

# Cabinet

Tuesday 6 December 2022

11.00 am

Ground Floor Meeting Rooms, 160 Tooley Street, London SE1 2QH

## Appendices – Part 1

### List of Contents

Item No.	Title	Page No.
9.	<b>Southwark Standards Report 2021-22</b> Appendix 1.	1 - 46
10.	<b>Place planning Across Southwark's Primary Schools: A strategy for future-proofing quality and supply</b> Appendix 1.	47 - 101
17.	<b>Air Quality Strategy &amp; Action Plan (2023 - 2027) and Air Quality Management Area</b> Appendices 1 – 2.	102 - 167
18.	<b>Southwark District Heating Network Local Development Order</b> Appendices A – D.	168 - 210

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## A Great Start in Life

# Southwark Standards Report 2021-22





## FOREWORD - COUNCILLOR JASMINE ALI, DEPUTY LEADER AND CABINET MEMBER FOR CHILDREN, YOUNG PEOPLE, EDUCATION AND REFUGEES

This annual school standards report marks an important part of the council's calendar. Each year the report has shown an improvement in school standards as we move at pace towards our goal of 100% outstanding schools in Southwark.

It is important to note that the past three years have provided exceptional challenge for educational settings, in Southwark, with many of our children experiencing disruption to their place and quality of learning, which, unsurprisingly, has had a detrimental impact on their achievement. Evidence is showing that our youngest pupils and our most disadvantaged pupils have felt the greatest impact. Our next steps must be to help schools to support those pupils who may have been most negatively impacted by the disruption to schooling (the youngest and/ or most disadvantaged) to catch up.

The overall contents of the report show that we in a good position to narrow attainment gaps in educational outcomes between disadvantaged pupils and their better off counterparts.

Positive accounts show how Southwark's pupils performed **strongly** in their most recent assessments, in many cases **better** than pupils in the rest of London and always better than pupil performance nationally, and 98% of Southwark's schools are (at the time of writing) currently rated by Ofsted as good or outstanding, an achievement we are rightly, and extremely, proud of.

This can be seen in the highlights of this school standards and achievement report which includes:

- 68.3% of children achieved a Good Level of Development (GLD) at **Early Years Foundation Stage** in 2021-2022.
- Southwark performance in the **Phonics** Screening Check is once again above national.
- **Key Stage 1**-Performance across all measurements in **Key Stage 1** declined nationally, and performance in Southwark and London mirrored this decline but remain **higher** than national.
- At expected standard, Southwark reported better performance than right across London and nationally in reading and writing, and the same performance as London, but above national in mathematics and science.
- At Greater Depth, Southwark's performance was above national across all measures and below London in reading and mathematics, and equalled London performance in writing,
- Southwark's results at **Key Stage 2** are consistently above those reported nationally in all subjects and above London for the first time in reading and in the key headline measure of RWM combined.
- There has been a significant improvement in KS2 reading. This year, outcomes are above both national and London.
- **Key Stage 4** Performance information for Key Stage 4 in all key measures have improved since 2019.
- Southwark's performance at the Attainment 8 measure has improved since 2019.

- The percentage of pupils achieving grades 5 to 9 in English and Maths has increased by more than 6 percentage points.
- The average point score in the English Baccalaureate is higher than in 2019.
- **Key Stage 5** is stronger than before with A level performance consistently higher than that reported in 2019, at all grade boundaries in Southwark.
- **Southwark Special Educational Needs and or Disabilities (SEND)** is also strong. Pupils at school supported and with an Education Health Care Plan (EHCP) in primary, continue to perform in line with or above national outcomes. SEND pupils at school support and EHCP at Key Stage 4 perform better than both nationally and in London at Progress 8, Attainment 8 and EBacc.
- More positive news for the **children in our care** - there was a very good improvement in the percentage of children achieving a standard pass in English at GCSE. A significantly higher number of children took A level and entered university in 2022.
- 99.3% of Southwark 16 & 17 year olds had an offer of education or training. This is an improvement on the previous year's figure of 98.5% and better than the national performance of 94.3%. This is a marked improvement for those children and young people who find our services hard to access and are categorised in policy terms as **Not In Education, Employment or Training**.

The contents of the report show that our next steps must be to help schools to support those pupils who may have been most negatively impacted by the disruption to schooling (the youngest and the most disadvantaged) to catch up.

There are other important steps that the council will take to support great education in Southwark. We will work with schools to manage surplus capacity in schools. We will work to ensure our children and young people with Special Educational Needs and/or Disabilities is appropriate, good value and, wherever possible, delivered in borough. We will continue to work with schools to maintain and better out high standards across all of our education settings.

Last and but not least, I want to acknowledge the incredible journey it has taken to get Southwark schools to 98% good and outstanding. I want to thank our own education team, our parents, the fantastic teachers and school staff in this borough, and our exceptional children and young people for making this happen.

## Education in Southwark

### Context

Southwark is a diverse borough with residents from a wide range of ethnicities and backgrounds. Latest estimates<sup>1</sup> indicate that 51% of people living in Southwark have a white ethnic background compared to 84% nationally. A much larger proportion of our residents come from black and mixed ethnic backgrounds when compared to England. The diversity of Southwark is much greater among our children and young people, with roughly equal proportions of young people from white and black ethnic backgrounds.

The numbers and proportion of pupils with SEND have risen year-on-year for the past six years nationally, across London and in Southwark. The percentage of pupils with EHC plans in Southwark is broadly in line with that in other London boroughs, however, the percentage of 'SEND support' pupils in Southwark has been above London averages for the past six years.

At the start of the academic year, 2021-22, Southwark's state-funded schools<sup>2</sup> served 43,288 Southwark pupils<sup>3</sup>. According to the January 2022 School and Alternative Provision (AP) Census, 41% of our pupils are eligible for the pupil premium<sup>4</sup>.

At end of academic year 2021-22				
Phase	Total Number of schools	Number of community, foundation or voluntary-aided schools	Number of Academies	Number of Free Schools
Nursery	5	5	0	0
Primary	73	57	10	6
Secondary	19	3	13	3
All-through	1	0	1	0
Special	8	5	2	1
Pupil Referral Unit	1 (places commissioned by the Local Authority)	0	0	0
Hospital Schools	2	2	0	0

<sup>1</sup> JSNA Annual Report, 2022: <https://www.southwark.gov.uk/health-and-wellbeing/public-health/health-and-wellbeing-in-southwark-jsna/southwark-profile>

<sup>2</sup> Number and types of schools in Southwark, sourced from DfE website <https://get-information-schools.service.gov.uk/>

<sup>3</sup> Details includes hospital schools. Sourced from DfE publication: - Schools, pupils and their characteristics: January 2022. <https://www.gov.uk/government/statistics/schools-pupils-and-their-characteristics-january-2022>

<sup>4</sup> Pupil premium figure sourced from DfE publication <https://www.gov.uk/government/publications/pupil-premium-allocations-and-conditions-of-grant-2022-to-2023>

**Community, Foundation and Voluntary- Aided Schools**

The funding for these schools comes from central government, via the Local Authority. They are maintained by the Local Authority and follow the national curriculum.

**Academies and Free Schools**

These are state funded schools which are not required by law to follow the national curriculum and are able to set their own term times. They must comply with the School Admissions Code<sup>5</sup> and school admissions appeal code<sup>6</sup>. Academies and free schools receive funding directly from central government, not via the Local Authority.

Multi- Academy Trusts (MATs) with a presence in Southwark are: The Harris Federation; Ark; City of London Academies Trust; Communitas Education Trust; The Charter School Educational Trust; United Learning, and SPA Education Trust (special schools).

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<sup>5</sup> <https://www.gov.uk/government/publications/school-admissions-code--2>

<sup>6</sup> <https://www.gov.uk/government/publications/school-admissions-appeals-code>

## Executive Summary

- The past three years have provided challenge for education settings, in Southwark, with many of our children experiencing disruption to their place and quality of learning which, as we expected, has had a detrimental impact on their achievement. Anecdotal evidence has shown that our youngest pupils and our most disadvantaged pupils have felt the greatest impact.
- However, early indications are that Southwark's pupils performed strongly in their most recent assessments, in many cases better than pupils in the rest of London and always better than pupil performance nationally. This is testament to the way in which our schools and services across the council have worked, and continue to work, to support children and families.

**EYFS-** There have been significant changes made to the Early Years Foundation Stage Profile framework, which make it difficult to compare performance fairly year on year. 68.3% of children achieved a Good Level of Development (GLD) in 2021-2022.

**Phonics-** Southwark performance in the phonics Screening Check is once again above national.

**Key Stage 1-** Performance across all measurements in Key Stage 1 declined nationally, and performance in Southwark and London mirrored this decline but remain higher than national.

- At expected standard, Southwark reported better performance than in London and nationally in reading and writing, and the same performance as London, but above national in mathematics and science.
- At Greater Depth, Southwark's performance was above national across all measures and below London in reading and mathematics, and equalled London performance in writing,

**Key Stage 2-** Southwark's results at KS2 are consistently above those reported nationally in all subjects.

- Outcomes above London for the first time in reading and in the key headline measure of RWM combined.
- There has been a significant improvement in KS2 reading. This year, outcomes are above both national and London.

**Key Stage 4-** Performance information for Key Stage 4 in all key measures have improved since 2019.

- Southwark's performance at the Attainment 8 measure has improved since 2019 and is above both London and national results.
- Progress 8 score has improved over time and is better than those in London and nationally.
- The percentage of pupils achieving grades 9 to 5 in English and Maths has increased by more than 6 percentage points. These results are above both London and national.
- The average point score in the English Baccalaureate is higher than in 2019, and remains above both London and national.

**Key Stage 5-** The A level performance in Southwark is consistently higher than that reported in 2019, at all grade boundaries.

- The White Paper, “Opportunity for All”<sup>7</sup>, released in March, 2022, placed a great deal of emphasis on supporting children to catch up, and on ensuring that schools across the country focused on the basics of teacher development, curriculum enrichment, attendance and mental health: core threads running through the work delivered by the Learning and Achievement team in Southwark. 97% of Southwark’s schools were (at the end of the 2021/22 academic year) rated by Ofsted as good or outstanding, an achievement we are rightly, and extremely, proud of.
- The Education Directorate in Southwark Council provides a wide remit of services, both statutory and non- statutory, to education settings across the borough, adding value to the excellent work delivered by our schools, nurseries, colleges and adult learning provide
- Our challenge over the next period is to ensure that we build on this high quality of education by ensuring that our schools are full, well-funded and able to provide the specialist support that they need to, for all of our children and young people. To this end, our priority areas of focus in 2022-23 are:
  - To maintain and better our high standards across all of our education settings;
  - To ensure provision for our children and young people with Special Educational Needs and/ or Disabilities is appropriate, good value and, wherever possible, delivered in borough<sup>8</sup>;
  - To manage effectively the surplus capacity in our schools<sup>9</sup>.

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<sup>7</sup> <https://www.gov.uk/government/news/schools-white-paper-delivers-real-action-to-level-up-education>

<sup>8</sup> <https://moderngov.southwark.gov.uk/documents/g7339/Public%20reports%20pack%20Tuesday%2013-Sep-2022%2011.30%20Cabinet.pdf?T=10>

<sup>9</sup> Insert link to strategy when published

## 1. Primary Achievement

### Early Years Foundation Stage (EYFS) 2021-22

#### EYFS Highlights:

- ✓ 68.3% of children achieved a Good Level of Development (GLD) in 2021-2022
- ✓ 65% of children with English as an additional language (EAL) achieved a GLD compared with 70.9% of children with English as a first language;
- ✓ 58.2% of children defined as disadvantaged achieved a GLD compared with 71.7% of children not defined as disadvantaged;
- ✓ 23.8% of children with Special Educational Needs (SEN) achieved a GLD compared with 76.0% of children with no SEN. The more advanced the level of SEN the smaller the percentage of the cohort that achieved a GLD.

### Pupils achieving a Good Level of Development (GLD)

	2022
Southwark	68.3%
London	TBC
National	Nov 2022

### EYFS Priorities for Improvement: 2022-23

- Removing barriers to learning through a focus on improving provision for disadvantaged children and children with SEND to address social disadvantage and improve outcomes.
- Creating a high-quality, rich and progressive provision offer with particular focus on communication and language, personal, social and emotional development, literacy and mathematics.
- Legacy- creating high-quality long-lasting resources to support professionals in early years and as part of graduated offer to help schools support themselves.

### Phonics Screening Check at years 1 and 2 (provisional) 2021-2022

#### Phonics Screening Check Highlights:

- ✓ Outcomes in both year 1 and year 2 phonics in Southwark are once again above national and in line with London.

## Year 1 Phonics Screening Check<sup>10</sup>

	2016	2017	2018	2019	2022
Southwark	82%	84%	85%	84%	78%
London	83%	84%	85%	84%	78%
National	81%	81%	82%	82%	75%

## End of Year 2<sup>11</sup>

	2016	2017	2018	2019	2022
Southwark	91%	92%	92%	92%	88%
London	92%	92%	93%	92%	88%
National	91%	92%	92%	91%	87%

## Key Stage 1 (year 2) Teacher Assessments (Provisional) 2021-2022

### Key Stage 1 Highlights:

- ✓ Southwark's performance at KS1 has remained consistently above national outcomes.
- ✓ Outcomes in Southwark are above London in reading and writing and in-line with London in mathematics and science at the expected standard.
- ✓ At the greater depth standard, Southwark's results remain above national and in-line with London outcomes in writing.

## Working at the Expected Standard at Key Stage 1 (KS1)

	Reading			Writing			Mathematics			Science		
	2018	2019	2022	2018	2019	2022	2018	2019	2022	2018	2019	2022
Southwark	79%	79%	71%	74%	73%	65%	78%	78%	71%	82%	83%	78%
London	78%	77%	70%	73%	73%	63%	79%	79%	71%	84%	83%	78%
National	75%	75%	67%	70%	69%	58%	76%	76%	68%	83%	82%	77%

<sup>10</sup> See Appendix 1 for cohort characteristics analysis

<sup>11</sup> Consists of all Year 2 pupils who were screened in Year 1 and met the required phonics standard, plus any pupils in Year 2 who were re-screened or screened for the first time. Arising from the cancellation of all primary assessments in 2020 and 2021 as a result of Covid-19, the 2022 Year 2 cohort were not screened for phonics in Year 1. Rather, these pupils were first screened in autumn 2021.

**Working at Greater Depth at KS1<sup>12</sup>**

	Reading			Writing			Mathematics		
	2018	2019	2022	2018	2019	2022	2018	2019	2022
Southwark	26%	25%	19%	18%	17%	12%	24%	23%	18%
London	28%	28%	22%	19%	18%	12%	25%	25%	20%
National	26%	25%	18%	16%	15%	8%	22%	22%	15%

**Key Stage 2<sup>13</sup> (year 6) SATs (provisional) 2021-22****Key Stage 2 Highlights:**

- ✓ Since the introduction of the revised Key Stage 2 assessment (2016), we have shown substantial improvement over time and Southwark schools are performing well.
- ✓ Whilst outcomes have declined in the KS2 headline measure of reading, writing and maths combined (as in other key stages due to the Covid pandemic), the decline is not as large as experienced nationally and across London.
- ✓ Southwark's results at KS2 are consistently above those reported nationally in all subjects, and above London for the first time (since the introduction of the revised KS2 assessments) in separate reading, writing and science and in RWM combined.
- ✓ There has been improvement in KS2 reading. This year, outcomes are above both national and London, which is the result of exceptional work that leaders and teachers have done to improve both reading lessons as well as the wider curriculum. This has enabled pupils to tackle more complex texts with greater knowledge and confidence.
- ✓ Southwark's performance at a higher standard or greater depth, as in previous years, was better than the national average for all subjects including reading, writing and maths combined in 2022.
- ✓ Pupil progress is, once again, above national standards in all three subjects of reading and writing and maths.

<sup>12</sup> See Appendix 2 for KS1 cohort characteristics analysis

<sup>13</sup> See Appendix 2 for the full KS2 cohort characteristics analysis.

**Showing the % of pupils working at the expected standard  
Standard Assessment Tests (SATs)**

	Reading (test)			GPS (test)			Mathematics (test)			RWM (test & TA)		
	2018	2019	2022	2018	2019	2022	2018	2019	2022	2018	2019	2022
Southwark	77%	76%	79%	80%	82%	76%	80%	81%	74%	69%	68%	66%
London	79%	78%	78%	83%	84%	78%	81%	83%	77%	70%	71%	65%
National	76%	74%	74%	78%	78%	72%	76%	79%	71%	65%	65%	58%

**Teacher Assessments**

	Writing (TA)			Science (TA)		
	2018	2019	2022	2018	2019	2022
Southwark	80%	81%	75%	84%	85%	82%
London	82%	82%	74%	85%	86%	81%
National	79%	79%	69%	83%	83%	78%

**Showing the % of pupils working at a higher standard and greater depth  
Standard Assessment Tests (SATs)**

	Reading (test)			GPS (test)			Mathematics (test)			RWM (test & TA)		
	2018	2019	2022	2018	2019	2022	2018	2019	2022	2018	2019	2022
Southwark	29%	28%	33%	40%	41%	35%	27%	29%	27%	12%	12%	11%
London	31%	31%	32%	44%	45%	37%	30%	34%	30%	13%	14%	11%
National	28%	27%	28%	35%	36%	28%	24%	27%	22%	10%	11%	7%

**Teacher Assessments**

	Writing (TA)		
	2018	2019	2022
Southwark	22%	23%	20%
London	24%	24%	17%
National	20%	20%	13%

## Progress from Key Stage 1 to Key Stage 2<sup>14</sup>

Progress at Key Stage 2 (KS2) is measured using pupils' prior attainment at Key Stage 1 (KS1). The national average is set at 0 and a school's overall progress score is determined by finding the average progress of each year 6 pupil compared with others in the same prior attainment group at KS1. Most pupils are expected to make good or better progress from their relative starting points. Any figure above 0 is considered to be better than expected for that group, and the higher the figure, the better the progress made.

	Reading			Writing			Mathematics		
	2018	2019	2022	2018	2019	2022	2018	2019	2022
Southwark	+1.1	+1.0	+0.9	+1.1	+1.1	+1.4	+1.3	+0.9	+0.7
London	+0.8	+0.8	Not yet available	+0.8	+0.8	Not yet available	+1.3	+1.2	Not yet available
National*	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

\* Assumption that progress score at national level will be 0.0

### Key Stage 1 and 2 Priorities for Improvement: 2022-23

- Plan for and monitor closing gaps between disadvantaged pupils and others in order to raise attainment at KS1.
- Ensure there is a full curriculum offer and that it is impacting positively on reading and writing outcomes at the end of KS2.
- Deliver a targeted writing project for identified lower attaining schools in order to raise attainment at KS2.

<sup>14</sup> Progress figures at LA level sourced from provisional tables checking data. Regional level data not yet available.

## 2. Secondary Achievement

### Key Stage 4 (Years 10 and 11): GCSEs (Provisional)<sup>15</sup>

#### Key Stage 4 Highlights:

- ✓ Southwark's performance at the Attainment 8 measure has improved since 2019 and is above both London and national results.
- ✓ Progress 8 score has improved over time and is better than those in London and nationally.
- ✓ The percentage of pupils achieving grades 9-5 in English and Maths has increased by almost 13.5 percentage points. These results are above both London and national.
- ✓ The average point score in the English Baccalaureate is higher than in 2019, and remains above national. This year our result also was above the London average.

#### Attainment and Progress 8 Scores

	Attainment 8 Score			Progress 8 Score		
	2018	2019	2022	2018	2019	2022
Southwark	50.2	49.5	53.4	0.30	0.25	0.34
London	49.4	49.7	52.6	0.23	0.22	0.23
National	46.6	46.8	48.8	-0.02	-0.03	-0.03

#### English & Mathematics and English Baccalaureate

	English and Mathematics % Grades 9 to 5			English Baccalaureate Average Point Score		
	2018	2019	2022	2018	2019	2022
Southwark	48.3%	45.5%	58.9%	4.52	4.45	4.91
London	48.7%	49.0%	57.3	4.42	4.47	4.77
National	43.5%	43.4%	49.8	4.05	4.08	4.28

<sup>15</sup> Notes: Results for 2022 are provisional and based on published DfE data. Revised data will be available in January 2023.

### Key Stage 5 (Year 13): A- Levels<sup>16</sup> 2021-2022

The data presented in the table below is only indicative as it comes from the unvalidated results that three quarters of schools shared with us. However, according to the data we have available from schools, this has been another exceptionally good year overall for Southwark A-level students and is marked by a strong performance across the board.

#### Key Stage 5 Highlights:

- ✓ The A level performance in Southwark is consistently higher than that reported in 2019, at all grade boundaries.
- ✓ At the very top grades, Southwark's performance increased by more than 14 percentage points.

### Percentage of A- Level Entries by Grade

	A* - A			A* - C			A* - E		
	2018	2019	2022	2018	2019	2022	2018	2019	2022
Southwark	24.7%	25.1%	39.6%	78.8%	77.1%	85.9%	98.0%	97.8%	99.2%
National	26.2%	25.2%	35.9%	76.8%	75.5%	82.1%	97.6%	97.5%	98.4%

### Key Stages 4 and 5 Priorities for Improvement: 2022-23

- Make better use of data to reduce inequalities in the performance of particular ethnic groups in exams.
- Support schools attaining the Race Charter Mark (a national accreditation achieved in conjunction with the Schools, Students and Teachers Network, SSAT) to provide a sustainable means of developing and sharing best practice.
- Promote Inclusion Charter guidance

## 3. Quality of Education in Southwark's Schools

#### Quality of Education Highlights: 2021-22

- ✓ At the end of the academic year 2021/22, 97% of Southwark schools in Southwark were judged by Ofsted to be good or better. This eight percentage point increase since 2015 puts Southwark schools three percentage points above London and nine percentage points above national.
- ✓ This is the best position for schools within the authority ever and shows that the vast majority of our pupils and students are receiving a good education on a daily basis.

<sup>16</sup> Note: LA results for 2022 are unvalidated, provisional and derived from directly provided data from schools. Not all schools have provided their data for 2022

- ✓ Over this same period the Ofsted framework has changed on a number of occasions and expectations on schools have increased. Despite the additional challenge this has brought to school outcomes for pupils and students have improved to this level.

### Overall Ofsted Judgements as at end of August 2022

A summary of Ofsted judgements of Southwark schools is shown in the table below, with a full breakdown of the Ofsted ratings for every school set out in Appendix 3.

