shows the process of how we respond to pre-application requests from prospective applicants and developers.

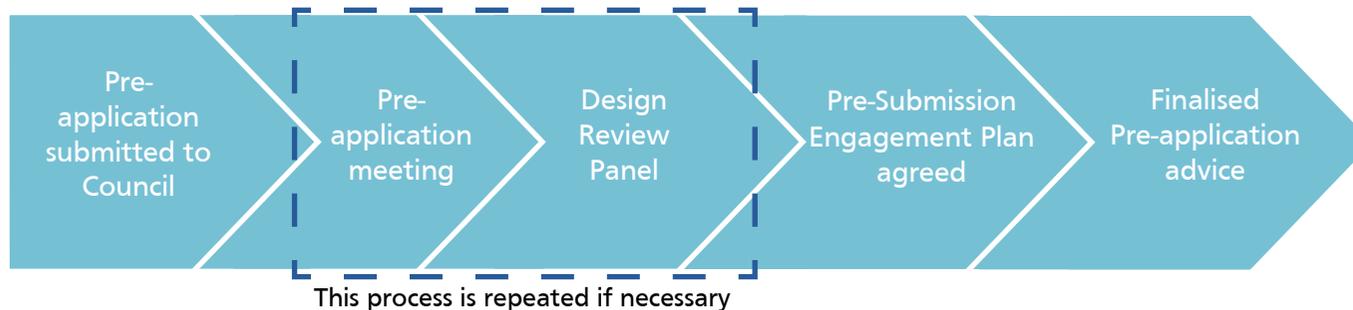
Pre-Application for Major and Strategic applications

A developer may request and pay for pre-application meetings with the council to discuss their ideas for a development. The council does not consult on pre-application enquiries. They are not published on the Planning Register and the public cannot comment on them. This is because pre-application enquiries are often at a very early stage of design resolution and/or commercially sensitive.

Pre-Submission Engagement Plan

The type and extent of engagement with the public that must be carried out by the developer before the submission of a planning application may be agreed between the council and the developer in a Pre-Submission Engagement Plan. An Engagement Summary of the public consultation that has taken place before the submission of the planning application, a Social Value Statement, and an Engagement Plan for any further stages of public consultation that are needed after the submission of a planning application must be included as part of the planning application. This engagement will be considered as part of the planning decision. Further detail on these requirements is set out in the Developer Consultation Charter.

Major planning applications include development proposing 10 or more homes or a floorspace over 1,000 sqm. Strategic planning applications are developments proposing over 50 homes or floorspace over 3,500 sqm.



CONSULTATION ON PLANNING APPLICATIONS

There are different requirements for publicising planning applications depending on the application type. These requirements are shown below.

All documents and plans relating to a planning application can be found via the council's [Planning Register](#).

Application Type	Site notice	Press notice	Neighbour Notification Letters
Development including an Environmental Impact Assessment (EIA)	✓	✓	<ul style="list-style-type: none"> Immediately adjoining occupiers depending on the size/layout of development Those within the setting of a listed building or conservation area potentially impacted by the development in Southwark. We will also consult adjoining boroughs and their residents as needed.
Major development: 10 or more homes or over 1000sqm commercial floorspace	✓	✓	
Strategic development of 50 or more homes or over 3500sqm commercial floorspace	✓	✓	
Minor development of less than 10 homes or less than 1000sqm commercial floorspace	✓	If conservation area or departure from development plan	<ul style="list-style-type: none"> Immediately adjoining occupiers depending on the size/layout of development
Reserved Matters (for outline permission)			
Minor Material Amendments	✓	If conservation area	
Householder	✓	If conservation area	
Advertisement Control		If conservation area	<ul style="list-style-type: none"> No statutory requirement
Prior Approval			<ul style="list-style-type: none"> Immediately adjoining occupiers
Listed Building Consent	If external works	✓	<ul style="list-style-type: none"> No statutory requirement as neighbour notification is carried out under accompanying full application
Non-Material Amendments	No statutory requirement for public consultation		
Lawful Development Certificate	No statutory requirement for public consultation		
Approval / Discharge of Conditions	No statutory requirement for public consultation		

CONSULTATION ON PLANNING APPLICATIONS

The flowcharts in this section illustrate the process of determining different planning applications. **Pink chevrons** in the flow chart below indicate a stage of public consultation, where the public can engage with the process and comment.

Minor planning applications

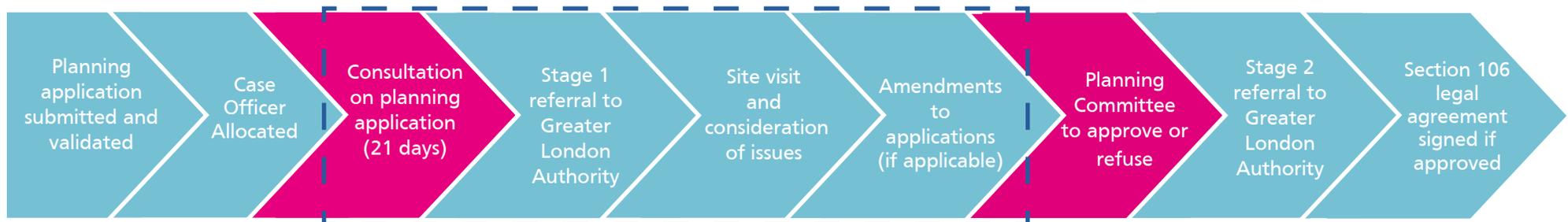
Minor planning applications include development proposing 9 or less homes, changes of uses, and householder applications.



This process is repeated if necessary. Reconsultation is for 14 days and is required if there is a 'material' change to the original application.

Major and Strategic planning applications

Major planning applications include development proposing 10 or more homes or a floorspace over 1,000 sqm. Strategic planning applications include development proposing over 50 homes or floorspace over 3,500 sqm.



This process is repeated if necessary. Reconsultation is for 14 days or 30 days where an Environmental Impact Assessment is part of the application and is required if there is a 'material' change to the original application.

MAKING COMMENTS ON A PLANNING APPLICATION

Planning Register

Comments on a planning application can be submitted via the council's [planning register](#) during the consultation period.

This is the preferred method of submitting your comments, where possible, as we move to more digital modes of consultation.

Letters and Email

Comments will be accepted by email and letter.

Comments can be emailed to the relevant case officer.

Letters can be posted to
Planning Division
Southwark Council,
PO BOX 645529
London SE1P 5LX

Libraries or My Southwark Service Points

Applications can also be viewed at local libraries or My Southwark Service Points if you do not have internet access.

Planning Committees

In addition to the consultation opportunities detailed above, there may also be a chance to comment on planning applications if it is presented at our planning committees.

Southwark has a main Planning Committee and two Planning Sub-Committees. The committees are made up of elected councillors who decide whether planning applications should be approved or refused.

Planning Committee meetings take place in the council offices at 160 Tooley Street, London SE1 2QH unless indicated otherwise. All are open to the general public and we also livestream them on the council's Youtube channel.

Planning Committee also consider new conservation areas, Article 4 directions, and provide comments on new planning documents. [Part 3F](#) of the council's Constitution sets out the full roles and responsibilities of our planning committees.

How to find out about whether a scheme is going to Planning Committee

Planning Committee dates are listed on our [website](#). If you have commented on an application, you will be notified if it will be determined at a Planning Committee meeting and we will tell you how to get involved.

If you wish to speak at a committee you must notify the constitutional team in advance at Constitutional.Team@southwark.gov.uk by 5pm on the working day preceding the meeting.

One representative for objectors and one representative of any supporters (if living within 100 metres of the development site) are allowed to address the committee.

Both representatives will be able to speak for three minutes each. If there is more than one objector or supporter wishing to speak, the time is then divided within the three minute time slot.

PLANNING COMMITTEES

Applications considered at Planning Committee

The majority of planning applications are decided by council officers under delegated powers, however our planning committees decide large, complex or controversial applications. The following is intended as a summary only.

Planning Committee

Planning Committee generally considers planning applications for the following type of development:

- 50 or more homes
- 3,500sqm or more commercial floorspace
- Mixed use development with 3,500sqm floorspace or more, including applications for change of use

...and that meet one or more of the following criteria:

- Has 5 or more relevant* objections, including the council's own developments
- Is requested by two councillors to be determined by at Planning Committee, and agreed by the Chair of the committee
- Is significantly contrary to the local development plan
- Is clearly linked to another application which is to be considered by the planning committee
- Involves a legal agreement, other than those in accordance with policy requirements
- Is of strategic importance, referable to Mayor London or requires Secretary of State notification as a departure from the development plan.
- Requires an Environmental Impact Assessment
- Includes development of Metropolitan Open Land or contaminated land

Planning Sub-Committees

Planning Sub-Committees generally consider planning applications for the following type of development:

- 10-49 homes
- 1,000sqm - 3,500sqm commercial floorspace
- Mixed use development with 1,000sqm - 3,500sqm of floorspace, including applications for change of use

...and that meet one or more of the following criteria:

- Has 5 or more relevant* objections, including the council's own developments
- Is significantly contrary to the local development plan

Planning Sub-Committees also consider:

- Planning applications that requested by two councillors to be determined by at Planning Committee, and agreed by the Chair of the committee
- Development of Metropolitan Open Land

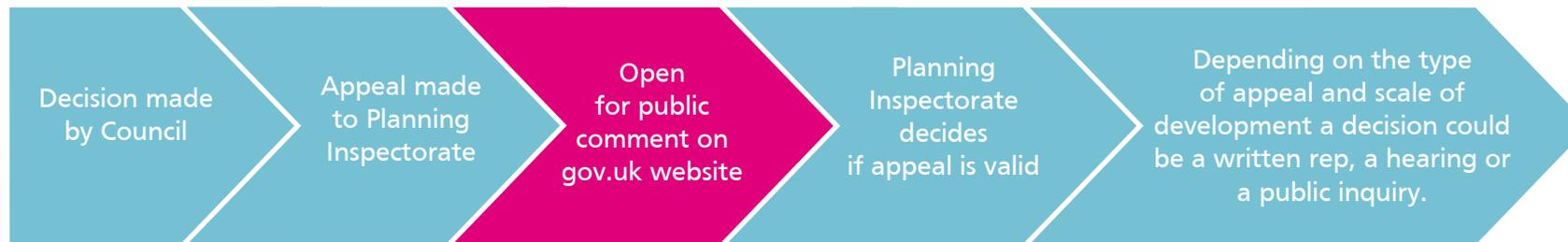
* A 'relevant objection' is defined as any objection except an objection which clearly does not raise any material planning considerations or raise a major issue of a planning nature. Some applications with 5 or more objections will not be considered at Planning Committee if objections can be addressed by an appropriate planning condition, or if the application clearly complies with the relevant planning policies, or if the application is recommended for refusal.

APPEALING A PLANNING DECISION

The flowchart below shows the process of a planning appeal. **Pink chevrons** in the flow chart indicate a stage of public consultation, where the public can engage with the process and comment.

Appealing a decision on a planning application by the applicant

An applicant is able to appeal the decision of the Council to refuse their planning application. The decision is reviewed by an independent body, the Planning Inspectorate (PINS) and then either allowed overturning the Council's decision or dismissed upholding the decision by the council.



Getting involved

Written Representations

If an applicant has been refused planning permission, they may appeal the decision to the Planning Inspectorate (PINS). Most appeals are decided by the written representations procedure. With this procedure the Planning Inspector considers written evidence from the appellant, the council and any member of the public who has an interest in the appeal.

If you were consulted or made comments on the planning application then you will be notified by the council within five days of the appeal being validated. There is a deadline for comments five weeks after the start date of the appeal, or six weeks after the date on the local planning authority's enforcement notice.

This notification will include a date by which further comments about the application need to be sent to the Planning Inspector.

Appeals for householder applications cannot be commented on.

Further information can be found on the Planning Inspectorate's website, including what happens when the appeal is being decided by the Secretary of State at a hearing or inquiry.



**POST PLANNING
AND EXCEPTIONAL
CIRCUMSTANCES**

POST PLANNING

Section 106

- Section 106 Agreements are legal agreements between the council and developers. They set out the obligations and benefits that will be delivered after a planning permission is granted.
- The principles and any financial contributions required will be agreed prior to the decision notice being issued, such as carbon offsetting contributions. A summary of obligations and contributions is included in the officer report at the decision-making stage.
- The formal decision for a planning application is issued upon completion of the S106 legal agreement.
- There is no consultation on S106 agreements

Community Infrastructure Levy (CIL)

- Community Infrastructure Levy (CIL) is a charge to pay for the improved and increased infrastructure that is required as a result of new development.
- It is just one of the ways in which developments can benefit the local community through local and strategic investment.
- 70% of the CIL money that we receive is made available to borough-wide infrastructure, e.g. construction of new Underground stations

Local or Neighbourhood CIL

- Local CIL is an important way of mitigating impacts of development and the Council has a process for agreeing how to allocate funds through [Community Investment Plans](#).
- 25% Local or Neighbourhood CIL is made available to local community areas through Community Investment Plans, while the remaining 5% is used for administrative purposes.
- Beyond paying the levy developers will have no role or responsibilities in the delivery of projects.

Section 106 and Community Infrastructure Levy (CIL) Process

Financial contributions are usually collected once the construction of development starts. We have launched an [online tool](#) that makes it easier to access information on the s106 and CIL contributions that we collect and the community projects that are funded. We also publish an annual Infrastructure Funding Statement that provides a summary of all financial and non-financial developer contributions relating to S106 and CIL within the borough. Any expenditure over £100,000 must be agreed by Planning Committee.

You can get find out more about CIL and get involved in putting forward ideas on how this money should be used in your community on the [CIL website](#).

Enforcement

Sometimes, development that needs planning permission goes ahead without it or development that has permission is carried out without complying with the approved drawings or planning conditions. This can have a harmful impact on the living standards of our community and the surrounding environment.

The Council can take enforcement action which could ultimately lead to prosecution. The Council's Planning [Enforcement Plan](#) outlines how and when enforcement action is taken.

If you suspect a breach of planning control, you can report a [planning breach](#) on our website.

CONSULTING IN EXCEPTIONAL CIRCUMSTANCES

Plan-making and policy documents

In exceptional circumstances it may not be possible to carry out consultation in the ways set out above.

We will:

- Be guided by national guidance.
- Make all documents out to consultation available on our website. In a scenario where council offices are closed and it is not possible for hard copies of documents to be made available, we will post a copy of the document to those who request it where they cannot access the internet.
- Advertise a consultation through MySouthwark, council social media and a newspaper notice. We will also notify our statutory consultees.
- Make an online survey available so that as many people as possible will have access to the consultation.
- Hold virtual meetings between planning officers and members of the community if necessary using digital tools.

We recognise that consulting without face-to-face workshops or interactive events is not ideal, however, it is important that we can continue consultation even in difficult times so that we can continue to provide housing, employment and community spaces in Southwark with up to date plans and policies.

Planning applications

As with plan-making, it is important that there are alternative methods to consultation on planning applications in case of exceptional circumstances.

We will:

- Be guided by national guidance.
- Extend the formal consultation period from 21 days to 28 days to give members of the community more time to make a comment on a planning application.
- Where planning officers cannot go on site to put up a site notice, neighbourhood letters will be sent to those in close proximity of the site or a site notice will be put up by the applicant.
- Where a planning officer cannot carry out a site visit they may ask the applicant to carry out a virtual/video site visit and to take photos from specific areas of the site.
- Use satellite photography to assess the site.

The Development Consultation Charter sets out what type of consultation you can expect from a developer in exceptional circumstances.

**EQUALITY AND
DIVERSITY**

EQUALITY AND DIVERSITY

What role can planning play?

Planning has a key role to play in supporting the council to promote equality and value diversity, through addressing the wider determinants of health inequalities, and creating inclusive places residents can be proud of.

It is key that our consultation and engagement on planning processes has consideration for equality.

Southwark local context

Southwark is a unique, vibrant borough and our greatest asset is our residents and communities. Our vision is for united, connected communities across the whole borough.

We're committed to working with our organisations, to challenge ourselves and others to be better at every opportunity. We are committed to promoting equality, especially ensuring all of our residents can feel included, and play an active role in shaping our neighbourhoods and local areas.

Southwark Stands Together

The SCI, and our additional work around consultation and engagement support the wider objectives of [Southwark Stands Together](#), a long term programme of positive action, education and initiatives working with staff and the community to tackle racism, injustice and inequalities.

This borough-wide initiative seeks to address the injustice and racism encountered by Black, Asian and minority ethnic communities and to the health inequalities exposed by COVID-19.

Fairer Future Principles

The SCI builds on our [Fairer Future Principles and Values](#), and seeks continuous engagement with residents and the wider community in the planning process.

Council's Approach to Community Engagement

The SCI aligns and is underpinned by the Council's Approach to Community Engagement, that sets out how we will ensure that we support meaningful engagement and are inclusive.

We will make particular effort to connect with seldom heard communities and those likely to be most affected by regeneration, planning policy and planning applications.

We also recognise that everyone's needs are not the same. We will provide engagement and consultation in plain language and provide materials in a variety of formats to support our varied communities to get involved.

We are committed to building knowledge and understanding of all of our local communities. This includes local and borough wide demographics and information about the needs of our communities through feedback, consultation and engagement, local and national research.



PUBLIC SECTOR EQUALITY DUTY

Public Sector Equality Duty (PSED) and planning

The broad purpose of the equality duty is to integrate consideration of equality and good relations into the day to day business of public authorities. The Public Sector Equality Duty (PSED) was created under the Equality Act 2010 and requires public authorities to consider;

- The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act.
- The need to advance equality of opportunity between persons sharing a relevant protected characteristic and those who do not share it.
- The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it.
- This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

The PSED requires us to consider how we can positively contribute to the advancement of equality and good relations. It requires equality considerations to be reflected into the design of planning policies and the delivery of services, including throughout the course of determining a planning application.

Protected characteristics

Protected characteristics are the nine characteristics currently protected by equality legislation. They are:

- Age
- Disability
- Gender reassignment
- Pregnancy and Maternity
- Marriage or civil partnership
- Race
- Religion or belief
- Sex
- Sexual orientation.

We also pay consideration to the socio-economic disadvantage of our residents and communities.

How we will meet the PSED in Planning

We will deliver the PSED through our plan making and planning application processes.

We find out as much as we can about the needs and make up of our local communities in a relevant and proportionate way. We will use local and national data, local intelligence and information gathered through engagement activity, both in our neighbourhoods and considering wider borough needs for particular protected characteristics.

We will consider how any local plan or planning application will positively meet diverse needs, address disadvantage, and foster good community relations and promote equality.

We will report at each stage of the preparation of the plans and development proposals and there will be an account of how local needs and make up have been considered and how an understanding of the local community and their needs has developed.

This will be undertaken through producing an **Equality Impact Assessment (EQIA)** a tool to help us implement the Public Sector Equality Duty at the heart of our decision making and daily practice.

Developers must submit detailed **Equalities Impact Assessments** for larger planning applications. The PSED does not apply to developers or applicants. However, with certain planning applications it is appropriate for developers and applicants to aid us in meeting this duty, by considering potential equalities issues.

A proportionate equalities assessment should be made for every planning application. The planning officer will assess what the potential equalities issues are and any mitigation possible.

DIGITAL STRATEGY

DIGITAL STRATEGY

We are leading the way to make planning a digital service.

Digital tools will provide more detailed and easily searchable information online. We are working with the Greater London Authority, Central Government and other local authorities to improve the service we provide through new digital services and technology.

Digital tools being developed will make planning more understandable and straightforward for individual applicants, with faster decisions being made, whilst others, focused on larger developments, will enable the decision making process to be more open and transparent.

Digital Planning Service

We are working on a number of innovative digital planning service projects that will allow us to deliver an improved service to all who use our service, and move towards a data-first, rather than document first approach for improved monitoring and data management.

The projects under development and include:

- The **Back Office Planning Service (BOPS)** project that is exploring improved ways to processing planning applications;
- **Reducing Invalid Planning Applications (RIPA)** project that is seeking to simplify the application submission process;
- Providing transparent information on all **Community Infrastructure Levy and legal (Section 106)** agreements so that the website shows all of the contributions negotiated, when it is due and if it has been paid alongside the projects where it is spent. This will be achieved through a new online module that is now available online [here](#).

Affordable Housing monitoring

We are working with different partners to provide [clear and timely information](#) on the affordable housing stock in the borough so that we can accurately and efficiently monitor the number and delivery of affordable housing.

Accessible information

Planning documents that are simple and easy to use online. They will be written with links to more information and websites where this is available.

Comprehensive data

We are improving the website to provide comprehensive data about developments that have taken place in Southwark and planning permissions in Southwark since 2004. This will include housing, offices, shops, open space, community uses and other issues.

This will include a register of all social rented and intermediate homes, which have been permitted since 2004, so that we will have accurate figures on where they are being provided.

Easier to find issues

We are developing a tool to make finding out about planning issues easier. It will allow the public to check if they need planning permission and, if so, it will identify any potential issues that relate to the development before making a planning application making it simpler to complete a planning application.

This will help to speed up the planning process and increase the likelihood of gaining a planning permission.

DIGITAL STRATEGY

Interactive maps

We are also working on how we can improve accessing information about planning applications online. This will include mapping planning applications so that it is easier for the community to see what is going on in their area.

The Old Kent Road Opportunity Area has interactive mapping online to show where applications have been approved and for what kind of development. This will be extended for the rest of the borough.

Self-Service Portal

LB Southwark is working with a number of consultants to digitise the planning process to improve the system for planning officers and for those who interact with it.

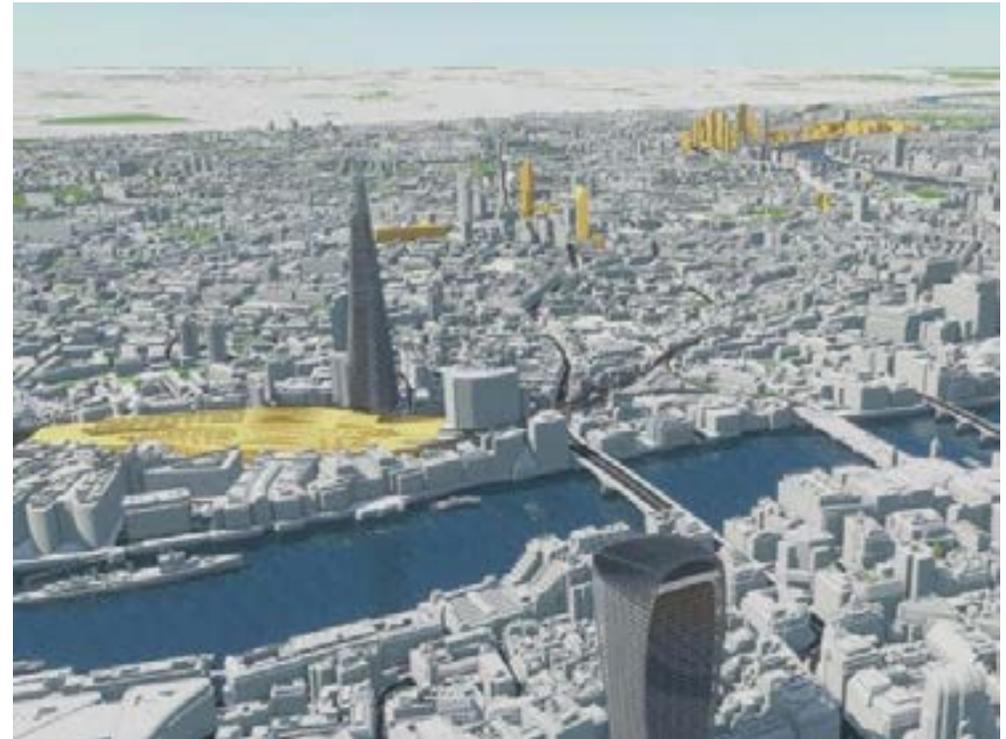
This will have a public facing aspect where applicants and local residents will be able to access information on planning applications, planning constraints and planning policy.