106 schools currently with an Ofsted Judgement (including Special Schools)	2022 %
2 Schools in Special Measures (1 secondary academy; 1 primary academy)	2%
0 Schools in Serious Weaknesses	0%
1 School Requires Improvement (1 maintained primary school)	1%
69 Schools Judged Good	65%
34 Schools Judged Outstanding	32%
103 Schools Judged Good or Outstanding	97%

### Improvement over time

Overall Ofsted Judgements <sup>17</sup>	2015	2016	2017	2018	2019	2020	2021	2022
Special Schools judged either Good or Outstanding	100%	100%	100%	100%	100%	100%	100%	100%
Primary / Infant & Nursery Schools judged either Good or Outstanding	87%	91%	87%	87%	91%	92%	92%	97%
Secondary Schools judged either Good or Outstanding	94%	94%	94%	94%	95%	95%	95%	97%
All Schools judged either Good or Outstanding	89%	92%	89%	89%	93%	93%	93%	97%

<sup>17</sup> Position as at 31st August of each year

## 4. Learning and Achievement in Special Educational Needs and/ or Disabilities (SEND)

### SEND Highlights: 2021-22

- ✓ All special schools in Southwark are good or outstanding; five out of the seven special schools are outstanding.
- ✓ Southwark SEND pupils at school support and EHCP in primary, continue to perform in line with or above pre-pandemic outcomes, which were in line with or above national outcomes.
- ✓ Between 2016 and 2018 the percentage of pupils with EHC plans meeting the required standard in the Year 1 phonics screening check has been in line with, or above, both London and national averages. Despite dropping in 2019, the percentage of pupils with EHC plans meeting the required standard has risen by just over 3% in 2022.
- ✓ The percentage of pupils at SEN support meeting the required standard in the Year 1 phonics screening test has consistently been above national averages to 2019. In 2022 the percentage of pupils at SEN support meeting the required standard in the Year 1 phonics screening test has fallen by 5% to 53%.
- ✓ At Key Stage 2, the percentage of pupils with an EHCP and with SEN support reaching the expected standard in the combined reading, writing, mathematics (RWM) measure, has steadily increased since 2017 and has mirrored national and London performance improvement. For pupils with an EHCP this increase has been by 3 percentage points and for SEN support by 6 percentage points.
- ✓ Southwark SEND pupils at school support and EHCP at Key Stage 4 perform better than both nationally and in London at Progress 8, Attainment 8 and EBacc.

### (SEN) Attainment at key stages in 2021-22

*The cohort of pupils with EHC plans, although rising, is small. The needs of pupils with EHC plans are individual and are different year-on-year. Consequently, there are no expectations that the outcomes for pupils with EHC plans can be compared with previous years. This is the case for all Key Stages. Special Educational Needs (SEN) attainment data in the tables below are based on published DfE data. The most recent data available is used in all cases. Data for 2022 is provisional.*

**(SEN) Pupils with Education Health and Care Plans achieving a Good Level of Development (GLD) in EYFS**

	2016	2017	2018	2019	2022
Southwark	7%	X <sup>18</sup>	5%	8%	2.5%
London	5%	5%	5%	6%	Not yet available
National	4%	4%	4%	5%	Not yet available

**(SEN) Pupils at SEN Support achieving a Good Level of Development (GLD)**

	2016	2017	2018	2019	2022
Southwark	35%	33%	29%	27%	29.5%
London	31%	31%	32%	34%	Not yet available
National	26%	27%	28%	29%	Not yet available

**(SEN) Year 1 Phonics Screening Check (Provisional)**

**Pupils with Education Health and Care Plans meeting the required standard**

*It is inadvisable to compare year on year outcomes, and London and national outcomes given the complexity of pupils' needs and the size of the cohort.*

	2016	2017	2018	2019	2022
Southwark	25%	22%	22%	17%	20.2%
London	23%	22%	23%	27%	Not yet available
National	18%	18%	19%	20%	Not yet available

**(SEN) Pupils at SEN support meeting the required standard**

	2016	2017	2018	2019	2022
Southwark	56%	59%	55%	58%	53%
London	57%	57%	59%	60%	Not yet available
National	46%	47%	48%	48%	Not yet available

<sup>18</sup> X= Suppressed to preserve confidentiality; small number of 1 or 2, or % based on small number

**(SEN) Key Stage 2 (KS2)- Year 6 SATS (Provisional)**

*It is inadvisable to compare year on year outcomes given the complexity of pupils' needs and the size of the cohort.*

**(SEN) Pupils with Education Health and Care Plans reaching the Expected Standard at KS2 in reading, writing and mathematics combined**

	2017	2018	2019	2022
Southwark	8%	9%	9%	11%
London	9%	11%	10%	Not yet available
National	7%	8%	9%	Not yet available

**(SEN) Pupils with SEN support reaching the Expected Standard at KS2 in reading, writing and mathematics combined**

	2017	2018	2019	2022
Southwark	30%	35%	35%	36%
London	29%	33%	36%	Not yet available
National	21%	24%	25%	Not yet available

**(SEN) Key Stage 4**

*Comparable Key Stage 4 pupil characteristics data for 2022 is not available yet so we have made the decision to include only performance information up to 2021. Due to the cancellation of exams in response to COVID-19 and the change to using teacher assessments, 2020 and 2021 exam results are not directly comparable with other years. It is inadvisable to compare year on year outcomes, and London and national outcomes given the complexity of pupils' needs and the size of the cohort.*

**(SEN) Pupils with Education Health and Care Plans achieving English Baccalaureate (A\*-C / Grades 9-4)**

	2018	2019	2020	2021
Southwark	1%	1%	1%	9%
London	3%	3%	3%	3%
National	2%	2%	2%	2%

**(SEN) Pupils at SEN support achieving English Baccalaureate (A\*-C / Grades 9-4)**

	2018	2019	2020	2021
Southwark	13%	16%	26%	23%
London	10%	10%	10%	16%
National	6%	7%	9%	9%

**(SEN) Average attainment 8 score for pupils with ECHP**

	2018	2019	2020	2021
Southwark	13.7	15.2	16.9	20.6
London	15.5	15.7	15.5	16.4
National	13.5	13.7	15.2	15.7

**(SEN) Average attainment 8 score for pupils with SEN support**

	2018	2019	2020	2021
Southwark	38.3	38.6	45.0	44.2
London	35.3	35.1	35.3	40.1
National	32.2	36.7	36.4	32.6

**(SEN) Average progress 8 score for pupils with Education Health and Care Plans**

	2018	2019	2020	2021
Southwark	-1.03	-1.14	*	*
London	-0.91	-1.12	*	*
National	-1.09	-1.17	*	*

**(SEN) Average Progress 8 Score for Pupils with SEN support**

	2018	2019	2020	2021
Southwark	-0.12	-0.20	*	*
London	-0.24	-0.39	*	*
National	-0.43	-0.43	*	*

**(SEN) Post- 16 Attainment by age 19**

*Attainment figures for 2022 are not available yet so we have made the decision to include only performance information up to 2021. Due to the cancellation of exams in response to COVID-19 and the change to using teacher assessments, 2020 and 2021 exam results are not directly comparable with other years. It is inadvisable to compare year on year outcomes given the complexity of pupils' needs and the size of the cohort.*

**(SEN) % of 19 year olds with statement of SEN or plan qualified to level 2 including English and mathematics**

	2018	2019	2020	2021
Southwark	15.9%	22.9%	21.9%	15.2%
London	16.4%	17.2%	16.4%	16.7%
National	14.8%	14.9%	14.7%	16.1%

**(SEN) % of 19 year olds with SEN support qualified to level 2 including English and mathematics**

	2018	2019	2020	2021
Southwark	38.6%	39.8%	45.6%	48.5%
London	42.3%	44.2%	42.3%	46.9%
National	35.6%	36.0%	36.3%	40.9%

## 5. Learning and Achievement of young people not in education, employment or training (NEET).

Southwark is required to track and support young people leaving school to secure, as far as possible, their journey into further education, training or employment. Performance in this area is measured by identifying the number of young people who are aged 16 and 17 at the beginning of years 12 and 13, and who are not in employment education or training (NEET), or whose activity is not known. This often includes young people who turn 18 after 1<sup>st</sup> September. The size of the average post 16 cohort currently is 6000. Local authorities have a duty to ensure that every young person (16-17 years old) has an offer of education or training. This is called the "September Guarantee".

### NEET Highlights

- ✓ In September 2020 (the most up to date validated performance available at the time of writing), 99.3% of Southwark 16 & 17 year olds had an offer of education or training. This is an improvement on the previous year's figure of 98.5% and better than the national performance of 94.3%.
- ✓ As a result, of good, tailored, careers guidance we have achieved improvements. In March 2022, 97% of the post- 16 cohort were in education, employment or training, bringing us above the London (96%) and national (93%) figures.
- ✓ Improved data sharing with schools in Southwark has helped us to identify at an earlier stage young people without an offer of education and training in September. This has enabled us to contact more young people so that they receive support to engage before they become NEET.

### % 16-17 year olds made an offer of an education place under September Guarantee

Year	Southwark	London	National
2017	97.8%	95.7%	94.7%
2018	98.4%	95.1%	94.5%
2019	98.5%	95.5%	95.0%
2020	99.3%	95.9%	94.3%
2021	tbc	tbc	tbc

## The percentage of 16-17 year olds recorded as NEET/ not known

This data is published annually and covers the average of the period December to February known as the score card data.

Year	Southwark % 16-17 year olds				London % 16-17 year olds				National % 16-17 year olds			
	NEET	Not Known	Total	EET	NEET	Not Known	Total	EET	NEET	Not Known	Total	EET
2016	1.3%	3.0%	4.3%	95.7%	1.8%	3.5%	5.3%	94.7%	2.8%	3.2%	6.0%	94.0%
2017	1.5%	7.2%	8.7%	91.3%	1.8%	3.2%	5.0%	95.0%	2.7%	3.3%	6.0%	94.0%
2018	1.4%	8.5%	9.9%	90.1%	1.7%	3.0%	4.7%	95.3%	2.6%	2.9%	5.5%	94.5%
2019	2.4%	6.4%	8.8%	91.2%	1.8%	2.3%	4.1%	95.9%	2.7%	2.8%	5.5%	94.5%
2020	1.7%	4.5%	6.2%	93.8%	1.8%	2.2%	4.0%	96.0%	2.8%	2.7%	5.5%	94.5%
2021*	1.7%	1.3%	3.0%	97.0%	1.5%	1.9%	3.4%	96.6%	2.6%	2.2%	4.8%	95.2%

The lower the NEET or not known figure, the better the performance<sup>19</sup>.

### NEET Priorities for Improvement 2022-2023

- Partner agencies to be up to speed on and promote the [Raising the participation age \(RPA\)](#) and concentrate on sustainable progression routes at key points of the academic year.
- Development of systems to improve the notification and tracking of young people leaving post 16 provision before the end of a course.
- Early identification by schools of at risk of NEET young people and establishment of a process of escalation for schools and providers who fail to provide statutory data.

<sup>19</sup> The data above is based on the December to February averages and is published in October by the DfE, eight months after collection on GOV.UK in the NEET scorecard data. 2021/22 data is presented as an approximation from our internal data, so could be subject to change denoted by “\*”.

## 6. Learning and Achievement of Southwark's Looked After Children

The Head Teacher of the Virtual School publishes a full report every year. At the time of writing the report (5<sup>th</sup> April, 2022), there were 430 students recorded on the Virtual School roll: 293 of statutory school age and 137 in Key Stage 5. This was a slight increase from the previous school year (422 students in total). 46% of the student roll were identified as having Special Educational Needs (SEN), which compares to 12.6% across the national population of statutory school age looked after children. 74% of Southwark's Looked After Children are placed outside of Southwark.

### Looked After Children Highlights:

- ✓ There was a very good improvement in the percentage of children achieving a standard pass in English at GCSE.
- ✓ A significantly higher number of children took A level and entered university in 2022.

English and Maths			
	2020	2021	2022
English Standard, 9-4	32%	27%	47%
English Strong, 9-5	26%	16%	17%
Maths Standard, 9-4	13%	27%	17%
Maths Strong, 9-5	7%	20%	15%

Achieving a pass in both English and Maths			
	2019	2020	2022
Standard, 9-4		22%	14%
Strong, 9-5	10%	15%	11%

Number of Looked After Children entering University

Year	Taking A Level/ L3	Progressing to University
2020	13	4
2021	14	5
2022	22	13

### Key Stages 4 and 5 Priorities for Improvement: 2022-23

- Narrow the attainment gap through support and interventions for schools and children to improve outcomes
- Support the development of attachment aware and trauma informed schools in Southwark by delivering a flexible and diverse virtual training programme

## 7. Learning and Achievement in Adult Learning 2021 - 2022

### Adult Learning Highlights:

- ✓ More than 2000 people benefited from a range of courses at Southwark Adult Learning Service in the academic year 2021-2022.
- ✓ A high proportion of learners who start a course successfully complete it. For most courses, this means nine in ten learners will achieve their learning goal.
- ✓ There was increased demand for more Entry level mathematics, and additional provision was arranged to meet it.
- ✓ External quality assurance from City & Guilds' judged standards to be consistently good or better in ESOL, English and maths at Entry levels. The last QA report from C&G reported: 'A good level of evidence was presented by the learners, who were being assessed at a level appropriate to their skills set' 'Assessment was consistently accurate, and IQA was thorough'.

## 8. Innovations and Wider Achievements

Southwark is an innovative borough: seeking continuous improvement to its practices to ensure best value for money for its residents. Below are some examples of innovation within Education in 2021-22 that have resulted in more effective partnership- working across the Council and with external partners and organisations, which has led to a stronger, more joined up commitment to finding solutions to the challenges our children and young people face today.

### Southwark's Wellbeing First: Improving Mental Health & Resilience in Schools (IMHARS) Programme

Supporting Southwark Council's Thrive Model, and working in collaboration with schools, £2m is being invested in mental health prevention in schools through the launch of Southwark's Wellbeing First: Improving Mental Health & Resilience in Schools (IMHARS) Programme. The aim of the programme is to build resilience through schools so that children and young people can cope with challenges by ensuring more children live in stronger families.

- We aim to deliver a sustainable, universal infrastructure across all schools in Southwark, as part of our local, schools-led system, based on effective collaborations and partnerships, with IMHARS aligned to the open access service The Nest.
- To date, 92 schools (5 nursery, 64 primary, 6 special and 17 secondary schools) have made successful funding applications for a range of school-based initiatives designed to build resilience and promote mental health that will benefit at least 30,000 pupils, accounting for more than two thirds of all school children in Southwark.
- A key strand of the project is collaboration between schools, which has resulted in successful shared projects, examples include an art therapy programme, a sensory space

for students requiring more targeted support, new curriculum and teaching and learning resources, pupil voice and resilience leadership support, ELSA training across three secondary schools and specialist training for parents and carers.

- As part of Thrive London, our Mental Health First Aid (MHFA) two- day course has trained over 350 Mental Health First Aiders across 93 schools and Southwark Council with its partners has facilitated and delivered sessions to school staff on wellbeing for staff and pupils, as well as co-designing and delivering sessions on PSHE and Wellbeing Education.
- We have facilitated and supported the development of Southwark’s IMHARS School Champions, who have further developed the PSHE and Wellbeing curriculum framework, resources and reading lists. In addition to school for school support, the Champions have enhanced template policies, attended conferences and training events, quality-assured resources as well as delivered training to and shared best practice and learning with schools across the borough.
- To date, 85 schools that have achieved Southwark’s “Wellbeing First IMHARS” awards or “Healthy Schools London” accreditations, with more than 25 at Gold or Enhanced level.

In the year 21/22, wider achievements included:

- ✓ 28 additional Mental Health First Aiders across 27 schools;
- ✓ CPD and training delivered to over 100 participants across 48 schools, including: Relationships and Sex Education; Trauma- & Mental Health-Informed Schools; Wellbeing First IMHARS; MHFA, ELSA, curriculum support, etc;
- ✓ 20 headteachers participated in leadership coaching to support school effectiveness;
- ✓ 24 schools have achieved Southwark’s “Wellbeing First IMHARS” or Healthy Schools London awards, with several at Gold or Enhanced level;
- ✓ 14 IMHARS & Healthy Schools Champions who have supported over 30 schools, through school-for-school work and/or sharing IMHARS practice;
- ✓ Two successful IMHARS celebration events, with over 90 attendees, across over 40 unique schools. Delegates attended informative training workshops to continue building on their school’s IMHARS practice. New IMHARS school films highlight the impact of Southwark’s IMHARS Programme<sup>20</sup>

With our collaborative work in 21/22, 100% of schools in Southwark have engaged with Southwark’s Wellbeing First IMHARS programme and wider offer.

### **The Southwark Scholarship Scheme<sup>21</sup>**

Each year Southwark Council opens applications to young people (under 25 years old) who have lived in the borough for a minimum of 3 years, to go to university without the worry of tuition fees.

Since the scheme began in 2011, Southwark Council has helped 121 people pursue higher education on the scholarship, which covers the full tuition fees for their chosen course. Our scholarship supports young people who have an excellent academic record of achievement, made

<sup>20</sup> <https://education.southwark.gov.uk/pshe-healthy-schools/imhars-about>

<sup>21</sup> [www.southwark.gov.uk/scholarships](http://www.southwark.gov.uk/scholarships)

a positive contribution to their local community and have a combined household income of less than £25,000.

Since graduating from university, our scholars have gone on to careers in Education, Engineering, Law, Medicine as well as other pioneering fields.

For the 2021-22 intakes, 10 students were awarded the scholarship, as detailed below:

School	University	Course of Study
Sacred Heart Sixth Form	Lancaster University	Business Management
Kingsdale Foundation School	University of Manchester	Mechanical Engineering
ARK Walworth Academy	University of Kent	LLB Law
Kingsdale Foundation School	Southampton University	Economics
ARK Walworth Academy	London South Bank University	Midwifery Practice
St Saviour's and St Olave's	Coventry University	English Literature
St Michael's Catholic College	University of Exeter	LLB Law with European Studies
La Retraite Catholic School	Durham University	LLB Law
City of London Academy	King's College London	BSc Computer Science with year in industry
Southwark College*	University of Roehampton*	Primary Education with QTS*

\*Since 2013, St Olave's United Charity has been supporting the scheme by funding the scholarship of one additional scholar each year through our recruitment process, which is included in the list above (T&Cs apply.)

### **Southwark Stands Together (in Schools)<sup>22</sup>**

Following the murder of George Floyd in 2020, Southwark council set up listening groups for its residents to identify issues of concern of racism and discrimination locally, listen to people from Black, Asian and minority ethnic communities about their experience and learn from our residents and council colleagues about how the council can become an anti-racist organisation.

Marginalisation in education was identified as one of the themes and so project groups, made up of council officers from education and children's social care, head teachers and governors, were set up to focus on the areas of:

<sup>22</sup> <https://moderngov.southwark.gov.uk/documents/b50014675/Supplemental%20Agenda%20No.%201%20Monday%2018-Jul-2022%2011.00%20Cabinet.pdf?T=9>

- Professional development of school staff
- Curriculum
- Work experience
- Inclusion

To date, the groups have created a webpage<sup>23</sup> to create, collect and share resources for subject leads and teachers, careers leads and young people which show them examples of alternative, inclusive curricula and resources, careers journeys that show the types of jobs that Southwark's diverse people do and how they got them, and opportunities for staff development. Our aim is to encourage more schools to use and share these resources to celebrate the work our schools are doing to become anti-racist.

In addition, we have identified a charter mark, the Race and Conscious Equality (RACE) charter mark<sup>24</sup>, which we are encouraging schools to apply for (and are supporting them financially to do so). Having this mark will show commitment to Black, Asian and Minority Ethnic staff and children and will support schools to develop their confidence in identifying and challenging racism and racist/ non-inclusive practice.

Our governors have received training and support to develop their racial literacy and Southwark Stands Together is now a standing item on any agenda our Governor Services team clerk. Southwark Stands Together is also a golden thread running through school improvement, with all new pilot activities including a section in their creation on how to incorporate the key values of the work.

Our data analysis in this area is becoming more robust and we work closely with Family Early Help in Children's Social Care to examine disproportionality in exclusions and to support their work with data that we have access to.

### **Southwark Inclusion Charter<sup>25</sup>**

Children have a fundamental right to a good education. Everyone has a part to play in reducing barriers to education, and we are all accountable and responsible for supporting inclusion in Southwark. The Southwark Inclusion Charter (signed off by Cabinet in July 2021) is a joint undertaking between the council, schools, health services (including mental health), colleges, and safeguarding partnership agencies across the borough, with the expectation that all relevant parties will endorse it. The need for the Charter is driven by a shared recognition that permanent exclusion from education can have a significant negative impact on the wellbeing of children and their future. We are further motivated by our desire to confront and tackle inequalities exposed by the disproportionate exclusion of children with particular characteristics.

Southwark's permanent exclusion rate (0.02) is below Inner London (0.04) and National (0.06) rates. However, data still indicates a disproportionate rate of exclusion for children on Free School Meals (2.5 times higher) and SEN support (2.2 times higher). There has been an increase in the number of girls receiving a permanent exclusion and there is now a similar rate for both genders. Ethnicity data shows a disproportionate rate of permanent exclusion for Black Caribbean children which is almost six times higher than the rate for White British children (0.51 compared to 0.09).

<sup>23</sup> <https://education.southwark.gov.uk/southwark-stands-together>

<sup>24</sup> <https://figtreeinternational.org.uk/race-charter-mark>

<sup>25</sup> [\(Public Pack\)Agenda Document for Cabinet, 18/07/2022 11:00 \(southwark.gov.uk\)](#)

We will strive for best practice across our policies and processes and towards 100% inclusion approaches to behaviour in education settings, whilst recognising that there are rare instances where exclusion is unavoidable to safeguard children.

## Appendix 1. Detailed Cohort Characteristics in relation to attainment only.

**NOTE:** The commentary below refers only to attainment. This does NOT include the amount of progress individuals or groups of pupils have made in phonics, reading, writing and mathematics. Progress is a key factor in determining how well children achieve. Commentary relating to performance by pupil ethnicity is based on pupils where their ethnicity is known and where the cohort size is 30 or more. Commentary relating to performance by pupils' SEN and EAL status does not include pupils where their status (for the specific characteristic) is unknown. All commentary is based on provisional 2022 data.

### List of abbreviations:

RWM - Reading, writing and mathematics GPS – grammar, punctuation and spelling FSM - free school meals SEN - special educational needs EHC - education, health and care plan

Cohort	Phonics	KS1	KS2
<b>Total cohort</b>	77.5% of Year 1 children achieved the required phonics screening standard of 32 or more points.	71.4%; 65.4%; 70.6%; and 78.3% of pupils achieved the expected standard and above in KS1 reading, writing, mathematics, and science respectively.  Attainment was highest in KS1 science, followed by reading.	79.0%; 74.8%; 76.4%; 74.5%, 81.6%; and 65.6% were working at the expected standard in KS2 reading; writing; GPS; maths; science and RWM combined respectively.  Attainment was highest in science followed by reading.
<b>Gender</b> <ul style="list-style-type: none"> <li>▪ Boys</li> <li>▪ Girls</li> </ul>	Girls were more likely to achieve the required phonics standard compared to boys, with about four in every five girls achieving the standard compared to around three quarters of boys.  If looking at the proportions that boys and girls each account for of the eligible Year 1 phonics cohort and the cohort of Year 1 pupils reaching the phonics standard,	Girls outperformed boys in all KS1 subjects. The gap between the two was largest in writing at 10.3 percentage points. Conversely the gap was smallest in mathematics at 1.4 percentage points.  Comparing the share boys represent of the eligible cohort, and the proportion they account for of the cohort achieving the	Girls outperformed boys in all KS2 subjects. The gap between the two cohorts was largest, at 12.3 percentage points, in writing. Conversely, the gap between boys and girls was smallest in maths, at 1.8 percentage points.  The proportion of boys working at the expected standard was lower than their representation of the

Cohort	Phonics	KS1	KS2
	boys were slightly underrepresented amongst the latter group.	expected standard and above, boys were repeatedly underrepresented (be it by a small amount) in all subjects.	eligible cohort and across all KS2 subjects.
<b>FSM eligible</b> <ul style="list-style-type: none"> <li>▪ Eligible</li> <li>▪ Not eligible</li> </ul>	<p>70.2% of those children identified as eligible for FSM achieved the required phonics standard. This compared to 81.2% of pupils who were not eligible for FSM - a difference of close to 11 percentage points.</p> <p>Children who were eligible for a FSM, were slightly underrepresented amongst those achieving the required phonics standard - accounting for just over one-third of the overall eligible Year 1 phonics cohort, yet, making up only 30.4% of those reaching the standard.</p>	<p>Pupils eligible for FSM performed less well than their non eligible counterparts in all KS1 subjects - by more than 10 percentage points each, across all subjects. The gap was largest in mathematics (a 12.9 percentage point gap).</p> <p>Additionally, pupils eligible for FSM were underrepresented amongst those achieving the expected standard and above across all KS1 subjects.</p>	<p>Children identified as eligible for FSM performed less well compared to their non eligible counterparts. The gap in performance was largest in reading, writing and mathematics combined at 18.8 percentage points, or, if looking at separate KS2 subjects, in mathematics with a gap of 17.9 percentage points.</p> <p>Taking into consideration the share of the overall eligible cohort accounted for by FSM eligible children, this group of children were underrepresented amongst those working at the expected standard across all KS2 subjects.</p>
<b>SEN detailed</b> <ul style="list-style-type: none"> <li>▪ No SEN</li> <li>▪ SEN support</li> <li>▪ Statement or EHC Plan</li> </ul>	<p>85.4% of children with no SEN achieved the required phonics standard. This compared to 44.9% of children with SEN.</p> <p>The more advanced the SEN, the smaller the percentage of the</p>	<p>Children with SEN performed less well and by a substantial amount, across the whole of KS1, than their peers that had no registered SEN. The gap in attainment was largest in writing - a 45.5 percentage point gap, followed by</p>	<p>Across the whole of KS2, children with SEN fared less well than those with no registered SEN. The attainment gap for the separate KS2 subjects was largest in writing - 47.2 percentage points gap, followed</p>

Cohort	Phonics	KS1	KS2
	<p>cohort that achieved the required phonics standard, i.e., 20.2% of children with an EHC plan met the phonics required standard compared to 52.8% of children with SEN support.</p> <p>SEN children as a whole were disproportionately underrepresented and by quite a fair amount. Although making up 17.3% of the overall eligible cohort, children with SEN represented only 10.0% of the cohort who achieved the required phonics standard. The disparity was largest amongst children with SEN support.</p>	<p>reading - a 44.7 percentage point gap.</p> <p>The more advanced the SEN stage, the smaller the percentage of the cohort that achieved the expected standard at KS1 and for all subjects.</p> <p>Taking into consideration the share of the eligible cohort represented by SEN children compared with the share they account for amongst those who achieved the expected standard and above at KS1, SEN children as a whole and for all stages were underrepresented in all KS1 subjects - by a considerable amount. SEN support children, particularly, were most underrepresented across all KS1 subjects.</p>	<p>by GPS - 44.6 percentage points gap. For reading, writing and mathematics combined, the gap was 46.0 percentage points.</p> <p>The more advanced the SEN stage, the smaller the percentage of the cohort working at the expected standard at KS2 and in all subjects.</p> <p>When taking into account the share of the eligible cohort represented by children with SEN compared to their representation amongst those working at the expected standard at KS2, SEN children were underrepresented in all subjects. More noticeably, the difference in share of the eligible cohort compared to share of those meeting the standard was largest amongst children with SEN support.</p>
<p><b>Ethnicity</b></p> <ul style="list-style-type: none"> <li>▪ Asian or Asian British <ul style="list-style-type: none"> <li>▫ Bangladeshi</li> <li>▫ Indian</li> <li>▫ Pakistani</li> <li>▫ Any Other Asian</li> </ul> </li> </ul>	<p>White and Asian children jointly with children from any other White background had the highest performance with 86.2% of each of the specified ethnic groups reaching the standard. In contrast, at 65.6%, phonics</p>	<p>White and Asian children and Chinese children had the highest performance for percentage of children reaching the expected standard and above in the different KS1 subjects. White and Asian pupils performed the best</p>	<p>White and Black African, White and Asian, and Chinese children were the highest achievers across the KS2 subjects when working at the expected standard. White and Black African children performed the best in reading, White and</p>

Cohort	Phonics	KS1	KS2
<ul style="list-style-type: none"> <li>▪ Black or Black British               <ul style="list-style-type: none"> <li>▫ Black African</li> <li>▫ Black Caribbean</li> <li>▫ Any Other Black</li> </ul> </li> <li>▪ Chinese</li> <li>▪ Mixed / Dual Heritage               <ul style="list-style-type: none"> <li>▫ White &amp; Black African</li> <li>▫ White &amp; Black Caribbean</li> <li>▫ White &amp; Asian</li> <li>▫ Any Other Mixed</li> </ul> </li> <li>▪ White               <ul style="list-style-type: none"> <li>▫ White British</li> <li>▫ Irish</li> <li>▫ Traveller of Irish Heritage</li> <li>▫ Gypsy Roma</li> <li>▫ Any Other White</li> </ul> </li> <li>▪ Any Other Ethnic Group</li> </ul>	<p>attainment was lowest for White and Black Caribbean children when compared to all other children. Children from any other ethnic background had the second lowest performance at 68.0%.</p> <p>If taking into consideration the share children from each ethnic background accounted for of the overall eligible cohort, compared to the share they represented of pupils meeting the phonics standard, there was a lower proportion than expected of Black Caribbean children; White and Black Caribbean children; and those from any other ethnic group, meeting the phonics standard.</p>	<p>for reading - 85.5% and writing - 81.8%, whilst Chinese children had the highest results for mathematics - 86.5% and science - 91.9%. Conversely, Black Caribbean children and those from any other ethnic background had the lowest performance for working at expected standard and above across the KS1 subjects. Black Caribbean pupils had the lowest percentage for achieving writing - 54.4% and mathematics - 57.9%, whilst children from any other ethnic background achieved the lowest at reading - 56.9% and science - 67.1%.</p> <p>If comparing the share of the overall eligible cohort against the share of the cohort of children successfully working at expected standard by the different ethnic groups, Black Caribbean children; those from any other Black background; those from any other mixed background; and children from any other ethnic group, all were slightly underrepresented across the full range of KS1 subjects.</p>	<p>Asian children had the highest performance in writing, GPS and RWM combined, and Chinese children performed the best in maths and science. Conversely, children from Black Caribbean, White and Black Caribbean backgrounds together with children of any other ethnic group achieved the lowest results across the various KS2 subjects. Children of any other ethnic group had the lowest attainment in reading and writing, White and Black Caribbean children had the lowest performance in GPS, and Black Caribbean had the lowest achievement in the remainder of the KS2 subjects including RWM combined.</p> <p>When factoring in how much each ethnic group accounts for of the eligible cohort, Black Caribbean, any other Black, White and Black Caribbean, and children from any other ethnic group repeatedly had lower representations - by small amounts - across all KS2 subjects.</p>

Cohort	Phonics	KS1	KS2
<p><b>EAL</b></p> <ul style="list-style-type: none"> <li>▪ English</li> <li>▪ Other than English</li> <li>▪ Unknown / Missing</li> </ul>	<p>Children whose first language was English performed just marginally better than those whose mother tongue was not English - 78.5% versus 78.0% respectively.</p>	<p>Children with English as their first language performed better than pupils with other than English as a first language in all KS1 subjects.</p> <p>The proportion of children with English as an additional language working at the expected standard was lower than their representation of the eligible cohort and across all KS1 subjects.</p>	<p>With the one exception of separate reading, children with English as an additional language did better in all KS2 subjects compared with pupils that had English as a first language.</p>
<p><b>Disadvantaged pupils</b></p> <p><i>(In receipt of pupil premium for FSM6; adopted from care; LAC)</i></p>	<p>Disadvantaged children performed less well than their non disadvantaged counterparts - 70.2% compared to 81.2% respectively - a difference of 11 percentage points.</p> <p>If taking into consideration the proportion of the overall cohort made up by disadvantaged children compared against the proportion they account for of those who successfully met the required phonics standard, disadvantaged children were underrepresented by a small amount in the latter cohort.</p>	<p>Pupils defined as being disadvantaged performed less well than their non disadvantaged counterparts and by a substantial amount. The largest difference in performance was in mathematics - a 13.2 percentage points gap.</p> <p>Taking into account their share of the overall cohort, disadvantaged children were additionally and repeatedly underrepresented amongst those working at the expected standard and above, across all KS1 subjects.</p>	<p>Children identified as disadvantaged performed less well than their non disadvantaged counterparts and by large amounts.</p> <p>Additionally, disadvantaged children were consistently underrepresented amongst the cohort of children working at the expected standard and in all KS2 subjects.</p>

Notes: Analysis based on internally held provisional attainment data: Phonics and KS1 – July 2022; and KS2 – September 2022. Analysis of performance by pupil characteristics based on matched January 2022 school census data and pupil premium data.

Sources: Provisional Phonics, KS1 and KS2 2022, and January 2022 school census.

## Appendix 2. Key Stage 4 Attainment- School Level Results 2018 to 2022

	Attainment 8		
	2018	2019	2022*
Ark All Saints Academy	41.9	43.6	48.6
Ark Globe Academy	46.6	45.8	50.9
Ark Walworth Academy	40.6	42.1	44.7
Bacon's College	48.5	50.6	54.7
The Charter School East Dulwich	n/a	n/a	57.0
The Charter School North Dulwich	59.9	60.5	64.3
City of London Academy	52.8	44.7	51.7
Compass School Southwark	40.5	46.3	42.3
Harris Academy Bermondsey	53.3	53.4	55.0
Harris Academy Peckham	42.9	41.0	47.6
Harris Boys Academy East Dulwich	55.1	52.4	57.2
Harris Girls' Academy East Dulwich	52.3	51.8	56.0
Kingsdale Foundation School	55.9	54.9	59.3
Notre Dame RC Girls' School	47.4	48.3	49.7
Sacred Heart RC Secondary School	55.0	55.5	62.6
Southbank University Academy	n/a	41.3	41.8
St Michaels' RC School	54.2	53.4	55.1
St Saviour's & St Olave's CofE School	56.7	55.2	58.3
The St Thomas the Apostle College	53.8	53.4	60.8
Southwark	50.2	49.5	53.4
London	49.4	49.7	52.6
National	46.6	46.8	48.8

	Progress 8		
	2018	2019	2022*
Ark All Saints Academy	-0.07	0.08	0.38
Ark Globe Academy	0.39	0.41	0.48
Ark Walworth Academy	-0.44	-0.18	-0.03
Bacon's College	-0.04	0.08	0.48
The Charter School East Dulwich	n/a	n/a	0.47
The Charter School North Dulwich	0.68	0.65	0.70
City of London Academy	0.09	-0.47	-0.01
Compass School Southwark	-0.53	0.01	0.48
Harris Academy Bermondsey	0.91	0.93	0.73
Harris Academy Peckham	0.15	0.18	0.17
Harris Boys Academy East Dulwich	0.80	0.75	0.83
Harris Girls' Academy East Dulwich	0.79	0.64	0.69
Kingsdale Foundation School	-0.07	-0.22	-0.12
Notre Dame RC Girls' School	0.60	0.31	0.27
Sacred Heart RC Secondary School	1.10	0.98	1.28
Southbank University Academy	n/a	-0.53	-0.65
St Michaels' RC School	0.22	0.52	0.39
St Saviour's & St Olave's CofE School	0.56	0.50	0.67

	Progress 8		
	2018	2019	2022*
The St Thomas the Apostle College	0.90	1.00	1.22
Southwark	0.30	0.25	0.34
London	0.23	0.22	0.23
National	-0.02	-0.03	-0.03

	English & mathematics % Grades 9 to 5		
	2018	2019	2022*
Ark All Saints Academy	26%	28%	45%
Ark Globe Academy	48%	37%	52%
Ark Walworth Academy	27%	32%	49%
Bacon's College	47%	50%	64%
The Charter School East Dulwich	n/a	n/a	63%
The Charter School North Dulwich	69%	68%	78%
City of London Academy	54%	36%	59%
Compass School Southwark	17%	32%	34%
Harris Academy Bermondsey	42%	45%	56%
Harris Academy Peckham	29%	26%	50%
Harris Boys Academy East Dulwich	50%	46%	58%
Harris Girls' Academy East Dulwich	55%	49%	61%
Kingsdale Foundation School	61%	60%	67%
Notre Dame RC Girls' School	33%	37%	50%
Sacred Heart RC Secondary School	64%	53%	80%
Southbank University Academy	n/a	31%	37%
St Michael's RC School	56%	54%	61%
St Saviour's & St Olave's CofE School	65%	65%	66%
The St Thomas the Apostle College	54%	58%	76%
Southwark	48.3%	45.5%	58.9%
London	48.7%	49.0%	57.3%
National	43.5%	43.4%	49.8%

\* 2022 data is provisional and is sourced from DfE Performance Tables: <https://www.gov.uk/school-performance-tables>

Sources: GCSE 2018 to 2019 and 2022 - DfE performance tables and DfE statistical releases.

Notes: School level results above are for mainstream schools that were still operating at the end of 2021/22 academic year. School level results are not available for 2020 and 2021 due to the cancellation of all exams and assessment because of the COVID-19 pandemic. LA and national results are for all state-funded funded schools.

### Appendix 3. Ofsted Ratings - 31<sup>st</sup> August 2022

**Key: 1 – Outstanding. 2 - Good. 3 - Requires Improvement. 4 - Inadequate/Special Measures.**

Newly opened schools do not have an inspection judgement in their first three years of operation. (represented by “null” in table below).

School Name	Type	Current Ofsted Inspection Rating	Ward
<b>Nursery Schools</b>			
Ann Bernadt Nursery School	Nursery	2	Peckham
Dulwich Wood Nursery School	Nursery	2	Dulwich Wood
Kintore Way Nursery School and Children's Centre	Nursery	1	South Bermondsey
Nell Gwynn Nursery School	Nursery	2	Peckham
The Grove Nursery School	Nursery	2	St Giles
<b>Primary Schools</b>			
Albion Primary School	Primary	1	Rotherhithe
Alfred Salter Primary School	Primary	2	Rotherhithe
Angel Oak Academy	Primary	1	Peckham
The Belham Primary School	Primary	2	Rye Lane
Bellenden Primary School	Primary	2	Rye Lane
Bessemer Grange Primary School	Primary	2	Champion Hill
Boutcher Church of England Primary School	Primary	1	South Bermondsey
Brunswick Park Primary School	Primary	2	Camberwell Green
Camelot Primary School	Primary	2	Old Kent Road
The Cathedral School of St Saviour and St Mary Overie	Primary	1	Borough & Bankside
Charles Dickens Primary School	Primary	1	Borough & Bankside
Charlotte Sharman Primary School	Primary	2	St George's
Cobourg Primary School	Primary	3	Old Kent Road
Comber Grove School	Primary	2	Camberwell Green
Crampton Primary	Primary	1	Newington
Crawford Primary School	Primary	2	Camberwell Green
Dog Kennel Hill School	Primary	2	Champion Hill
Dulwich Hamlet Junior School	Primary	1	Dulwich Village
Dulwich Village Church of England Infants' School	Primary	1	Dulwich Village
Dulwich Wood Primary School	Primary	2	Dulwich Wood
English Martyrs' Roman Catholic Primary School	Primary	2	North Walworth

<b>School Name</b>	<b>Type</b>	<b>Current Ofsted Inspection Rating</b>	<b>Ward</b>
Friars Primary Foundation School	Primary	2	Borough & Bankside
Galleywall Primary School	Primary	1	South Bermondsey
Goodrich Community Primary School	Primary	2	Dulwich Hill
Goose Green Primary and Nursery School	Primary	2	Goose Green
Grange Primary School	Primary	2	London Bridge & West Bermondsey
Harris Primary Academy East Dulwich	Primary	1	Goose Green
Harris Primary Academy Peckham Park	Primary	2	Peckham
Harris Primary Free School Peckham	Primary	2	Rye Lane
Heber Primary School	Primary	2	Goose Green
Hollydale Primary School	Primary	2	Nunhead & Queen's Road
Ilderton Primary School	Primary	1	Old Kent Road
Ivydale Primary School	Primary	2	Peckham Rye
John Donne Primary School	Primary	1	Nunhead & Queen's Road
John Keats Primary School	Primary	NULL	Old Kent Road
John Ruskin Primary School and Language Classes	Primary	1	Camberwell Green
Judith Kerr Primary School	Primary	2	Dulwich Village
Keyworth Primary School	Primary	2	Newington
Lyndhurst Primary School	Primary	2	St Giles
Michael Faraday School	Primary	2	Faraday
Oliver Goldsmith Primary School	Primary	2	St Giles
Peter Hills with St Mary's and St Paul's CofE Primary School	Primary	2	Surrey Docks
Phoenix Primary School	Primary	1	Old Kent Road
Pilgrims' Way Primary School	Primary	2	Old Kent Road
Redriff Primary School	Primary	1	Surrey Docks
Riverside Primary School	Primary	1	North Bermondsey
Robert Browning Primary School	Primary	2	North Walworth
Rotherhithe Primary School	Primary	2	Rotherhithe
Rye Oak Primary School	Primary	2	Rye Lane
Saint Joseph's Catholic Primary School, the Borough	Primary	2	Borough & Bankside
Snowsfields Primary School	Primary	2	London Bridge & West Bermondsey
Southwark Park Primary School	Primary	2	North Bermondsey

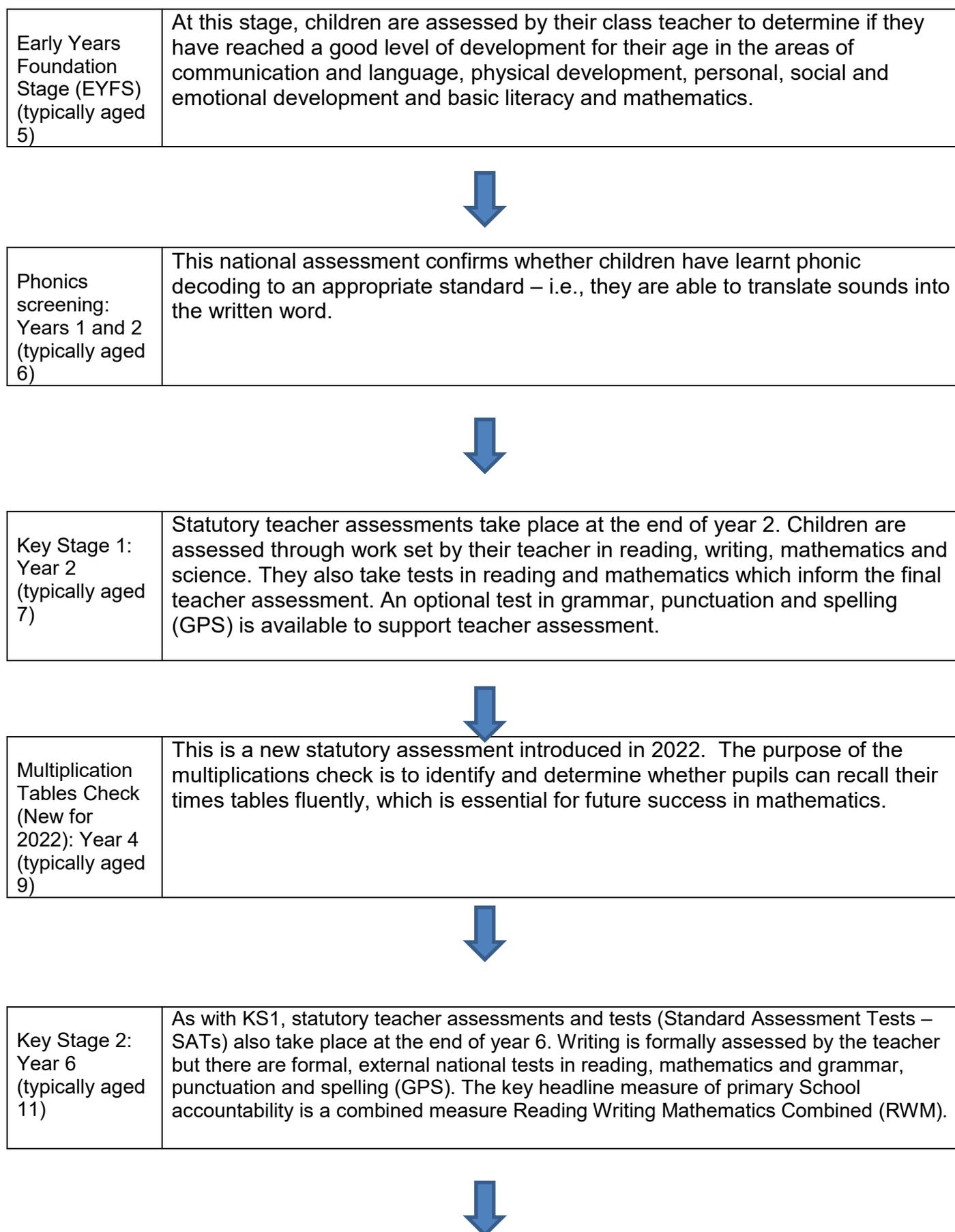
<b>School Name</b>	<b>Type</b>	<b>Current Ofsted Inspection Rating</b>	<b>Ward</b>
St Anthony's Catholic Primary School	Primary	2	Dulwich Hill
St Francesca Cabrini Primary School	Primary	2	Peckham Rye
St Francis RC Primary School	Primary	2	Old Kent Road
St George's Cathedral Catholic Primary School	Primary	2	St George's
St George's Church of England Primary School	Primary	2	St Giles
St James' Church of England Primary School	Primary	2	North Bermondsey
St James the Great Roman Catholic Primary School	Primary	2	Peckham
St John's and St Clement's Church of England Primary School	Primary	2	Goose Green
St John's Roman Catholic Primary School	Primary	2	Surrey Docks
St Joseph's Catholic Infants School	Primary	2	Camberwell Green
St Joseph's Catholic Junior School	Primary	2	Camberwell Green
St Joseph's Catholic Primary School	Primary	1	Rotherhithe
St Joseph's Roman Catholic Primary School	Primary	2	North Bermondsey
St Jude's Church of England Primary School	Primary	2	St George's
St Mary Magdalene Church of England Primary School	Primary	2	Rye Lane
St Paul's Church of England Primary School, Walworth	Primary	4	Newington
St Peter's Church of England Primary School	Primary	2	Faraday
Surrey Square Primary School	Primary	1	Faraday
Tower Bridge Primary School	Primary	2	London Bridge & West Bermondsey
Townsend Primary School	Primary	2	North Walworth
Victory Primary School	Primary	2	North Walworth
<b>Secondary Schools</b>			
Ark All Saints Academy	Secondary	2	Camberwell Green
Ark Globe Academy	Secondary	2	Chaucer
Ark Walworth Academy	Secondary	2	Faraday
Bacon's College	Secondary	4	Rotherhithe
The Charter School East Dulwich	Secondary	2	Goose Green