3D models

We require the submission of a 3D model of a proposed development for strategic applications. We insert the model into VU.CITY, a 3D model of the borough, so that we can visualise the proposal and better understand its scale and size, and how it relates to its context. This must be submitted with the scale and the program it was developed in.

Digital Inclusivity

The Planning Team is working with the Digital Inclusion team to understand how planning consultation can be improved to ensure that all residents have access to engaging with the planning process.



VU.CITY model (Image: VU.CITY)

The background of the page is decorated with a repeating pattern of three types of light gray icons: an envelope, a speech bubble, and a group of three stylized human figures. These icons are scattered across the page, creating a subtle, thematic backdrop for the central text.

ADDITIONAL INFORMATION

ENGAGING WITH US: FIND OUT MORE

Planning Policy

[Development Consultation Charter \(DCC\)](#)

Our [Local Plan](#) and [Planning Policies Map](#)

Digital Projects

Post Planning

[Section 106 and Community Infrastructure Levy \(CIL\)](#)

[How to report a planning breach](#)

Planning Applications

[When do you need planning permission](#)

[How the pre-application process works](#)

[How to submit a Planning Application](#)

[How to comment on an application](#)

[How to use the planning register](#)

Information on Planning

[Glossary of Planning Terms](#)

[A Guide to Neighbourhood Planning](#)

[Plain English Guide to the Planning System](#)

[A Guide to Plan-Making](#)

[A Guide to Permitted Development Rights](#)

[Southwark Council's Movement Plan](#)

[Planning Portal](#)

GLOSSARY

Advertisement control: Advertisements depending on their type require planning permission, advertisement control is the processing of policing advertisements.

Cabinet: The Cabinet is made up of a Leader, a Deputy Leader and up to 10 councillors appointed by the Leader. Each holds a special portfolio of responsibility. The Cabinet meetings are open to the public.

Council Assembly: The council assembly is the meeting of all 63 elected councillors sitting on the council. It's chaired by the Mayor of Southwark.

Environmental Impact Assessment (EIA): A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.

Lawful Development Certificate (LDC): A certificate issued by a local planning authority stating that an existing or proposed use is considered lawful for planning purposes.

Listed building consent: Consent required for the demolition, in whole or part of a listed building, or for any works of alteration or extension that would affect the character of the building.

London Plan: The Mayor of London is responsible for producing a new planning strategy for the capital. The London Plan is the name given to the Mayor's spatial development strategy.

Major development: 10 or more homes/over 1000 sqm commercial floorspace.

Minor development: Less than 10 homes/ less than 1000 sqm commercial floorspace.

National Planning Policy Framework (NPPF): National planning policy for which the central government is responsible.

Neighbourhood Plan: A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Public Sector Equality Duty (PSED): The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to promote equality in the exercise of their functions.

Major Planning Application: Applications for development of between 10 - 49 homes and 1,000 sqm - 3,499 sqm commercial floorspace.

Planning breach: The failure to obtain planning permission or comply with the details of a permission.

Prior approval: A procedure where permission is deemed granted if the local planning authority does not respond to the developer's application within a certain time.

Reserved matters: Aspects of a proposed development which an applicant can choose not to submit details of with an outline planning application. Matters reserved for later determination, for example.

Southwark Plan (2022): Southwark's Local Plan - A Local Plan is the plan for the future of the borough, drawn up by the Local Planning Authority (Southwark Council) in consultation with the community.

Strategic development: 50 or more homes/over 3500 sqm of commercial floorspace.

Validation requirement: A document or piece of evidence that must be submitted with a planning application otherwise it cannot be determined.

Variation of conditions: An application to request the removal or change of a condition attached to a planning permission.

Fairer future

Delivering our promises

Southwark
Council
southwark.gov.uk

STATEMENT OF COMMUNITY INVOLVEMENT
DECEMBER 2021
DRAFT FOR CONSULTATION

APPENDICES

No.	Title
Appendix A	Statement of Community Involvement (SCI)
Appendix B	Development Consultation Charter (DCC)
Appendix C	Consultation Report
Appendix D	Consultation Plan
Appendix E	Equalities Impact Assessment

DEVELOPMENT CONSULTATION CHARTER

CONSULTATION DRAFT
DECEMBER 2021



Introduction

What is the Development Consultation Charter?

This Development Consultation Charter (DCC) sets out how our community can expect to be consulted by developers through the three stages of the planning application process:

- Stage 1: Best practice before a planning application is submitted to the council
- Stage 2: At the submission of a planning application
- Stage 3: After a planning application has been approved

We want to put the community at the heart of shaping the changes that are taking place in their neighbourhoods and ensure that consultation is being carried out to the quality and level that we set out in this Charter.

We require developers to submit an **Engagement Plan** and an **Engagement Summary** at the planning application stage that outlines what type of consultation has already been undertaken by the developer, the feedback that has been received from the community and how it has been used to inform the development, what further consultation is planned.

This Development Consultation Charter sets out the requirements for developers to demonstrate the comprehensiveness of their community consultation and engagement throughout the planning application process, and ensure that they have taken due regard of equalities impacts. The Charter also requires developers to demonstrate due regard to existing transport and social infrastructure, community assets, local demography, heritage and cultural assets, and sustainability and climate change considerations.

The Charter requires all applications to submit an **Equalities Impact Assessment** that is proportionate to the type and scale of development.

The Charter applies to the council's own development projects, such as building new council homes or other community buildings.

Who is the Development Consultation Charter for?

The community: The community includes all of those who live, work, study, worship and volunteer in Southwark. This Charter will provide you with information on what type of engagement and consultation you can expect from developers throughout the planning process so that you can help to shape your neighbourhoods.

Developers: This Charter sets out clear guidelines for developers on how consultation should happen at each stage of the planning process so that a development is supported by and reflects the needs of the community.

The Council: This Charter informs what the council will require from developers as part of the validation and assessment of planning applications.

Why do we need a Development Consultation Charter?

We recognise planning and growth is not just about change to the buildings and environment around us, but improving the lives of people in the borough. It is important that everyone has a voice and is able to influence change and the way we invest in the borough.

The Development Consultation Charter is our promise to the community to deliver the objectives of Southwark Plan Policy SP2 "Southwark Together". This Charter forms part of our **Statement of Community Involvement (SCI)** which is a statutory document that sets out how we will consult our community throughout the planning process. This way of working together requires providing the community with:

- Clear guidelines for consultation and a better understanding of the planning process
- More timely and accessible information online
- Accessible, online information on how the engagement and feedback has shaped discussions and proposals

This will help developers to submit a planning application that has been shaped by working closely with the community. We can then make informed, transparent decisions on the merits of the development.

Why should a developer engage and consult with the community?	Why should the community get involved in planning?
<p>Engagement with the local community has many benefits.</p> <p>Engagement can:</p> <ul style="list-style-type: none"> • Ensure developers understand local concerns at an early stage and lead to better outcomes for local people • Assist in the design process to develop the best design for the site • Inspire innovative ideas and solutions with people who understand local issues • Gain more support from and empower the community as they have been listened to, valued and respected 	<p>Engaging with the planning process means that you can get involved in shaping your area.</p> <p>Engagement can:</p> <ul style="list-style-type: none"> • Allow you to have your say on how your neighbourhood is developed • Make sure that the needs of the community are responded to • Empower the community and make a difference to how development happens in the borough

Who is consulted and engaged with on a planning application?

This Charter aims to bring forward effective and meaningful conversations between the community and the developer. In particular, it sets out our expectations about reaching local people that reflect the diversity of Southwark and the location of the site within our neighbourhoods.

Developers must consult face-to-face with local people as well as local groups, and should research the following organisations in their area. This list is not exhaustive.

- Local faith groups
- Tenants & Residents Associations (TRAs)
- Local schools and colleges
- Ward Councillors
- Voluntary organisations such as Community Southwark and the Forum for Equalities and Human Rights in Southwark. These groups have extensive links with local groups and organisations within the borough.
- Local heritage societies
- Neighbourhood forums
- Multi-ward forums
- Business Improvement Districts

How will this Charter work?

There are three different stages to the planning process that the Charter covers:

Before a planning application is submitted to the council

We require developers to set out how they will engage with the community in a **Pre-Submission Engagement Plan** before a planning application is submitted. A developer will sometimes have pre-application meetings with the council to discuss their ideas for a development. The engagement to be carried out by the developer may be agreed with the council at this stage

At planning application stage

An **Engagement Summary, Engagement Plan and Equalities Assessment** will be submitted by the developer as part of a planning application. The Engagement Summary must outline all the engagement that took place prior to the submission of the application, how the developer has listened to the consultation and then evolved the proposal as a result, and a Social Value Statement. An Engagement Plan sets out further public consultation by the developer during the planning application process. Both will be considered as part of the planning decision as a material consideration.

After a planning application is approved

The community will be updated at key stages of the construction process, with ongoing opportunities for members of the public to receive updates on the construction of the development and raise any concerns.

The Engagement Plan and Engagement Summary must demonstrate how relevant people with protected characteristics have been considered within the proposed development and the consultation process.

Where we think that the engagement has not met the requirements of this Charter, including face-to-face consultation, we will require developers to do further engagement work.

What type of applications must be consulted on by the developer?

The extent of public consultation varies site by site depending on the type and scale of development and the location and context of the application site. We expect developers proposing 10 homes or more, or at least 1000 sqm of commercial floorspace to engage with the community from the earliest possible stage of the development. Any major or larger applications must undertake a public meeting where people can have their say on the application.

All council schemes such as new community buildings or housing schemes that propose at least one home will also engage with the community*.

Council Schemes	All council schemes, including housing schemes that propose one or more new homes
Major Applications	10 - 49 homes 1,000 sqm - 3,499 sqm commercial floorspace
Strategic Applications - lower range	50 - 99 homes 3,500 - 10,000 sqm commercial floorspace
Strategic Applications - higher range	100 + homes over 10,000 sqm commercial floorspace

*With the exception of council-owned Hidden Homes schemes, as these are conversions in existing developments. The impacts of this type of development on equalities issues should still be taken into consideration in the planning application process.

What should a developer consider in the preparation of the Pre-Submission Engagement Plan and Engagement Summary?

The developer must carry out research on the application site and its surrounding area, and summarise the findings as part of the Pre-Submission Engagement Plan and Engagement Summary. The research should include an assessment of key transport and social infrastructure, community assets, local demography, heritage and cultural assets, and sustainability and climate change considerations. The Engagement Summary should also show how this research has informed the design and development of the proposed scheme. The following criteria must be considered, but are not exhaustive:

About the community

- Have due regard to how the development might impact people differently depending on their race, age, gender reassignment, disability, sexual orientation, religion or belief, or sex.
- How the development fosters good relations between different groups in the community
- How can the community get involved and help shape the development?

Conservation and Heritage

- Is the site in a conservation area?
- Is the building listed?
- Is the site/building a place of community interest

Community Infrastructure

- Existing health care, community, cultural and educational provision

Finding out about the site and neighbouring area

- Who currently occupies the site?
- Will they need to be relocated? On what basis? Will they be expected to return?
- Are there neighbours in close proximity?
- What is in the surrounding area - including employment and businesses?

Highways and Transport

- How is the site accessed?
- Will there be an increase in traffic during construction?
- Will there be an increase in traffic in the new development and servicing in the site

Climate Change and Sustainability

- Climate change mitigation and adaptation considerations of the site and proposal

When will consultation happen?

Consultation will happen at different stages in the planning process. To make sure that the community is involved from the earliest possible stage until the end of the process when construction begins, consultation will take place:

- Before a planning application is submitted. This is undertaken by the developer. If the proposal substantially changes between this phase of consultation and the submission of a planning application, the developer must re-consult the community on the revised proposal prior to its submission.
- At the planning application stage. Statutory consultation is undertaken by the council. Further public consultation must also be undertaken by the developer at this stage, especially if the planning application is subsequently amended and undergoes further stages of statutory consultation.
- After the application is approved. The council will also consult on reserved matters if applicable. The developer may do further consultation if required.

The engagement that is undertaken should be proportionate to the impact of the proposal and the people who may be affected. The people who are engaged should reflect local diversity.

Consulting in exceptional circumstances

We recognise that in exceptional circumstances, such as the COVID-19 pandemic, consultation may need to take place in different ways or use different methods so that we can continue to deliver new homes and projects within our borough.

The tables on pages 10-14 of this Charter set out best practice examples of how we expect developers to carry out consultation in Southwark, as well as alternatives to face-to-face meetings and workshops in exceptional circumstances. These alternatives should only be used when face-to-face engagement is not possible, and help us to continue working with our communities so that people can have their say and help shape their neighbourhoods.

Old Kent Road Community Review Panel

A [Community Review Panel](#) has been set up in the Old Kent Road Opportunity Area. This panel provides independent advice on planning in the regeneration area. It discusses issues including housing, transport, public and green spaces and the environment. This will help to ensure all new developments are of the highest possible quality and meet the needs of people living and working in the area.

The panel is made up of around 12 members from all backgrounds and ages (18 or over). The panel meets once a month to discuss proposals. These discussions are turned into a formal report that feeds into decisions made by the council. All of the panel's recommendations are taken seriously and are a formal part of the planning process. Experience or knowledge in planning or architecture is not required to be on the panel, and Southwark councillors and employees are not eligible to apply.

The panel will initially run for a year to start with. At the end of the year, everyone will have the opportunity to decide if they want to carry on being involved. An independent company, Frame Projects, is responsible for recruiting and managing the panel. Frame Projects will ensure the panel is independent; properly briefed and able to effectively communicate its views to the council. This type of consultation is separate to this Charter, but applicants are encouraged to consult this panel when preparing an application in the Old Kent Road, and this is something that can be mentioned in the Pre-Submission Engagement Plan.

Equalities Impact Assessment

Equality and diversity is about the whole population; we all have one or more protected characteristics with similar and different needs; experiencing differential and sometimes adverse impacts as a result of a development proposal or plan. Consultation and engagement can contribute to key information in finding out about different needs and experiences of local communities. These will be key to undertaking an effective **Equalities Impact Assessment**.

Developers must engage with those from hard-to-reach groups to ensure populations representative of the application site and its neighbourhood are considered by the application and as part of the consultation process. This includes residents and visitors to the area who have protected characteristics.

As set out in the Statement of Community Involvement (SCI), the Public Sector Equalities Duty (PSED) does not apply to developers. However, to be compliant with the SCI and this Charter, we require developers to support the council in meeting and discharging this important duty. For developers, this means producing a proportionate Equalities Impact Assessment of the impacts of the development. It must illustrate how the proposal will remove or minimise disadvantages suffered by people due to their protected characteristics, and what steps have been taken to meet the needs of people from protected groups where these are different from the needs of other people. It should also detail positive equalities impacts.

The role of the planning officer

Officers will do the following when determining a planning application:

Stage 1 **Have due regard to those with protected characteristics**

- Define and/or review protected characteristics engaged by the application
- Assess how those with protected characteristics are impacted: positive, negative, neutral.
 - E.g. if neutral - There are no specific impacts on protected characteristics and therefore no mitigation impact is required.
- If negative, how will these impacts be mitigated?

This assessment of equalities impacts should be proportionate to the type and scale of the proposed development.

Stage 2 **Promoting equality**

Identify and promote opportunities to advance equality through the proposed development for those with protected characteristics. Understand needs of protected characteristics (specific or universal) Opportunities should be proportionate to the scale and type of the proposed development.

We will deliver equalities training for planning officers to guide them through how to assess the application, what to look for and how to support the applicant in mitigation.

For certain schemes, meeting specific criteria, applicants will be required to meet additional requirements to give proper consideration to equalities issues.

Where applicable, it is a validation requirement to submit an Equalities Impact Assessment that includes evidence that the application has had due regard to the impacts on those with protected characteristics, and promoted equality. This will be monitored to ensure applications are compliant.

The role of the developer

The Public Sector Equalities Duty (PSED) does not apply to developers or applicants. However developers should take a positive role in assisting the council in meeting the duty through their planning applications. Therefore we require additional documentation to be submitted that evidences how developers have identified, promoted and advanced opportunities for equality.

How can developers advance opportunities for equality?

- Have regard to Southwark's borough and neighbourhood population and data
- Define and address opportunities in the design process
- Built form and public spaces
- Consider transport and movement
- Land use mix (e.g. opportunities for small businesses)
- Consideration of existing businesses that may be displaced by development
- Pre-submission consultation and planning application consultation may develop a greater understanding of local demand and opportunity.
- Pre-application meetings
- Employment and training opportunities

Requirements for Developers

- **Stage 1:** Best practice before a planning application is submitted - Pre-application stage
- **Stage 2:** At the submission of a planning application stage
- **Stage 3:** After a planning application has been approved - Post-application stage

Stage 1: Best practice that a developer should undertake <u>before</u> submitting a planning application		Minor Council-own applications*	Major applications	Strategic applications - lower range	Strategic applications - higher range
Normal circumstances	Alternatives in exceptional circumstances				
Prepare a Pre-Submission Engagement Plan for each stage of consultation, and include an evidenced based analysis of the site and context	Prepare a Pre-Submission Engagement Plan for each stage of consultation, and include an evidenced based analysis of the site and context	√	√	√	√
Display a notice / board at the application site, which includes images of the proposed scheme and contact details of the developer	Display a notice / board at the application site, which includes images of the proposed scheme and contact details of the developer	√	√	√	√
A leaflet drop with a follow-up door-knock to those within close proximity to the site (including images of the proposed scheme, contact details of the developer and how to make comments on the proposal to the developer)	Developer to send Neighbourhood Letters to those within close proximity to the site (including images of the proposed scheme, contact details of the developer and how to make comments on the proposal to the developer)	√	√	√	√
Computer Generated Images/ 3D modelling A video presentation of the site and the proposed scheme should be available on the developer's website where possible	Computer Generated Images/ 3D modelling A video presentation of the site and the proposed scheme should be available on the developer's website where possible		√	√	√

Best practice that a developer should undertake <u>before</u> submitting a planning application	Minor Council-own applications*	Major applications	Strategic applications - lower range	Strategic applications - higher range
Normal circumstances	Alternatives in exceptional circumstances			
Planning officers may advise developers who will need to be consulted	Planning officers may advise developers who will need to be consulted	√	√	√
Consider the council's Climate Change Strategy and Movement Plan	Consider the council's Climate Change Strategy and Movement Plan	√	√	√
Present the proposed scheme to the Design Review Panel (if required)	Present the proposed scheme to the Design Review Panel (if required)		√	√
Public consultation workshops as agreed in Pre-Submission Engagement Plan	Use online surveys and digital tools to find out the views of the community. For those who do not have access to the internet and cannot complete an online survey, the developer should complete the survey over the phone with the resident. Contact details for the developer should be provided on Neighbourhood Letters/Leaflets.		√	√
Meetings with local residents, any relevant groups including community / resident groups, businesses and other stakeholders	Meetings with relevant groups including community / resident groups, businesses, and other stakeholders via video-conference software (e.g. Zoom, Microsoft Teams)			√
Developers set up website providing details and images of the proposal	Developers set up website providing details and images of the proposal			√
Set out approach to utilities (water, broadband, energy)	Set out approach to utilities (water, broadband, energy)			√

Stage 2: Required steps that a developer must undertake with the submission of their planning application		Minor Council-own applications*	Major applications	Strategic applications - lower range	Strategic applications - higher range
Normal circumstances	Alternatives in exceptional circumstances				
Submit an Engagement Summary that includes the summary of the Pre-Submission Engagement Plan, including how the developer responded - a 'You said, We did'	Submit an Engagement Summary that includes the summary of the Pre-Submission Engagement Plan, including how the developer responded - a 'You said, We did'	√	√	√	√
Submit an Engagement Plan for further engagement through the planning application process	Submit an Engagement Plan for further engagement through the planning application process	√	√	√	√
Construction boards (hoardings) displayed	Construction boards (hoardings) displayed where relevant	√	√	√	√
Leaflet drop (and/or at pre-app stage)	Neighbourhood Letters to those within close proximity of the site. This should include the contact details of the developer	√	√	√	√
Computer Generated Images/ 3D modelling	Computer Generated Images/ 3D modelling A video presentation of the site and the proposed scheme should be available on the developer's website where possible	√	√	√	√
Consider the council's Climate Change Strategy and Movement Plan	Consider the council's Climate Change Strategy and Movement Plan	√	√	√	√
Present the submitted scheme to the Design Review Panel (if required)	Present the submitted scheme to the Design Review Panel via video-conference software (if required)	√	√	√	√

Required steps that a developer must undertake with the submission of their planning application		Minor Council-own applications*	Major applications	Strategic applications - lower range	Strategic applications - higher range
Normal circumstances	Alternatives in exceptional circumstances				
Public consultation workshops and A public community meeting Attend a Multi-ward Forum if requested by the council (For Strategic Applications only)	Use online surveys and digital tools to find out the views of the community. For those who do not have access to the internet and cannot complete an online survey, the developer should complete the survey over the phone with the resident. Contact details for the developer should be provided on Neighbourhood Letters/Leaflets.		√	√	√
Feedback to people on how they have shaped development from: • Multiple public consultation workshops ; and • A public community meeting	Provide detailed feedback on how they have shaped the development: • Update the website • Where possible, use visuals and images that demonstrate changes to the development			√	√
Developers keep development website up-to-date	Developers keep development website up-to-date			√	√
Equalities Impact Assessment	An Equalities Impact Assessment should be submitted proportionate to the development type	√	√	√	√
Submit a 3D model file for use in VU.CITY (FBX file, 1:1 scale and details of program modelled in)	Submit a 3D model file for use in VU.CITY (FBX file, 1:1 scale and details of program modelled in)				√



Stage 3: Best practice that a developer must undertake after a planning application has been approved		Minor Council-own applications*	Major applications	Strategic applications - lower range	Strategic applications - higher range
Normal circumstances	Alternatives in exceptional circumstances				
Construction boards (hoardings) displayed on site with updates on progress and contact details for the site manager	Construction boards (hoardings) displayed on site with updates on progress and contact details for the site manager Information is also to be updated on the website	√	√	√	√
Website with the progress updates by developer	Website with progress updates by developer			√	√
Where applicable, comply with any Construction Environment Management Plan that is secured through by condition on the decision notice or a S106 obligation	Where applicable, comply any with Construction Environment Management Plan that is secured through by condition on the decision notice or a S106 obligation		√	√	√

* With the exception of Council owned Hidden Homes schemes, as these are conversions in existing developments, and are exempt from this degree of consultation. Hidden Homes could include new homes created from unused or underused space within existing estates.