<b>School Name</b>	<b>Type</b>	<b>Current Ofsted Inspection Rating</b>	<b>Ward</b>
The Charter School North Dulwich	Secondary	1	Champion Hill
City of London Academy (Southwark)	Secondary	2	South Bermondsey
Compass School Southwark	Secondary	2	North Bermondsey
Haberdashers' Aske's Borough Academy	Secondary	NULL	Borough & Bankside
Harris Academy Bermondsey	Secondary	1	South Bermondsey
Harris Academy Peckham	Secondary	2	Rye Lane
Harris Boys' Academy East Dulwich	Secondary	1	Dulwich Hill
Harris Girls' Academy East Dulwich	Secondary	1	Peckham Rye
Kingsdale Foundation School	Secondary	1	Dulwich Wood
Notre Dame Roman Catholic Girls' School	Secondary	1	St George's
Sacred Heart Catholic School	Secondary	1	Camberwell Green
South Bank University Academy	Secondary	2	Faraday
St Michael's Catholic College	Secondary	1	North Bermondsey
St Saviour's and St Olave's Church of England School	Secondary	1	Chaucer
The St Thomas the Apostle College	Secondary	1	Nunhead & Queen's Road
<b>Special Schools</b>			
Beormund Primary School	Special	2	London Bridge & West Bermondsey
Cherry Garden School	Special	1	Rye Lane
Evelina Hospital School	Special	1	Bishop's
Haymerle School	Special	2	Old Kent Road
Highshore School	Special	2	Camberwell Green
Maudsley and Bethlem Hospital School	Special	1	St Giles
Newlands School	Special	2	Peckham Rye
Spa School	Special	1	South Bermondsey
Spa School Camberwell	Special	NULL	St Giles
Tuke School	Special	1	Peckham
<b>PRU</b>			
Southwark Inclusive Learning Service (Sils)	PRU	2	Peckham

Notes: Table above based on latest inspection judgements for schools with an inspection and report published by August 2022.

Source: School Inspections and Outcomes: Management Information

## Appendix 4: Guide to Assessments and Examinations



Key Stage 4: Year 11 (typically aged 16)	From 2016, the old threshold measure of 5 or more GCSEs and equivalent including English and mathematics was replaced by a new measure based upon point scores across 8 subjects. The previous grading system of A*-G has been replaced with a grading scale of 9 to 1 with 9 as the top grade.
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Key Stage 5, A Level: Year 13 (typically aged 18)	Young people who choose to follow an academic route after their GCSEs will ordinarily study for Advanced levels. They are examined at the end of the two year sixth form course.
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### GCSE Grades (Introduced in 2017)

New grading structure	Old / current grading structure
9	A*
8	
7	
6	B
5 (strong pass)	
4 (standard pass)	C
	D
3	E
2	F
1	G
U	U

The new and old grades are not directly equivalent and consequently the Department for Education (DfE) has stressed that the new and old grading systems cannot be directly compared. That being said, the new grades 9 to 4 represent a standard pass and most closely resemble the old grades A\*-C pass at GCSE.

When the DfE is measuring a school's performance, they use grades 9 to 5 (a strong pass) to determine the proportion of pupils achieving English and mathematics.

## Appendix 5: Southwark Adult Learning Context

The Adult Learning Service is part of the Education Directorate in the Children and Adults' Services Department of the council. Approximately two thirds of the provision is delivered directly by the council from the Thomas Calton Centre, in the heart of Peckham. The remaining third of provision is delivered through a network of five local community providers working from various settings distributed across the borough.

Courses are delivered in the daytime and evening where all Entry learners to Level 2 have the opportunity to gain nationally recognised qualifications. These qualifications support their employability potential and provide routes and access to further and higher education and training.

More than 2000 people benefited from a range of courses at Southwark Adult Learning Service in the academic year 2021-2022. These enrolment numbers herald a healthy return to the pre-pandemic levels of participation in local adult learning. A high proportion of learners who start a course successfully complete it. For most courses, this means nine in ten learners will achieve their learning goal.

Southwark council's adult and community learning service offers a good variety of type and level of courses. The provision is a mix of nationally accredited qualifications, and in-house (non-accredited) community learning courses.

The focus of the service is on disadvantaged residents who are least likely to participate in structured and formalised adult learning opportunities.

The provision is aligned to the council's vision of a Fairer Future for All residents, bringing together Southwark residents from different ethnic and social backgrounds, cultures, and income groups. The purpose is to deliver and support learning and progression that enable citizens to become more self-reliant and self-confident from their starting point.

Southwark Adult Learning works closely with the council's Local Economy Team to realise our vision for a high quality local skills offer that is accessible and responsive to learner and employer needs. This includes mathematics, English and digital skills provision to ensure that residents can access the skills needed for everyday life and for meaningful work.

COVID-restrictions were eased at the start of September 2021 and Adult Learning was able to welcome learners back to in classroom teaching and learning. Where appropriate, some courses continued to be delivered online and in a hybrid mode (onsite and online).

### Qualifications and attainment levels

Qualification/ Award	Notional equivalent
Pre-entry	Basic Levels
Entry 1	
Entry 2	
Entry 3	
Level 1	GCSE, grades 3-1
Level 2	GCSE, grades 9-4
Level 3	A- Level



### Accredited provision

#### English, English for Speakers of Other Languages (ESOL), and mathematics

Accredited courses include those in the subject areas of Preparation for Life and Work, and childcare. English, ESOL, and mathematics are a part of the Preparation for Life and Work curriculum area.

Enrolments and initial assessments for 2021-22 courses took place in person at the Thomas Calton Centre in the heart of Peckham. Courses at Pre-Entry and Entry level classes in particular were full very quickly. There was a steady number of new learners enrolling for the first time, and returning or continuing learners enrolling to progress on a higher level course.

There was increased demand for more Entry level mathematics, in particular, and additional provision was arranged to meet it.

Learners reported that they were looking forward to moving on to a higher level of vocational studies as they are now meeting the required standards of English and maths. ESOL recruited well at the different available levels.

As a City & Guilds' accredited centre we are subject to external quality assurance by this awarding body. These assessments judge our standards to be consistently good or better in ESOL, English and maths at Entry levels. The last QA report from C&G reported: 'A good level of evidence was presented by the learners, who were being assessed at a level appropriate to their skills set' 'Assessment was consistently accurate, and IQA was thorough'.

Tutors work effectively with their learners and help them gain the most from their studies. They understand their learners' individual learning needs and meet them well. The detailed initial assessment information is used to inform lesson planning. Arrangements to carry out initial assessment of learners at the start of their programmes are good. Residents wishing to enrol benefit from one-to-one information, advice and guidance consultations with relevant tutors. These consultations are held at time slots to suit the prospective learner's availability, and childcare support is arranged if needed. The initial assessment allows for the learners to be matched with the type and level of course most suited to their starting points and aspirations. Their learning support needs and further assessments, as appropriate to their declared learning difficulties or disabilities are also discussed. Reasonable adjustments are made to maximise the individual learning gain.

The evidence for measuring the impact of our courses includes monitoring learner progress, achievement, progression and by the gain in self-confidence/well-being that is reported by the learners. Our conversations with learners and from their own individual learner feedback forms plus reviews of course documents and lesson observations all feed into the evidence of how well the curriculum is implemented and the impact it has on the learners.

Childcare courses range from introductory level to level 2. Level 2 is notionally equivalent to GCSEs. In addition, new courses in 2021-22 in childcare included level 2 Autism and level 3 Early Years (this is notionally equivalent to GCE A-levels) which have contributed to the overall success and provide an excellent in-house progression pathway. Both of these courses have shown excellent outcomes for learners verified by external quality assurance from the accredited body CACHE such as finding relevant fulfilling employment or further training and putting into practice the knowledge learnt in their home environment.



SALS is encouraged that a number of local nurseries have specifically requested that our learners apply to them for employment following the successful work placements in their settings. One childcare learner has produced a Youtube video sharing her experiences of suffering from depression and anxiety to changing her life around. This was thanks to SALS who supported and encouraged her to continue and complete a beginners, level 1 and level 2 Diploma in childcare. She has done this while supporting a sick relative but is now employed in a nursery.

### **Community Learning**

Community learning includes interest-based courses such as woodwork, pottery, sewing, painting, photography and yoga. Learners are provided with structured, yet individually paced, learning with challenging and achievable goals agreed between them and their tutor. In addition to the skills and knowledge developed in these courses, feedback showed a much needed respite from social isolation which supported the Council's agenda to support the health and wellbeing of its residents. One learner commented 'Pottery turned out to be the perfect choice for me from a mental health perspective - I found the act of making something out of clay to be very meditative and relaxing because it forces you to clear everything else out of your head in order to concentrate on the piece you're working on.'



Family learning courses form an important and integral part of this offer. Different types of families learn together on Family Learning courses. Effective partnership work with local schools broadens learning opportunities for those who may not yet have the self-confidence to study at a larger provider. For example, in a local school, learner x who was a full time parent, attended a family literacy course “Help your child with reading and writing;” then progressed to a beginners’ childcare course, and then onto a teaching assistant course in the same school. They successfully secured a job there. One learner felt very isolated during lockdown and was worried that it would get worse. She also felt so limited and fearful especially about her son’s behaviour and speech but had no idea what to do. She started opening up during the family learning activities last year and registered for the Childcare for beginners’ course. She believes that the learning has impacted her so much and is understanding more about children’s behaviour.

Southwark Adult Learning Service is committed to playing its part in realising the council’s ambitions for sustainable social and economic development.

**APPENDIX 1****Keeping Education Strong: Strategy for future proofing primary schools and protecting the quality of education in Southwark**

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**1 Introduction**

Today our schools are rated 97% good or outstanding by Ofsted. This was not always the case and over ten years ago our schools were fourth from the bottom of London authorities against this measure. There are many factors that contribute to this transformation of school improvement, such as the hard work of our teachers and governors, pupils and parents, and our own school improvement work. In addition, the council has made an investment in school buildings that has resulted in a beautiful transformation of buildings and vastly improved learning environments that lift the eyes and aspirations of everyone in them.

The improvements across our schools have resulted in outcomes for our children and young people being consistently above the national average. Many of our schools are amongst the best 10% of state funded schools in the country. These improvements have been hard won and we must do all we can to protect the high standards our children deserve and to which we have become accustomed.

Ten years ago the demand for school places outstripped supply. Today we are dealing with just the opposite, where supply exceeds demand for school places.

It is the principle of the Council to protect a high quality of education; keep every one of our schools open where possible; maintain parental choice; minimise movement between schools. The education team is committed to working with individual schools to assess the feasibility of keeping a school open where there are falling numbers of pupils. This will involve practical support for the schools, including the assessment and advice of school financial plans and risk assessments.

However, the link between pupil numbers and school funding means that it is not always feasible to keep a school going. As the number of children in a class falls so does the income to the school, meaning the cost of teaching staff, equipment and enrichment activities become unaffordable.

In some cases it will not be practical for the school to function with reduced pupil numbers and the offer to the remainder of the pupils will suffer as a result. If this is the case and a decision to consult on a closure of a school is made, the council's education team will work closely with the school to find pupils alternative places in good or outstanding schools and ensure that those that remain offer an attractive choice for children and families.

The process that has to be gone through to get to a place of sufficient places for the population Southwark has, is undoubtedly a difficult one. However, not addressing the problem will only make the situation for all schools more difficult to manage. It will jeopardise the high educational outcomes we have become used to and that our children and young people need, and deserve, if we are to reduce inequalities.

The following strategy has been drawn up by a cross council team involving education, regeneration and finance, in close consultation with councillors and schools. The strategy seeks to enable the council to work closely with schools to manage places in primary schools while we attempt to weather the current demographic storm. This has been brought about by a national and local fall in birth rates, the movement of families from the UK, following first the uncertainties, and later, the reality, of Brexit, and finally, the movement of families from London to other parts of the country following the pandemic, and more recently, the cost of living crisis.

In addition to this strategy, the deputy leader and lead member for children, young people, and education will work with local councillors in Southwark and across London. This joint work will bring the issue of falling school rolls to the attention of the education secretary. A letter from Southwark on behalf of many London councils has already been sent to a recent education secretary asking for funding to enable schools to function with falling rolls. The deputy leader will renew lobbying activity with key partners with the new Government Cabinet.

### The current situation

Today across Southwark there are 72 stated funded primary schools with reception classes. We have 924 surplus places in Reception and a total of 5,850 surplus places across the primary school system. This has put pressure on individual school finances as schools are funded for each pupil on roll. This represents a financial risk to the schools and council.

The current Published Admissions Number for Reception (correct as at September 2022) is 3,581. The current capacity for all year groups (correct as at September 2022) is 26,399.

Years	R	1	2	3	4	5	6	Total
<b>September 2022 Capacity</b>	3,581	3,641	3,686	3,746	3,905	3,905	3,935	26,399
<b>September 2022 Roll (provisional)</b>	2,657	2,910	2,902	2,994	2,967	3,030	3,089	<b>20,549</b>
<b>September 2022 Vacancies</b>	924	731	786	751	940	874	849	5,856
<b>% Vacancies</b>	26%	20%	21%	20%	24%	22%	22%	<b>22%</b>

In recent years we have taken steps to reduce surplus capacity, such as reducing schools' published admission numbers (PAN), federating schools and supporting schools to make alternative use of school space. However, strategies to remove surplus capacity have not kept pace with the rate of reductions in the number of children in schools. A borough-wide approach, that removes the majority of these surplus places over the next three years, will now be required to adequately address the scale of capacity change.

## **2 Aims and objectives of this strategy**

The aim of this strategy is to ensure school places are sufficient in number, character, diversity and equipment, to provide all children with the opportunity of receiving a good quality education. It is also important to maintain, parental choice of schools with the aim of providing a good, local school place for every Southwark child. These schools need to be financially sustainable in the medium and long term. This will be achieved through a process ensuring that we have the right number of schools in the right places.

The project plan aligned to this strategy document provides a coordinated approach across the borough, which will adjust the number of schools to match capacity and enable the admissions process to support any pupil place movement across schools in a way that is managed effectively for children and families.

This strategy proposes to make changes in one phase to minimise disruption and distress to children and families, communities and staff, so that if a school move is required, it is only required once. This will help to promote stability and help families plan for and identify an alternative school for their child and school based staff to seek re-deployment opportunities.

Working closely with school leaders, and receiving independent oversight, the strategy and its implementation approach aims to provide a fair and transparent process that anticipates and mitigates any potential disproportional impact on communities. We know our schools are the heart of our communities and that a decision to close a school can have an impact that can reach beyond the school itself.

### 3 Background to decline in numbers

Local authorities have a legal duty to provide sufficient school places, in the right location, for the population. The number of school places required fluctuates over time as a result of local and national changes, for example, in birth rates, migration, housing. Between 2010 and 2016, as demand and projected demand across London increased rapidly, Southwark, and other local authorities, needed to add primary school places. Within Southwark, the number of children entering Reception grew from approximately 2950 in 2007/08 to nearly 3600 in 2015/16: a 22% increase. The number of school places was increased through provision of additional classes and expanding some schools in order to meet demand.

Since 2016, we have seen a steady decline in demand in most parts of London and across Southwark and its neighbours.

#### Reasons for the decline in demand

##### 3.1 Falling birth rate

Britain has an ageing population, and the falling numbers of births is a national phenomenon. In England and Wales the number of live births has dropped by 14% since 2012. However, the reduction in Southwark is more dramatic, falling by 30% over the same period<sup>1</sup>. London as a whole, and our neighbouring boroughs, have also seen numbers fall at a higher than national average.

Area	Births 2012	Births 2021	Difference	%
Southwark	5,056	3,525	-1,531	-30%
Lambeth	4,833	3,554	-1,279	-26%
Lewisham	4,940	4,024	-916	-19%
Inner London	53,965	43,120	-10,845	-20%
London	134,037	110,961	-23,076	-17%
England & Wales	730,883	625,008	-105,875	-14%

The falling birth rate nationally reflects people having smaller families, women having babies later in life, and other demographic factors. In inner London areas like Southwark this appears to be exacerbated by other factors which mean fewer families with children and prospective parents (those planning to start a family) are living in the borough.

Southwark is divided into five Planning Areas (PAs). Each PA contains a collection of wards. Birth rate varies from planning area to planning area, sometimes considerably. Appendix 10 of this report (from the latest Pupil Place Planning Report) shows the past figures and future trends in births for the five planning areas. As PA2 and PA3 share one ward, the figures do not add up to the borough total.

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<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/birthsummarytablesenglandandwales/2020>

### 3.2 Demographics

The 2021 Census found that the number of children aged 0-15 living in Southwark had reduced by around 2,000 (-4%) since 2011.

Area	0-15 2011	0-15 2021	Difference	%
Southwark	50,398	48,500	-1,898	-4%
Lambeth	51,831	45,700	-6,131	-12%
Lewisham	53,937	54,900	963	+2%
Inner London	563,297	549,900	-13,397	-2%
London	1,531,169	1,595,900	64,731	+4%
England & Wales	9,891,138	10,352,600	461,462	+5%

Most strikingly, it found that the number of children aged 0-4 had reduced by 21% over the same ten-year period: around 4,400 in Southwark's case. Although detailed figures for population change are not yet available for the 0-4 age range for other boroughs, percentage changes are shown below:

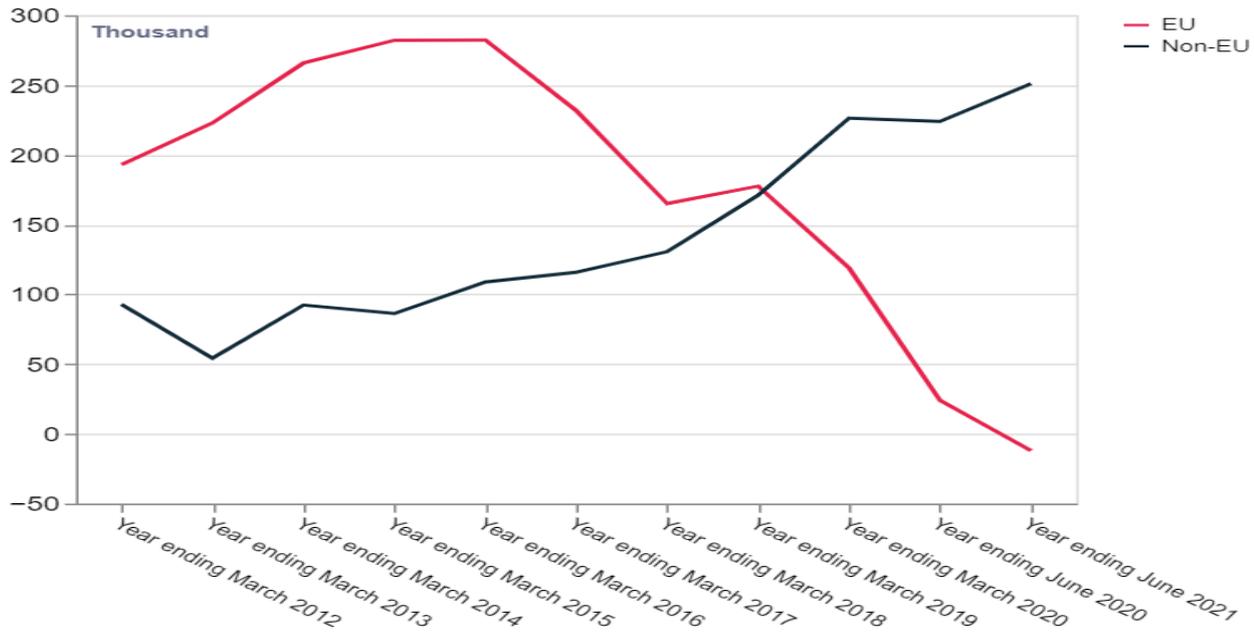
Area	%
Southwark	-21%
Lambeth	-26%
Lewisham	-13%
Inner London	-17%
London	-11%
England & Wales	-7%

A substantial amount of demographic variation exists from planning area to planning area, even down to age structures, ethnicity, fertility, mortality, and deprivation. This is also true of geography and types of housing.

### 3.3 EU Migration/Brexit

EU migration has fallen since 2016 and this has had a significant impact on London, the area where EU immigrants make up the largest proportion of the population. In lieu of an analysis at a local level, anecdotal evidence has shown that migration from the EU fell sharply between the Brexit referendum in June 2016 and the first emergence of Covid-19 in early 2020, while non-EU migration rose (Office for National Statistics, ONS, 2020). The pandemic further accelerated these trends. While it reduced both immigration and emigration overall, a significant number of EU citizens returned to their countries of origin, while non-EU migration was less affected (ONS, 2022).

The graph below shows the national figure for net migration from EU countries and non-EU countries.



The Greater London Authority (GLA) are planning to analyse this data in more detail, and will report back later this year or in early 2023 on the migration effects on London at a local authority level.

### 3.4 Housing costs

Lack of affordable housing is a London-wide problem that is a key focus in Southwark and is a contributing factor to falling rolls. Southwark has the highest number of council homes in London and is building more, with a target of building 11,000 new council homes by 2043. However prices in the private sector have risen rapidly in recent years, making private housing increasingly unaffordable for families.

London has high property prices for homes suitable for families compared to other parts of the country<sup>2</sup>. Average property prices in March 2022 (latest available data), compared to the same figures in March 2016, showed an upward trend in all levels of geography, with Southwark seeing a higher increase than neighbouring boroughs in both percentage and real terms bringing the average price of a property more in line with neighbouring boroughs.

Area	Median Property Price 2022	Average Property Price 2016	Difference (%)
Lambeth	£550k	£475k	+£75k (+14%)
Southwark	£539k	£368k	+£171k (+32%)
London	£510k	£419k	+£91k (+18%)
Lewisham	£450k	£368k	+£82k (+22%)
SE England	£355k	£279k	+£76k (+21%)
England	£270k	£210k	+£60k (+22%)

<sup>2</sup> [UK House Price Index \(data.gov.uk\);](https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/medianhousepriceforationalandsubnationalgeographiesquarterlyrollingyearhpsdataset09)

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/medianhousepriceforationalandsubnationalgeographiesquarterlyrollingyearhpsdataset09>

(Source: ONS - <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/medianhousepricefornationalandsubnationalgeographiesquarterlyrollingyearhpssadataset09>)

Southwark has also seen private rented accommodation rapidly rise in price over recent years and now has the highest rental costs in South East London as illustrated in the table below.

### Advertised monthly 2-bedroom private sector rents in March 2022, in South East London and Lambeth

(downloaded and analysed in **March 2022**, from zoopla.com)

(From table 4.2A)

Borough	Size	Lower Quartile	Median	Upper Quartile	Mean	Count
Bexley	2	£1,200	£1,300	£1,400	£1,438	62
Bromley	2	£1,350	£1,400	£1,600	£1,472	99
Greenwich	2	£1,583	£1,850	£2,392	£2,074	164
Lewisham	2	£1,500	£1,600	£1,900	£1,756	105
Southwark	2	£1,993	£2,579	£3,900	£3,122	465
Lambeth	2	£1,800	£2,350	£3,000	£2,499	333

**Monthly room rents in South East London and Lambeth**, (downloaded and analysed in March 2022, from spareroom.co.uk) (From table 4.3A)

Borough	Lower quartile	Median	Upper quartile	Mean	Count
Bexley	£550	£600	£690	£629	107
Bromley	£550	£650	£750	£644	147
Greenwich	£630	£750	£934	£795	273
Lewisham	£600	£690	£800	£724	337
Southwark	£700	£804	£913	£835	552
Lambeth	£652	£760	£890	£790	492

### 3.5 Changes to benefit system

Southwark was directed by the Department for Communities and Local Government (DCLG) and the Department for Work and Pensions (DWP) to be a pilot borough for the introduction of Universal Credit (UC) in 2018. Universal Credit is a single payment that replaced a number of previous benefits, and includes an element to pay the rent of a property, and an allowance for up to two children, but not more.

A comprehensive quantitative assessment of the effects of UC in Southwark was not undertaken, but a study<sup>3</sup> commissioned by the Housing Department and DWP revealed that there was a broadly negative effect on housing affordability in the borough which could have caused outmigration to more affordable areas. Previous government welfare reforms included changes to the Local Housing Allowance (LHA), which set the rate of housing benefit paid to welfare claimants living in the private rented sector. While the changes to LHA pre-dated the rollout of UC, they were incorporated into

<sup>3</sup> <https://committees.parliament.uk/writtenevidence/2931/pdf/>

UC: the LHA was originally intended to link benefit rates for housing costs to changes in local market rents so that the cost of suitable properties at the lower end of the market would be always be covered.

This reform froze LHA at 2016 levels until 2019, while private sector rents increased significantly. The consequences of this were increased levels of mobility, as lower income households were unable to afford private rented accommodation and there was a shortage of available affordable housing. Research has found that the gap between the LHA and the median advertised monthly rent for a two-bedroom property in Southwark was over £1,000. While Southwark has a clear policy to support council tenants in arrears due to UC, many in the private rented sector were impacted.

The benefit also only paid for the number of rooms that a family were entitled to in social rented housing (the “Bedroom Tax”), meaning tenants who were under- occupying were penalised financially.

The net effect of this has been to force residents to find more affordable accommodation, which has often been outside Southwark and outside of London. These residents are often families with children, which has contributed to the downward drift in pupil numbers.

#### 4 Impact on schools of lower pupil numbers

As at September 2022, Southwark has considerable over capacity in the primary sector, with 924 Reception year (Year R) vacancies and 5,855 vacant places across school year groups Year R to Year 6. A number of actions to address this have already been taken by the Local Authority, including: school mergers, PAN reductions and the closure of a primary school.

GLA projections anticipate that primary reception demand overall will continue to decline until at least September 2031 and, most likely, beyond this date. Approaches to reduce school place capacity are being developed through this report.

An analysis of the school rolls in primary since 2015/16 is given in the table below.

This shows the annual change in the primary reception and primary sector as a whole for the last eight academic years.

##### Number of children in Reception and Years R to 6

Year	R	+/-	%	R to 6	+/-	%
2015/16	3,579			23,374		
2016/17	3,520	-59	-2%	23,476	102	+0.4%
2017/18	3,331	-189	-5%	23,426	-50	-0.2%
2018/19	3,247	-84	-3%	23,242	-184	-1%
2019/20	3,220	-27	-1%	22,690	-552	-2%
2020/21	2,985	-235	-7%	22,071	-619	-3%
2021/22	2,929	-56	-2%	21,382	-759	-3%
2022/23	2,657	-272	-9%	20,544	-839	-0.3%
<b>2015-22</b>	<b>-922</b>		<b>-26%</b>	<b>-2,830</b>		<b>-12%</b>

The regional picture shows similar drops in demand in neighbouring boroughs, although the figures are highest in Southwark, and some way above the London average.

### Number of Primary pupils in Reception Classes (headcount) 2015-16 to 2021-22

LA	2015 /16	2016 /17	2017 /18	2018 /19	2019 /20	2020 /21	2021 /22	Change 2016-22
Lambeth	3,055	2,949	2,905	2,900	2,873	2,702	2,604	-451 (15%)
Lewisham	3,561	3,423	3,406	3,235	3,240	3,126	3,052	-509 (-14%)
Southwark	3,579	3,520	3,331	3,247	3,220	2,985	2,929	-650 (-18%)
London	102,206	101,308	97,965	95,237	95,685	94,023	91,645	-10,561 (-10%)

Many London boroughs, including Southwark, now need to remove primary school places. This situation requires a well-managed and significant reduction in the number of places. Based on current available data, Southwark's demand for school places will continue to drop for the foreseeable future. Based on acceptance of school place offers for September 2022, we are expecting around 924 vacancies for the forthcoming academic year, an increase of 206 on the previous level of vacancies.

#### How pupil numbers affect school finances

Schools receive funding for each child on their roll. With such a significant drop in the number of children, the funding for each school has reduced to a point where some are now struggling to remain sustainable.

Since 2017, we have removed over 420 surplus Reception places in primary schools, which equates to over 14 classes. This reduction in the supply of places has not kept pace with the overall drop in demand. In addition, in year admission levels have also fallen significantly across all year groups. *Vacant school places are not funded.*

This has put extraordinary financial pressure on the current community of Southwark schools in managing their finances within a continually decreasing funding envelope.

That is, as pupil numbers decrease, the majority of schools experience a less than full year group and, therefore, an inability to maximise the use of resources. This is because many costs are driven by the number of classes in a school, whereas funding levels are driven by the number of pupils.

## School capacity and vacancy levels across all year groups

School capacity and vacancy levels across all year groups over the last five years are as follows:

Year (as at January)	2018	2019	2020	2021	2022
Reception capacity	3,935	3,995	3,746	3,716	3,640
Reception vacancies	604	748	526	731	712
Year R to 6 capacity	26,455	26,894	26,920	26,941	26,618
Year R to 6 vacancies	2,969	3,751	4,194	5,133	5,306

The number of Reception places are likely to remain at around 3,580 for September 2022 (following a further removal of one Reception class at two schools- 60 places- during the current academic year). If, as anticipated following this year's Reception offers for September 2022, the number of children available to fill those places remains at around 2,650 or below, there would be around 930 surplus places by September 2022: 28% of all Reception places would be empty.

This is unsustainable; doing nothing is not an option.

### The financial impact of doing nothing

If the Council were to do nothing to manage the supply of primary places and the existing schools did nothing to reduce their expenditure in response to a reduction in pupils, gross expenditure could exceed income by over £5m in financial year 2023-24. A further £10m in-year deficit would accrue over the next two financial years (see appendices 3a and 3b).

### Target school capacity levels

The Department for Education guidance recommends that a school system retains some surplus capacity (5-10% is considered good practice) and this is where we want to get to. We currently have 3,580 Reception places so 5-10% of this would equate to an ideal vacancy level of around 180 to 350 spare Reception places. With present levels of vacancies, if reception numbers remained at their current levels or decreased, this would mean removing between 575 to 750 school Reception places (19 to 25 FE). This is a different projection to that made in the Pupil Place Planning Report (2022) because that report is based on GLA projections, which are slightly more optimistic but still show 340-480 excess reception places (11-16 forms of entry).

Combined with increasing capacity across most year groups, we now require significant action to address the issue. This will also have an impact on buildings and the estate (see appendix 4).

## **How we propose to work together to make changes**

We need to maintain a focus on how the future might look once Southwark has completed this process for our children and families. Throughout the process of making changes to our schools to reflect the future lower need for places, the Council will continue to work in partnership with school leaders, including academy trusts, the Catholic Diocese the Church of England Diocese, the Regional Schools Director and neighbouring Local Authorities (see appendix 5). Our shared priorities are to maintain educational quality for the long term, to provide the right number of places in the right locations, and to ensure that schools can remain financially sustainable. As is evidenced, these factors are all interlinked and influence each other.

We will have a sustainable school estate, which is still able to offer parental choice, and is able to include all our children. Inclusive, well-funded schools that have been able to build on the educational success of our current high standards, building an education system that is fit for the future demands of our communities.

## **5 Factors to consider for removing surplus capacity**

The following factors have been developed in partnership with council members, chief officers and school leaders for consideration when making recommendations to reduce surplus capacity by evaluating the school estate this will be applied to ALL primary schools – maintained and academy:

- Falling number on roll (past numbers of pupils and projections);
- Financial sustainability
- Quality of education (for example, Ofsted rating, staffing/capacity);
- Quality of estate and buildings (compliance issues, health of buildings, etc.);
- Local issues (e.g. availability of other similar designations of schools in the local area.)

Other factors that will be considered in decision-making include:

- The impact on the number and denomination of places at faith schools, and the balance of places between secular and faith schools;
- Equality impact implications;
- Climate impact implications
- Health impact implications

The impact of making changes will be to safeguard high quality education and achieve improved:

- Flexibility to respond to future demographic need;
- Financial sustainability;
- Quality of provision;
- Quality and sustainability of leadership and management;
- Quality of the school estate.

## 6 Approaches to removing surplus capacity

The Council has worked in partnership with schools (including academy trusts) and Dioceses to remove c. 400 Reception places already. This has been achieved through reducing the Published Admission Number (PAN) for Reception at some schools, and through the closure of one school.

In order to manage capacity of school places in Southwark, a range of approaches will need to be considered and implemented to meet short-term and longer-term requirements. These are outlined below:

Approach	What it means	Statutory process/ policy
Informal capping of Reception intake	<ul style="list-style-type: none"> <li>• Cap of a school's Reception intake at a lower number of offers than the Published Admission Number (PAN) (i.e. capping to 30 rather than 60 if there are fewer than 30 places allocated on national offer day up to 1st September)</li> <li>• This is a short-term, one year action; it does not result in a permanent reduction in places available.</li> </ul>	None required.
Formal reduction of Reception Published Admission Number (PAN)	<ul style="list-style-type: none"> <li>• Formal reduction of Reception PAN to a lower number (i.e. from 60 to 30) through consultation or application to</li> </ul>	<a href="https://publishing.service.gov.uk">School admissions code 2021 (publishing.service.gov.uk)</a>

	<p>the Schools Adjudicator.</p> <ul style="list-style-type: none"> <li>• Enables school to plan for the reduction by providing 18 months lead in.</li> <li>• Admissions authority could admit above PAN if the places were required.</li> </ul>	
Amalgamation	<ul style="list-style-type: none"> <li>• Where two or more schools join together to be one school. This involves the closure of one or more schools, and may require the expansion of the remaining school. The process of amalgamation can result in fewer places being available.</li> <li>• Pupils and staff at the closing school(s) could transfer to the remaining school. Staff restructure may be required.</li> </ul>	<a href="#">Opening and closing maintained schools1012.pdf (publishing.service.gov.uk)</a>
Closure	<ul style="list-style-type: none"> <li>• Where a school (or schools) close.</li> <li>• Pupils transfer to other school(s) via mini-</li> </ul>	<a href="#">Opening and closing maintained schools1012.pdf (publishing.service.gov.uk)</a> <a href="#">Closure of an academy by mutual agreement Jan 2022 (publishing.service.gov.uk)</a>

	admissions process. <ul style="list-style-type: none"> <li>• Staff seek other roles and roles, if necessary, are made redundant.</li> </ul>	
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## 7 Summary of the proposed approach and statutory process

This strategy proposes to make changes in one phase to minimise disruption and distress to children and families, communities and staff, so that if a school move is required, it is only required once. This will help to promote stability and help families plan for and identify an alternative school for their child and school based staff to seek re-deployment opportunities.

The council will work with school leaders to develop a proposal for this one phase change. There will then be consultation with schools, families and ward councillors about this proposal as set out below.

A school closure will be a difficult and distressing decision and process for many. Where this is unavoidable, we will aim to limit periods of anxiety and uncertainty for children, families, staff and communities. We will also provide support for the education, choices and well-being of children and staff in the schools affected. We will build in wider timescales for consultation than required but will need to follow the statutory process as stipulated by the Department for Education.

Due to the scale of the problem and the impact it is having (and that the impact of taking action will have) on education, schools and pupils, it is proposed to reduce capacity, at scale, within the shortest timeframe possible taking into account statutory and local governance limitations. The statutory processes referred to above describe how stakeholders will be consulted over a period of time and the opportunities within the process for influencing decision-making.

- Once a shortlist of schools for proposal for some form of structural change has been established (see section 9: Programme Timeline), a statutory consultation will need to be put in place. These schools will go through stage one of the statutory process.
- Full consideration can then be given to the feedback from all stakeholders consulted before taking a decision on which of these schools to put forward for stages two and three of the statutory process (Publication and Representation). This will be a sufficient number of schools to achieve the level of reduction required.
- A final decision to amalgamate or close schools will be made in line with stage four of the statutory process, which can be implemented as part of a phased programme (stage 5) over a two- year period.

- The implementation of a phased amalgamation or closure will enable families and key stakeholders to plan for their children's ongoing education and for local authority officers to manage and coordinate admission arrangements for children into alternative schools.
- We would expect all statutory and local governance processes to be completed and final decisions on any closures to be made by summer term, 2024. However, this will depend on the consultation and representation processes.

## 8 Risks and Mitigations

Area	Risk	Mitigation
<b>Community</b>	Large numbers of parents may begin to withdraw children from schools proposed for closure and send them to other Southwark schools or out of borough schools rather than wait for a local authority managed admissions process.	Communication- bringing families along with us, making sure they understand the issues and process (both of managing surplus capacity and of admissions). Highlight key aim is to protect high quality education.  Provide clarity on the admissions arrangements for all schools.
	Formal objections may be raised about individual school proposed closures or the overall strategy at any stage which could delay the process.	This will be part of the consultation process for any proposed closure.
	Diocesan Boards may not support the inclusion of their schools in this programme and may take action (e.g. moving schools into their respective MATs) - which will affect the number of places able to be reduced from overall capacity.	Early engagement with stakeholders.  They will be considered, as far as is possible, as part of the assessment process.
	MATS may not support the inclusion of their schools in this programme.	
<b>Schools</b>	Instability and shortage of staff in schools affected and impact on morale and wellbeing.	A clear plan communicated in advance on impact and opportunities for staff and support for teaching and learning in schools affected and wider schools estate.
	Schools not identified as being in scope for significant action might find themselves oversubscribed.	LA duty is to ensure sufficiency across the borough. There will be sufficient school places. We cannot control parental preference or guarantee first choice but there will be an admissions process which will support parents to move their children to other schools.

	Schools may convert to academy during the process.	This is a real possibility. The governors of each school are entitled to make this choice.
<b>Council</b>	The strategy may be unpopular with residents and politicians.	Engagement with stakeholders.
	Reputational and relationship damage to the local authority.	Clear communication with residents and elected members of key messages.
	Redundancies across LA services	Clear communication with council staff of key messages.  Making sure we follow correct internal policies and procedures.
<b>Financial</b>	See appendix 3	See appendix 3

## 9 Programme Timeline

### Programme Timeline (TBC)

Period	Key steps	Involves	Who
October 2021-July 2022	Preparation and planning.	<ul style="list-style-type: none"> <li>Informing stakeholders of the challenges</li> <li>Working with schools to agree proposed ways forward</li> <li>Producing and sharing a strategy paper</li> </ul>	<ul style="list-style-type: none"> <li>Education leads</li> <li>Cross- council group of officers</li> <li>Key stakeholders</li> </ul>
June 2022	Strategy paper shared with Lead Member	<ul style="list-style-type: none"> <li>Strategy paper shared with Lead Member for feedback/ approval</li> </ul>	<ul style="list-style-type: none"> <li>Director of Education</li> </ul>
September 2022	Wider discussion with Councillors	<ul style="list-style-type: none"> <li>Lead Member shares strategy paper with councillors for feedback</li> </ul>	<ul style="list-style-type: none"> <li>Lead Member (JA)</li> </ul>
October 2022	Communication to all schools to provide update.	<ul style="list-style-type: none"> <li>Letter to schools from Director of Education outlining the challenge and reassuring schools that there is a plan in place going through Cabinet</li> <li>List of key messages/ FAQs that schools can use to inform parents/ staff.</li> </ul>	<ul style="list-style-type: none"> <li>Communications</li> <li>Lead Member and councillors</li> <li>Director of Education</li> <li>Schools communicate key messages to parents</li> </ul>
November 2022	Opportunity for schools to ask questions on process or strategy paper	<ul style="list-style-type: none"> <li>Webinar for all schools to ask questions about the paper and proposed process</li> </ul>	<ul style="list-style-type: none"> <li>Director of Education (ND)</li> <li>Council Officers</li> </ul>
By December 2022	Update assessment of rolls and vacancies of all primary schools in Southwark (including academies)	<ul style="list-style-type: none"> <li>Completing an assessment of rolls across the primary school estate</li> </ul>	<ul style="list-style-type: none"> <li>Place Planning team</li> </ul>

December 2022	Authorisation from Cabinet on paper and approach	<ul style="list-style-type: none"> <li>• Strategy paper and approach goes to Cabinet</li> </ul>	<ul style="list-style-type: none"> <li>• Director of Education (ND)</li> <li>• Lead Member (JA)</li> </ul>
January 2023 (if approach agreed)	<p>Schools informed of the decision to proceed and result of the rolls assessment.</p> <p>Councillors informed of results of rolls assessment.</p>	<ul style="list-style-type: none"> <li>• All schools informed of the decision to proceed.</li> <li>• All primary schools informed of the outcome of their rolls assessment</li> <li>• Primary schools in scope for the next stage (evidence gathering around the criteria) informed</li> </ul>	<ul style="list-style-type: none"> <li>• Director of Education (ND) by letter.</li> <li>• Lead Member (JA)</li> </ul>
January 2023	Evidence-gathering around criteria started	<ul style="list-style-type: none"> <li>• Evidence gathering process starts</li> <li>• Criteria templates completed for each school in scope</li> </ul>	<ul style="list-style-type: none"> <li>• Officers from each relevant area (finance, place planning, learning and achievement, etc.)</li> </ul>
February 2023	Recommendation made to LA about how to proceed.	<ul style="list-style-type: none"> <li>• IRM reads the evidence for each school in scope and makes a recommendation: <ol style="list-style-type: none"> <li>1. Propose outright school closure</li> <li>2. Propose amalgamation with another school</li> <li>3. Propose no further action</li> <li>4. Other</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• Independent Recommendations Maker.</li> <li>• Director of Education and relevant officers.</li> </ul>
March 2023	Schools informed and given the opportunity to discuss/ challenge outcome of recommendation	<ul style="list-style-type: none"> <li>• Schools in scope informed of the result of the evidence gathering. recommendation and councillor discussions invited to meeting to discuss the results and final proposal by the LA</li> <li>• Meetings held with schools in scope</li> </ul>	<ul style="list-style-type: none"> <li>• HTs and Chairs of Governors of schools directly affected before wider consultation.</li> </ul>