Validation requirements

Pre-Submission Engagement Plan

The Pre-submission Engagement Plan is a requirement for pre-application discussions. The type of engagement with the public to be carried out before to submission of an application may be agreed between the council and the developer at pre-application stage. It must include:

- The meetings, events and public consultation methods proposed before a planning application is submitted; and
- A summary of the research of site and context analysis including: demographics, heritage and cultural considerations, community role and facilities, sustainability and climate change considerations, transport and highways. See Page 6 of this Charter for further detail; and
- Ways to feedback responses during this stage of consultation.

Engagement Plan

The Engagement Plan is a validation requirement at submission stage. It must outline the next stage of public consultation for the planning application, and draw on the findings of pre-submission engagement. It must include:

- The meetings and public consultation proposed; and
- Ways to feedback responses during the consultation.

Engagement Summary

The Engagement Summary is a validation requirement at submission stage. It must include:

1. A detailed summary of the meetings, public consultation events and consultation methods that has been undertaken or used before the application was submitted. (Date, Attendees, Feedback)
2. A summary of the research of site and context analysis including:
 - demographic context:
 - Who occupies the site? Will they need to be relocated? On what basis? Will they be expected to return?
 - Due regard to how the development might impact people differently depending on their race, Age, gender reassignment, disability, sexual orientation, religion or belief, or sex.
 - How the development fosters good relations between different groups in the community.
 - Are there neighbours in close proximity?
 - heritage and cultural considerations,
 - community role and facilities,
 - sustainability and climate change considerations,
 - transport and highways.
 - Summary of how Community Investment Plans have been considered

See Page 6 of this Charter for further detail.
3. A public consultation summary of support and of objections, and how any objections have been responded to - a 'You said, We did'. This will be used to inform officer and committee reports.

4. A Social Value Statement. This should describe the economic, social and environmental impacts of the development, how the development will contribute to the long-term wellbeing and resilience of existing and future residents and businesses. This should take into account feedback gathered from the community and which reflects the diversity and demographics of the local area.

Equalities Impact Assessment

An Equalities Impact Assessment is a validation requirement at submission stage. The document must show how the planning application promotes equality, **identifies any negative equalities impacts and details actions to reduce any identified impact, and details positive equalities impacts.**

Monitoring the Development Consultation Charter

- A completed Engagement Summary must be completed by the applicant and submitted with their planning application. This is a validation requirement and the planning application will remain invalid until it has been submitted. The Engagement Summary will be made public on our Planning Register website alongside the planning application.
- Applications that submit a good practice Engagement Summary will be placed on our planning website with a link to the full application on the Planning Register to promote good practice.
- We will monitor the number of Engagement Plans and Summaries that we receive.
- The submission of an Engagement Plan, Engagement Summary and Equalities Assessment will be monitored at validation stage.
- We will review the development consultation process including best practice guidance.

STATEMENT OF COMMUNITY INVOLVEMENT
DECEMBER 2021
DRAFT FOR CONSULTATION

APPENDICES

No.	Title
Appendix A	Statement of Community Involvement (SCI)
Appendix B	Development Consultation Charter (DCC)
Appendix C	Consultation Report
Appendix D	Consultation Plan
Appendix E	Equalities Impact Assessment



**Statement of Community Involvement
Consultation Report
December 2021**

Introduction

What is the SCI?

1. The Statement of Community Involvement (SCI) is our commitment to people about how we will consult and engage with the community throughout the planning process.
2. The Development Consultation Charter forms part of the SCI and sets out standards of consultation for developers who wish to develop in the borough.
3. We want to make planning matters more accessible and create a better experience for people around engaging during the planning application process and the preparation of planning policy.
4. In providing opportunities for people to get involved in shaping and improving the current SCI we can create more engagement and collaboration around local planning decisions and the preparation of regeneration and planning strategies for the future.

What is a consultation report?

5. This consultation report summarises the consultation that took place for the SCI. It sets out what events took place, how the SCI was publicised and provides a summary of the responses received throughout the consultation period. It also sets out what consultation events were unable to take place as a result of restrictions relating to COVID-19.

Who was consulted and how?

6. Consultation on the Statement of Community Involvement (SCI) began in January 2020 and was closed due to COVID-19 in May 2020.
7. The SCI Engagement Plan set out a series of actions and groups of people to engage with, with a particular emphasis on engaging with people who do not usually get involved with planning.
8. To achieve this, the Council collaborated with community groups such as the Regeneration for All Liaison Group to combine resources and reach as many people as possible. The Council has also engaged with the Forum for Equality and Human Rights in Southwark (FEHRS) where representatives at the meeting were asked to let members of the their respective community groups

know about the consultation. Council officers also attended meetings with community groups and forums to engage with people from diverse backgrounds.

9. The SCI was advertised through Southwark Council's social media with a Twitter update released regularly. Those signed up to MySouthwark (over 16,000 people) also received regular reminders of the consultation.
10. Members of community groups were asked to encourage other members of the groups they represent to take part in the consultation.
11. Council officers participated in leaflet drops in areas where there is a lot of regeneration and development happening such as Old Kent Road.
12. Posters were also put in libraries and leaflets have been put in local businesses and faith centres in the Old Kent Road Opportunity Area.
13. An online survey was published on the Consultation Hub to reach those who would not attend one of the consultation events. A link to this survey was sent to MySouthwark users and was in Twitter posts.

Consultation events summary

14. The council had already held Planning Workshops on the SCI and Development Consultation Charter on March 25 2019 (76 attendees) and August 1 2019 (85 attendees). These events focused on how the public would like to be engaged on planning matters and the feedback received helped to shape the current draft of the SCI.
15. The SCI Engagement Plan sought to implement the principles set out in the council's new Approach to Community Engagement as well as engage with those who do not usually engage with planning. Engagement throughout the consultation of the SCI focused on reaching different groups of people from our diverse communities.
16. The Regeneration for All Liaison Group, who the council was working with on this consultation, also intended to hold events for three key groups that they are already working with – older people, younger people and those from an African/Caribbean background.
17. Events were formatted and structured differently depending on the target audience. For example, council officers attended coffee mornings/ resident meetings to engage with older people living in Sheltered Housing Units

(SHU). The Faith Workshops are intended as an introduction to planning as many of these communities have not yet engaged with planning.

18. The list below outlines the key events of the SCI consultation. These events include information sessions, leaflet drops, workshops and drop in sessions.

27-Jan	Community and Voluntary Sector meeting	Information item to inform representatives about the SCI and the consultation
04-Feb	LGBT Forum	Forty five minute discussion on the SCI and how consultation in planning can improve. Approx. 25 attendees
27-Feb	Consort SHU	Discussion on getting involved in planning and how it could be made easier at a resident's coffee morning. Approx. 10 attendees
02-Mar	OKR Leaflet Drop and Questionnaire	Information leaflets handed out on the street, placed in local shops and places of worship. Officers spoke with members of the community to let them know about the consultation and how to get involved in planning
03-Mar	FEHRS Meeting	Forty five minute discussion on the SCI with representatives from different community groups
03-Mar	Russel Court SHU	Discussion on getting involved in planning and how it could be made easier at a resident's coffee morning. Approx. 8 attendees
03-Mar	Atrium Drop In Session	Answering questions from residents and council staff
04-Mar	Pedworth SHU	Discussion on getting involved in planning and how it could be made easier at a resident's coffee morning. Approx. 7 attendees
04-Mar	Silverlock SHU	Discussion on getting involved in planning and how it could be made easier at a resident's coffee morning. Approx. 5 attendees
11-Mar	Workshop for Faith Groups	Two hour workshop on an Introduction to Planning, specifically targeted at members of faith groups in the borough. Approx. 15 attendees
Further events were cancelled due to COVID-19 restrictions		

Summary of comments received

<p><i>Planning Workshop 25th March 2019 - 76 participants</i></p> <p><i>Review of community engagement – Planning Workshop 1st August 2019 - 85 participants</i></p>	
Emerging themes	Comments
Transparency	<ul style="list-style-type: none"> • Show clearly how public consultation has resulted in changes within policy documents • Show clearly how s106 and CIL is collected and delivered • Make it clear what is meant by '<i>planning considerations</i>' so that the community has a fair chance of making an impact on a development • Communication between the public and the council needs to be improved • The website is confusing and it is hard to find out about developments • Why are pre-applications confidential and not made public like the rest of the application • There is a lack of clarity on what the community is consulting on and on how the public can influence the outcome • A timetable should be published online so the public can keep up to date with the progress of the application
Accessibility	<ul style="list-style-type: none"> • The Charter contents are unclear and difficult to understand • Professional support is required at consultation • The community needs resources to appoint advisors independent of the developer and the Council • Plain English should be used and efforts made to ensure the document can be understood by all residents within the borough. • When residents are trying to engage on strategic and major applications, there is no level playing field. Difficulty in understanding planning documents makes it difficult to engage • There should be a better use of visuals when it comes to planning applications as it can be difficult for the community to understand technical drawings and plans
Inclusivity	<ul style="list-style-type: none"> • The diversity of consultees must be ensured. • The council should work collectively with communities to validate the evidence that is gathered to ensure the facts about the site and surrounding area is correct. • Diversity and equality must be taken into account in the planning process. • There should be a community-led design review panel and community mapping at the grassroots level.

	<ul style="list-style-type: none"> • There needs to be a means to expand reach to people on MySouthwark mailing list so that as many people as possible are informed about consultation events • There should be an Equalities Impact Assessment at an early stage of the application
Consistency	<ul style="list-style-type: none"> • Developers must be clear in who they have consulted and how • It is not clear how or when the council consults and this leads to frustration and inconsistency • The community would like the Council to ensure that any engagement carried out by a developer, as result of the Development Consultation Charter, is meaningful and inclusive • There needs to be a way of standardising consultation to make sure that it is meaningful and not a tick box exercise

19. Below is a summary of the comments received throughout the formal consultation period – this includes comments submitted via the Consultation Hub, emails and discussions through consultation events. Appendix A sets out a summary of all of the written comments received with an officer response.

20. Despite regular updates on the council's Twitter page and reminders sent out via MySouthwark, the response rate to the Consultation Hub or responses received via email remained low. We received 14 written emails regarding the consultation and 25 responses to the online survey.

21. However, it is worth noting that majority of those who attended consultation events had never engaged in planning before and so the aim to extend the reach into the community was achieved. To encourage more people to engage in the consultation we will shorten the online survey and target publicity of the SCI to groups we have not reached yet.

Document	Comments
SCI	<ul style="list-style-type: none"> • Most agree it intends to be a positive, ambitious document but the objectives of the document need to actually happen – should be monitored externally • Some people like that the document is informative, most feel it is too long with too much information and links to other information makes it confusing • Document should be simplified and clearer to understand • Need to see examples from the council about how this engagement will happen • Most state that it is not possible to know if the SCI will meet the Engagement Principles until it is given time to see if it works

	<ul style="list-style-type: none"> • SCI should be enabling residents to communicate with each other • There are no hard proposals in the document • Many examples given of consultations where views of residents were ignored • Lengthy documents put people off getting involved • Councillors and council staff will need to change their attitudes for this to work instead of just pretending to listen – the SCI will not make engagement better, it is up to council staff • Ordinary people/ lay people do not have the time to spend on going through consultation documents • Use of jargon/corporate buzz words • Summaries of policy documents should be made available – policy documents are too long and difficult to understand. There are too many of them • Provide community focus groups without the ‘usual suspects’ • Website needs to be clearer • Planning documents should be presented at Tenant and Residents Associations meetings • Leaflets and emails need to provide the information about the plans – it should not just be links • It is vital that the council do not slide into a digital-only approach. It would be wrong for councils to continue like this after COVID-19. Online engagement does not reach those without a computer • Good planning rules are wasted if the council does not carry out the necessary inspections to make sure that the building complied with the planning permission • LBS needs to widen the way we communicate about policy consultations • There should be a London-wide publicity campaign to explain the importance of local plans • Majority of people want to receive feedback via email/social media/website using visuals • To get involved in development management, things need to be publicised and there needs to be tools to assist easy community involvement
DCC	<ul style="list-style-type: none"> • Document too long and complicated, needs to be more concise and simpler in structure • It should be a policy/legal requirement that developers have to follow these guidelines • Not sure how this will work in practice • Equalities duties should be key • Need to see examples • Sceptical about developers close relationships with the council

	<ul style="list-style-type: none"> • Developers concerned about timing of releasing pre-app notes into public domain. Also, if a developer wants a completely confidential pre-app, will the council refuse? • Intention is good but must be followed up with action
--	--

What have we learned from the consultation?

22. A low response to the online survey has reaffirmed that using a range of consultation methods has the benefits of reaching more people and generating more discussion around planning and consultation in planning. Because of this we will:

- Shorten the online survey so that it is easier to complete
- We will reinforce that comments can be submitted by emailing planningpolicy@southwark.gov.uk as many people find it easier to write their own feedback rather than follow an online survey
- We will use a range of methods to consult including 1-2-1 phone calls, Zoom drop in sessions and a live webinar where people can submit questions.

23. Feedback from consultation events suggests that people are interested in planning but are often unsure of when developments are happening until it is too late. It has been suggested that communication around planning should be improved.

24. People often rely on active community groups or Tenants and Residents Associations to find out about what is going on in the borough. Improved communication with these groups may improve the response rate of the community to planning consultations.

25. The theme of more engagement between members of the community has emerged. This means that members of the community want the opportunity of talking and working together as a way to engage and share ideas.

26. There is a lack of trust between the community and the council. Many members of the community do not trust that the council will carry out the level of engagement set out in the SCI and DCC and believe this should be monitored externally. To address this, the DCC has been updated to require that Engagement Plans and Engagement Summaries are a validation requirement for developers and these will be uploaded as part of the planning register for the relevant application. The officer report specifies how consultation has been carried out by both the developer and the council and how these comments have been taken into account.

Extension of consultation

27. The SCI consultation began in January 2020 and was due to close on April 8 2020 after twelve weeks of consultation. On March 16 2020 this consultation was extended until April 30 2020.
28. This consultation was extended as it was a good opportunity to encourage people to get involved with planning and inform people how to find out about what developments are happening in their area. The extension was intended to give people more time to respond to the consultation. The extension in the consultation deadline was intended to allow the council to continue to encourage people to get involved with planning as well as the SCI.
29. Members of community groups had also suggested extending the consultation over the school holiday period in April as it was thought that there would be an increase in people going to libraries, local shops etc. where they will see the publicity on the SCI and have more time to engage with the online survey.
30. The extension would have also allowed the council to attend community group meetings, such as the Disability Forum, to fully achieve the objectives set out in the Engagement Plan.
31. Following this initial extension in the consultation, the consultation was further extended until June 30 2020. This was due to restrictions put in place relating to COVID-19. It was considered that this extension may allow for more time to complete the objectives set out in the Engagement Plan. However, it became clear that it would not be possible to carry out all of the events set out in the Engagement Plan owing to ongoing restrictions. Because of this, the consultation ended on May 15 2020. An updated consultation plan sets out how we consult in the next phase of consultation.

What happens next?

32. All of the comments received during the consultation were considered and helped to shape the amended SCI.
33. The SCI was also amended to outline standards of consultation when, in exceptional circumstances such as COVID-19, face-to-face engagement is not possible. It is important that this is included in the SCI so the community can be aware of what type of engagement they can expect in different circumstances.

34. This amended SCI will go back out to consultation for another 12 weeks so that the community can give their opinions on any additional changes they would like to see made to the SCI.

35. Once this consultation is over, responses will be compiled and the SCI will be amended where necessary to take on board the comments received. This new SCI will then be formally adopted by Cabinet.

Appendix A: Officer responses to a summary of comments received via the consultation hub or email

Question	Officer response
What do you think is positive about the SCI?	
Good/great/sounds positive	Support noted
Paper commitments are just that unless they are monitored externally	We will upload Engagement Plans and Engagement Summaries on to the planning register so that you can see how consultation is happening for each application
It sounds very inclusive and positive in as much that citizens are being considered in planning decisions. It's about time the council listened to the views of citizens who reside in the borough and balances the needs of them over developers who only see the area as one in which to make money. It's also good to have all relevant planning information in one document.	Support noted
Only if this is a genuine offer, no flip flopping and obstructions by the usual suspect lbs officers. Who often frustrate processes with their own agenda	The Statement of Community Involvement is our commitment on how we will engage throughout all planning matters. The standards set out in this document must be adhered to
Southwark council are trying to change the way development happens to include the voices on local and existing residents and businesses. It will allow for issues to be raised on how future development may impact existing communities.	Support noted
It is positive PROVIDED that it is continuous.	Support noted
It is a huge and ambitious document. It seems to cover everything one could possibly think of that would need community involvement.	Support noted
Engaging ownership from the local community of their area and resources.	Noted.
The aspirations are excellent. It is ambitious, forward-thinking and aligned with inclusive, well-being and access agendas.	Support noted
To make it collaborative and democratic so that the majority can decide rather than just people with power or money	Support noted

<p>I like all the bullet points above. Community involvement will bring about better planning decisions for all stakeholders by ensuring that planning is an activity that is done in partnership with the community and not to it</p>	<p>Support noted</p>
<p>It's impossibly complicated. No normal person could work out what it's about. It's presumably been written by council officers, who are experts at writing in jargon for each other to read</p>	<p>The SCI must set out the standards for consultation throughout the entire planning process which can make it a very long document. The SCI has been rewritten to be clearer and use plain English.</p>
<p>The basic principles are great – the question is whether they are ever put into practice.</p>	<p>The SCI is our commitment to the community on how we will consult.</p> <p>We will upload Engagement Plans and Engagement Summaries on to the planning register so that you can see how consultation is happening for each application</p>
<p>What do you think can be improved in the SCI?</p>	
<p>Build an underground station</p>	<p>The Old Kent Road AAP deals with the proposal to build new underground stations as part of the Bakerloo Line extension.</p>
<p>Introduce real content to the statement - write it like an informative newspaper feature which informs the layman about the facts and figures of past community involvement. How has been structured and how it is going to be changed and improved. Give examples of independent views with quotes from named experts who have been involved.</p> <p>Avoid as much as possible restatement of cliches associated with concepts - 'inclusivity' etc</p>	<p>The introduction of the SCI will be amended to more clearly set out the purpose of the document.</p> <p>We will upload Engagement Plans and Engagement Summaries onto the council website so that the community can see how these consultation standards are put in to practice and see examples of how community engagement happens</p>
<p>Agendas are hidden. In all reality there are no equal partnerships</p>	<p>One of our Engagement Principles is collaboration which intends to bring people from different groups together</p>
<p>It needs firm commitments of practical ways that communities can be involved - not just warm words. It needs to be brought to 'life' with testimonials and examples of cases where you said this, we listened and this was the outcome.</p>	<p>As this is a new way of consulting, we do not have testimonials yet on how this consultation process will work. In the meantime, we will upload Engagement Plans and Engagement Summaries on to the planning register so that you can</p>

	see how consultation is happening for each application
<p>Public pre-app consultation comments should go through council</p> <p>Planning docs online should be presented more systematically – eg Design and Access in 4 parts, Light and shade study in four parts not consecutive in the list.</p> <p>Visualize- impact more needs to be done now to assist comm groups and planning cllrs</p> <p>List of community groups on the doc a start but need a much bigger process which is by area and interest group – can Community Southwark help or develop better system across the council TRAs also need to be engaged.</p>	<p>The council will monitor public pre-app consultation comments through the Pre-Submission Engagement Summary that is prepared by developers and discussed with the council.</p> <p>Developers are now required to submit 3D images of large developments which assists in visual impact assessments</p> <p>The council is committed to working with all members of the community and meets with members of community groups when necessary. This will continue throughout the life of the SCI</p>
<p>Transparency . Who decided on these topics regarding democracy and how was the Call For rolled out. Often in areas of gentrification. Grass roots communities are undermined and ignored.</p>	<p>The council is committed to working with all members of the community and meets with members of community groups when necessary. This will continue throughout the life of the SCI</p>
<p>Including community involvement around public land that the council are looking to sell. Offering it to the community first!</p>	<p>Consultation around the Community Infrastructure Levy gives the community the opportunity to give opinions on what projects should be funded in the community.</p>
<p>I think that the Statement of Community Involvement is fine PROVIDED that people WANT to be involved - quite often this is not the case.</p>	<p>The council will continue to work with and encourage people to get involved in the planning process</p>
<p>The statement is very long, it's also quite complicated. Even though the intention is good, I suspect the level of engagement with it will be extremely poor due to the length and convoluted document. In the current form, I do not think it simply and concisely explains why it is important or relevant in a way that the local population would participate with it</p>	<p>Once adopted, the council must adhere to the standards set out in the SCI.</p> <p>The introduction of this document and the website will be amended to highlight the importance of getting involved in planning and why that is relevant to local communities.</p> <p>There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.</p>

<p>I fear that it is going to be too big to make it work. Officers at the Council will just not be able to keep in mind and take into account all the things set out in the SCI.</p>	<p>Once adopted, the council must adhere to the standards set out in the SCI.</p>
<p>Too long, too many links, information overload</p> <p>For me I don't much care about written statements from the council, the way the council actually behave and engage with people it way more important.</p>	<p>There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.</p>
<p>Work with unfunded organisations to shape the future of our communities by empowering SGTO to help equip tenants and residents associations as well the tenant managed organisations</p>	<p>The council will continue to work with representatives of community groups and engage with other organisations whenever necessary.</p>
<p>At this stage it is entirely bureaucratic.</p> <p>Document too long, nothing concrete</p> <p>There is little evidence of how the Council plans to actually implement the plan other than setting up a series of committees and groups. Questions of the accountability and transparency of these groups are not really addressed. There is a lack of timelines which is problematic</p>	<p>There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.</p> <p>The SCI sets out the minimum timeframes that a planning policy document will be consulted on as well as a planning application</p>
<p>If the words meant what they say and Southwark weren't just paying lip service to us, it would be nice.</p>	<p>The council is committed to continuing to improve consultation in planning so that the community can continue to help shape their neighbourhoods</p>
<p>It says a lot about what you are going to do and the principles that you should adhere to, but far less about how you will directly communicate with the community and how we can directly respond. This should be the focus of the statement, and should be more concisely explained nearer the beginning of the document. As it is, the document seems overly long and more concerned with explaining at length things that the Southwark Council should be doing as a matter of course, e.g. working for diversity. I found this document too long and with no particular point clear from the outset. I am a masters graduate who works in</p>	<p>There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.</p> <p>The document will also be amended to highlight what methods the council uses to communicate with the community.</p>

publishing with a particular interest in urban planning, so I imagine that a lot more people will have the reaction of: too long, didn't read.	
Make it more accessible. Make sure every resident is aware and encouraged to participate. Use all the social media channels, Southwark magazine, south London news, put leaflets on libraries, supermarkets, churches, and train and tube stations, schools and bus stops. Really make it inclusive by ringing a proportion of population who doesn't go out as much too. Make the council responsible for reaching every single household	<p>Consultation on the SCI used many different mediums to make people aware of this consultation, for example, council social media, posters and leaflet drops, emails to MySouthwark users and asking representatives of community groups to help us to inform members of their organisations.</p> <p>Every Engagement Plan for different consultations will highlight what methods of communication will be used to reach the community.</p>
The document is a complete mess: it's amateurishly designed and apparently not proof-read. It commits the council to using plain English and then has multiple uses of IDM, an acronym not explained in the document.	The document has been amended to explain what IDM means.
This document was not written for an average person living in our community. It is very long, is trying to explain many things, giving links to many on-line pages (and it is very confusing). As a resident, I want to have a simple explanation. The document doesn't work for me and needs to be simplified to be understood	There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.
Does the SCI meet the principles of Built on Trust, Collaborative, Inclusive	
Hopefully	Noted
<p>I disagree with all these questions because I have actually participated in many of the consultations and the same kind of vacuous contentless concepts were discussed most of the time.</p> <p>The one real value of the groups was not followed up - many interesting and interested people were put together, with different skills, from different walks of professional life and there was an opportunity to group us together and allow us as individuals to form an</p>	<p>The SCI intends to continue to improve consultation on planning.</p> <p>In future consultations, we will encourage engagement and communication between members of the community so that ideas within the community can continue to come forward.</p> <p>Each consultation has added value to the writing of all policy documents and a Consultation Report reflects how</p>

<p>ongoing connection - that would give us a platform and real power.</p> <p>But the outcome of the each consultative exercise was just to satisfy the requirements that you had consulted people. And they gave brain storming answers to philosophical questions laden with jargon that didn't mean much to me.</p> <p>And I see that jargon reflected in the documents and paragraphs reflected here.</p>	<p>comments made at consultation shape policy documents.</p> <p>The SCI has been rewritten to be clearer and use plain English.</p>
<p>Words in a plan mean nothing is the reality is no one is really listening</p>	<p>The SCI commits the council's planning department to proving feedback after a consultation period on policy documents.</p>
<p>Activity is reliant on developers in terms of quality of plans and individuals and community groups to respond. Planning applications paperwork and the planning policy needs substantial more openness to enable peoples engagement to be meaningful in everyday language. Plus the issues that may be of top concern are not highly relevant in planning policy.</p>	<p>It is important that developers engage through the DCC as this is the earliest opportunity the community can have to give opinions on a development.</p> <p>All consultation events will be held using everyday language and more visuals to facilitate those who may not be able to understand detailed planning policy documents.</p>
<p>There is no mention of a robust whistle blowing policy which is more than a paper commitment</p>	<p>A whistle blowing policy is not considered necessary. We will upload Engagement Plans and Engagement Summaries on to the planning register so that you can see how consultation is happening for each application and so the community can monitor if consultation is going as set out in the SCI and DCC</p>
<p>Need to see an example of this process being carried out</p>	<p>We will upload Engagement Plans and Engagement Summaries onto the council website so that the community can see how these consultation standards are put in to practice</p>
<p>To be transparent, open and honest, it needs to be simpler to read and comprehend. It isn't inclusive, I think most residents would look at this and wonder what it's got to do with them.</p>	<p>There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.</p>
<p>My "not sures" are because I do not think we can answer until we see how it works.</p>	<p>We will continue to work with community groups and encourage community groups to work together.</p>

<p>My “fully disagree “ is because I do not see in the SCI any system for enabling individual residents to communicate with one another about issues either being consulted on or which individual residents raise either in a consultation or spontaneously because of an issue they are concerned about.</p> <p>All the responses to consultation are directed to the Council. I am not immediately clear how residents will have access to the comments of all others. Perhaps it will be there.</p> <p>But what seems absent is the democratic ability of residents to communicate with one another. You may well say that there are lots of community organisations where that can be done. But my wish would be that when one resident raises an issue other residents should be able to communicate with that person and through discussion between residents agreement may be reached on how to address a particular issue with the Council. I appreciate that there are GDPR issues with this but if that can be overcome I think we would start having some real democracy in Southwark.</p>	<p>This summary of responses provides you with the comments that were made during the online consultation survey. It is not possible to share personal information about those who made comments due to General Data Protection Regulations (GDPR).</p>
<p>No real hard proposals are there to 'practically' engage the community. Like SGTO will be an established partner in all consultations, funds will be ringfenced for the council to engage voluntary organisations like tenants and resident associations and no meaningful commitments to ensure that service users will ALWAYS be represented in a meaningful way</p>	<p>Engagement Plans for individual projects will highlight how the community can expect to be engaged with in specific cases. The SCI sets out the minimum standards for this as different projects will require different levels of engagement. The council will also continue discussions with representatives of community groups to ensure the community is represented in a meaningful way, for example, a new Old Kent Road Community Panel is being set up to help assess developments in the Old Kent Road area.</p>
<p>The lack of transparency in the consultation process suggests a tick-box checking approach rather than any genuine engagement from the overall community</p>	<p>We will upload Engagement Plans and Engagement Summaries on to the planning register so that you can see how consultation is happening for each application. Consultation reports for policy are also uploaded online so that</p>

	you can know what to expect from a consultation and see that it is in line with the principles set out in the SCI so that there is full transparency in how consultation in planning is happening
In the past - e.g. Rotherhithe Street Parking changes - you've had a consultation which came out against your plans but you said you know better and went ahead anyway.	Engagement Summaries and You Said/We Did reports will be uploaded to the website so that you can see how your comments were taken on board and also to explain why some ideas may not have been possible
The principles are all sound but in communicating with the community via a series of lengthy linked PDFs, you risk putting people off engaging at all.	There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.
Apart from receiving this email I haven't seen any advertising anywhere else	Notifications were sent out to MySouthwark users several times throughout the consultation, the Council's Twitter regularly reminded people of the consultation, posters were put up in libraries and leaflet drops were held in the Old Kent Road Area (these leaflet drops would have continued in other areas but restrictions relating to COVID-19 came into effect)
<p>It's more an attitude of mind on behalf of Councillors and Council staff. Just pretending to listen to and collecting a few requirements from the local community isn't enough.</p> <p>If the recent Our Healthy Streets consultation in Dulwich is anything to go by, I would answer all the above questions as fully disagree. I don't trust the process, it wasn't inclusive and was far from collaborative. Local councillors were essentially trying to force feed an unpalatable solution to the community.</p> <p>In theory, the SCI should put people at the heart of engagement, but here is often a big gap between theory and practice.</p> <p>And why do you use management consultant style language such as "values" It just makes all the verbiage hard to penetrate. What's wrong with "principles"</p>	Training will be provided to all planning officers on how to engage with the community effectively so that all officers can carry out the standards of consultation set out in the SCI

<p>It will only attract those people who have some sort of specialist interest in council procedure and decision-making. No ordinary member of my Tenants & Residents Association will have the time, energy or ability to fathom out what it is all about.</p>	<p>The Introduction of the SCI and the website will be updated to explain to people why it is important to get involved in planning and how this relates to everyone's life.</p> <p>There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.</p>
<p>Does the SCI meet the principles of reflective, timely, proportionate, evidence based?</p>	
<p>Looks good if it is actually going to happen</p>	<p>The council is committing to the principles set out in the SCI</p>
<p>I do not see the evidence in this document about what reflective thinking you have done based on workshops you have run in the summer of 2019. There are loads of glossy photos which give the impression that you have done a lot but actually there is no real ongoing connection between what you are doing now and many of the individuals that took the time to come and participate in the workshops.</p>	<p>At the 2019 workshops, it became clear that people wanted consultation in planning to become more transparent, accessible and inclusive. The SCI aims to achieve this through providing links to all information relevant to the planning system and setting out clear standards of how you can expect to be consulted.</p>
<p>Most data taken is word of mouth. No hard evidence whatsoever</p>	<p>Evidence for the SCI was taken from conversations held at workshops in 2019 and ongoing conversations with representatives of community groups. Discussions with the community is best way to find out how they wish to be consulted.</p> <p>All other planning policy documents are supported by a robust evidence base that can be found on our website.</p>
<p>The processes proposed are new and the above relate to process and delivery. I do not know of the evidence of good public engagement in planning policy except that nationally it is seen as difficult and lack of public confidence.</p>	<p>Engagement Plans and Engagement Summaries are a validation requirement for developers and these will be uploaded as part of the planning register for the relevant application.</p>
<p>Most current consultations are not evidence based</p>	<p>The SCI is committing to new ways of working going forward</p>
<p>Promises/plans need to be adhered to</p>	<p>Agreed</p>
<p>I'm not clear if the document is a hard and fast promise/commitment or it's a good intention to do the best effort.</p>	<p>The SCI sets out our minimum standards for consultation in planning that must be adhered to once adopted</p>

Currently I don't believe Southwark do any of these things well, or meet any of these commitments.	
Only time will tell. It all looks good but how it works in practice is what will matter.	The SCI is committing to the standards set out in the document
The principles are sound but the delivery through a PDF using corporate buzzwords and jargon does not fill the reader with confidence that they will be met.	The SCI has explained wherever possible what words relating to planning mean. However, the SCI has been rewritten to be clearer and use plain English.
I am looking forward to Southwark being much more open with the information it has and letting us judge whether its decision making was based on the evidence and whether it is sticking to its own principles.	Noted
Document is too difficult to understand	There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.
Does the SCI meet the principles of simple & accessible, clear & informative, responsive	
It needs to meet these principles to work	Agreed
The council have always been responsive in my experience	Noted
there would need to be a complete change to our current experiences where we are routinely NOT consulted on anything even when it's right on our boundary or in one case when a development was actually right on our land. Despite complaining about this, we still do not receive consultations. I'm unclear as to whether this will change, the meaningful engagement would require us to receive timely notice of planning and engagement from Southwark when we respond. To give another example, a complaint to Building Control almost 1 year ago, we are still yet to receive a response.	The SCI sets out how you can expect to find out about planning applications. It is also recommended that you sign up to the mailing list to receive notifications about applications in your area
Only time will tell	We will upload Engagement Plans and Engagement Summaries on to the planning register so that you can see how consultation is happening for each application.

As I think the Statement itself could be more accessible, clearer and more informative, it doesn't suggest that the engagement will be any of those things.	The SCI has been rewritten to be clearer and use plain English.
There are too many different sections to read and it is impossible to easily grasp the difference between them: Neighbourhood Planning; Local Plan; Plan-Making; Development Plan; Planning Policy Framework, etc.	There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.
As the document committing Southwark to these principles itself completely fails to be 'simple & accessible' and 'clear and informative', I have no faith in future communications being any better	There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.
How can we improve access to planning policy documents?	
Email them to us	When a planning policy document is going out to consultation an email will be sent to MySouthwark users with a link to the documents
<p>The tactic of putting up so many documents makes it impossible for the layman to engage without actually spending hours and hours wading through documents.</p> <p>You need to make a summary that is interesting and engages people. It needs to name Southwark people involved and what they are trying to do. It needs to name people (who have participated in workshops).</p> <p>You need to think about the average person trying to engage with this and if you are serious about engaging that person - then reduce the content and offer different paths.</p> <p>Currently the amount of stuff you have up would be ideal for professional town planners.</p>	<p>All of the plans and supporting documents for the plans are necessary to have up on the website so that people can read them in full and read the evidence base. This is necessary for a plan to be submitted to the Planning Inspectorate to be examined and then adopted.</p> <p>The SCI has been rewritten to be clearer and use plain English.</p>
Provide community focus groups without the usual suspects interference	Workshops held by the council are generally open to the public. For the SCI, we held workshops and discussions that were tailored for specific groups e.g. an Introduction to Planning working for faith communities

	and discussions with older people in sheltered housing units
Simple language and provide when subjects get technical which they will, provide examples to refer too. If you really want to improve access and get citizens involved then the council need to make sure this happens.	There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.
The website is not clear enough. I have been involved in planning policy and applications for about 4 years. I have found all of the above on the website. More one page diagrams like those to explain the developer charter would help with links.	We are continuing to update the website to make it easier to use.
Signpost hard copies in libraries	Posters advertising a consultation are put up in libraries
Clearer filing system	We are updating our website to make it clearer to use
Most policy documents are 'on line' there are many people who for various reasons do not have computers, cannot use them, cannot read especially if they are full of jargon.	Hard copies of local planning documents can be found in libraries and council offices when out to consultation
The web search is somewhat unwieldy, both on Southwark website and the planning sub-site. It's not easy to find these documents. Searching often only returns references to meetings about the documents and not the actual documents.	We are continuing to update our website to make it clearer to use
Present documents at TRAs	Tenants and Resident Associations can sign up to MySouthwark to get notified of consultations that may be relevant to them or their residents
Writing in letters not emails	In order to reach as many people as possible, email notifications via MySouthwark are used. We currently have 16000 people signed up to receive updates
There are too many of them, they are too difficult to find and they are off-putting in their density and style. Only a minority of respondents will have the time or resource to really address this consultation	There are many parts to the planning system that the document must cover and it must also have several supporting documents, however, the SCI has been rewritten to be clearer and use plain English.
Leaflets and emails need to have the basic salient points about the plans	Leaflets and emails will cover the basic points of a consultation with a link to the

featured more prominently to engage the community – no one will bother following links to planning policy documents unless the plans are outlined to them.	main documents for those who would like to learn more
In theory I am able to access these documents, because I am computer-literate. But I don't think ordinary people should have to spend their time doing something which is really the job of specialists.	Copies of policy documents are also available in libraries and council offices for those who are not computer-literate
A simple postcode finder with a general outline of plans within 100, 500m etc) would be useful. Prioritised by the scope (e.g. 35 storey building first and someone's side return extension last)	Southwark Maps is available which highlights planning applications in the borough in map format. Notification of planning applications is also available through the planning register. The SCI will make it clearer how to access information.
I am not sure, but I know that it is vital that the council do not slide into a digital-only approach. The COVID-19 crisis has obviously created a time when all consultation is digital and I think it would be easy but wrong for councils to continue that way afterwards.	The amended SCI will outline what type of consultation you can expect when face-to-face is not possible but it will also stress that alternatives to face-to-face should only be used in exceptional circumstances
Does the SCI help you to get involved in plan-making?	
Personally, I would like either speed humps or regular 20 MPH signs in my street. It would be nice to see this happen soon and then I will now that you are taking notice.	This is not a planning issue and is outside the scope of this consultation. However, your query will be forwarded to the council Highways department
So far suggestions given are ignored by LBS officers & by Cllrs Showballed on request to the city contractors personal agenda & the email new who have the lucrative contracts Cllrs who are corrupt	Feedback on consultations will be given in the form of a You Said/We Did report so that people can see how their comments helped shape a document and to explain why some suggestions were not used
The statement is a long policy document, the diagrams are better more accessible and short.	There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.
If you are not aware of them then you cannot get involved. We find out most	Tenants and Residents Associations can sign up to MySouthwark to find out

things through our local T & RA Committee meetings	about consultations that may be relevant to them and their residents
currently the only way I hear about anything is via the Walworth Society. Interestingly, it seems if you live in a Council property you get a newsletter that talks about whats going on. We live in a private block of flats and don't receive any information directly from Southwark, it's like they don't know we are here.	The Walworth Society and other community organisations are often involved in planning matters. One of the principles in the SCI is collaboration with community groups as they often have a wide reach into the community
I guess if I was really really keen on it then it would. But I don't see how it helps the council to elicit responses from people.	The council wants to encourage people to engage with planning so that the community can become more involved in shaping their place
I have no idea how to do it - and I am a University lecturer!	There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.
Telling me what the plans were would make me engage in them more, not telling me how the planning system works	The SCI highlights the plans relevant to Southwark and briefly explains what each of them are
The SCI itself doesn't. There has to be pull on behalf of council staff	Noted. Once the SCI is adopted these standards of consultation will have to be carried out by the council.
I find it totally overwhelming. It makes me less inclined to get involve	There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.
I do not see anything in this document that materially changes my chances of being involved in any particular plan making processes.	One of the aims of the document is to provide you with information and show you where you can find information about the planning process if you choose to get involved
There needs to be far more effort to engage with local residents. The residents need to have the opportunity to understand about planning, developments and changes in their local area, how this will affect them, what the benefits/detriments will be to them etc. Recently there was a consultation on the new Walworth library; they claimed a distribution of approximately 15,000. This consultation received 340 responses which equates to just over 2% response to the circulation. If you put that into perspective of the location	The SCI aims to set out how you can find out about and engage with planning. It sets out how people can find out about a consultation through MySouthwark. This database holds 16,000 users that receive notifications about planning consultations. Consultations are also advertised through council social media. We aim to reach as many people as possible and inform them of consultations in their area, however, we cannot guarantee the number of people who choose to

<p>population size of Walworth and the surrounding area, it's a really poor response and can't possibly reflect a true representation of those diverse people.</p>	<p>get involved. We will update the website and improve our messaging on this consultation to encourage people to engage with planning and why planning is important to engage with.</p>
<p>I have fairly recent experience of how the carrying out of works approved by planning rules are quite likely to breach the planning if the council does not monitor the works as they are being done. I would suggest that you look at the history of the planning and carrying out and objections to the building built at [REDACTED]. Any amount of good rules are wasted if the Council does not carry out the necessary inspections to make sure the building complied with the planning permission. Also there is a clear flaw in the planning rules which allows the owner to say he/she is building a family house when the intention is to let rooms in or parts of the house and not use the house as a family home.</p>	<p>The SCI sets out how you can report a breach in planning through the enforcement team. This comment has been passed on to the relevant enforcement team.</p>
<p>I think it would help if you widened the way you communicate about planning policy consultations. I hardly ever hear about planning consultations in my area - such as the Blue Marketplace - but I would be keen to contribute. Also, I think it would be good if you allowed people to input online. It's not always practical for people to come to a consultation, like a one off at one specific time. Or if you do, you will not get responses from certain groups of people such as young people (you should include teens - they'll be living here the longest!) or those with children.</p>	<p>The SCI has been amended to further highlight how you can find out about planning in your area.</p> <p>Online consultation will form a part of most consultations going forward as this is recognised as an effective form of engagement.</p>
<p>Consultations should be done in line with agreed regulations and should not be discreet.</p> <p>They should follow strict timelines.</p> <p>Feedback should be taken on board and follow-up meetings with amended proposals should be put forward.</p>	<p>The SCI sets out the standards of consultations. The minimum timelines for consultation are set out in the SCI and individual consultation plans for planning policy documents will set out exact dates and timelines. Feedback will be given through You Said/We Did report</p>
<p>Really not good enough Southwark. How do you propose to engage those</p>	<p>Although digital engagement is effective, it will not make up an entire</p>

parts of the community who, for example aren't online	consultation except in exceptional circumstances. Consultations on policy documents generally consist of workshops and other events that will facilitate those who are not online
I wish the experts would get on with their jobs for the benefit of the whole community and stop wasting time on consulting sectional interests.	Noted
I feel that all London councils and the mayor should have a combined publicity campaign to explain the importance of local plans and that during eg the consultation of site allocations is the time when you can most affect the future of your neighbourhood, rather than waiting for a developer to submit an application entirely in line with the priorities of the local plan.	Noted
How would you like to receive feedback on consultations?	
Majority say via email, some answered via twitter using a link to find out more info. Publish on the website Posters for the local community Use TRAs to feedback Use visuals Provide a list of consultations and the results of what was discussed Provide a summary of responses In writing to the person who raises an issue	The SCI sets out the minimum standards for feedback to the community on a consultation for a planning policy document. Feedback will be placed on the website with a notification of this set out through email.
Does the SCI help you to get involved in Development Management? Most lay people won't bother to read the SCI – it is too wordy	There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.
Information on lbs website is problematic it's always off line	We are updating the planning pages so that is easier to use
The actual delivery of engagement will help	Noted

Workshops are needed to inform decision making	The Development Consultation Charter sets out when a workshop is necessary in a planning application
Get involved through our Tenants & residents Association when we are told/asked. Although often we find out when it is too late or our objections are ignored.	Tenants and Residents Associations can sign up to be notified of when there is a planning application in their neighbourhood so they are up to date with what is happening in their area
If what is written is actually implemented it might make a difference	Noted
Time will tell. It is complicated but it might help	Noted
There is little information available about actual plans let alone how to get involved	The SCI sets out when you will be consulted and provides information on how to make a comment. The SCI provides links to all of the plans mentioned in the document so that you can find out more information about them.
To get involved in development management, things need to be publicised and there needs to be tools to assist easy community involvement	The SCI sets out how a planning application is publicized
I am not sure this document advances the public's ability to get involved to any significant extent.	One of the aims of the SCI is to provide information for people so that they know how to get involved if they choose to do so
it is not clear and cannot be use to guide me through complexities of planning approvals	The Consultation Roadmap sets out the process of how a planning application is approved
What do you think is positive about the DCC?	
Allow us to give feedback	Noted
I hope that developers will learn to take account of the parking limitations in areas where there previously was a carpark , which is now going to have a house built on it. [REDACTED] is a specific example. People thrown out of their flats. Redesign of building making a house and several flats BUT surveying the road for parking at a time during normal working hours is simply either stupid or crooked.	Parking surveys are assessed on a case by case basis and under guidelines that are set out at a national level
No equal community power here a strategic partnership is needed across all these proposals	The DCC aims to include the community at the earliest possible stage in a development so that the community can have their say on what is happening in an area

it focuses on involving the community, however, my fear again is it's just words - the reality is no one actually listens to feedback from citizens	A consultation report will be provided by a developer to set out how the comments received by the community were taken into account
Make developers consider the view and issues on existing residents and businesses	This will be set out in a consultation report
Sounds good if implemented and legislated for. If it's just a good intention it won't happen, there needs to be some legal recourse to ensure the Developer is obligated to carry out the policy. Any loophole will be used and exploited in order to maximise developer profit over local resident benefit.	Once adopted by the council, developers will be obliged to carry out the consultation standards in the DCC
It looks mighty comprehensive	Noted
It is supposed to set standards for community consultation but doesn't force staff to actually adhere to it.	Once adopted by the council, developers and council staff will be obliged to carry out the consultation standards set out
I think the fact that you have to click through to yet another document is highly problematic.	The SCI and DCC are separate documents as the SCI sets out the consultation that will be carried out by the council and the DCC sets out the consultation that will be carried out by developers
Comprehensive and shows actual routes to engagement	Noted
There is nothing positive about it	Noted
As the Covid announcement takes so much space on the web page of the council it's very difficult to read	The council's priority is to ensure that all residents are up to date on the current situation relating to COVID-19. This announcement will be removed when possible
It is probably a useful planning tool for developers and council officers.	Noted
I think it's good that early engagement is been promoted and that developers will have to commit themselves to the full process.	Noted
it sets out expectations and a process	Noted
What can be improved in the DCC?	
Make it more concise	The DCC will be amended to make it more concise
Make it less complicated and simpler in structure	The format of the DCC will be amended