May/ June 2023	Final decision-making by Cabinet	<ul style="list-style-type: none"> <li>• Cabinet approve the decision on how to proceed with each school on list</li> </ul>	<ul style="list-style-type: none"> <li>• Director of Education</li> <li>• Lead member</li> <li>• Cabinet</li> </ul>
June/ July 2023	Informal consultation with school communities (parents/ carers/ residents/ businesses)	<ul style="list-style-type: none"> <li>• Informal consultation with school communities takes place to prepare them for statutory process</li> <li>• Reminder of challenge, reasons, approach and what has taken place already (all primaries assessed on rolls, etc. Those with insufficient children on roll assessed on more detailed criteria and recommendation made; council officers, councillors and schools have agreed with/ challenged the recommendation; proposal to XXX with list of schools)</li> <li>• Detailed timeline of statutory process, information sessions on statutory process so school communities understand what happens next and how they can get involved/ say what they think.)</li> </ul>	<ul style="list-style-type: none"> <li>• Director of Education</li> <li>• Relevant council officers</li> <li>• Lead Member</li> <li>• Ward councillors</li> <li>• Stakeholders from school communities</li> <li>• Members of the public</li> </ul>
September-Christmas 2023	Stage One Statutory process	<ul style="list-style-type: none"> <li>• Consultation (formal)</li> </ul>	<ul style="list-style-type: none"> <li>• Relevant council officers</li> <li>• Public</li> </ul>
January-Easter 2024	Stages Two and Three	Publication and Representation	<ul style="list-style-type: none"> <li>• Relevant council officers</li> <li>• Anyone wishing to make representation</li> </ul>

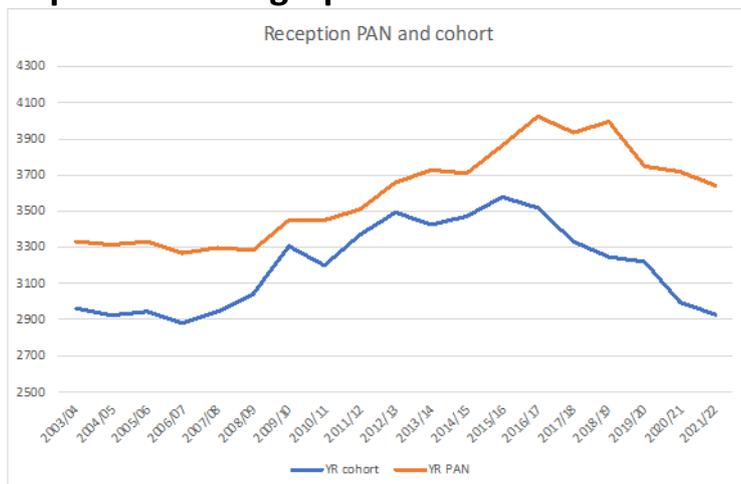
Easter- July 2024	Stage Four: Decision	<ul style="list-style-type: none"> <li>Final decision goes to Cabinet for schools to close</li> </ul>	<ul style="list-style-type: none"> <li>Director of education</li> <li>Lead Member</li> <li>Cabinet</li> </ul>
September 2024- July 2025	Stage Five	<ul style="list-style-type: none"> <li>Implementation and transition (where applicable, a school closes)</li> </ul>	<ul style="list-style-type: none"> <li>Relevant council officers</li> <li>Schools</li> </ul>
July 2025 (TBC)	Process complete		

## Appendix 1: Additional Demographic Information

### Demographics

- Births fell by over 1100 (20%) between 2011 and 2019, from nearly 5200 to under 4100.
- Births in 2020 fell by another 500 to just over 3500 – this is the 2024/25 Reception cohort.
- This will be further compounded by movement in and out of the borough.
- Reception cohorts have fallen by 650 (18%) between 2015/16 and 2021/22.
- Reception cohort was 68.5% to 70.5% of the corresponding births until 2020/21 and 2021/22 when it dropped to below 67%.
- Cohorts have historically reduced by 5-10% between YR and Y6, although this may be 12% for the 2022/23 Year 6 cohort.
- Children already born affect Reception cohorts until 2024/25 – births for the 2024/25 Reception cohort were 800 lower than for the 2021/22 Reception cohort.
- If Reception cohorts remain below historic level of around 70% of births it further reduces cohort size.

### Impact of demographics



The impact of reducing Reception cohorts is a growth in surplus places.

Surplus places have increased from below 150 in 2011/12 to over 700 for 3 of the four years from 2018/19.

The Reception Year PAN has reduced by nearly 400 places (nearly 10%) between 2016/17 and 2021/22, involving 15 schools.

The PAN reduction, however, has only kept pace with the reduction in Reception cohort size – it has not reduced the number of surplus places.

In 2020/21 and 2021/22 the 700+ surplus places have equated to almost 20% of all Reception places. 700 places is equivalent to 24 1FE schools having no intake at all (Southwark has 25 1FE schools).

A number of schools 2021/22 had an intake of 10 or less children into the Reception year

## Future forecasts and their implications

Reception Year cohorts are expected to continue to decline. In the short-term this expectation is based upon actual birth data for cohorts up to and including 2024/25. Beyond that, it is based upon GLA forecasts of births. [Note – updated GLA pupil projections are expected shortly which would affect this section]

Reception Year cohort	Reception Year as 67% of births	Reception Year as 70% of births
2022/23	2850	2980
2023/24	2740	2860
2024/25	2380	2450
2025/26	2540	2650
2026/27	2480	2590
2027/28	2480	2590
2028/29	2470	2580
2029/30	2460	2570
2030/31	2450	2560

Forecasts are based upon a set of assumptions, each of which may prove more or less accurate. If birth rates and / or conversion rates from birth to Reception increase then the possible Reception cohort sizes above may prove pessimistic. Similarly, if births or conversion rates fall further, Reception cohorts could be lower.

Admissions data indicates that the September 2022 Reception cohort is likely to be below 2750. If correct, this would be represent a further reduction in the conversion rate from birth to Reception to around 64%. If that was to become a recurrent level, the indicative Reception cohorts above would need revising downwards by another 90-100 pupils.



## **Appendix 2: Primary schools' financial position, risks and options.**

The Council already faces a significant financial challenge in their maintained primary schools to stabilise their current financial position, where over 20% of maintained primary schools have deficit balances.

In the event of a school closure any deficit balance remaining ultimately falls to the Council's general fund and, therefore, the residents of Southwark. If the current financial position is not stabilised and the maintained primary schools with existing deficits of more than £500k were to close, the deficit balances plus redundancy costs could exceed £3.4m.

The need to close schools, and how many schools, is about restoring equilibrium between the supply of places and the demand for those places, which in turn should more closely match expenditure to income – reducing the pressure that puts on schools (particularly nursery schools and 1FE primary schools) in managing their expenditure within a continually decreasing funding envelope.

In the meantime, schools must be supported and challenged to take more immediate action to reduce their own expenditure in response to reduced income.

School governing bodies (GBs) are required to set a balanced budget each year and they must take into account the current pupil number forecasts, assessing the impact on their own pupil admissions, and anticipate the need to reduce expenditure accordingly.

Schools can generally manage (i.e. matching expenditure with income) with a year group of at least 27 pupils per class and anything below 25 pupils per class becomes financially tenuous.

As schools' largest cost is staffing, typically accounting for 75% to 80% of total expenditure, in almost all cases a restructure of the schools' establishment will be required to drive down costs in response to the fall in pupil numbers and funding. If pupil numbers continue to decline, this may lead to further requirements for restructuring. This is not a long-term sustainable solution because of the potential impact on staff and pupils of working and learning in an uncertain environment. This will also not necessarily result in the required financial savings as the school has to keep up with falling rolls year on year. Uncertainty about future viability may lead to recruitment and retention difficulties, which may impact on loss of expertise, knowledge and experience.

Currently, many of the maintained primary schools applying for a licensed deficit have based their recovery plans on over-optimistic pupil numbers and rely on natural attrition of staffing to bring their budget back into balance. This lack of strategic planning erodes the LA's confidence that the GB has the ability to fulfil one of its three core strategic functions to oversee the financial performance of the school and making sure its money is well spent.

More timely interventions, such as Notices of Concern under the Scheme for Financing Schools or suspension of the GB's financial delegation under [Section 66 of the Education and Inspections Act 2006](#)) should be considered by the LA to safeguard the financial position of the LA and the school.

Finally, the potential of a LA Multi Academy Trust, offered in the *Opportunity for All* White Paper and the new *Schools Bill*, does not provide a panacea to the financial position outlined above and to have a realistic chance of incorporating a successful and strong MAT, the supply of school places needs to be matched with demand which in turn should more closely match expenditure to income.

## Appendix 3: Financial impact

### 1. Cost of closing 5 / 10 / 20 schools

- Any deficit balance – current total deficit balance £3.345m (16 schools);
- Direct costs of redundancies – £350k (based on recent closure / proposed closure) but subject to individual staffing profile of each school;
- Administrative expenditure, including associated officer time, cost of maintaining a potentially empty building, etc.

### 2. Financial impact of closing 5 / 10 / 20 schools on traded services:

Based on 5 / 10 / 20 schools representing approx. 10% / 20% / 40% of maintained primary schools and that all current traded services charge on a per school basis, for every school closure about £10k is potentially lost across all current traded services\*.

Reduction in schools	Loss of Income(approx.)	Equivalent FTE
5	£50k	1-2
10	£100k	2-4
20	£200k	4-8

\*Education Business Alliance, Ed Psychology, Governor Services, Schools HR, Music Service

Plus associated redundancy costs, but may not necessarily shed staff immediately as services such as Governor Support and Schools HR would be required to support schools through the closing process.

This loss of income to the Council could be mitigated by broader marketing of current services to academies and other boroughs / exploring alternative delivery models / shared services with neighbouring boroughs.

### 3. Financial impact of closing 5 / 10 / 20 schools on central services supported by the Dedicate School Grant:

- a. Central Schools Services Block – not impacted by school closures as based on total pupil numbers (maintained and academies). However, based on pupil number projections this could reduce by over £150k, from current funding level of £1,856k, over the next four financial years.

Funds statutory services for all schools: planning for education; admissions; education welfare service; independent school fees; school licenses and subscriptions (copyright etc); school forum costs; schools funding formula – with this latter expenditure being vulnerable to the introduction of the National Funding Formula.

b. Schools Block

- (i) Education services to maintained schools – not impacted by school closures as funding is based on total pupil numbers in maintained schools. The current funding level is £288.2k and is subject to approval of the School Forum and covers strategic planning; attendance; landlord responsibilities of school estate; and corporate overheads.

Due to the forecast reduction in pupil numbers, overall, and assuming minimal movement of pupils outside the borough and a 30% movement of pupils outside the maintained sector, we expect the available funding to decrease as follows:

<b>Reduction in schools</b>	<b>Loss of DSG Funding (approx.)</b>
5	£4k
10	£10k
20	£24k

- (ii) De-delegated services to maintained mainstream schools – not all services are impacted by school closures as funding is based on total pupil numbers in maintained schools. The current funding level is £3,339k and is subject to approval of the School Forum and covers schools in Financial Difficulty support; Maternity and Trade Union Supply cover; Behaviour Support services (early help and Summerhouse) & School Improvement services.

Due to the forecast reduction in pupil numbers, overall, and , overall, and assuming minimal movement of pupils outside the borough and a 30% movement of pupils outside the maintained sector, we expect the available funding for pupil based services to decrease, as illustrated in the table below.

<b>Reduction in schools</b>	<b>Loss of DSG Funding (approx.)</b>
5	£69k
10	£157k
20	£336k

The LA services most vulnerable to this reduction are:

Service	2022-23 DSG Funding	Loss of DSG Funding From reduction in:		
		5 schools	10 schools	20 schools
Behaviour support services – contribution to early help	384k	£6k	£16k	£34k
Behaviour support services – Summerhouse	1,114k	£18k	£46k	£99k
Additional school improvement services	519k	£27k	£55k	£112k
<b>Total</b>	<b>2,017k</b>	<b>£51k</b>	<b>£117k</b>	<b>£245k</b>

Added to this, is the additional loss of the Schools Monitoring and Brokerage Grant (£165k) from 2023-24 from the Learning and Achievement Team. In terms of the ‘tipping point’ for school improvement services, it is clear in the Opportunity for All White Paper / Schools Bill, that in a future schools system a LA will only retain responsibility for sufficiency, admissions, safeguarding and attendance and ensuring the quality of education will rest with MATs .

## Appendix 4: Implications for buildings

Where vacant school buildings are owned by the council the council will bring forward proposal to repurposed them for educational and/or community use. Working to ensure they are maintained in public ownership so they can be brought back into use for school provision when pupil places demand increase in future years.

By reducing surplus capacity the council would avoid:

- Holding costs for vacant buildings / operating and environmental costs of using under occupied buildings.
- Increased running & maintenance costs of building with inefficient use of main and annex buildings/space due to reduced numbers of pupils.
- If spaces are mothballed, costs are associated with maintaining those spaces although the cost is reduced from occupancy.
- Reviewing the wider school estate to make use of the more efficient buildings in terms of running & maintenance costs (e.g. asbestos issues or energy efficient buildings, in that old inefficient buildings should be closed or mothballed).

Potential alternatives might include:

- Special educational needs provision
- Adult, further or vocational education

The potential to support the Voluntary and Community Sector (including VCS arts and cultural operations) throughout the borough

## Appendix 5: Importance of working in partnership

It is essential to recognise that:

- Reducing Reception cohorts is a collective challenge.
- The Council will work with schools (Headteachers and Governors), Dioceses, MATs, and DfE / Regional Directors and neighbouring Local Authorities to develop and take forward proposals.
- There have already been reductions in Published Admission Numbers at community, Church of England, Catholic, and academy schools, as well as school closure.
- Future changes are also expected to impact all types of school.

It is important to note that the Council can only propose / determine reductions in Published Admission Number (PAN) at community schools, and can only propose / determine closure of LA maintained schools (i.e. not academies). For closure of LA maintained faith schools the relevant Diocese would have a right of referral to the Schools Adjudicator. For academies, only the academy trust can propose / determine a lower Published Admission Number, and only the academy trust can apply to the Department for Education to close or amalgamate a school. This legislative landscape emphasises the need for effective partnership working.

Reductions in Published Admission Number (PAN), amalgamation, or closure of schools requires engagement with the community, including staff and parents, before decisions are made.

There may be opportunities to utilise a decline in the pupil numbers to improve educational provision in Southwark. In particular it may provide opportunities to:

- Develop cross-school collaboration, including at governance and leadership levels, to improve educational performance, staff development (and resilience of staffing structures), and financial sustainability; and / or
- Create a more educationally and financially resilient structure of schooling; and / or
- Improve the school estate through reinvestment of capital receipts if sites become surplus (which could include using a surplus site for decant while ongoing sites are invested in while pupils are off-site).

The Council will be working with schools / academy trusts and Diocese to consider the implications of the 2022 White Paper 'Opportunity for All' and the Government's aspiration that all schools are, or are in the process of becoming, academies by 2030. The White Paper is available [here](#).

## Appendix 6: Glossary

PAN	<p>Published Admission Number. This means that maximum number of children to be admitted into a school for the normal point of entry e.g. the Reception Year for an infant/primary school (Year 3 for a Junior school).</p> <p>Reductions in PAN have to be consulted upon in accordance with requirements of the Admissions Code.</p> <p>An Admissions Authority can admit pupils in excess of PAN without prior consultation.</p>
Admissions Authority	<p>The body that is responsible for the Admissions Arrangements for a school and for prioritising applications in accordance with the Admissions Arrangements. For community and voluntary-controlled schools this is the Local Authority. For foundation and voluntary-aided schools it is the Governing Body. For academies it is the academy trust.</p>
Admissions Arrangements	<p>The policy determined by the Admissions Authority for a school, which includes its PAN and the over-subscription criteria. Where an Admissions Authority proposes either a reduction in the PAN or changes to the over-subscription criteria they must consult upon the proposed future policy in accordance with the Admissions Code.</p>
Admissions Code	<p>The statutory guidance issued by the Department for Education that places requirements upon Admissions Authorities and Local Authorities for the determination and implementation of Admissions Arrangements and the application and offer process.</p>
Community school	<p>A school that is maintained by a local authority and where the local authority is the land-owner, employer, and Admissions Authority.</p>
Foundation school	<p>A school that is maintained by a local authority and where the governing body is the land-owner, employer, and Admissions Authority.</p>
Voluntary-aided school	<p>A school that is maintained by a local authority and where the governing body is the employer and Admissions Authority and the land is (most commonly) owned by the relevant Diocese.</p>
Academy	<p>A school that is directly funded by the Secretary of State through a Funding Agreement and where the Academy Trust is the employer and Admissions Authority. The land ownership depends upon whether the school was previously a community, foundation, or voluntary-aided school.</p>
Academy Trust	<p>A charitable company that operates one or more academy schools.</p>

## Appendix 7: Southwark primary schools

There are 72 schools with a Reception intake in Southwark (two of which are infant schools that each feed a linked junior school that has a Year 3 intake).

	PAN up to 30	PAN 31 to 60	PAN 61 to 90
Community	10	21	4
Foundation	2	0	0
Voluntary-aided	12	8	1
Academy (including Free Schools)	1	13	0
<b>Total</b>	<b>25</b>	<b>42</b>	<b>5</b>

	PAN up to 30	PAN 31 to 60	PAN 61 to 90
Catholic	4	6	0
Church of England	9	2	1
Secular	12	34	4
<b>Total</b>	<b>25</b>	<b>42</b>	<b>5</b>

These schools are situated across the borough as shown in the following map (see appendix 8).

In 2021/22, the Reception PAN was just below 124 forms of entry (FE), of which:

- 21% of places were within the 36% of schools that admit up to 30 pupils a year;
- 67% of places were within the 56% of schools that admit between 31 and 60 pupils a year; and
- 12% of places were within the 7% of schools that admit over 61 pupils a year.

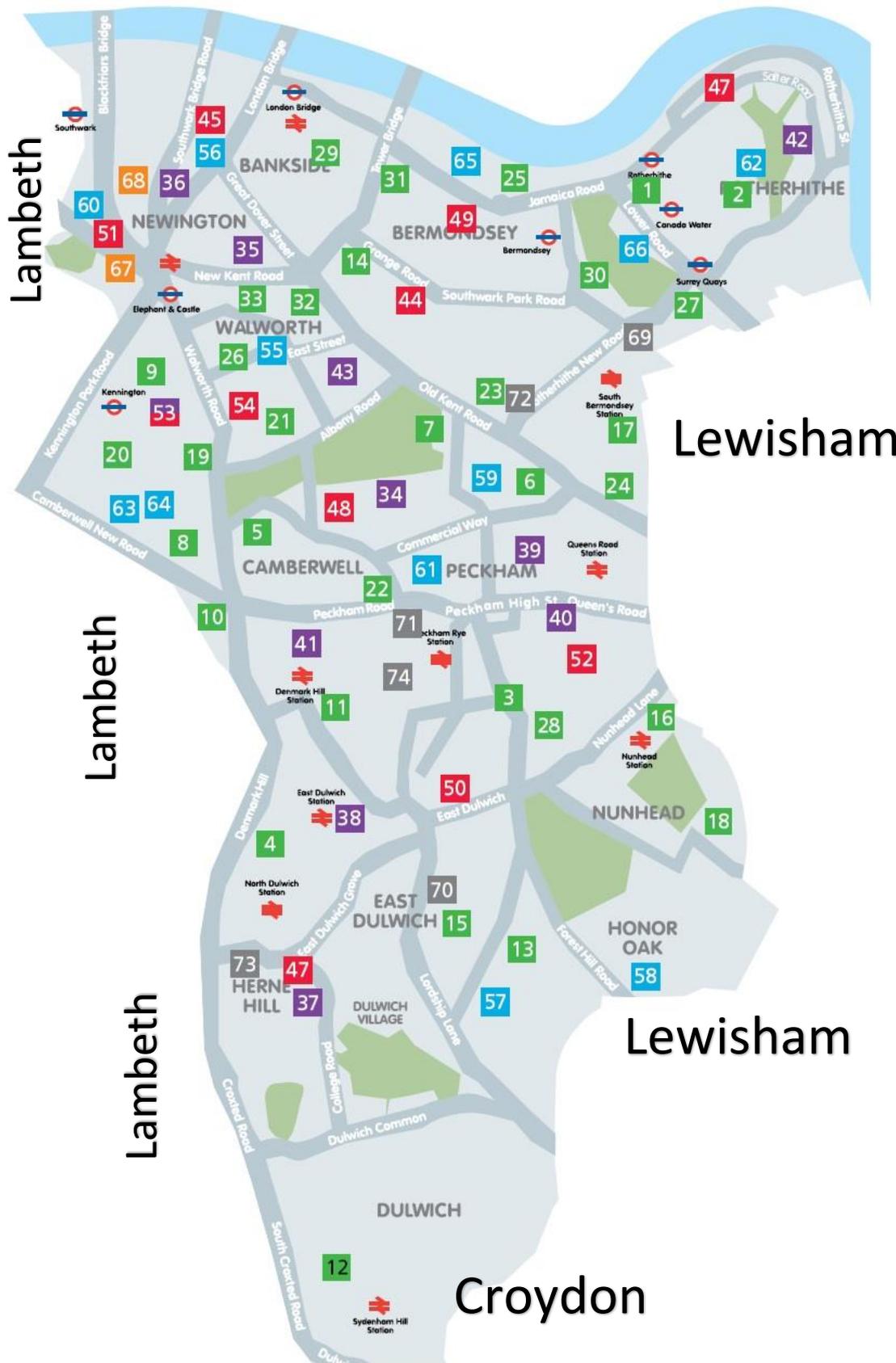
The following table shows the schools within each planning area.