<p>The successful contractors should also have teams at director levels that reflect the diversity of the community</p>	<p>A community panel for the Old Kent Road area is being set up to represent the community in developments in this area</p>
<p>Developers need to say exactly what they intend to do. So for example if they say they will provide a % of social housing then they must be held to that. At the moment it seems as is they can state one thing at the consultation phase and then renege on it when the development is actually taking place. When this happens does the council hold them to account? If not who does?</p>	<p>The percentage of social housing etc. is agreed in a section 106 once an application is approved. This is a legal agreement and must be adhered to. If a developer wishes to carry out a development that does not adhere to the section 106 they would have to submit a new application</p>
<p>Council also need to make an effort to engage to understand concerns in timely fashion eg site allocation in current local plan coming forward several years later. Local community then needs engagement by council for mayor/strategic schemes.</p> <p>Consultants required to set out engagement activity but it is the council and ward councillors who know which groups are operating in the local area and can encourage groups to make time for developer activity.</p> <p>Exhibitions only reach a few people – timeliness of developer online material needs improving Developers access to contacts for local groups to ensure information is sent out through many channels – especially for major/strategic schemes</p>	<p>The SCI sets out how the community will be consulted for a local plan.</p> <p>Developers will receive advice from the council on which community groups need to be consulted so that they can be sure to reach the relevant people when carrying out a consultation</p>
<p>Making it a policy that developers have to follow these guidelines</p>	<p>The DCC will be adopted by the council and developers will have to follow these guidelines</p>
<p>It seems to focus on “regeneration” which is sometimes seen as a euphemism for demolishing council blocks of flats and selling to developers who will profit from the deal by having a greater portion of private flats than council remnant flats in the new building. And it also seems to mean rehousing tenants in ways not always satisfactory.</p>	<p>The DCC sets out consultation standards for all levels of planning applications and not just those in areas of regeneration. The council’s housing team carries out extensive consultation when a planning application involves a council owned property so that residents are aware and involved in the decision-making process</p>

<p>Make it a legal requirement to follow all of the standards and advertise these at entrances to all buildings</p>	<p>The DCC will be adopted by the council and developers will have to follow these guidelines</p>
<p>It could be made more practical and specific. For instance, leaflet-drop: who will write these leaflets? What style of language will they be written in? What level of education will they assume of the readership?</p> <p>Surely it is impossible to ensure that all sections of a local community will participate? How can you avoid consultation being dominated by vested interests?</p>	<p>Specific information about different ways to consult, for example leaflet drops, was not included as this will vary greatly depending on the size, scale and nature of a project. This will be set out in more detail in individual engagement plans.</p> <p>The DCC and SCI aims to sets standards for consultation that will allow as many people as possible to get involved</p>
<p>I would very much like the council to commit to council and developer communications been held to much stricter transparency and accuracy rules.</p> <p>To give a common example, London is full of developer hoardings announcing that the development includes, say, '80 new affordable homes' while not mentioning that the buildings demolished to make way for the new development contained 120 social rent homes.</p>	<p>All documents relating to an application are uploaded on the website. This includes an officer report which sets out what is currently on the site and what the proposed development will offer</p>
<p>Use flow chats rather than long lists</p>	<p>The format of the DCC will be amended to make it clearer to understand</p>
<p>Does the DCC meet the principles of Built on Trust, Collaborative, Inclusive</p>	
<p>I agree that a Development Charter that holds developers to account is a good thing. I am not sure who this would work in practise.</p> <p>I appreciate the efforts to do this - but I have a low level of trust that it will actually be enforced ie in situations when push comes to shove and some developers are offering a fortune to Southwark to put up posh flats in Old Kent Road when the new tube station comes.</p>	<p>Once the DCC is adopted developers and the council will be obliged to carry out the consultation standards set out in the document</p>

Equality duties should be key	Agreed. This will be addressed in individual consultation reports
Need to see practical examples to make a judgement on this	As this is a new process there are not many examples of this type of consultation yet. Engagement Plans and Engagement Summaries are a validation requirement for developers and these will be uploaded as part of the planning register for the relevant application.
It will depend on size of scheme and developer, and longer term relationship with council.	Once the DCC is adopted developers and the council will be obliged to carry out the consultation standards set out in the document
unless there is legislation and there is a legal obligation to prove they have engaged with the local population and that they can't proceed unless there is a suitable level of response from the consultees. It's not enough to say we offered a consultation, it must be met with a response. If there is a lack of response, the consultation has failed and they must be forced to do it again.	Once the DCC is adopted developers and the council will be obliged to carry out the consultation standards set out in the document. Feedback will be provided in a consultation report
sceptical about developers and also sometimes their cosy relationship with the Council and/or some of the Council employees.	Once the DCC is adopted developers and the council will be obliged to carry out the consultation standards set out in the document
No quality check are made by council planning staff to check whether or not the developers are consulting, what promises they have made and whether they have followed through on those commitments	The developer will be required to submit an Engagement Plan and Engagement Summary outlining the consultation that took place and how the community's comments were taken into account
In theory, yes, but past experience has shown that developers and councils don't always seem to act on the guidance principles they outline	Once the DCC is adopted developers and the council will be obliged to carry out the consultation standards set out in the document
It depends entirely on whether Southwark makes developers stick to their agreements, something the council has a very poor record on.	Once the DCC is adopted developers and the council will be obliged to carry out the consultation standards set out in the document
Does the DCC meet the principles of reflective, timely, proportionate, evidence based?	
From the lack of content, lack of accountable individuals, named in this consultation, lack of history and reference, factual examples. I don't see	As this is a new process there are not many examples of this type of consultation yet. We will upload Engagement Plans and Engagement

how the processes that you set out here so theoretically can actually be answered meaningfully	Summaries on to the planning register so that you can see how consultation is happening for each application
Much of quality of consultation, engagement and developer proposals assessment is subjective.	An Engagement Plan and Engagement Summary will be submitted by a developer to assess the consultation carried out
All this demands a day of studying the documents. I do not have that time. I am worried that the council is slanting this survey towards getting the answers it wants, rather than getting real feedback.	There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.
Great principles, I remain skeptical	Noted
This should be quantifiable and measurable and focus for immediate improvement.	Developers have started using the DCC to improve their engagement on schemes that they submit to the council. Examples of these Engagement Plans and Engagement Summaries will be available online
The Development Consultation Charter is not "Simple & Accessible", it's complicated, too long and I would imagine a majority of residents won't know it exists, or even if they did come across it would not read it due to its complexity. It is not clear, or well explained. Finally I can't comment on the responsiveness because my only experience is of receiving no response at all.	The format of the DCC has been altered to make it easier to understand, and the SCI has been rewritten to be clearer and use plain English
I am worried about the complication of the SCI.	Once adopted, the standards set out in the SCI will have to be adhered to. There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.
the fact that these consultation documents are so bad does nothing for my faith in the council's ability to provide clear and readable documents in future.	There are many parts to the planning system that the document must cover, however, the SCI has been rewritten to be clearer and use plain English.

Summary of responses made via email

Environment Agency No comment	Noted
Resident Expresses interest in becoming involved with planning	Noted

<p>Resident Expresses interest in becoming involved with planning, particularly interested in 'negotiating a mature approach to Southwark's wellbeing & to the ladies who have single handedly raised this borough'</p>	Noted
<p>Resident Caroline Gardens would benefit from an on site nurse with an emergency alarm for residents – possible community funding project</p>	Noted
<p>Resident The consultation survey is too long and complex Involved in the Peckham Heritage Regeneration Partnership and have scrutinized planning documents and impressed by the care and quality of the decision making process. But concerned that the volume of evidence in major cases requires a professional level of expertise and time that is not widely available. Planning register is crucial for democratic communication. Officer reports are invaluable but is it possible to have simplified version to explain recommendations that would then be put out to public consultation before final decisions are made.</p>	<p>We will shorten the survey for the next round of consultation so that it is easier to complete.</p> <p>An officer report sets out a full analysis of the planning application and the reasons for recommending a decision on a planning application and so must contain a lot of detail. Officer reports also now contain an Executive Summary.</p>
<p>Resident Concerned about the chance people will get to speak at planning committees. Objections are limited to 3 minutes which gives the impression that matters have been decided and objections are just a formality</p>	Noted. The SCI deals with the consultation process while planning committees deal with the decision-making process
<p>The Planning Lab on behalf of Peer Group Supports community engagement throughout the planning process.</p> <p>Peer Group agree that engagement should take place from the earliest possible stages in the process of developing a proposal but consider that timing of this communication should be able to reflect individual site circumstances. In</p>	<p>Noted. In order to maintain some form of confidentiality, nothing relating to the pre-app will be released into the public domain until a formal planning application is submitted.</p> <p>The Engagement Plan sets out a template for what the consultation should aim to achieve and who it should aim to consult. It is important that engagement is planned so that the most can be made of the consultation period.</p>

particular, the timing of public consultation may need to respond to individual Client and site sensitivities and potential impacts on business continuity.

Concerned that sending pre-app meeting notes too soon in the pre-application process would have a detrimental impact on the effectiveness of early confidential pre-app discussions. Pre-apps are often used to test principles and sharing meeting notes too early could result in unsettling existing tenants before a concept is ready to be progressed. Developers can require a degree of commercial confidentiality, not to the detriment of stakeholders, but for their own business priorities and continuity. Pre-app meeting notes should not be published until the submission of an application at the earliest.

The current draft of the engagement plan requires a significant amount of information and detail be provided upfront. Peer Group considers that the consultation process should be a dynamic process, responsive to project specifics and issues that emerge and that the Engagement Plan should not be too prescriptive at this early stage in a project.

Pre-app validation list: this list should not be mandatory for every major application but that applicants should provide a level of information suitable to their specific proposals. For instance, at the first pre-application stage it is unusual for most schemes to have prepared CGI images or 3D modelling when a proposal may still be at concept stage.

Roadmap: Roadmap states

If some of the information is unknown then part of the aim of the engagement should be find out this missing information.

Proposals will be expected to meet the standards set out in the DCC. In cases where the design is at a very early stage and images are not possible then this may justify not having CGI images. However, these images should then be made available at a later stage of the consultation.

The roadmap is intended to set out in a simple manner the general steps in the planning process. This will be amended to be made clearer.

<p>that developers will begin the engagement process by 'registering their interest' and LBS will arrange to have a meeting within 3 weeks. Peer Group is unclear on what information is required to register interest and whether a meeting will be confidential at this stage?</p>	
<p>Thames Water Ltd New developments have the potential to increase the requirements for water and wastewater infrastructure. As such we would welcome inclusion of text within the SCI encouraging applicants to seek pre-application advice from Thames Water to discuss water and wastewater infrastructure requirements ahead of the submission of any application</p>	<p>Noted. Applicants will be notified by council officers to seek pre-app advice from Thames Water wherever relevant</p>
<p>Resident keen to get involved in the planning activities, particularly when it comes the buildings immediately surrounding the Trilogy development</p>	<p>Noted</p>
<p>Highways England No comment</p>	<p>Noted</p>
<p>Planning Advisory Service</p> <ul style="list-style-type: none"> • Clarification on whether all Pre Apps and Planning Performance Agreements (PPAs) big and small have to have an engagement plan • If an applicant doesn't want to consult at pre-app will LBS refuse to enter into a Pre App/PPA • Or will LBS have a pre app and explain to the applicant that pre-app notes will go public • Can an applicant ask that a pre app/PPA never goes public • In agreed pre app/PPA, are councillors briefed on pre app before planning committee • Clarification needed on what part of pre app gets put into public domain e.g. meeting minutes, plans, final PPA advice from LBS? 	

<ul style="list-style-type: none"> • Can pre apps be Freedom of Information or do you agree confidential pre-apps? 	
<p>Transport for London Although the revised Statement of Community Involvement (SCI) provides details of how local residents will be involved in the planning process, it has relatively little to say about engagement with stakeholders such as Transport for London. For completeness it may be helpful to include a brief section on stakeholder engagement including a list of organisations that will be consulted on planning policy documents and planning applications</p>	<p>Noted. Reference to stakeholder engagement will be included</p>



STATEMENT OF COMMUNITY INVOLVEMENT
DECEMBER 2021
DRAFT FOR CONSULTATION

APPENDICES

No.	Title
Appendix A	Statement of Community Involvement (SCI)
Appendix B	Development Consultation Charter (DCC)
Appendix C	Consultation Report
Appendix D	Consultation Plan
Appendix E	Equalities Impact Assessment



**Statement of Community Involvement
Consultation Plan
December 2021**

Table of Contents

Introduction	4
What is the Statement of Community Involvement (SCI)?	4
Why are we consulting on the SCI?	4
What is a Consultation Plan?	5
Summary of the consultation to date	5
The purpose of this consultation	6
How are we consulting?	6
Consultation Methods	9
Table 1: Minimum consultation	9
Table 2: Additional consultation	10
How to comment on the SCI	11
What happens next?	11

Introduction

What is the Statement of Community Involvement (SCI)?

1. The SCI is our commitment to you on how we will consult and engage with the community throughout the planning process. We want to hear from communities, residents, businesses and other stakeholders about how we can work together to shape and change areas in the borough.
2. The SCI aims to:
 - Put people at the centre of the engagement process and help to build strong relationships
 - Make things simpler and make sure people have a better experience when getting involved in planning matters
3. The SCI:
 - Gives details about the opportunities you have to help make plans, policies and decisions that can affect your community and where you live
 - Outlines our commitment to you and sets out how we will deliver the values in the New Approach to Community Engagement
4. The Development Consultation Charter (DCC) forms part of the SCI. It explains how developers are expected to carry out successful engagement for large scale developments (development is considered large scale if it involves over 10 homes). The charter provides the developer with guidance on how to engage effectively with the public.
5. The DCC:
 - Helps developers understand community need
 - Provides clear guidelines for consultation
 - Explains what successful engagement looks like
 - Provides a template of an engagement plan

Why are we consulting on the SCI?

6. The public consultation on the SCI is an opportunity for Southwark residents to have their say on how the community is engaged throughout the planning process. The responses received by the council during the process of the consultation will help to shape and improve the SCI for the benefit of the community. This is important to enable better engagement and collaboration between the council and the community during the process of planning decisions, regeneration preparations and creating strategies for the future of the borough.

What is a consultation plan?

7. A consultation plan sets out how you can expect to be consulted throughout this stage of consultation on the SCI. It details how you will find out about the consultation and how you can make your comments on this document. The purpose of this consultation plan is to detail how you will be consulted on the SCI and DCC at this stage. If you have further questions about the consultation or the SCI you can contact the planning policy team at planningpolicy@southwark.gov.uk

Summary of consultation to date

8. There is no statutory requirement to consult on the SCI. However, in order to write a SCI that responds to the needs of our local community and to continue to improve the way that we consult throughout the planning process we have carried out extensive consultation on this document.
9. As set out in the Consultation Report, the SCI has already been shaped by comments received during four workshops held as part of an informal consultation on planning. These Planning Workshops were held on March 25 2019 (76 attendees) and August 1 2019 (85 attendees). These events focused on how the public would like to be engaged on planning matters and the feedback received helped to shape the current draft of the SCI.
10. This feedback helped to shape the draft SCI that went out to consultation in January 2020. This consultation closed in May 2020 due to restrictions relating to COVID-19. This round of formal consultation aimed to implement the principles set out in the council's new Approach to Community Engagement as well as engage with those who do not usually engage with planning. Engagement throughout the consultation of the SCI has focused on reaching different groups of people from our diverse communities. This is set out in full in the Consultation Report.
11. Restrictions relating to COVID-19 meant that not all events were able to take place during the previous stage of consultation. However, regular updates were sent to MySouthwark users and regular Twitter updates reminded the public to take part as well as leaflet drops in the Old Kent Road area to let people know about the consultation.
12. The SCI and the DCC have been amended to reflect comments made internally by the planning policy and development management, as well as other relevant departments. It has also made improvements to clarity, flow and style of the document.

13. The SCI and DCC will go out to Consultation for a further 8 weeks.

The purpose of this consultation

14. The SCI and DCC have been amended to take on board the feedback received. The documents have also been updated to set out alternatives to consultation in exceptional circumstances, for example when face-to-face engagement was not possible during restrictions relating to COVID-19.

15. The purpose of the consultation is to receive feedback from the community on the changes made to the SCI and DCC. In particular, we want to know your opinions on the key proposed changes to the documents which include:

- Further information on Neighbourhood Planning;
- Further information given on how to get involved at different consultation stages;
- Further information given on how to register comments and find out about consultations or planning applications;
- The rewording of sections to be more clear and use plain English;
- The alternative methods to consultation when face-to-face engagement is not possible, for example during COVID-19; and,
- How the SCI reflects the work associated with the Southwark Stands Together Pledge.

How are we consulting?

16. This consultation plan sets out the consultation we are planning to carry out on the SCI and DCC. There is no statutory requirement to consult the community on the SCI. However, in order to produce a document that reflects the needs of the community we will consult on the proposed changes to the SCI.

17. The following sections set out how we plan to meet the minimum consultation requirements set out in the adopted SCI 2008 and how we will exceed these requirements where possible while maintaining the safety of the community by managing any COVID-19 related risks to council staff or the public. Alternatives proposed to the SCI in this consultation plan are in line with the council's gradual approach to returning to the office.

18. The engagement plan will ensure that we work with our community and voluntary sector partners and focus on our strengths to build effective engagement plans. We understand the reach the community and voluntary sector have into the community to help encourage and promote the consultation.

19. We will work to make engagement relevant and think about the reasons people may wish to take part. This will include updating our messaging and the website to show people why they should engage with planning.
20. Because of restrictions relating to COVID-19, this consultation will take place mostly online.
21. Focusing on online platforms provides opportunities for the use of different techniques. Online communication is a medium in which many people choose to communicate and by targeting residents via their preferred means, the likelihood of involvement is increased. Users can take part in an online consultation when and where they want. Because of its increased accessibility, online consultation has the power to reach new audiences – particularly the young. Online consultation also has the benefit of giving those who do not usually participate a chance to get involved. It will also allow those who may not be able to attend consultation events and meetings a chance to get involved in the conversation from home. We encourage participation from all attendees in online and public consultation meetings and endeavor to ensure everyone has a chance to speak.
22. We have previously written to many community groups and all Tenants and Residents Associations in Southwark to make them aware of how to sign up to receive email updates on planning policy consultations through MySouthwark. We will continue to encourage new groups to join the mailing list and publicise consultations through our website and where possible through council newsletters, council meetings (where appropriate) and social media. When the SCI consultation opens, local groups are welcome to invite us to join their meetings to discuss the consultation.
 - We will engage with our partner organisations, including Community Southwark and the Forum for Equality and Human Rights in Southwark (FEHRS) who have good connections with many community groups in Southwark.
 - Local ward Councillors and a community champion in each multi-ward areas of Southwark as part of the Empowering Communities programme have regular meetings where neighbourhood issues can be discussed and residents can voice their concerns. All ward Councillors will be notified of the consultation, and will make announcements at these meetings if they are taking place throughout the consultation period.
 - An announcement will also be made at planning committee about the consultation.

23. We welcome opportunities that the voluntary and community sector groups may take to facilitate engagement using community platforms.
24. Inclusive engagement must be maintained while engaging remotely. Allowing for a mix of voices and perspectives remains important to engagement. To ensure that those who do not have access to the internet can engage with the consultation we will hold phone call and online sessions. Because the council is currently operating a gradual return to the office which means that there is limited in-person staff availability, phone and online methods of communication are the preferred option.
25. It is important that we use other platforms, social media and our community partners to help us reach those that have not previously engaged and those that we have yet to hear from.
26. We will also ensure that the presentations and materials used throughout any consultation event are accessible to all. We will aim to use visuals, graphics and flow charts wherever possible to ensure that the material is as easy to understand as possible.
27. Consultation will last for 8 weeks from 14 December 2021 – 7 February 2022. The SCI and DCC will be available to view in advance of the consultation period from 30 November 2021.
28. Comments can be made on the Consultation Hub or by email to planningpolicy@southwark.gov.uk
29. The tables below will set out how you can expect to be consulted during this consultation. We set out the minimum SCI requirements that we will carry out, and then the additional consultation we propose to carry out. We set out dates where these are already agreed.

This table is not exhaustive and throughout the consultation period we will look at ways in which to carry out different types of consultation with as many different groups as possible

Consultation Methods

TABLE 1: MINIMUM CONSULTATION AS REQUIRED BY THE ADOPTED 2008 SCI

Method of Consultation	Consultee	Comments
Send a mail out to all statutory consultees informing them of the consultation and inviting comments	Statutory consultees	Notification will be sent out through MySouthwark which all statutory consultees are signed up to
Display consultation documents at our offices As the council is currently operating a gradual return to the office, we will print one copy per person and send out it to individuals if requested	All	All documents are available online and everyone is encouraged to use this facility first. As staff have not yet returned to the council offices full time copies of the plan will need to be printed specially and posted and this will take time.
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/consultation-and-updates/statement-of-community-involvement
Advertise the consultation in the local press	All	This will be Southwark News

TABLE 2: ADDITIONAL CONSULTATION

Method of Consultation	Consultee	Comments
Update MySouthwark users regularly of the consultation and where to find consultation documents	All	An email will be 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. We will also use Facebook pages such as the Empowering Communities Facebook pages to reach a wider audience	All	Send out regular updates and reminders through council social media pages
Display the SCI and accompanying documents on the council's Consultation Hub with an online questionnaire available for comments	All	A link to the Consultation Hub will be sent in regular updates to MySouthwark users
Engage with groups such as Community Southwark and the Forum for Equality and Human Rights in Southwark (FEHRS) as well as the Empowering Communities programme to inform residents of the consultation	All	Engage those who we have not yet reached so that they can get involved in the drop in sessions that are planned. Community groups and organisations may be useful in reaching these groups
Phone call drop in: We will allocate timeslots for people to give feedback over the phone where they cannot write a letter/send an email/ access the Consultation Hub	All	This service will allow those who cannot access the internet or send a letter to engage with the consultation
Online meetings: If requested by local groups we will attend local	All	This service will allow those who have questions and comments to speak to an officer about their

Method of Consultation	Consultee	Comments
group meetings to discuss the SCI		suggestions from the SCI. Some online platforms can still be used with modifications for those who have internet access.

How to comment on the SCI

30. We welcome your comments on the SCI and DCC and in particular your comments on the proposed changes to the documents

31. Feedback can be given:

- On the Consultation Hub
- By email to planningpolicy@southwark.gov.uk
- By phone to 020 7525 5403
- By letter / post to:

Planning Policy,
Southwark Council,
PO BOX 64529,
London SE1P 5LX

For any queries or assistance, please contact: planningpolicy@southwark.gov.uk

What happens next?

32. All of the comments received during the consultation to date were considered and helped to shape the amended SCI.

33. The SCI has been amended to outline standards of consultation when, in exceptional circumstances such as COVID-19, face-to-face engagement is not possible. It is important that this is included in the SCI so the community can be aware of what type of engagement they can expect in different circumstances. This is also in line with current government guidance.

34. This amended SCI will be consulted on for another 8 weeks as set out above so that the community can give their opinions on any additional changes they would like to see made to the SCI.

35. Once this consultation is over, responses will be compiled and the SCI will be amended where necessary to take on board the comments received. This new SCI will then be formally adopted. The SCI will be implemented and monitoring will be ongoing.

36. Feedback from this consultation will be made available on the website and a link to this feedback will be sent to MySouthwark users.



STATEMENT OF COMMUNITY INVOLVEMENT
DECEMBER 2021
DRAFT FOR CONSULTATION

APPENDICES

No.	Title
Appendix A	Statement of Community Involvement (SCI)
Appendix B	Development Consultation Charter (DCC)
Appendix C	Consultation Report
Appendix D	Consultation Plan
Appendix E	Equalities Impact Assessment



Statement of Community Involvement
Equalities Impact Assessment
November 2021

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 effect 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/departmental/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		Statement of Community Involvement 2021			
Equality analysis author		Tom Buttrick			
Director		Stephen Platts			
Department		Planning Policy	Division	Chief Executive	
Date of analysis		November 2021			
Sign-off	Laura Hills	Position	Planning Policy Manager	Date	25 November 2021

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

Brief description of policy/decision/business plan
<p>The Statement of Community Involvement (SCI) is an important planning document that defines how and when local residents, community groups and stakeholders can be involved in the planning process; both when we write new planning policy documents and when we consult on planning applications for new development. The SCI:</p> <ul style="list-style-type: none"> • Puts people at the centre of the engagement process and help to build strong relationships • Make things simpler and make sure people have a better experience when getting involved in planning matters • Gives details about the opportunities you have to help make plans, policies and decisions that can affect your community and where you live • Outlines our commitment to you and sets out how we will deliver the values in the New Approach to Community Engagement <p>The Development Consultation Charter (DCC) forms part of the SCI. It explains what engagement applicants and developers are expected to carry out for larger scale developments (large scale is anything over 10 homes or above 3,500sqm commercial floorspace). The Charter provides the developer with guidance on how to engage effectively before, design and after the submission of a planning application</p> <p>The DCC:</p> <ul style="list-style-type: none"> • Helps developers understand community need • Provides clear guidelines for consultation • Explains how community feedback will be used in evolving the proposal

- Signposts templates for Engagement plans and Summaries

Section 3: Service users and stakeholders

Service users and stakeholders	
Key users of the department or service	Members of the public; Developers; Local Authorities; Housing Associations; Environment and Leisure Department; Flood and Drainage Department; Children's and Adult's Services Department; Housing and Modernisation Department; Councillors; Finance and Governance Department; Chief Executive Department; Greater London Authority; Transport for London; Thames Water; Metropolitan Police; Chief Executive's Department.
Key stakeholders were/are involved in this policy/decision/business plan	Members of the public; Housing Associations; Local Authorities Environment and Leisure Department; Children's and Adult's Services Department; Housing and Modernisation Department; Councillors; Finance and Governance Department; Chief Executive Department.

Section 4a: Summary of EQIA

The SCI is the council's framework for consultation and engagement through the Planning process. Its successful implementation will ensure that the process better addresses the needs of those in the borough, especially those with protected characteristics. There are no direct health and wellbeing implications of the SCI or Development Consultation Charter, but the documents encourage the consideration of the public, and their needs which includes health and wellbeing implications of plan-making and development.

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 also 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)
<p>SCI The SCI is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system. Reviewing our current approach to consultation in planning and setting out new actions to make consultation more accessible would have a positive social impact for all, including those with protected characteristics.</p> <p>There are no foreseen negative impacts to people based on their Age.</p> <p>The SCI has been updated to include information on how people can expect to be consulted when face-to-face engagement is not possible – this will require a greater emphasis on digital engagement. Feedback received during the last stage of consultation suggests that older people may not have access to or have the skills necessary for digital engagement.</p>	<p>SCI There are no positive or negative health impacts identified for the above protected characteristic and the SCI.</p>

<p>Development Consultation Charter The DCC is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The Charter sets out the expected type and extent of engagement Developer's must undertake for different types of development and the reports they must submit. By setting out these new actions and the required reports will make consultation more accessible and this would have a positive social impact for all, including those with protected characteristics.</p>	<p>Development Consultation Charter There are no health impacts identified for the above protected characteristic and the Development Consultation Charter .</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>With regard to age, Southwark has a young population with 40% of the population aged 20-39. It is also recognised that there has often been a challenge around engagement particularly from young people (under 24), but also people under 45 who form a high percentage of the population. Digital consultation may help to extend our reach into the community and expand the range of people who engage with planning.</p> <p>Comments made at consultation events suggest that older residents may not have digital skills or have access to the internet and those that do often do not know how to use it. Therefore the internet should not be the only way people can find out about consultations or get involved. The council must ensure that that all residents, regardless of age, are able to access consultation, there are alternatives to online consultation.</p> <p>Further information of the Southwark profile for the above protected characteristic is provided in Appendix 1 of the EQIA for the SCI - Supporting Datasets.</p>	
<p>Mitigating actions to be taken</p>	
<p>We will continue to monitor and review the Charter to ensure that the likelihood of negative impacts arising is minimal.</p> <p>The SCI is clear that a digital only approach is only acceptable in exceptional circumstances. The SCI clearly sets out alternatives to digital consultation and communications to facilitate those who may not have access to the internet. It is important to ensure that all Consultation Plans in the future can demonstrate that there are alternatives to digital engagement to ensure as many people as possible can get involved in a consultation as set out in the SCI.</p>	

Individual Consultation Plans on different projects will set out how consultation will take place, how any negative impacts on any equalities group will be mitigated against, and follow the council's Approach to Community Engagement

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)

SCI

The SCI is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.

Reviewing our current approach to consultation in planning and setting out new actions to make consultation more accessible would have a positive social impact for all, including those with protected characteristics. The SCI ensures that consultation events will be accessible to all.

The SCI has been updated to include information on how people can expect to be consulted when face-to-face engagement is not possible – this will require a greater emphasis on digital engagement. This may have a potential impact on how those with certain disabilities can engage.

The SCI is clear that a digital only approach is only acceptable in exceptional circumstances – individual Consultation Plans on different projects will set out how this will happen and how any negative impacts on any equalities group will be mitigated.

SCI

There are no positive or negative health impacts identified for the above protected characteristic and the SCI.

<p>Development Consultation Charter The DCC is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The Charter sets out the expected type and extent of engagement Developer's must undertake for different types of development and the reports they must submit. By setting out these new actions and the required reports will make consultation more accessible and this would have a positive social impact for all, including those with protected characteristics, including disability.</p>	<p>Development Consultation Charter There are no health impacts identified for the above protected characteristic and the Development Consultation Charter .</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>In the 2011 census about 13.5% of residents reported a long term condition that limited them this includes those with physical and mental disability as well as illness.</p> <p>Further information of the Southwark profile for the above protected characteristic is provided in Appendix 1 of the EQIA for the SCI - Supporting Datasets.</p>	
<p>Mitigating actions to be taken</p>	
<p>We will continue to monitor and review the charter to ensure that the likelihood of negative impacts arising is minimal.</p> <p>Individual Consultation Plans on different projects will set out how consultation will take place, how any negative impacts on any equalities group will be mitigated against, and follow the council's Approach to Community Engagement. As people's needs are not the same we will provide a range of options to ensure participation in consultation events. The onus will be on those carrying out the consultation to use suitable engagement materials and venues with access for everyone. We will also use a reflective approach and learn from work across other council projects around mental health.</p> <p>Where necessary the council will work with community groups, Public Health and Clinical Commissioning Group (CCG) to offer the best support around engagement when necessary</p>	

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)
<p>SCI The SCI is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>Reviewing our current approach to consultation in planning and setting out new actions to make consultation more accessible would have a positive social impact for all, including those with protected characteristics. There are no foreseen negative impacts to people based on their gender.</p>	<p>SCI There are no positive or negative health impacts identified for the above protected characteristic and the SCI.</p>
<p>Development Consultation Charter The DCC is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The Charter sets out the expected type and extent of engagement Developer's must undertake for different types of development and the reports they must submit. By setting out these new actions and the required reports will make consultation more accessible and this would have a positive social impact for all, including those with protected characteristics.</p>	<p>Development Consultation Charter There are no health impacts identified for the above protected characteristic and the Development Consultation Charter .</p>
Equality information on which above analysis is based	Health data on which above analysis is based
Further information of the Southwark profile for the above protected characteristic is provided in Appendix 1 of the EQIA for the SCI - Supporting Datasets.	
Mitigating actions to be taken	
We will continue to monitor and review the charter to ensure that the likelihood of negative impacts arising is minimal.	

<p>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.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>
<p>SCI The SCI is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>Reviewing our current approach to consultation in planning and setting out new actions to make consultation more accessible would have a positive social impact for all, including those with protected characteristics. There are no foreseen negative impacts to people based on pregnancy and maternity characteristics.</p>	<p>SCI There are no positive or negative health impacts identified for the above protected characteristic and the SCI.</p>
<p>Development Consultation Charter The DCC is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The Charter sets out the expected type and extent of engagement Developer's must undertake for different types of development and the reports they must submit. By setting out these new actions and the required reports will make consultation more accessible and this would have a positive social impact for all, including those with protected characteristics.</p>	<p>Development Consultation Charter There are no health impacts identified for the above protected characteristic and the Development Consultation Charter .</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>

Further information of the Southwark profile for the above protected characteristic is provided in Appendix 1 of the EQIA for the SCI - Supporting Datasets.

Mitigating actions to be taken

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

Individual Consultation Plans on different projects will set out how consultation will take place, how any negative impacts on any equalities group will be mitigated against, and follow the council's Approach to Community Engagement

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)

SCI

The SCI is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.

Reviewing our current approach to consultation in planning and setting out new ways of undertaking to consultation will make consultation more accessible would have a positive social impact for all, including those with protected characteristics, including race

Engagement on the SCI has aimed to reach out to people of different backgrounds. Feedback received at consultation suggests that the SCI may be too complicated for people where English is not their first language.

SCI

There are no positive or negative health impacts identified for the above protected characteristic and the SCI.

Development Consultation Charter

The DCC is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.

Development Consultation Charter

There are no health impacts identified for the above protected characteristic and the Development Consultation Charter .

<p>The Charter sets out the expected type and extent of engagement Developer's must undertake for different types of development and the reports they must submit. By setting out these new actions and the required reports will make consultation more accessible and this would have a positive social impact for all, including those with protected characteristics.</p>	
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>54.2% of Southwark's population is from White Ethnic backgrounds (which includes 39.7% from White British backgrounds) and 12.4% from White Other Ethnic backgrounds.</p> <p>45.8% of the population are from Black, Asian and minority ethnic backgrounds, nearly 27% from Black African and Caribbean backgrounds. 9.4% of people from Asian backgrounds with just over 6% from Mixed ethnic backgrounds and 3.3% from Other ethnic backgrounds.</p> <p>Further information of the Southwark profile for the above protected characteristic is provided in Appendix 1 of the EQIA for the SCI - Supporting Datasets.</p> <p>Feedback from consultation events and workshops suggested that people who do not speak English as their first language may struggle with complex language and long documents associated with planning.</p>	
<p>Mitigating actions to be taken</p>	
<p>We will continue to monitor and review the charter to ensure that the likelihood of negative impacts arising is minimal.</p> <p>Individual Consultation Plans on different projects will set out how consultation will take place, how any negative impacts on any equalities group will be mitigated against, and follow the council's Approach to Community Engagement. As people's needs are not the same we will provide a range of options to ensure participation in consultation events. The onus will be on those carrying out the consultation to use suitable engagement materials and venues with access for everyone.</p> <p>Engagement on the SCI has aimed to reach out to people of different backgrounds. In acknowledgment of the fact that English may not be the first language of everyone, we will ensure the council's website is easy to understand and clearly sets out how we will undertake community engagement to assist with this.</p>	

When planning a consultation event plain English and translation where necessary should be used for consultation and engagement content.

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)

SCI

The SCI is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system. Reviewing our current approach to consultation in planning and setting out new actions to make consultation more accessible would have a positive social impact for all, including those with protected characteristics.

There are no foreseen negative impacts to people based on their religion and belief.

Engagement on the SCI has aimed to reach out to people of different backgrounds with a specific event held for Faith communities who do not usually engage with planning although this not a problem that only people of faith experience. Feedback from this event suggested that the planning system, and by extension, the SCI is too complicated for those who have little knowledge of the planning. The council's planning website will be updated available to assist with this.

SCI

There are no positive or negative health impacts identified for the above protected characteristic and the SCI.

<p>Development Consultation Charter The DCC is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The Charter sets out the expected type and extent of engagement Developer's must undertake for different types of development and the reports they must submit. By setting out these new actions and the required reports will make consultation more accessible and this would have a positive social impact for all, including those with protected characteristics.</p>	<p>Development Consultation Charter There are no health impacts identified for the above protected characteristic and the Development Consultation Charter .</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>Census data 2011 identified the following belief make-up of the borough: 52.54% Christian; 1.35% Buddhist; 1.27% Hindu; 0.35% Jewish; 8.52% Muslim; 0.23% Sikh; 0.47% other religion; 26.74% no religion; 8.54% did not say.</p> <p>Further information of the Southwark profile for the above protected characteristic is provided in Appendix 1 of the EQIA for the SCI - Supporting Datasets.</p>	
<p>Mitigating actions to be taken</p>	
<p>We will continue to monitor and review the charter to ensure that the likelihood of negative impacts arising is minimal.</p> <p>Feedback from members of faith communities who do not usually engage with planning suggested that the planning system, and by extension, the SCI is too complicated for those who have little knowledge of the planning. We will ensure the council's website is easy to understand and clearly sets out how we will undertake community engagement to assist with this.</p>	

<p>Sex - A man or a woman.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>

<p>SCI</p> <p>The SCI is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system. Reviewing our current approach to consultation in planning and setting out new actions to make consultation more accessible would have a positive social impact for all, including those with protected characteristics.</p> <p>There are no foreseen negative impacts to people based on their sex.</p>	<p>SCI</p> <p>There are no positive or negative health impacts identified for the above protected characteristic and the SCI.</p>
<p>Development Consultation Charter</p> <p>The DCC is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The Charter sets out the expected type and extent of engagement Developer's must undertake for different types of development and the reports they must submit. By setting out these new actions and the required reports will make consultation more accessible and this would have a positive social impact for all, including those with protected characteristics.</p>	<p>Development Consultation Charter</p> <p>There are no health impacts identified for the above protected characteristic and the Development Consultation Charter .</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>Census 2011 data: Female: 50.5%/ Male: 49.5%</p> <p>Further information of the Southwark profile for the above protected characteristic is provided in Appendix 1 of the EQIA for the SCI - Supporting Datasets.</p>	
<p>Mitigating actions to be taken</p>	
<p>We will continue to monitor and review the charter to ensure that the likelihood of negative impacts arising is minimal.</p>	

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)
<p>SCI The SCI is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system. Reviewing our current approach to consultation in planning and setting out new actions to make consultation more accessible would have a positive social impact for all, including those with protected characteristics.</p> <p>There are no foreseen negative impacts to people based on their sexual orientation.</p>	<p>SCI There are no positive or negative health impacts identified for the above protected characteristic and the SCI.</p>
<p>Development Consultation Charter The DCC is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The Charter sets out the expected type and extent of engagement Developer's must undertake for different types of development and the reports they must submit. By setting out these new actions and the required reports will make consultation more accessible and this would have a positive social impact for all, including those with protected characteristics.</p>	<p>Development Consultation Charter There are no health impacts identified for the above protected characteristic and the Development Consultation Charter .</p>
Equality information on which above analysis is based	Health data on which above analysis is based
<p>Southwark has the second largest gay or lesbian population in London at 5% with our neighbouring borough Lambeth as the highest.</p> <p>Further information of the Southwark profile for the above protected characteristic is provided in Appendix 1 of the EQIA for the SCI - Supporting Datasets.</p> <p>Feedback from consultation events and workshops did not address issues surrounding sexual orientation.</p>	

Mitigating actions to be taken
<p>We will continue to monitor and review the charter to ensure that the likelihood of negative impacts arising is minimal.</p> <p>The LGTBQ Forum were specifically consulted on the SCI and will be in the future where there is a policy/project that may directly effect this community.</p>

<p>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.</p>

Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>SCI Socio-economic disadvantage continues to be a major cause of inequality for people living in Southwark.</p> <p>A person's family economic and social position can have an impact of their income, health, living conditions or occupation.</p> <p>The SCI is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system. Reviewing our current approach to consultation in planning and setting out new actions to make consultation more accessible would have a positive social impact for all, including those with protected characteristics.</p> <p>The SCI has been updated to include information on how people can expect to be consulted when face-to-face engagement is not possible – this will require a greater emphasis on digital engagement. This may have a potential impact on those from a lower socio-</p>	<p>SCI There are no positive or negative health impacts identified for the above protected characteristic and the SCI.</p>

economic background who may not have access to the internet.	
<p>Development Consultation Charter The DCC is anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The Charter sets out the expected type and extent of engagement Developer's must undertake for different types of development and the reports they must submit. By setting out these new actions and the required reports will make consultation more accessible and this would have a positive social impact for all, including those with protected characteristics.</p>	<p>Development Consultation Charter There are no health impacts identified for the above protected characteristic and the Development Consultation Charter .</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>Further information of the Southwark profile for the above protected characteristic is provided in Appendix 1 of the EQIA for the SCI - Supporting Datasets.</p>	
<p>Mitigating actions to be taken</p>	
<p>We will continue to monitor and review the charter to ensure that the likelihood of negative impacts arising is minimal.</p> <p>Emphasis on digital engagement may have a potential impact on those from a lower socio-economic background who may not have access to the internet. The SCI is clear that a digital only approach is only acceptable in exceptional circumstances – individual Consultation Plans on different projects will set out how this will happen and how any negative impacts on any equalities group will be mitigated. Increasing and diversifying participation in engagement is a Council priority.</p>	

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 Statement of Community Involvement and Development Consultation Charter aligns with the council's Approach to Community Engagement document used throughout the council that is considerate of the Human Rights Act.
Information on which above analysis is based
Further information of the Southwark profile for the above protected characteristic is provided in Appendix 1 of the EQIA for the SCI - Supporting Datasets.
Mitigating actions to be taken
We will continue to monitor and review the implementation and use of Statement of Community Involvement and Developer Consultation Charters to ensure that the likelihood of negative impacts arising is minimal.

Appendix 1: Supporting Datasets

The data below sets out the need in the borough and the number of people with these protected characteristics. It provides evidence for who is impacted by the Statement of Community Involvement and Development Consultation Charter . These are taken from the JSNA data held by public health and a range of other sources national and regional sources of data.

The table identifies where do have data, and the places we would want to have more specific equalities data, but either the data is unavailable and difficult to locate or it is unobtainable due to the nature of the protected characteristic and process of obtaining that data.

Dataset										
Southwark Profile	Age	Disability	Sex	Gender Reassignment	Marriage and Civil Partnership	Race and ethnicity	Religion and belief	Pregnancy and maternity	Socio-economic disadvantage	Sexual Orientation
Statement of Community Involvement Southwark Profile	The council has support available for homecare for the elderly and independent living and residential care. In 2018, 17.31% of the population in Southwark were over 60. In the same year, 22.56% of the	Approximately just over 15,000 residents in Southwark are considered to have a disability. ⁴ In 2016, 1550 people in Southwark were claiming benefits as a disabled person ⁵ .	Percentage of residents in the borough broken down by sex In Southwark in 2018, there were 158,418 men and 158,838 living in Southwark ⁶ . Crime rate per protected characteristic-	Percentage of residents in the borough broken down by gender reassignment – <i>Data unavailable</i> Crime rate per protected characteristic- Transgender hate https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/	Not available	Under the Equality Act 2010, outside of the PPTS planning definition, we recognise Gypsy and Travellers as an ethnicity. We have acknowledged this in our EQIA. Percentage of residents in the	Percentage of residents in the borough broken down by Religion ¹¹	Those who are pregnant or who live with and are responsible for a child ¹² . Percentage of residents in the borough who are pregnant or have infant children ¹³ . Number of community uses accessed by pregnant women	Southwark Council has committed to delivering 11,000 new homes by 2043 ¹⁴ . The average house price in Southwark was £476,597 in 2019 ¹⁵ . Southwark residents have the spend around 15.19 times annual earnings on purchasing a home ¹⁶	Percentage of residents in the borough broken down by sexual orientation ¹⁸ The Southwark LGBTQ+ Community Consultation 2018-2019 report sets out the findings of a survey designed to assess the experience of LGBTQ+ people in the borough of health and wellbeing,

⁴ data set DWP- 2019 PIP & DLA figures

⁵ <https://www.nomisweb.co.uk/reports/lmp/la/1946157256/report.aspx?town=southwark#tabempunemp>

⁶ <https://fingertips.phe.org.uk/profile/child-health-profiles/data#page/12/gid/1938133228/pat/6/par/E12000007/ati/102/are/E09000028/iid/93203/age/174/sex/4>

¹¹ <https://www.southwark.gov.uk/health-and-wellbeing/public-health/health-and-wellbeing-in-southwark-jsna/southwark-profile>

¹² <https://www.southwarkhomesearch.org.uk/Data/Pub/PublicWebsite/ImageLibrary/3889%20-%20Soutwark%20Allocations%20Policy.pdf>

¹³ <https://www.southwark.gov.uk/health-and-wellbeing/public-health/health-and-wellbeing-in-southwark-jsna/southwark-profile>

¹⁴ <https://www.southwark.gov.uk/housing/housing-strategy>

¹⁵ Housing in London 2019 Tables, Greater London Authority

¹⁶ NOMIS – Official Labour Market Statistics; price to residence-based earnings ratio, Office for National Statistics.