PA	School	Legal type	Faith	Max PAN	PAN 21/22	PAN 22/23
PA1	ARK Globe	Academy		60	60	60
PA1	Cathedral School of St Mary Overie CE	VA	CE	30	30	30
PA1	Charles Dickens Academy	Academy		60	60	60
PA1	Charlotte Sharman	Foundation		60	30	30
PA1	Cobourg	Community		60	60	30
PA1	Crampton	Community		30	30	30
PA1	English Martyrs RC	VA	RC	60	60	60
PA1	Friars	Foundation		30	30	30
PA1	Keyworth	Community		90	60	60
PA1	Michael Faraday	Community		60	60	60
PA1	Robert Browning	Community		60	30	30

PA	School	Legal type	Faith	Max PAN	PAN 21/22	PAN 22/23
PA1	St Georges Cathedral RC	VA	RC	30	30	30
PA1	St John's Walworth CE	VA	CE	30	School closed	
PA1	St Joseph's (Borough)	VA	CE	30	30	30
PA1	St Jude's CE	VA	CE	30	30	30
PA1	St Paul's CE Academy	Academy	CE	45	30	30
PA1	St Peters CE	VA	CE	30	30	30
PA1	Surrey Square Academy	Academy		60	60	60
PA1	Townsend	Community		30	30	30
PA1	Victory	Community		30	30	30
PA2	Albion	Community		60	60	60
PA2	Alfred Salter	Community		60	60	60
PA2	Boutcher CE	VA	CE	30	30	30
PA2	Galleywall City of London	Free		60	60	60
PA2	Grange	Community		60	60	60
PA2	Ilderton	Community		60	60	60
PA2	John Keats	Free		60	60	60
PA2	Peter Hill with St Mary's and St Paul's CE	VA	CE	30	30	30
PA2	Phoenix	Community		120	90	90
PA2	Pilgrims Way	Community		30	30	30
PA2	Redriff	Academy		90	60	60
PA2	Riverside	Community		45	45	45
PA2	Rotherhithe	Community		90	60	60
PA2	Snowfields	Community		30	30	30
PA2	Southwark Park	Community		60	60	60
PA2	St James CE	VA	CE	60	60	60
PA2	St John's RC	VA	RC	30	30	30
PA2	St Joseph's RC Bermondsey	VA	RC	45	45	45
PA2	St Joseph's RC Rotherhithe	VA	RC	30	30	30
PA2	Tower Bridge	Community		30	30	30
PA3	Angel Oak	Academy		60	60	60
PA3	Bellenden	Community		60	30	30
PA3	Camelot	Community		90	60	60
PA3	Harris Peckham Park	Academy		60	60	60
PA3	Harris Free School Peckham	Free		60	60	60
PA3	Hollydale	Community		45	30	30
PA3	Ivydale	Community		90	90	90
PA3	John Donne	Academy		60	60	60
PA3	Rye Oak	Community		60	60	60
PA3	St Francesca Cabrini RC	VA	RC	60	60	60
PA3	S Francis RC	VA	RC	60	60	60
PA3	St James the Great RC	VA	RC	30	30	30

PA	School	Legal type	Faith	Max PAN	PAN 21/22	PAN 22/23
PA3	St John's and St Clements CE	VA	CE	60	60	60
PA3	St Mary Magdalene CE	VA	CE	30	30	30
PA4	Belham	Academy		60	60	60
PA4	Bessemer Grange	Community		90	90	90
PA4	Brunswick Park	Community		75	60	60
PA4	Comber Grove	Community		45	30	30
PA4	Crawford	Community		90	60	60
PA4	Dog Kennel Hill	Community		60	60	60
PA4	John Ruskin	Community		60	60	60
PA4	Lyndhurst	Academy		60	60	60
PA4	Oliver Goldsmith	Community		60	60	60
PA4	St George's CE	VA	CE	30	30	30
PA4	St Joseph's Infant RC	VA	RC	60	60	60
PA4	St Joseph's Junior RC	VA	RC	60	60	60
PA5	Dulwich Hamlet Junior	Academy		90	90	90
PA5	Dulwich Village Infants CE	VA	CE	90	90	90
PA5	Goodrich	Community		90	90	90
PA5	Goose Green	Academy		60	60	60
PA5	Heber	Community		60	60	60
PA5	Harris Primary Free East Dulwich	Free		60	60	60
PA5	Judith Kerr Free School	Free		56	56	56
PA5	Dulwich Wood	Community		60	60	60
PA5	St Anthony's RC	VA	RC	60	60	60

### Appendix 8: Map of state-funded mainstream primary schools in Southwark



**Community primary schools**

- 1 Albion Primary School
- 2 Alfred Salter Primary School
- 3 Bellenden Primary School
- 4 Bessemer Grange Primary School
- 5 Brunswick Park Primary School
- 6 Camelot Primary School
- 7 Cobourg Primary School
- 8 Comber Grove Primary School
- 9 Crampton Primary School
- 10 Crawford Primary School
- 11 Dog Kennel Hill Primary School
- 12 Dulwich Wood Primary School
- 13 Goodrich Primary School
- 14 Grange Primary School
- 15 Heber Primary School
- 16 Hollydale Primary School
- 17 Ilderton Primary School
- 18 Ivydale Primary School
- 19 John Ruskin Primary School
- 20 Keyworth Primary School
- 21 Michael Faraday Primary School
- 22 Oliver Goldsmith Primary School
- 23 Phoenix Primary School
- 24 Pilgrim's Way Primary School
- 25 Riverside Primary School
- 26 Robert Browning Primary School
- 27 Rotherhithe Primary school
- 28 Rye Oak Primary School
- 29 Snowsfields Primary School
- 30 Southwark Park School
- 31 Tower Bridge Primary School
- 32 Townsend Primary School
- 33 Victory Primary School

**Academies**

- 34 Angel Oak Academy
- 35 ARK Globe Academy
- 36 Charles Dickens Primary School
- 37 Dulwich Hamlet Junior School
- 38 Goose Green Primary School

- 39 Harris Primary Academy, Peckham Park
- 40 John Donne Primary School
- 41 Lyndhurst Primary School
- 42 Redriff Primary
- 43 Surrey Square Primary School

**Voluntary aided schools**

- 44 Boucher Church of England Primary School
- 45 The Cathedral School of St Saviour and St Mary Overie
- 46 Dulwich Village C of E Infants' School
- 47 Peter Hills with St Mary's and St Paul's C of E Primary School
- 48 St George's C of E Primary School
- 49 St James' C of E Primary School
- 50 St John's and St Clement's C of E Primary School
- 51 St Jude's C of E Primary School
- 52 St Mary Magdalene C of E Primary School
- 53 St Paul's C of E Primary School
- 54 St Peter's Walworth C of E Primary School
- 55 English Martyrs' Catholic Primary School
- 56 Saint Joseph's Catholic Primary School, The Borough
- 57 St Anthony's Catholic Primary School
- 58 St Francesca Cabrini Primary School
- 59 St Francis Catholic Primary School
- 60 St George's Cathedral Catholic Primary School
- 61 St James the Great Catholic Primary School
- 62 St John's Catholic Primary School
- 63 St Joseph's Camberwell Catholic Schools' Federation (Infants)
- 64 St Joseph's Camberwell Catholic Schools' Federation (Juniors)
- 65 St Joseph's Catholic Primary School, George Row
- 66 St Joseph's Catholic Primary School, Gomm Road

**Foundation schools**

- 67 Charlotte Sharman Primary School
- 68 Friars Primary Foundation School

**Free schools**

- 69 Galleywall Primary City of London Academy
- 70 Harris Primary Academy East Dulwich
- 71 Harris Primary Free School Peckham
- 72 John Keats Primary School
- 73 Judith Kerr Free School
- 74 The Belham Primary School

## Appendix 9: Equalities Impact Needs Analysis



# *Equality and health analysis for the reduction of the numbers of primary schools in Southwark*

**May 2022**

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**Section 1: Equality analysis details**


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<b>Proposed decision to which this equality analysis relates</b>	Reduction in the number of Primary Schools in Southwark – School Closures				
<b>Equality analysis author</b>	Ric Euteneuer, Principal Strategy Officer ( <i>School Place Planning</i> )				
<b>Strategic Director:</b>	David Quirke-Thornton, Strategic Director of Children’s and Adults’ Services				
<b>Department</b>	Children’s & Adults	<b>Division</b>	Education		
<b>Period analysis undertaken</b>	May 2022				
<b>Date of review</b>	July 2022				
<b>Sign-off</b>		<b>Position</b>	Director of Education	<b>Date</b>	

**Section 2: Brief description of decision**


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**1.1 Brief description of decision**

The number of primary pupils in Southwark have been decreasing rapidly, in excess of our ability to reduce provision. All the indicators for the short to medium term are that primary rolls will continue to fall. Primary reception rolls began to fall in 2017/18, and continued to fall for another year, when Southwark took action and reduced 12 school PANs. This effectively only kept pace with the fall in rolls, and rolls overall began to fall in 2018. Southwark – in common with most other London Boroughs – now needs to remove primary-phase places as demand is lower. Throughout the process of making changes to reflect the future lower need for places, the Council will work in partnership with schools (including academy trusts) and Diocesan authorities, with our shared priority being to maintain educational quality, providing the right number of places in the right locations, and ensuring that the remaining schools can be financially sustainable. To do this, we need to establish a series of principles to judge schools by principles have been developed in partnership with leaders. This will be agreed and a level of provision agreed with stakeholders that is sustainable and fit for the future. Given the reduction in numbers, this will inevitably result in some school closures and mergers, and the level of these will be determined as a result of the consultation above.

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**Section 3: Overview of service users and key stakeholders consulted**


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2. Service users and stakeholders	
<b>Key users of the department or service</b>	School staff and Governors Children's & Adults' Services staff Parents of pupils at the school Council Members Dioceses Multi-Academy Trusts (MATs)
<b>Key stakeholders were/are involved in this policy/decision/business plan</b>	School staff and Governors Children's & Adults' Services staff Parents of pupils at the school Council Members Dioceses Multi-Academy Trusts (MATs)

School leaders in the authority area have been consulted with regarding the proposed consultation on the proposals for July 2022, as well as Southwark Councillors.

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#### 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.

<b>Age</b> - 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).																																									
<b>Potential impacts (positive and negative) of proposed decision</b>	<b>Potential health impacts (positive and negative)</b>																																								
<p>The proposals will operate irrespective of the age of the parent(s) and children. Children are admitted to year R in the year in which they become 5 years old for reception class and the school operate until children are 10 years old, The proposals would affect all children of a primary age and parents/carers irrespective of age.</p> <p>There are no expected differential effects for children or parents/carers based on age. Outside of this broad consideration, the proposals to close schools will not disproportionately affect particular age groups.</p>	There are no identified positive or negative health impacts related to age for this policy.																																								
<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>																																								
<p>The Schools Census 2021/22, as well as roll projections and existing school capacities show that there is potentially a projected increase of spare places at <u>reception</u> in Southwark in the long term, from a notional excess capacity of 17% in 2021-2022 to just below 22% in 2025/2026. Figures below show that there remains above the desired Audit Commission 5-10% level of spare capacity at reception, therefore allowing for an element of choice for applicants and not discriminating on the basis of age.</p> <p>Figures <i>in italics</i> are <u>projections</u>.</p> <table border="1"> <thead> <tr> <th><b>Year R</b></th> <th><b>Roll</b></th> <th><b>Cap</b></th> <th><b>Vac</b></th> <th><b>% Vacs</b></th> </tr> </thead> <tbody> <tr> <td>2020-2021</td> <td>2,985</td> <td>3,716</td> <td>+731</td> <td>+20%</td> </tr> <tr> <td>2021-2022</td> <td>2,929</td> <td>3,641</td> <td>+712</td> <td>+20%</td> </tr> <tr> <td>2022-2023</td> <td>2,657</td> <td>3,581</td> <td>+924</td> <td>+26%</td> </tr> <tr> <td>2023-2024</td> <td>2,974</td> <td>3,431</td> <td>+457</td> <td>+13%</td> </tr> <tr> <td>2024-2025</td> <td>2,921</td> <td>3,431</td> <td>+510</td> <td>+15%</td> </tr> <tr> <td>2025-2026</td> <td>2,852</td> <td>3,431</td> <td>+579</td> <td>+17%</td> </tr> <tr> <td>2026-2027</td> <td>2,796</td> <td>3,431</td> <td>+635</td> <td>+19%</td> </tr> </tbody> </table> <p>This does not (yet) include any reductions to capacity that have not already been agreed.</p>	<b>Year R</b>	<b>Roll</b>	<b>Cap</b>	<b>Vac</b>	<b>% Vacs</b>	2020-2021	2,985	3,716	+731	+20%	2021-2022	2,929	3,641	+712	+20%	2022-2023	2,657	3,581	+924	+26%	2023-2024	2,974	3,431	+457	+13%	2024-2025	2,921	3,431	+510	+15%	2025-2026	2,852	3,431	+579	+17%	2026-2027	2,796	3,431	+635	+19%	Not applicable
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For pupils of all primary school ages in Southwark, the figures show a similar pattern				
<b>All Year</b>	<b>Roll</b>	<b>Cap</b>	<b>Vac</b>	<b>% Vacs</b>
2020-2021	21,800	26,940	+5,140	+19%
2021-2022	21,290	26,610	+5,320	+20%
2022-2023	21,000	26,390	+5,390	+20%
2023-2024	20,700	25,890	+5,190	+20%
2024-2025	20,330	25,420	+5,090	+20%
2025-2026	19,970	24,940	+4,970	+20%
2026-2027	19,570	24,630	+5,060	+21%
Therefore the availability of reception and primary school places is scheduled to remain some way above the Audit Commission recommended limit of 10% for the next 5 or 6 years' time, which would imply that there would remain extensive choice for applicants, irrespective of (primary) school age, both locally and across the LA.				
In terms of alternative places for pupils currently attending Southwark schools, the <u>vacancies</u> at schools within Southwark for next year are shown above, in the third column. There is therefore room in the locality to accommodate all children affected by the proposals. On this basis, there appear to be no age related potential discriminatory potential for this policy or its effects on the school age population.				
<b>Mitigating actions to be taken</b>				
As there appear to be no age related potential discriminatory potential for this policy or its effects on the school age population, no mitigating actions are necessary				

<b>Disability</b> - 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.	
<b>Potential impacts (positive and negative) of proposed decision</b>	<b>Potential health impacts (positive and negative)</b>
<p>The proposal for closure will have no differential effect as regards the disability status of the pupils or parent(s). Every effort will be made to accommodate children with disabilities in the schools that they are allocated after the school closes. Indeed children with disabilities are prioritised - the Council's admissions policy states that, after Looked After Children (LACs) and siblings, children with exceptional medical, social or psychological needs, where it is agreed by the Local Authority and the Headteacher that these can best be addressed at a particular school are prioritised.</p> <p>If we are to regard SEN as a disability, then the school has around twice the national average of Children with a Pupils with an SEN Education, Health and Care Plan, as are children receiving SEN support.</p>	As stated opposite, children with disabilities are prioritised above pupils admitted on distance – the policy states that, after Looked After Children and siblings, children with exceptional medical, social or psychological needs, where it is agreed by the Local Authority and the Headteacher that these can best be addressed at a particular school.
<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>

<https://www.gov.uk/government/statistics/disability-prevalence-estimates-200203-to-201112-apr-to-mar>

The Office for Disability Issues has updated DWP estimates which show there are 11.6 million disabled people in Great Britain, of whom 5.7 million are adults of working age, 5.1 million are over state pension age and 0.8 million are children. 1.2 million residents of London were estimated to be disabled. Gives the latest disability prevalence within the UK. This was not broken down below sub regional geography, but this would equate to around 14.4% of the population, of whom 6.7% would be children of school age – or around 1,570 primary (4-11) aged children across the schools in Southwark. The numbers of children attending Townsend who are disabled are not recorded but it is expected they will follow the national prevalence within Southwark. In terms of SEN and children on EHCP Plans or with SEN support, local, regional and national figures are given below.

SEND status is recorded on the Annual Schools Census, available here

<https://www.gov.uk/government/statistics/schools-pupils-and-their-characteristics-january-2021>

Category	% Children with EHCP Southwark	% Children with EHCP London	% Children with EHCP England
Percentage	2.3%	2.9%	2.0%

Category	% Children with SEN Support Southwark	% Children with SEN Support London	% Children with SEN Support England
Percentage	14.8%	14.0%	12.6%

#### Mitigating actions to be taken

As there appear to be no disability related potential discriminatory potential for this policy or its effects on the school age population, no mitigating actions are necessary

**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)
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No impact on gender reassignment have been identified from the proposals. Gender reassignment of pupils, parents and carers will form no part of the proposals, nor any consequent actions, and children of primary age will not be undergoing gender reassignment

There are no identified positive or negative health impacts related to gender reassignment for this policy.

Equality information on which above analysis is based.	Health data on which above analysis is based
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When the GRA (Gender Recognition Act - giving birth certificate change, marriage, was passed by Parliament, related government literature at the time estimated 6,000 visible transsexual people in the UK.

These were people living fully in "opposite gender" role, pre and post-ops, who had come to statistical attention through applying for Passports in their changed status, or being referred to or having passed through gender clinics and the NHS. This was therefore estimated to be 0.01% of the population or around one in 10,000 people. This was not broken down by sub national geography, but, applying this

Not applicable

proportion to Southwark, this would equate to around 30 transgender residents in Southwark, across a range of ages.	
No negative impacts, with regard to this proposal have been identified	
<b>Mitigating actions to be taken</b>	
As no negative impacts, with regard to gender reassignment, have been identified, no mitigating actions are 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.)**

<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
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Marriage and civil partnership status would not be affected by the proposals, and would not disproportionately affect parents, carers, and staff of the school. Marital or civil partnership status do not form any part of the admission or recruitment process to the school, and someone's marital or civil partnership status would not affect the admission of a child to any other primary school in Southwark or other London Boroughs.	There are no identified positive or negative health impacts related to marriage or civil partnership for this policy.
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<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>
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<b>Mitigating actions to be taken</b>
As no negative impacts, with regard to marriage and civil partnership have been identified, no mitigating actions are 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	Potential health impacts (positive and negative)																
Pregnancy and maternity would not affect the parents, carers, as neither pregnancy nor maternity status form part of, or are disproportionately affected by the proposals. No negative or positive health or equality impacts have been identified																	
Equality information on which above analysis is based	Health data on which above analysis is based																
<p>Southwark's birth rate has declined in 2020, but the last comparative statistics published by ONS for London and England showed that Southwark has a lower level of births per 1000 women, and less births per woman than England and London overall.</p> <p>Southwark residents are having proportionately less children than in London or England. 2020 ONS birth figures are outlined below</p>	Not applicable																
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<p>* General Fertility Rate (GFR) number of live births per 1,000 women aged 15-44</p>																	
<p>** Total Fertility rate(TFR) number of live children that a group of women would bear if they experienced the age-specific fertility rates of the calendar year in question throughout their childbearing lifespan</p>																	
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<p>As no negative impacts, with regard to Pregnancy and Maternity have been identified, no mitigating actions are required</p>																	

<p><b>Race</b> - 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</p>	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>At a macro level the proposals will have no real disproportionate negative impact for pupils of any race at primary schools in the borough, nor for their ability to obtain a place for their children as an alternative. Reception and In Year Admissions are undertaken irrespective of the race or ethnicity status of the child or parent(s). We would expect the demography (by race) of the school population remaining after a closure programme to be broadly similar to the situation that existed prior to the closure programme.</p> <p>However, what the effects are on local school populations will depend on <i>which</i> schools are chosen for closure and the demography of those schools and the areas they are located.</p>	<p>There are no identified positive or negative health impacts related to race for this policy.</p>

<p>More detailed EIAs for individual proposals will be undertaken when the schools have been chosen and proposed for closure to ensure there are no differential effects on children from a BME background as a result of school closures, or that steps are taken to mitigate such effects.</p>																																																																
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Health data on which above analysis is based</b></p>																																																															
<p>Southwark has a considerably higher non-White population than England and London. The Southwark school population is more diverse than the population as a whole, as a number of BME families have arrived in the borough in recent years. Latest estimates from the GLA indicate that 51% of people living in Southwark have a white ethnic background compared to 84% nationally. A much larger proportion of our residents come from black and mixed ethnic backgrounds when compared to the rest of England.</p> <p>For Southwark primary schools, the white proportion of the population is <b>32%</b>, so the schools are much more diverse than the Southwark population. Detailed figures for all primary schools across Southwark in terms of ethnicity are shown below.</p>	<p>Not applicable</p>																																																															
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<p>The evidence shows that schools is more ethnically diverse than primary schools in Southwark, as a whole</p> <p>As the primary proportion of BME population considerably exceed their prevalence in the population, this would seem to indicate that there is</p>																																																																

no direct or indirect bias operating in terms of admissions to schools.	
<b>Mitigating actions to be taken</b>	
EQIAs for the closure of schools to be undertaken when the schools have been chosen and proposed for closure	

<b>Religion</b> - 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.	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
<p>Admission arrangements for community schools operate and admit children irrespective of the religion of the child or parent(s). In year admissions to community schools operate in the same way.</p> <p>For Voluntary Aided (VA) schools with religious admissions criteria, children meeting certain religious criteria are given priority in admissions. That said, where VA schools are operating with vacancies, they are not allowed to “reserve” these ongoing vacancies for children of faith, and children will be admitted regardless of faith to VA schools with vacancies, where a preference has been expressed. Indeed, some VA primary schools – primary Church of England Schools – reserve a number of “open places” for children of all religions or none.</p> <p>Whether there will be a differential effect on children attending schools with a religious background will depend very much on the schools chosen to close or merge. It is therefore recommended that, once these schools have been identified, a further EIA is undertaken to ascertain the potential effects of closure.</p>	There are no identified positive or negative health impacts related to race for this policy.
<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>
<p>No religious affiliation for schools or across Southwark is collected as part of the school census programme, so we have no record of religious observance in the borough at a school or borough level, outside the Census 2011. The latter stated that the Christian population of Southwark is 52.5%, with the under 15 population is 53.7%. This would seem to indicate that the religious diversity of children attending Schools in Southwark and the general population are similar and the impact is therefore likely to be minimal.</p> <p>The school population of the borough’s VA primary schools is around 24% of all pupils. However, it is recognised that not every Christian parent wants a religious education for their child. The high level of vacancies at VA primary schools (19%) would seem to indicate that there were sufficient places at religious school for children who required them. Whilst on the face of it, this would seem to indicate</p>	Not applicable

<p>a need for more religious based education in the borough, the same view is taken as for primary schools – that not every religious parent wants a Christian education for their child, and that new Christian schools would primarily be abstractive of existing school places rather than meeting an unmet need.</p> <p>An indication from the Census 2011 of the Religion of those aged 0 to 15 is given below</p> <p>Southwark (LBS), Inner London (IL), London (L), England (E).</p> <table border="1"> <thead> <tr> <th>Religion</th> <th>LBS</th> <th>IL</th> <th>L</th> <th>E</th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>53.7%</td> <td>42.0%</td> <td>43.6%</td> <td>50.5%</td> </tr> <tr> <td>Buddhist</td> <td>0.8%</td> <td>0.6%</td> <td>0.6%</td> <td>0.3%</td> </tr> <tr> <td>Hindu</td> <td>0.7%</td> <td>1.6%</td> <td>4.6%</td> <td>1.5%</td> </tr> <tr> <td>Jewish</td> <td>0.2%</td> <td>2.2%</td> <td>2.0%</td> <td>0.5%</td> </tr> <tr> <td>Muslim</td> <td>13.7%</td> <td>24.6%</td> <td>19.8%</td> <td>8.8%</td> </tr> <tr> <td>Sikh</td> <td>0.1%</td> <td>0.4%</td> <td>1.5%</td> <td>0.9%</td> </tr> <tr> <td>Other</td> <td>0.2%</td> <td>0.2%</td> <td>0.3%</td> <td>0.2%</td> </tr> <tr> <td>No religion</td> <td>20.2%</td> <td>16.7%</td> <td>18.2%</td> <td>29.5%</td> </tr> <tr> <td>not stated</td> <td>10.4%</td> <td>11.7%</td> <td>9.5%</td> <td>7.9%</td> </tr> </tbody> </table> <p>Southwark is more “Christian” than London, Inner London, and England as a whole, and less Muslim than London and Inner London (though above the English average. Figures for “No religion” are higher than London and inner London, but lower than the national average.</p>					Religion	LBS	IL	L	E	Christian	53.7%	42.0%	43.6%	50.5%	Buddhist	0.8%	0.6%	0.6%	0.3%	Hindu	0.7%	1.6%	4.6%	1.5%	Jewish	0.2%	2.2%	2.0%	0.5%	Muslim	13.7%	24.6%	19.8%	8.8%	Sikh	0.1%	0.4%	1.5%	0.9%	Other	0.2%	0.2%	0.3%	0.2%	No religion	20.2%	16.7%	18.2%	29.5%	not stated	10.4%	11.7%	9.5%	7.9%
Religion	LBS	IL	L	E																																																		
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<b>Mitigating actions to be taken</b>																																																						
A further EQIA – undertaken at the same time as the EQIA with regard to ethnicity – could be undertaken to ensure there are no differential effects on pupils of any religion or none if schools are proposed for closure.																																																						
<b>Sex - A man or a woman.</b>																																																						
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>			<b>Potential health impacts (positive and negative)</b>																																																			
As the gender split in primary schools at large in Southwark are almost equally split (51% boys, 49% girls), no negative consequences as to gender resulting from the proposals or subsequent reallocation of places if the school closes have been identified. All our primary school places are co-educational, like all other state-funded primaries in Southwark. Any system to reallocate allocate pupils to new schools should their own close would therefore have no impact on gender imbalance			There are no identified positive or negative health impacts related to gender for this policy.																																																			
<b>Equality information on which above analysis is based</b>			<b>Health data on which above analysis is based</b>																																																			
The proportion of boys and girls in primary schools are split 51% Boys: 49% Girls by gender (Source: Pupil Census January 2022),			Not applicable																																																			
<b>Year</b>	<b>R</b>	<b>1</b>	<b>2</b>	<b>3</b>																																																		
Boys	1,467	1,518	1,590	1,523																																																		
Girls	1,465	1,432	1,448	1490																																																		

Year	4	5	6	Total
Boys	1,540	1,587	1,621	10,846
Girls	1,529	1,520	1,585	10,469

This matches the prevalence in the local population (Source ONS Census 2011).