¹⁸ <https://www.southwark.gov.uk/health-and-wellbeing/public-health/health-and-wellbeing-in-southwark-jsna/southwark-profile>

<p>population were 19 and under¹ Percentage of residents in the borough broken down by age- Southwark's average age is 33.1 years². In 2018, the percentage 16-17 year olds not in education, employment or training (NEET) or whose activity is not known, is higher than the national average at 8.7%. This is amongst the highest percentages in London.³</p>			<p>Domestic abuse https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/</p>	<p>The Southwark LGBTQ+ Community Consultation 2018-2019 report sets out the findings of a survey designed to assess the experience of LGBTQ+ people in the borough of health and wellbeing, socialising and community safety. It makes recommendations for health and social care providers, Southwark police and voluntary organisations to improve this experience⁷.⁸</p> <p>Number of community uses accessed by gender reassignment – Currently there are no standard</p>		<p>borough broken down by race – In 2016 it was estimated that just over half (54%) of Southwark's population is of white ethnicity, a quarter (25%) black and a third of Asian (11%) or other (10%) ethnicities.</p> <p>Census data in 2011 shows 54,2% of the population of Southwark ARE White, 26.9% are Black, 9.4% ARE Asian and 6.2% are Mixed and 3.3% are Other.</p> <p>66% of the under-20 population is from black and minority ethnic communities⁹.</p>		<p>or women who have infant children – Currently there is no specific data held on the community groups that pregnant women access. However it is acknowledged that the total number of babies born in Southwark has been decreasing year on year since 2010. There were just under 4,400 live births in 2017, down from over 5,100 in 2010. The decline in the fertility rate in Southwark is seen across all age groups, but particularly among younger women. The average age of mothers having their first child in Southwark is 32.8 years, compared to</p>	<p>Amount of residents per ward in deprived areas¹⁷</p>	<p>socialising and community safety. It makes recommendations for health and social care providers, Southwark police and voluntary organisations to improve this experience¹⁹.</p>
--	--	--	--	---	--	---	--	---	---	---

¹ <https://fingertips.phe.org.uk/profile/child-health-profiles/data#page/12/gid/1938133222/pat/6/par/E12000007/ati/102/are/E09000028>

² <https://www.southwark.gov.uk/health-and-wellbeing/public-health/health-and-wellbeing-in-southwark-jsna/southwark-profile>

³ <https://fingertips.phe.org.uk/profile/child-health-profiles/data#page/7/gid/1938133228/pat/6/par/E12000007/ati/102/are/E09000028/iid/93203/age/174/sex/4>

⁷ https://communitysouthwark.org/sites/default/files/images/Southwark%20LGBTQ%2B%20Community%20Consultation%202018-19_Final.pdf

⁸ https://communitysouthwark.org/sites/default/files/images/Southwark%20LGBTQ%2B%20Community%20Consultation%202018-19_Final.pdf

⁹ <http://moderngov.southwark.gov.uk/documents/s72803/Appendix%201%20Best%20start%20in%20life%20Southwark%20school%20standards%20report%202017.pdf>

¹⁷ <https://www.southwark.gov.uk/health-and-wellbeing/public-health/health-and-wellbeing-in-southwark-jsna/southwark-profile>

¹⁹ https://communitysouthwark.org/sites/default/files/images/Southwark%20LGBTQ%2B%20Community%20Consultation%202018-19_Final.pdf

				sources of transgender statistics, nor is there standard data on the use of health services or referrals to gender identity clinics. However, GIRES (the Gender Identity Research and Education Society) estimate that 0.6-1% of the population may experience gender dysphoria.		Percentage of residents in the borough broken down by race¹⁰		30.5 years in England.		
--	--	--	--	--	--	--	--	------------------------	--	--

*data unavailable – data is not held on these characteristics currently and is difficult to obtain at a borough-wide level. Southwark Council is aware of the needs of these characteristics but there is a gap in specific quantitative data. This data in some cases is unobtainable.

¹⁰ <https://www.southwark.gov.uk/health-and-wellbeing/public-health/health-and-wellbeing-in-southwark-jsna/southwark-profile>

**APPENDIX 1**

Procurement strategy for the tree services - Equality and health analysis

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates		The procurement strategy for the tree services			
Equality analysis author		Tara Quinn			
Strategic Director:		Caroline Bruce			
Department		Environment & Leisure	Division		Leisure
Period analysis undertaken		August 2021 - ongoing			
Date of review (if applicable)		Spring 2022			
Sign-off		Position		Date	

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

1.1 Brief description of policy/decision/business plan

Background

1. Southwark manages approximately 82,500 trees spanning over 400 species in places such as parks and open spaces, housing estates and highways. In addition, there are approximately 30,000 trees in Southwark which are located on private land and not managed by the council directly.
2. The trees in and around our urban areas are collectively known as the 'urban forest' and are generally recognised and appreciated for their amenity and presence in the cityscape whilst at the same time improving air quality, protecting watercourses, saving energy, improving economic sustainability as well as having many health and wellbeing benefits.
3. In recent years the council has faced challenges around the resources available to manage the tree stock. This, coupled with the council's commitment to planting more trees, led to a review of the overall tree services with the aim of ensuring the council was meeting its statutory duty of care whilst also being responsible custodians of a valued asset in a challenging urban setting.
4. In March 2021 a Gateway 0 report was presented to Cabinet that explored the options available to the council for reshaping the council's tree services.
5. The current tree service is split between two in-house teams and external contractors.
6. The Tree Client Team (Parks and Leisure) six posts including the service manager responsible for;
 - Strategic, policy and risk management
 - Tree governance
 - Tree inspections and specification of works
 - Contracting out tree planting to external contractors
 - Dealing with insurance claims
 - Procurement of external contractor support for additional tree works.
7. The Tree Works Maintenance Team (Waste and Cleansing) 16 posts including the team manager responsible for;
 - Tree surgery
 - Pollarding
 - Felling
 - Waste storage/disposal
 - Stump grinding
 - Emergency response service.
8. The coordination of tree planting is undertaken by the client team and is currently capital funded and uses external specialised contractors via annually let contract arrangements including three year maintenance and aftercare.
9. The council continues to require significant levels of support from external suppliers to deliver the historic and ongoing backlog of tree works due to the limited capacity of the current in house team and the large volume of trees the council is required to maintain. Whilst this work is procured in line with Contract Standing Orders, the nature and length of the contracts means that this approach is not the most cost effective for the council.
10. The outcome of the GW0 report was to outsource the core tree works. The cabinet report recommended the approval of the option to externalise the tree maintenance works whilst retaining a small number of staff within a new tree planting team and the client team.

11. This analysis relates to a competitive tender process to establish tree maintenance and emergency contract(s) with up to three providers for a period of four years with an option to extend for an additional period of up to two years, at an annual estimated total value of £2m, with an estimated total contract cost of £12m for the full term of the contract from July 2022.
12. In addition to the above this analysis also relates to the proposal to establish a framework agreement for tree maintenance for a period of four years that will be open for use by all London boroughs from July 2022.
13. The proposed procurement exercise is not changing the policies that govern how the council manages its tree stock. It is changing how the work that is generated by the operation of those policies is carried out.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	The tree service does not have users specifically. The proposed procurement is the maintenance works on the trees that can be found across the borough. It is not a service that residents access, book, directly receive etc.
Key stakeholders were/are involved in this policy/decision/business plan	<ul style="list-style-type: none"> • Internal business units <ul style="list-style-type: none"> ○ Parks and Leisure ○ Waste and Cleansing ○ HR ○ Procurement ○ Legal ○ Finance • Cabinet Members

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. The Public Health Team can assist with research and data.

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
No specific impacts have been identified or raised in relation to this characteristic
Equality information on which above analysis is based
Mitigating actions to be taken;
No mitigating actions are currently required

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
No specific impacts have been identified or raised in relation to this characteristic
Equality information on which above analysis is based

Mitigating actions to be taken
No mitigating actions are currently required

Gender reassignment - The process of transitioning from one gender to another.
Potential impacts (positive and negative) of proposed policy/decision/business plan
No specific impacts have been identified or raised in relation to this characteristic
Equality information on which above analysis is based.
Mitigating actions to be taken
No mitigating actions are currently required

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)
Potential impacts (positive and negative) of proposed policy/decision/business plan
No specific impacts have been identified or raised relating to marriage and civil partnerships
Equality information on which above analysis is based

Mitigating actions to be taken
No mitigating actions are currently required

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
No specific impacts have been identified or raised in relation to this characteristic
Equality information on which above analysis is based
Mitigating actions to be taken
No mitigating actions are currently required

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
No specific impacts have been identified or raised in relation to this characteristic
Equality information on which above analysis is based

Mitigating actions to be taken
No mitigating actions are currently required

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
No specific impacts have been identified or raised in relation to this characteristic
Equality information on which above analysis is based
Mitigating actions to be taken
No mitigating actions are currently required

Sex - A man or a woman.
Potential impacts (positive and negative) of proposed policy/decision/business plan
No specific impacts have been identified or raised in relation to this characteristic
Equality information on which above analysis is based
Mitigating actions to be taken

No mitigating actions are currently required.

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

No specific impacts have been identified or raised in relation to this characteristic

Equality information on which above analysis is based

Mitigating actions to be taken

No mitigating actions are currently required.

Socio-economic disadvantage – although the Equality Act 2010 does not include socio-economic 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 family's 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

No specific impacts have been identified or raised in relation to this characteristic

Equality information on which above analysis is based

Mitigating actions to be taken

No mitigating actions are currently required

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 procurement of external tree works contract(s) will have no impact on the Articles that are set out in the Human Rights Act.
Information on which above analysis is based
Mitigating actions to be taken
No mitigating actions are currently required

Section 5: Further actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating actions or the areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
1	EQIA update	Review and update the EQIA document at GW2 stage should the GW1 proposal be approved.	Spring 2022
2			
3			

5. Equality objectives (for business plans)				
Based on the initial analysis above, please detail any equality objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.				
Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2

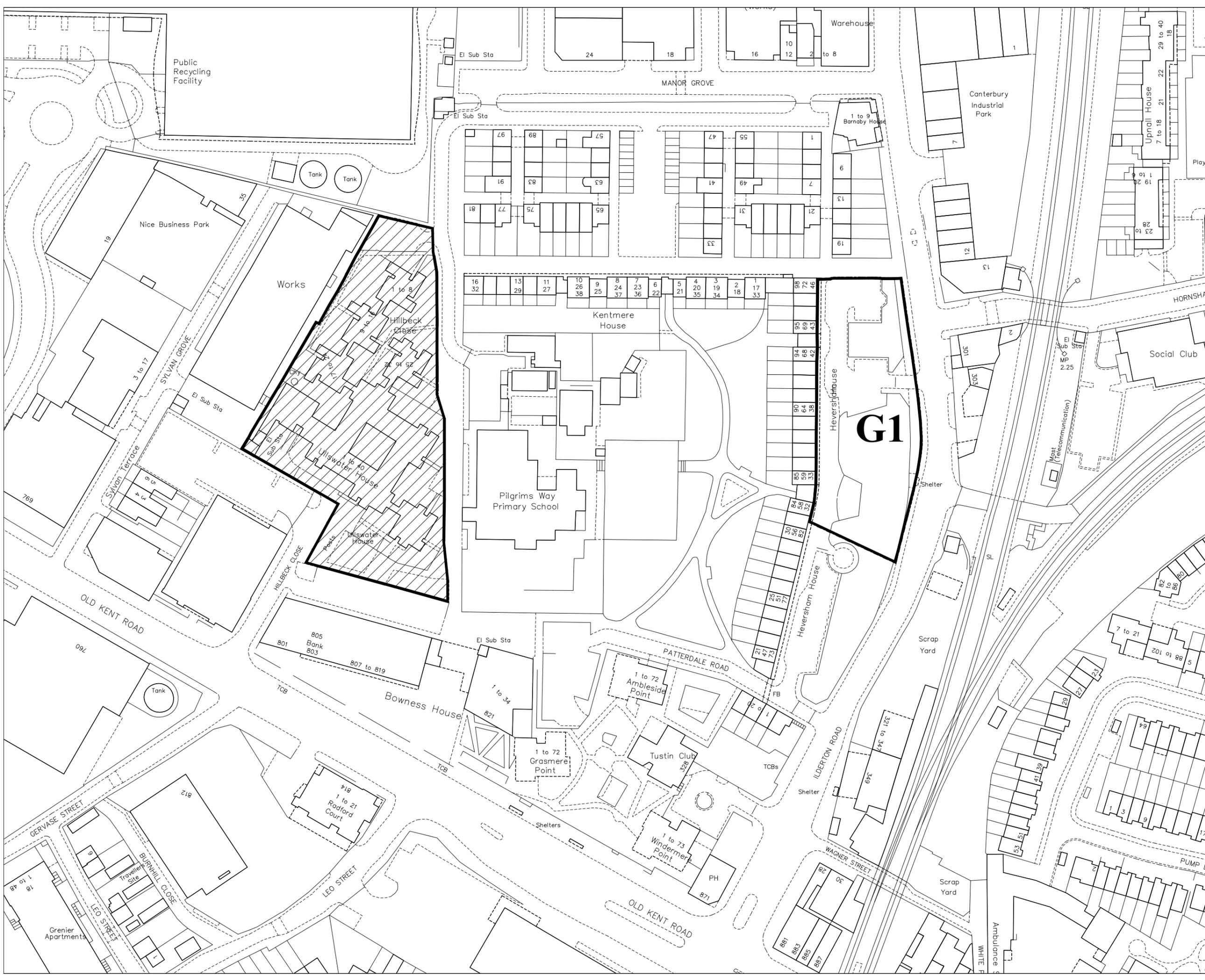
5. Health objectives (for business plans)				
Based on the initial analysis above, please detail any health objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.				
Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2



PLAN 1

KEY

 Area C.
Proposed CPO area in Phase 1.



Reproduced from the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. (London Borough of Southwark / Licence No. LA086541).

TITLE.
Tustin Estate.
proposed CPO phase 1
red line area.

DRAWING No.
LBS_4085(Layout2)

DRAWN BY.
MJMANKTELOW
Property Division

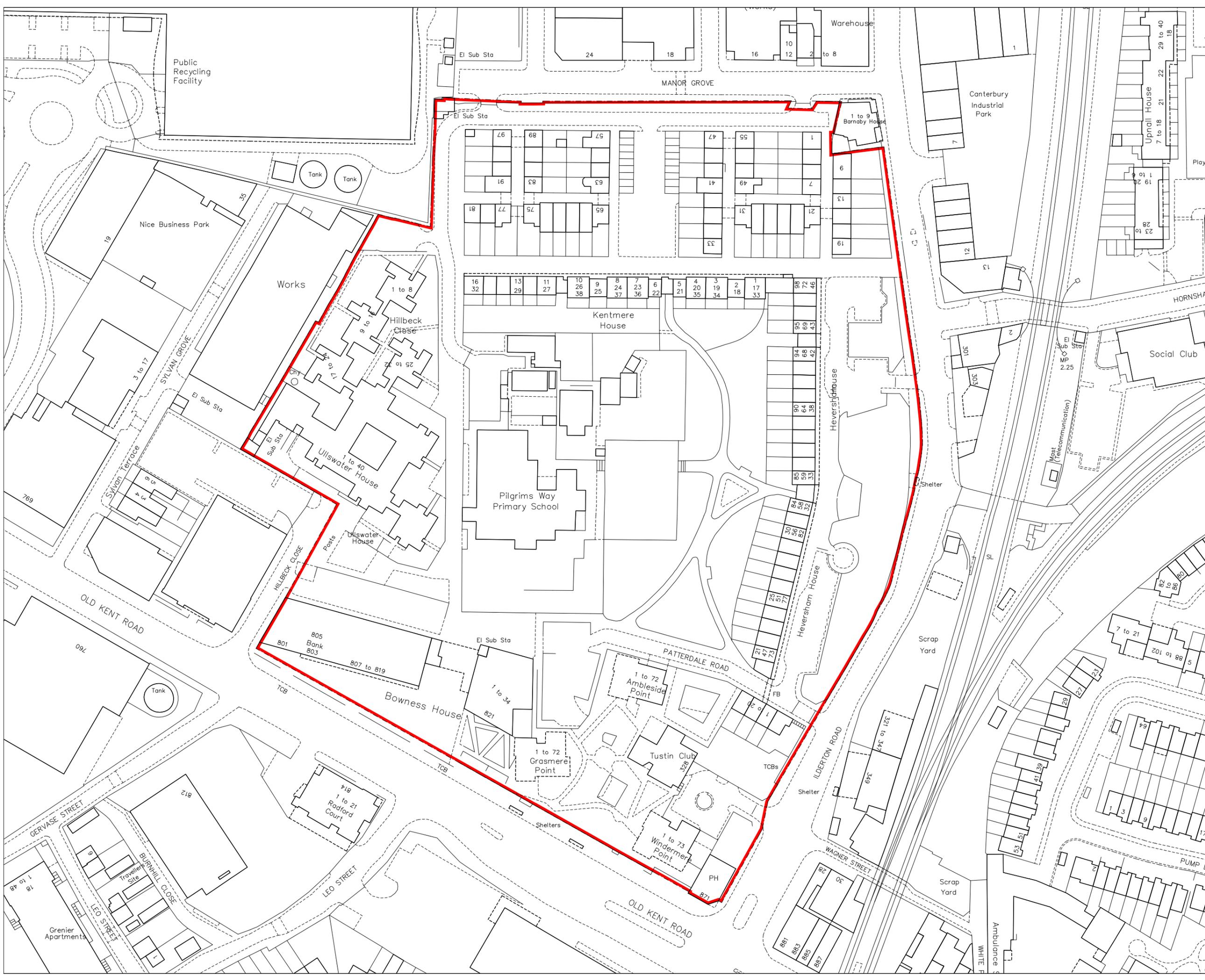
DATE.
25/11/2021

Original Scale - 1:1250
Subject to variation
when reproduced from
an Adobe pdf source





PLAN 2.



173

Reproduced from the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. (London Borough of Southwark / Licence No. LA086541).

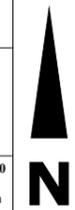
TITLE.
Tustin Estate.

DRAWING No.
LBS_4085(Layout1)

DRAWN BY.
MJMANKTELOW
Property Division

DATE.
25/11/2021

Original Scale - 1:1250
Subject to variation
when reproduced from
an Adobe pdf source



APPENDIX THREE**Tustin Estate Phase 1 Compulsory Purchase Order
Procedural and Legal matters****Acquisition of Leasehold Interests**

1. The Council holds the freehold interest of all the land within the area shown edged red on the Plan at Appendix One. The site contains a block of flats (Hillbeck) and a hostel (Ullswater) and surrounding amenity land.
2. The Housing Act 1985 gives qualifying Council tenants the right to buy their homes. Fifty one tenants at these properties purchased their homes under these provisions.
3. The Council can only repurchase these leases in the following circumstances:
 - where there is agreement with the leaseholder; *or*
 - following a confirmed compulsory purchase order.
4. The statutory compensation code provides that a leaseholder is entitled to the following compensation following a compulsory acquisition:
 - the market value of the interest acquired;
 - a home loss payment; this is 10% of the market value where the leaseholder lives at the property or 7½% of the market value where the leaseholder lives elsewhere; and
 - a disturbance payment to cover the leaseholder's reasonable costs arising as a direct and natural result of the compulsory acquisition, this might include removal costs, legal fees, surveyors fees and adaptation expenses.
5. Where an acquisition takes place by agreement ahead of the exercise of compulsory purchase powers the leaseholder is treated in the same way and with the same entitlement as would be the case if there was a compulsory purchase order.

Third party and statutory utility rights

6. Utility Companies may have rights across the sites that enable them to provide their infrastructure to the Estate. To enable redevelopment to proceed these rights will have to be acquired or extinguished. It is also possible that persons may have unregistered rights over the site such as a right of access and these rights, if any, will need to be dealt with in the same way as those of the utility companies.
7. Other leaseholders on the Estate may benefit from rights over the subject areas; the Council's standard form lease provides for them having rights over the whole Estate including roads, paths and gardens. These rights will have to be included within the Order for extinguishment.

APPENDIX THREE

Tustin Estate Phase 1 Compulsory Purchase Order Procedural and Legal matters

Outline of Compulsory Purchase Procedure

Resolution

8. The Cabinet passes a resolution to make an Order. This is the purpose of this report.

Referencing

9. The Council assembles information that provides details of all owners, mortgagees, tenants and occupiers. This is to both identify what interests need to be acquired and who is entitled to receive a notification of the publication of the Order. This stage will enable the precise details of the Order areas to be determined. The boundaries shown edged red on the plan at Appendix One may need subtle amendment in the light of this and it is recommended that the Director of Planning and Growth be given delegated authority to set the order extents.

Resolving planning and finance

10. In considering an Order the Minister needs to be confident that the proposals behind it are likely to come to fruition. In this connection s/he will need to be satisfied that there are no significant planning or financial obstacles that will frustrate it.

Making the Order

11. The Council makes the Order, to a prescribed format. A schedule accompanies the Order identifying ownership details of all land within it. A Statement of Reasons must also be prepared to accompany the Order. This is a critical document that may be challenged by objectors and therefore needs careful drafting.

Publication of the Order

12. The Council serves notice of making of the Order on all owners, mortgagees, tenants and occupiers affected by it. A notice of the making of the Order has to be published for two successive weeks in a local newspaper.
13. The notices will advise objections to it can be made to the relevant Government Minister and specify an address for this purpose. The Order is then passed to the Government Minister for confirmation.

Confirmation of the Order

14. The Order does not become effective unless confirmed by the Minister. Where there are objections to the Order they must be considered before confirmation. This is usually done by way of a public inquiry (which can take days or weeks) but can sometimes be dealt with by written representations.
15. After considering the objections [if there has been a public inquiry there will be an Inspector's Report] the Minister may confirm all or part, modify or reject

APPENDIX THREE

Tustin Estate Phase 1 Compulsory Purchase Order Procedural and Legal matters

the Order. If it is rejected that is the end of the process and the Council will need to revisit its plans.

16. Following confirmation of the Order or if applicable, modification, a notice advising of this must be published in the local newspaper and all leaseholders, tenants and occupiers should also have a notice served on them. A confirmed Order should be implemented within three years to retain its validity.

Taking Possession

17. This can be achieved by either Notice to Treat/Notice of Entry or by using General Vesting Declaration procedure. The latter is usually considered the most appropriate as it transfers both the right to possession and title of the land to the Council.

Power to make a Compulsory Purchase Order

18. Section 226 of the Town and Country Planning Act 1990 is the recommended enabling provision in this instance for the purpose of compulsorily acquiring the interests required to progress the implementation of the redevelopment of the site. The detailed application and use of this power is set out in paragraphs 19-27 below.

Legal Implications

19. Section 226(1)(a) of the Town and Country Planning Act 1990 (the Act) (as amended by section 99 of the Planning and Compulsory Purchase Act 2004) is the appropriate power in this instance to secure the compulsory acquisition of properties within Phase 1 of the Tustin Estate redevelopment. Section 226(1)(a) enables authorities to exercise their compulsory purchase powers if they think that the land in question will:

"Facilitate the carrying out of development, redevelopment, or improvement on, or in relation to, the land being acquired and it is not certain that they will be able to acquire it by agreement."

20. The Council, in exercising its power under this Section must have regard to section 226(1A) which states:

"(1A) But a local authority must not exercise the power under paragraph (a) of subsection (1) unless they think that the development, re-development or improvement is likely to contribute to the achievement of any one or more of the following objects-

(a) The promotion or improvement of the economic well being of their area;

(b) The promotion or improvement of the social well being of their area;

APPENDIX THREE

**Tustin Estate Phase 1 Compulsory Purchase Order
Procedural and Legal matters**

(c) The promotion or improvement of the environmental well-being of their area."

21. It is considered that the use of this section is therefore most appropriate having regard to the Council's aspirations for the estate as a whole. The interests to be acquired by the Order are required in order to permit the redevelopment of the area to take place. The proposal also satisfies the "well being" element of the Act in that the rebuilding of Phase 1 is clearly required in order to provide a better standard of accommodation for residents compared to its current state and to create a sustainable and diverse community, and the provision of new facilities which are able to meet the needs of the area. Thus the proposals will inevitably assist in promoting the social economic and environmental well being of the area.
22. Government Guidance on the use of CPO powers (Compulsory Purchase and the Crichef Down Rules – July 2019 –“the Guidance”) sets out the circumstances in which this power may be relied on by a local authority for the purposes of compulsorily acquiring land. It recognises that compulsory purchase powers under the Act provide an "important tool" to local authorities in assisting them to acquire and assemble land where it is necessary to help deliver social, environmental and economic change.
23. The Guidance acknowledges that CPO powers are intended as a last resort to secure land assembly for the implementation of projects, but that time may be lost if an authority waits for negotiations to break down before starting the process. Authorities may therefore plan a compulsory purchase timetable as a contingency measure and initiate formal procedures. This will also help to make the seriousness of the authority's intentions clear from the outset, which might encourage more meaningful negotiations.
24. For the purposes of confirming a compulsory purchase order, the Guidance identifies considerations which will be taken into account by the Secretary of State in making such a decision.
25. In particular, if an acquiring authority does not have a clear idea of how it intends to use the land which it is proposing to acquire, and cannot show that all the necessary resources are likely to be available to achieve that end within a reasonable time-scale, it will be difficult to show conclusively that the compulsory acquisition of the land included in the order is justified in the public interest, at any rate at the time of its making.
26. The Guidance also makes clear that compulsory purchase of land needs to be set within a clear strategic framework. The planning framework providing the justification for an order should be as detailed as possible and where development plan documents have been through the consultation processes but have not yet been examined or are awaiting the recommendations of the planning inspector, this will be given due weight.
27. However the Guidance recognises that it may not always be possible to wait until planning permission has been obtained.

APPENDIX THREE**Tustin Estate Phase 1 Compulsory Purchase Order
Procedural and Legal matters**

28. As is already set out in this report, officers will continue to seek to negotiate the acquisition of interests by agreement rather than relying solely on the compulsory acquisition powers available. Section 120 of the Local Government Act 1972 contains wide powers for local authorities to acquire land by agreement for any of their statutory functions or for *'the benefit, improvement or development of their area'*. Section 227 of the Town and Country Planning Act 1990 also enables a council to acquire land by agreement for facilitating the carrying out of development, redevelopment of improvement and for the social economic and environmental well being of the area. It is considered therefore that there are adequate powers available to the Council to secure outstanding interests in the land by Agreement.
29. The initial stage of the compulsory purchase process will be to ensure that the Council correctly identifies all necessary interests in the Order land that need to be incorporated within the schedule of the Order. As the Council is the freeholder much of this information should be readily available. Nonetheless it is advised that formal requisitions for information should be served on all known owners, mortgagees and occupiers of each property to be subject to the Order pursuant to Section 5A of the Acquisition of Land Act 1980. It is important that the Council takes all reasonable steps to ensure that all interests are properly captured in the Order and are properly notified, the requisition for information is a means of ensuring the Council fulfils this.
30. In the event that the Order is confirmed, the next stage will be to vest all necessary title in the Council. In these circumstances as has already been mentioned, the best means of doing so will be way of the General Vesting Declaration Procedure. This is something that can be carried out by the Council's legal advisors as and when this stage is achieved.

Human Rights Considerations

31. The Human Rights Act 1998 incorporated into domestic law the European Convention on Human Rights ("the Convention").
32. In proposing the Order the Council has duly considered the rights of property owners under the Convention, notably under the following Articles: *Article 1 of the First Protocol*. This protects the right of everyone to the peaceful enjoyment of possessions. No one can be deprived of possessions except in the public interest and subject to the relevant national and international law.
33. The Council has also considered the rights contained within Article 8 of the convention, which protects private and family life, home and correspondence. No public authority can interfere with these interests except if it is in accordance with the law and is necessary in the interest of national security, public safety or the economic well being of the country.
34. In relation to these Convention rights the Council has been conscious of the need to strike a balance between the rights of the individual and the interest of the public. In light of the significant public benefit that would arise from the redevelopment of the Tustin Estate it will be appropriate to make the Order, if the relevant leaseholder interests cannot be acquired by agreement. Objections can be made against the Order that will then have to be

APPENDIX THREE**Tustin Estate Phase 1 Compulsory Purchase Order
Procedural and Legal matters**

considered by the Secretary of State before he decides whether or not to confirm the Order.

Community Impact Statement

35. The effect of the negotiated acquisition or compulsory purchase order will be to dispossess persons of their rights in land. This is a necessary process to ensure the redevelopment of the Tustin Estate can proceed. This is considered acceptable where the proposals are in the public interest and where, as in this case, the advantages of redevelopment substantially outweigh the disadvantages to those dispossessed.
36. The redevelopment of the Tustin Estate is considered to have benefits to the immediate community but also the Borough as a whole in that it will act as a catalyst to further investment. It is therefore necessary to balance the benefits that could be provided by the proposed scheme against the possible impact to those with an interest in the affected land. In carrying out this exercise a degree of proportionality should therefore be adopted. The Human Rights of these individuals have accordingly been considered and commented upon in this report.
37. The furtherance of the redevelopment will not negate the Council's Diversity and Equal Opportunities policies. Indeed in the long term it is anticipated the diversity of the area will be widened.
38. Section 149 of the Equality Act 2010 requires the Council to have due regard to the need to:
 - a. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
39. The Council must, in order to comply with this Public Sector Equality Duty, take steps to ensure that it considers equalities issues throughout the compulsory purchase process and has due regard to its duties under the Equality Act.

Consultation

40. There has been extensive consultation with Tustin Estate residents [including tenants and leaseholders] at all stages of the development culminating in the ballot earlier this year. Consultation will continue as the development proceeds.

APPENDIX 1



Equality and Health Impact Assessment

Consultation on redevelopment
of the Ledbury Estate Towers

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 effect 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.
- They 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.
- They 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.
- They review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- They 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.
- They 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 the 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 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 with divisional/departmental/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 & 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		Consultation on redevelopment of the Ledbury Estate Towers			
Equality analysis author		Helen Laker (Independent review undertaken by Open Communities)			
Strategic Director:		Michael Scorer			
Department		Housing and Modernisation	Division	Asset Management	
Period analysis undertaken		September - October 2021			
Date of review (if applicable)		n/a			
Sign-off	Patricia Lewin	Position	New Homes Project Manager	Date	10 November 2021

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

1.1 Brief description of policy/decision/business plan
<p>The Council is committed to building 11,000 new council homes. To achieve this, the Council identifies potential development sites and works with the local community to explore the feasibility of each site. The Council seeks to engage with all local residents and community groups to ensure they are able to influence and shape the proposals throughout the design development process, as it recognises the impact that new homes will have on improving the lives of those in housing need.</p> <p>Public meetings with Ledbury estate residents began in July 2017 following concerns raised about fire safety. The decision to develop the Towers as a phased development was taken in consultation with residents following several meetings held in 2019.</p> <p>The proposals for redevelopment of the four tower blocks on the estate entails demolition of the towers comprising 224 homes to re-provide them as new homes in line with current design standards and terms of the Landlord Offer. Proposals also include the provision on 116 additional new homes for council rent and sale on the open market along with a re-provided T&RA hall and MUGA (multi-use games area).</p>

The four tower blocks located on two separate sites as shown in the image below are; Sarnsfield House, Skenfrith House, Peterchurch House and Bromyard House located on the south site.



As detailed in the Cabinet report of February 2021 (Ledbury Estate Towers – Ledbury Towers Residents’ Ballot) there will be improved open space and play areas, larger, safer and more energy efficient homes with private outdoor space, and a guaranteed right of return for all existing residents and non-resident leaseholders.

There has already been extensive engagement with residents over 4 years about the proposed major works phases, this statement is about consultation for new homes on the sites of the tower blocks, including the ballot on new homes to replace the tower blocks on the estate. Options considered included refurbishment, refurbishment with infill, and demolition and new build homes.

The ballot was sent out to:

- Remaining tenanted residents in the Towers
- Tenanted households who moved from the Towers with the Right to Return
- Remaining resident leaseholder households in the Towers
- Non-resident leaseholders in the Towers

Residents of the low rise homes on Ledbury Estate were given information about their proposals and asked for their comments.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	Members of the public; resident groups, community organisations, developers; consultants, Housing and Modernisation Department; Councillors; Finance and Governance Department; Greater London Authority; Transport for London; Chief Executive's Department.
Key stakeholders were/are involved in this policy/decision/business plan	Residents and former residents of the Ledbury Towers, non-resident leaseholders with flats in Ledbury Towers; neighbours on Ledbury Estate, Members of the public; Housing and Modernisation Department; Councillors; Finance and Governance Department; Livesey Exchange and Camelot Primary School.

Consultation area - Boundary of Ledbury Estate



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.

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), including health impacts of proposed policy/decision/business plan			
Two relevant principles are:			
<ul style="list-style-type: none"> • Simplicity & Accessibility: We recognise that everyone's needs are not the same. We will provide engagement and consultation in plain English and provide materials in a variety of formats to support older residents to get involved. • Inclusion: We will make a particular effort to connect with those likely to be most affected by any potential change. 			
Equality information on which above analysis is based			
1. iWorld housing database information for Ledbury Estate, updated with details of the household trackers supplied by the Ledbury team.			
For the areas outlined in blue on the map of the Ledbury Estate above, information compiled from the iWorld housing database on 20 August 2021 is set out below.			
This is based on Sarnsfield House, Skenfrith House and Peterchurch House blocks as Bromyard House is unoccupied. Also note that the data includes members from the same households, for example five leaseholders from one property.			
Three tower blocks and surrounding area:			
Under 18	0	Over 18 (up to 30)	4
Over 30 (up to 70)	63	Over 70	13
Data missing – leaseholders	64		
Under 18	0	Over 18 (up to 30)	0
Over 30 (up to 70)	32	Over 70	8
Data missing – leaseholders	49		
Hoyland Close:			
Under 18	0	Over 18 (up to 30)	0
Over 30 (up to 70)	28	Over 70	9
Data missing – leaseholders	21		

2. Information from TRA members
3. Consultation hubs
4. Information from resident feedback about communication in the Southwark Conversation, and local population data
5. Feedback from other consultation workshops
6. Ledbury team housing needs survey

Over 40% of the Southwark population consists of those aged 20 to 39, compared to 34% in the rest of London and only 8% of the population of Southwark is aged over 65.

Both the Southwark Conversation and the Kaizen report identified digital engagement as a means to improve participation. In the Planning department the move to digital engagement has increased the pool of participants from 2000 to 7000 in a relatively short period of time.

Mitigating actions to be taken

We need to make sure all age groups are included within the consultation process.

Digital methods are attractive to younger people, but many older age groups still prefer hard copies and face to face contact. The 24 hour presence of resident services officers based in the estate TRA hall helps to address this. The project team will also be more accessible as they will be based on the estate at least twice a month, in addition to attending the standing meeting with residents.

Project updates about the estate and the project proposals are uploaded to the Commonplace platform.

All correspondence relating to the Towers is posted to each home and uploaded to the Ledbury Estate website. This includes consultation information on proposals for development.

Weekly newsletters are provided to residents and those with the Right to Return to the estate, in accessible formats. Newsletters are provided monthly for residents in the low rise blocks next to Ledbury Towers.

The project team has held several events on the estate to engage with residents and stakeholders to listen to views and feedback to help inform the proposals, where possible. These have included in person consultation events on:

- Including the TRA Hall in the redevelopment
- Play Space
- Making Space for Girls
- Community Space

There are further consultation events planned before the planning application is submitted.

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), and health of proposed policy/decision/business plan

Two relevant principles are:

- **Simplicity & Accessibility:** We recognise that everyone's needs are not the same. We will provide engagement and consultation in plain English and provide materials in a variety of formats to support our varied communities to get involved.
- **Inclusion:** We will make a particular effort to connect with those likely to be most affected by any potential change.

Equality information on which above analysis is based

iWorld housing database information for Ledbury Estate updated with details of the household trackers supplied by the Ledbury team.

iWorld housing database information for the areas outlined in blue on the map at 20 August 2021 is set out below.

The data includes members from the same households, for example records include disabilities of five leaseholders from one property.

Ledbury outlined area – 34 residents recorded a disability

Arthritis	8	Anxiety	2
Back	3	Blood pressure	3
Breathing	1	Cancer	1
Cerebral palsy	1	Diabetes	1
Depression	1	Hearing	2
Heart	1	Kidneys	1
Muscle pain	1	Other illness	3
Other mental	1	Other mobility	2
Psychosis	1	Sight	1

Hoyland Close – 10 residents recorded a disability

Arthritis	1	Cancer	2
Diabetes	1	Heart	1
Other mobility	2	Depression	2
Psychosis	1		

Mitigating actions to be taken
<p>At least one resident uses a wheelchair, and so any consultation event should be held in a step free building or one that has a lift and accessible toilets. The Ledbury TRA Hall where events have been held has step free access and accessible toilets. Some tenants are vulnerable due to their age and so we will arrange house visits where requested, we have given our telephone contact. The Ledbury contact team and Open Communities are assisting the design team with including the vulnerable and the elderly in the consultation process.</p> <p>Everyone's needs are not the same. We will provide engagement and consultation in plain English and provide materials in a variety of formats to support residents.</p> <p>Hard copies of reports have been emailed or posted out to interested residents and further support can be designed around the tenant. Technical reports are available on the Ledbury Estate website. Resident services officers are also based in the TRA hall at the estate and provide individual support and advice to residents and those with the Right to Return. Resident Service Officers have identified the communication needs of every resident and ensure they receive information in the form that is accessible, for example reading newsletters to residents who are unable to read, and explaining proposals one to one with residents who have dementia.</p>

Gender reassignment - The process of transitioning from one gender to another.
Potential impacts (positive and negative), including health impacts of proposed policy/decision/business plan
It is unclear what impacts this will have on this group of people
Equality information on which above analysis is based.
Not applicable based on the above statement.
Mitigating actions to be taken
The Council has a commitment to use inclusive imagery, and to recognise the needs of all residents with protected characteristics in the way that services are delivered.

<p>Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)</p>
<p>Potential impacts (positive and negative), including health impacts, of proposed policy/decision/business plan</p>
<p>It is unclear what impacts this will have on this group of people</p>
<p>Equality information on which above analysis is based</p>
<p>Not applicable based on the above statement.</p>
<p>Mitigating actions to be taken</p>
<p>The Council has a commitment to use inclusive imagery, and to recognise the needs of all residents with protected characteristics in the way that services are delivered.</p>

<p>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.</p>
<p>Potential impacts (positive and negative), including health impacts of proposed policy/decision/business plan</p>
<p>The timing and durations of meeting may affect this group. Meetings are usually held in the evening and can run for up to two hours. Regular resident design group meetings are currently held online due to Covid-19 pandemic but this could change to in person meetings held at a nearby public meeting space.</p>
<p>Equality information on which above analysis is based</p>
<p>None</p>
<p>Mitigating actions to be taken</p>

Any consultation event should be held in a step free building or one that has a lift and accessible toilets.

Particularly relevant to this protected characteristic, the principle of being inclusive will mean that the council will seek to engage with those likely to be most affected by any potential change.

Resident Service Officers based at the T&RA hall on a 24 basis, and accessible to residents, have identified the communication needs of every resident and ensure they get information in the form that is accessible.

Project updates about the estate and the project proposals are uploaded to the Commonplace platform.

All correspondence relating to the Towers is posted to each home and uploaded to the Ledbury Estate website. This includes consultation information on proposals for development.

Weekly newsletters are provided to residents and those with the Right to Return to the estate, in accessible formats. Newsletters are provided monthly for residents in the low rise blocks next to Ledbury Towers.

The project team has held several events across the estate, including the hall, to engage with residents and stakeholders to listen to views and feedback to help inform the proposals, where possible. These have included in person consultation events on:

- Including the TRA Hall in the redevelopment
- Play Space
- Making Space for Girls
- Community Space

There are further consultation events planned before the planning application is submitted.

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), including health impacts, of proposed policy/decision/business plan

Lack of understanding of the language and illiteracy.

We can review the available data about Black and Ethnic Minority communities within the estate and any information received. Working closely with organisations locally to encourage levels of engagement.

We need to make sure that we provide engagement and consultation in plain English and provide materials in a variety of formats to support our varied communities to get involved. Resident services officers are also based in the TRA hall at the estate.

Equality information on which above analysis is based

iWorld housing database information for Ledbury estate updated with details of the household trackers supplied by the Ledbury team.

Responses to the Equalities Monitoring form issued with residents' questionnaires.

iWorld housing database information for the areas outlined in blue on the Ledbury Estate Map at 20 August 2021 is set out below.

The data includes members from the same households, for example records include disabilities of five leaseholders from one property.

Ledbury:

Asian British	1	Asian Vietnamese	1
Black British	1	Black Caribbean	9
Black Ghanaian	5	Black Ivorian	1
Black Nigerian	13	Black Other	4
Black Other African	2	Black Sierra Leonean	2
Black Somali	2	Colombian	1
Mixed White and Caribbean	1	Prefer not to say	2
White British - Eng, Scot, Welsh, NI	26	White Other European	1
White Other Non-European	2	No data	69

Hoyland Close

Asian Bangladeshi	1	Asian Indian	1
Asian Other	2	Asian Vietnamese	1
Black British	4	Black Caribbean	6
Black Ethiopian	2	Black Ghanaian	2
Black Nigerian	2	Black Other	1
Black Other African	1	Black Ugandan	1
White British - Eng, Scot, Welsh, NI	8	White Irish	1
White Portuguese	1	No data	23
Prefer not to say	1		

Mitigating actions to be taken

Working closely with organisations such as Ledbury Resident Project Group and Ledbury Estate TRA Group locally to encourage take up of feedback.

Working with tenants' named interpreters on the iWorld database.

Newsletters and notes of all meetings held on Ledbury are uploaded to the Ledbury Towers website. And project updates about the estate and the project proposals are uploaded to the Commonplace platform.

All correspondence relating to the Towers is posted to each home and uploaded to the Ledbury Estate website. This includes consultation information on proposals for development.

Weekly newsletters are provided to residents and those with the Right to Return to the estate, in accessible formats. Newsletters are provided monthly for residents in the low rise blocks next to Ledbury Towers.

Resident Service Officers have identified the communication needs of every resident and ensure they get information in the form that is accessible, for example reading newsletters to residents who are unable to read, and briefing family members where residents have asked for this.

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), including health impacts of proposed policy/decision/business plan

Southwark is home to over 400 faith organisations and many of these groups play an active role in their communities. Faith groups have a key role to play in reaching some of our harder to reach communities.

Equality information on which above analysis is based

Census data 2011

This identified the following belief make-up of the borough:
52.54% Christian; 1.35% Buddhist; 1.27% Hindu; 0.35% Jewish; 8.52% Muslim; 0.23% Sikh; 0.47% other religion; 26.74% no religion; 8.54% did not say.

Mitigating actions to be taken

Be mindful of venue locations. Some residents may not be happy to enter/use a venue of another faith.

Ledbury TRA Hall used for consultation events is a non-faith venue.

Sex - Gender.

Potential impacts (positive and negative), including health impacts of proposed policy/decision/business plan
It is unclear what impacts there will be on this group of people
Equality information on which above analysis is based
iWorld data Equalities Monitoring questionnaires
Mitigating actions to be taken
We will endeavour to ensure that any venues used will have accessible toilets. Ledbury TRA Hall has accessible toilets for women and men and for those with mobility issues. The Council has a commitment to use inclusive imagery, and to recognise the needs of all residents with protected characteristics in the way that services are delivered.

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), including health impact of proposed policy/decision/business plan
It is unclear what impacts this will have on this group of people
Equality information on which above analysis is based
Not applicable based on the statement above.
Mitigating actions to be taken
The Council has a commitment to use inclusive imagery, and to recognise the needs of all residents with protected characteristics in the way that services are delivered.

Socio-economic disadvantage – although the Equality Act 2010 does not include socio-economic 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, individual's or family's economic and social position in relation to others, based on income, education, health, living conditions and occupation.

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

For leaseholders the impact of the consultation will be considerably different due to financial implications.

For householders without internet access, information may not be as accessible, and they may find it harder to respond and participate in the consultation.

Equality information on which above analysis is based

Current household occupation data below based on information supplied by the Ledbury team, 7 November 2021, includes temporary accommodation residents.

Tower block	Secure tenants	Leasehold interests	Temporary accommodation
Bromyard House	4	3	0
Peterchurch House	3	3	29
Skenfrith House	6	6	40
Sarnsfield House	8	6	34

The Ledbury team remain in contact with, and available to, all tenants and leaseholders who have already been rehoused due to the impending demolition of the tower blocks.

Mitigating actions to be taken

We are committed to informing all residents on an estate where they are being affected by redevelopment. All residents will have an opportunity to share their thoughts and views regardless of their socio-economic status.

For leaseholders there is additional information supplied about financial and rehousing options available. The Landlord Offer document included a specific section on options for both resident and non-resident leaseholders, setting out details of the specific commitments. This includes leasehold buyout, shared ownership and equity options in addition to temporary rehousing until the new homes are completed amongst other things for both resident and non-resident leaseholders.

For residents with who have moved with the Right to Return there is a dedicated Resident Services Officer. Other Resident services officers are also based in the TRA hall at the estate. In addition, there is an independent tenant and leaseholder advisor, Open Communities, contactable by phone and email along with in person visits.

All residents are treated equally and additional support will be given where identified and/or requested.

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

- Positive impacts of better access to information about improvements to housing and open space;
- Resident empowerment from involvement in the detailed consultation process.
- Improved community strength from collective response to the stress and threats of safety issues in the Ledbury Towers;
- Positive impact of outcomes to quality of life resulting from the regeneration of the estate.

Information on which above analysis is based

Mitigating actions to be taken

Section 5: Further actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating actions or the areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
1	Analysis of needs of those who want to exercise their Right to Return	Identify which tenants want to return, where to, and what their needs are.	April 2023
2	Address, as much as possible, any concerns raised by residents and stakeholders about the proposals.	Analyse written and feedback received from those who are engaged during the consultation events and ongoing meetings.	In line with the project programme.
3			
4			
5			

5. Equality objectives (for business plans)				
Based on the initial analysis above, please detail any equality objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.				
Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2

5. Health objectives (for business plans)				
Based on the initial analysis above, please detail any health objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.				
Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2

This page is intentionally blank.

CABINET APPENDICES DISTRIBUTION LIST (OPEN)**MUNICIPAL YEAR 2021-22****NOTE:** Original held by Constitutional Team; all amendments/queries to
Paula Thornton Tel: 020 7525 4395

Name	No of copies	Name	No of copies
Cabinet Members		Officers	
Kieron Williams	1	Eleanor Kelly	1
Jasmine Ali	1	Doreen Forrester-Brown	1
		Caroline Bruce	1
		Michael Scorer	1
Electronic Versions (no hard copy)		Others (electronic)	
Evelyn Akoto		Paula Thornton, Constitutional Officer	5
Helen Dennis			
Stephanie Cryan			
Alice Macdonald			
Darren Merrill			
Rebecca Lury			
Jason Ochere			
Catherine Rose			
Ian Wingfield			
Victor Chamberlain			
Peter Babudu			
Victoria Olisa			
Gavin Edwards			
Margy Newens			
Leanne Werner			
Jack Buck			
Sarah King			
Humaira Ali			
		Total: 11	
		Dated: 29 November 2021	