**Mitigating actions to be taken**

As no negative impacts, with regard to gender have been identified, no mitigating actions are required

<b>Sexual orientation</b> - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
The proposed admissions arrangements operate irrespective of the sexual orientation of the parent(s) or pupils	There are no identified positive or negative health impacts related to sexual orientation for this policy.
<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>
The Integrated Household Survey undertaken in 2010 revealed that almost three-quarters of a million UK adults say they are gay, lesbian or bisexual - equivalent to 1.5% of the population. This was not broken down by sub national geography, but applying this proportion to the number of residents in Southwark, this would equate to around 4,000 LGBTQ inhabitants in the borough. No negative impacts, with regard to sexual orientation, have been identified, and sexual orientation will not form any part of the allocation of places for children to go to if schools were to close	Not applicable
<b>Mitigating actions to be taken</b>	
As no negative impacts, with regard to religion have been identified, no mitigating actions are required	
<b>Socio-economic disadvantage</b> – 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.	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
The proposed closures should operate irrespective of the socio economic status of the parent(s) or pupils, and the proposals for closure will not consider socio economic factors in closing a school. Whilst socio-economic status forms no part of the proposals, nor subsequent reallocation of places, the socio economic <u>effects</u> of proposed closures should be checked to ensure that pupils and parents are not differentially affected by the proposed closure of one or more schools. The demographic and economic profile of the school and the surrounding area, and the schools that children will potentially be allocated would require scrutiny.	There are no identified positive or negative health impacts related to socio economic status for this policy.
<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>

<p>Southwark ranked as 41st most deprived borough out of the 326 local authorities in England. This is a relative improvement from previous rankings (26th in 2007 and 17th in 2004). Southwark has also moved up to being the 12th most deprived borough in London in 2010, from 6th in 2004 and 9th in 2001</p>	Not applicable
<p><b>Mitigating actions to be taken</b></p>	
<p>EQIAs for the closure of schools to be undertaken when the schools have been chosen and proposed for closure, undertaken at the same time as the Race/ethnicity and religious aspects.</p>	
<p><b>Human Rights</b> 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</p>	
<p><b>Potential impacts (positive and negative) of proposed decision</b></p>	
<p>The 16 rights are: Right to life, Freedom from torture and inhuman or degrading treatment; Right to liberty and security; Freedom from slavery and forced labour; Right to a fair trial; No punishment without law; Respect for your private and family life, home and correspondence; Freedom of thought, belief and religion; Freedom of expression; Freedom of assembly and association; Right to marry and start a family; Protection from discrimination in respect of these rights and freedoms; Right to peaceful enjoyment of your property; Right to education; and a Right to participate in free elections. The “right to an education” for children in the borough will not be affected by the proposals, given the number of vacancies that exist for pupils displaced by school closures to be reallocated</p>	
<p><b>Information on which above analysis is based</b></p>	
<p>The website below gives guidance to the 16 articles and individual details for each <a href="http://www.equalityhumanrights.com/your-rights/human-rights/what-are-human-rights/human-rights-act">http://www.equalityhumanrights.com/your-rights/human-rights/what-are-human-rights/human-rights-act</a></p>	
<p>No negative impacts with regard to human rights have been identified</p>	
<p><b>Mitigating actions to be taken</b></p>	
<p>As regards the admission arrangements - no negative impacts with regard to human rights, have been identified, so no mitigating actions are required</p>	

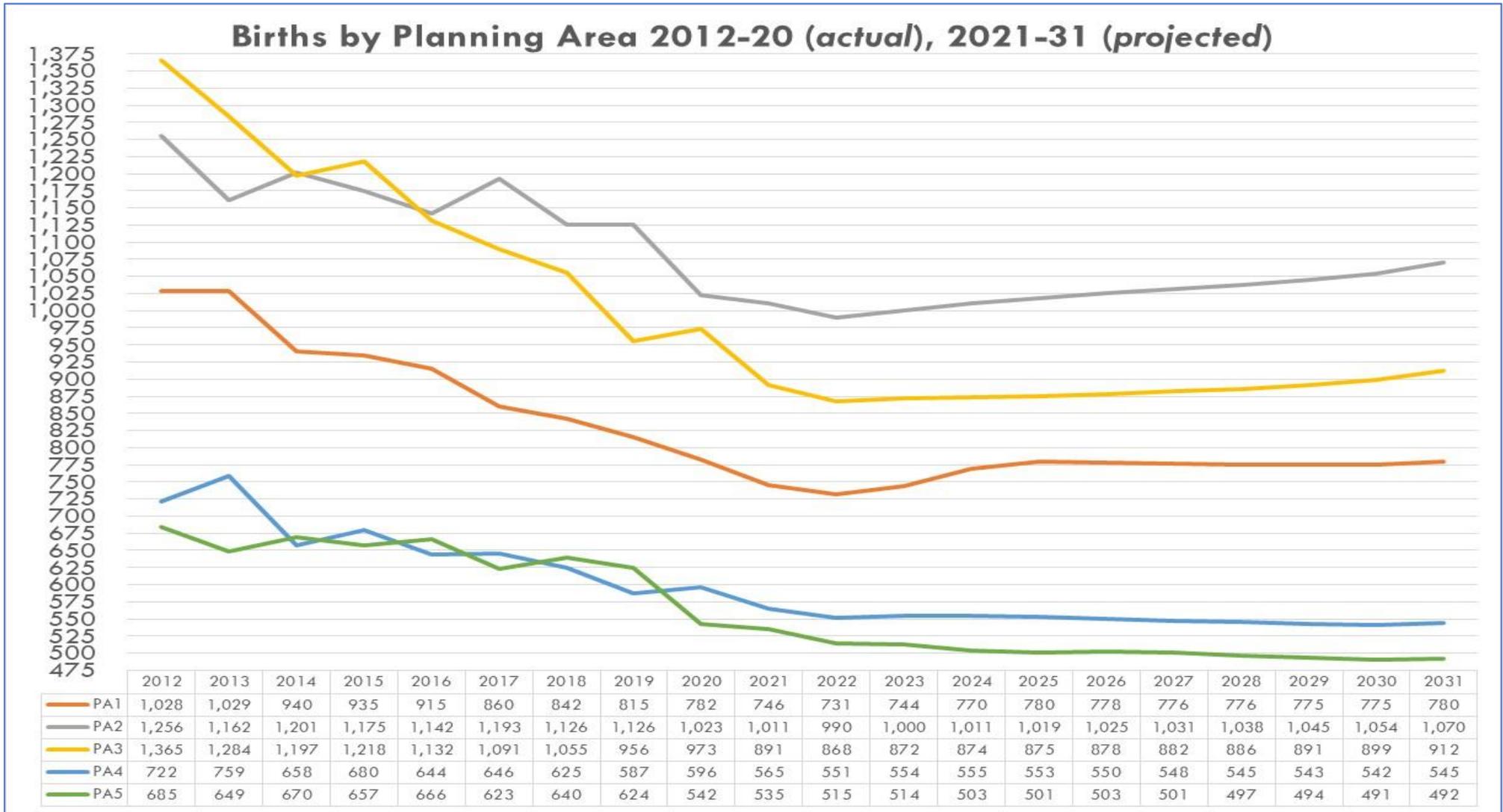
## Section 5: Further actions and objectives

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	Further EQIA work on specific closure proposals with regard to <i>i) Race</i> <i>ii) Religion</i> <i>iii) Socio-economic status</i>	EQIAs for the closure of schools to be undertaken when the schools have been chosen and proposed for closure	July 2022 to September 202

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.				
<b>No negative impacts of the arrangements have been identified, so no mitigating actions are required, and no equality objectives will derive from these specific proposals.</b>				
Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2
N/A	N/A	N/A	N/A	N/A

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.				
<b>No negative impacts of the arrangements have been identified, so no mitigating actions are required, and no health objectives will derive from these specific proposals.</b>				
Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2
N/A	N/A	N/A	N/A	N/A

## Appendix 10: Births by Planning Area



## Births from 2008 to 2021



	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Births	5008	4873	5131	5199	5056	4883	4666	4665	4499	4412	4288	4108	3557	3525

## Appendix 11: Schools by Ward

(New) Ward	Primary Schools	Secondary Schools
Borough & Bankside	Charles Dickens, St Joseph's Borough RC, Cathedral School CE, Friars	Haberbdashers' Aske's Borough
Camberwell Green	Comber Grove, Crawford, John Ruskin, Brunswick Park, St Joseph's Infants RC, St Joseph's Junior RC	Sacred Heart Roman Catholic Secondary, ARK All Saints
Champion Hill	Dog Kennel Hill, Bessemer Grange	The Charter School North Dulwich
Chaucer	ARK Globe Academy	St Saviour's & St Olave's CE
Dulwich Hill	St Anthony's RC, Goodrich	Harris Boys East Dulwich
Dulwich Village	Judith Kerr, Dulwich Hamlet Juniors, Dulwich Village Infants CE	No secondaries
Dulwich Wood	Dulwich Wood Primary	Kingsdale Foundation
Faraday	Michael Faraday, St Peters CE, Surrey Square	ARK Walworth, University Academy Engineering South Bank
Goose Green	Harris Primary Free East Dulwich, St John's & St Clements CE, Goose Green, Heber	Charter School East Dulwich
London Bridge & West Bermondsey	Grange, Snowfields, Tower Bridge	No secondaries
Newington	Crampton, Keyworth, St Paul's CE	No secondaries
North Bermondsey	Riverside, Southwark Park, St James CE, St Joseph's George Row	Compass School Southwark, St Michael's Catholic College
North Walworth	Robert Browning, Townsend, Victory, English Martyrs RC	No secondaries
Nunhead & Queen's Rd	Hollydale, John Donne	The St Thomas the Apostle RC
Old Kent Road	Cobourg, John Keats, Ilderton, Pilgrims Way, Phoenix, Camelot, St Francis RC	No secondaries
Peckham	Angel Oak, Harris Academy Peckham Park, St James The Great RC	No secondaries
Peckham Rye	Ivydale, St Francesca Cabrini RC	Harris Girls East Dulwich
Rotherhithe	Albion, Alfred Salter, Rotherhithe, St Joseph's RC	Bacon's College
Rye Lane	Harris Free Peckham, Bellenden, St Mary Magdalene CE, Rye Oak, The Belham School	Harris Peckham Academy
South Bermondsey	Boutcher CE, Galleywall	City of London Academy Southwark, Harris Bermondsey
St George's	St Georges Cathedral RC, St Jude's CE,	Notre Dame RC

(New) Ward	Primary Schools	Secondary Schools
	Charlotte Sharman	
St Giles	Lyndhurst, Oliver Goldsmith, St George's CE	No secondaries
Surrey Docks	Peter Hills CE, Redriff, St Johns RC	No secondaries





# SOUTHWARK AIR QUALITY ACTION PLAN

2023 – 2027

Draft for GLA's comments

If you have any comments on this AQAP please send them to Southwark Environmental Protection at:

Environmental Protection Team,  
Regulatory Services,  
Environment & Leisure,  
3<sup>rd</sup> Floor Hub 1, 160 Tooley Street  
London. SE1 2QH  
Telephone: - 020 7525 3551  
Email: - [environmental.protection@southwark.gov.uk](mailto:environmental.protection@southwark.gov.uk)

# SUMMARY

This Air Quality Action Plan (AQAP) has been produced as part of our duty under London Local Air Quality Management. It outlines the action we will take to improve air quality in Southwark between 2023 and 2027.

This action plan replaces the previous action plan which ran from 2017 to 2022. Successful projects delivered through the last action plan include:

- Expansion of Southwark’s Air Quality Monitoring Network.
- Reduced the council’s pension investment in fossil fuels.
- Production of Air Quality Planning Technical guidance document.
- Improved cycling and walking provisions in the Borough.
- Introduction of Low Transport Neighbourhoods in the Borough.
- Introduction of electric pool vehicles.
- Production of an Air Quality Joint Strategy Needs Assessment.
- The Southwark fleet procurement policy worked on the following hierarchy: - is the vehicle necessary, if so, the vehicle should be electrically powered. If an electric option is not available, the vehicle should be petrol fuelled. Diesel is only permitted when it is the only viable option.
- 2 Primary Schools and 3 nurseries in the Borough received a Mayor’s Air Quality audit.
- Produced Air Quality / Health Information Sheets
- Completed or taking part in the following Mayor’s Air Quality Fund projects, details can be found on [Southwark’s website](#).
  - Cleaner Air for Schools Projects Phase 1 and 2
  - Anti – idling project at Tower Bridge
  - Anti – idling project: ‘Idling Action London’ in conjunction London Borough of Camden / City of London
  - Air quality issues awareness raising
  - Construction site dust suppressant trial
  - Trial of Nitrogen Dioxide reducing reactive surface coatings on new developments.
  - Regulation of construction site Non-Road Mobile Machinery in conjunction with London Borough of Merton
- Emission based vehicle parking charges for on street parking and permits.
- Worked with TfL to reduce emissions from Rotherhithe Tunnel.
- GLA Air Quality Focus Area air quality projects.

Air pollution causes adverse health impacts, and contributes to the onset of respiratory, heart disease and cancer. Air pollution particularly affects the most vulnerable in society: children and older people,

and those with heart and lung conditions. Air quality is an equalities issue, because areas with poor air quality are often also the less affluent areas.<sup>1 2</sup>

[Southwark's Air Quality Joint Strategy Needs Assessment](#) (JSNA) on page 28 and 29 shows the GLA Air Quality Focus Areas in relationship to the number of children (0 – 15 years), number of older people aged 65+ and the percentage of deprived communities and ethnic minority. Higher percentages of deprived communities and ethnic minority are in, or adjacent to, air quality focus areas.

The annual health costs to society of the impacts of air pollution in the UK is estimated to be roughly £15 billion<sup>3</sup>. Southwark is committed to reducing the exposure to poor air quality of its residents and visitors, to improve health.

We have developed actions under seven broad topics:

- **Monitoring and other core statutory duties:** Southwark has expanded its continuous monitoring network to six sites. This improves information about changes in air quality over time. The new equipment allows the Council to monitor more of the pollutants in the air. The Council has made the information publicly available.
- **Emissions from developments and buildings:** emissions from buildings account for about 21% of the NO<sub>x</sub> emissions across London, so are an important source of NO<sub>2</sub>. Southwark seeks to reduce emissions from fuel combustion. This aim aligns with the Southwark Carbon strategy.
- **Public health and awareness raising:** Increasing awareness can drive behavioural change that lowers emissions, and informs the public how to reduce their exposure to air pollution;
- **Delivery servicing and freight:** Goods and service vehicles are usually diesel powered and have high NO<sub>2</sub> emissions. Low emission logistics requires alternatively fuelled vehicles to combat air pollution from this source;
- **Borough fleet actions:** Southwark's fleet includes light and heavy duty diesel-fuelled vehicles such as mini buses and refuse collection vehicles with high primary NO<sub>2</sub> emissions. Southwark can review its own fleet procurement to lead by example;
- **Localised solutions:** Supporting neighbourhoods to introduce information or undertake actions to improve air quality;
- **Cleaner transport:** Motor vehicles are the largest source of air pollution in London. There is a need to incentivise a modal shift to walking, cycling and ultra-low emission vehicles (such as electric).

<sup>1</sup> Environmental equity, air quality, socioeconomic status and respiratory health, 2010.

<sup>2</sup> Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006.

<sup>3</sup> Defra. Air Pollution: Action in a Changing Climate, March 2010

## Southwark's themes & priorities

- 1 **Monitoring and other core statutory duties:** evaluating air quality monitoring throughout Southwark to enhance compliance with our core statutory objectives;
- 2 **Emissions from development and buildings:** emissions from construction alone accounts for approximately 40% of the PM<sub>10</sub> emissions across Southwark, and therefore work in this area is important in reducing particulate concentrations. This will focus on air quality mitigation through the planning system and aligns with the Council's sustainability objectives;
- 3 **Public health and awareness raising:** increasing awareness can drive behavioural change to lower emissions as well as reducing exposure to air pollution. For example, increasing awareness of the impact of solid fuel burning can help shift attitudes and facilitate overall behaviour change;
- 4 **Delivery servicing and freight:** re-evaluating delivery servicing and freight vehicles, as these are usually heavy-duty diesel-fuelled vehicles with high primary NO<sub>2</sub> emissions;
- 5 **Borough fleet:** Southwark's fleet includes a mixture of light and specialist heavy-duty vehicles, we will continue to lead by example by making improvements in our own fleet by being tailpipe emission free by 2030, (subject to operational requirements)
- 6 **Localised solutions:** these seek to improve the environment of neighbourhoods through a combination of measures such as Streetspace Measures, traffic filtering, parking schemes, biodiversity and climate change projects;
- 7 **Cleaner transport:** road transport is the main source of air pollution in London and Southwark. We will continue to reduce vehicle mileage by incentivising and facilitating changes to walking, cycling, public transport and ultra-low emission vehicles (such as electric);
- 8 **Schools and communities:** implementing initiatives that target susceptible groups to ensure those most at risk are not disproportionately affected by the impacts of poor air quality, and implement recommendations of Southwark's School Air Quality Audits;
- 9 **Lobbying:** Southwark will continue to lobby and influence regional and national organisations and stakeholders on policies and issues beyond Southwark's influence to introduce progressive measures aimed at improving air quality.

## Our 10 key priorities are:-

1. Adopt the 2005 WHO guidelines for PM<sub>2.5</sub> with a target of compliance by 2030, and review the emerging policies from the GLA in respect of the 2021 WHO guidelines.
2. Enforce Non-Road Mobile Machinery (NRMM) air quality policies in Southwark.
3. Minimise emissions from construction by developing Southwark's own Air Quality section within an Environmental Supplementary Planning Document (SPD) and code of construction practice which goes above and beyond the GLA Supplementary Planning Guidance (SPG).
4. Continue to raise awareness and encourage behaviour changes through air quality campaigns.
5. Assess potential impact of installing Ultra-Low Emission Vehicle (ULEV) infrastructure (electric vehicle charging points, rapid electric vehicle charging points).
6. Provision additional electric vehicle charging infrastructure by installing a further 1000 Electric Vehicle charging points in Southwark by 2026.
7. Assess the air quality benefits of actions in the Borough's Strategies.
8. Provide new cycling and walking infrastructure and assess air quality impacts of new infrastructure.
9. Encourage people to switch to less polluting cars, with lower parking fees for zero emissions and smaller vehicles across the whole borough.
10. Lobby Central Government to control and reduce emissions that are out of Southwark's control.

This action plan sets out how we will effectively deliver against the above broad themes and key priorities, thereby improving air quality where it is within our control and through leading by example. However, these are local measures aimed at tackling air pollution, and air pollution by its very nature is transboundary.

Engagement with stakeholders and communities can make a difference to air quality in the borough. We would like to thank everyone who worked with us in the past, and we look forward to working with you again, and with new partners as we deliver this new action plan over the next five years.

This AQAP outlines how we plan to use local levers under our control to greatest effect in tackling air quality.

There are many air quality policy areas outside our influence (such as Euro standards, national vehicle taxation policy, taxis and buses), and we will continue to work with and lobby regional and central government on policies and issues beyond Southwark's direct control.

## RESPONSIBILITIES AND COMMITMENT

This AQAP was prepared by the Environmental Protection Team of Southwark Council with the support and agreement of Officers from the following teams and departments:-

- Environmental Protection
- Public Health
- Planning Policy
- Sustainable Services
- Highways Policy
- Climate Change
- External Affairs
- Legal Services
- Public Realm
- Parks
- Ecology & Trees
- Development Control
- Children's Services & Educational Development
- Housing Services & Housing Energy
- Fleet Management
- Information Technology
- Communications
- Procurement

This Air Quality Action Plan has been ratified by Southwark's Cabinet, endorsed by the Cabinet Member for Transport, Parks and Sport, and approved by the Head of Public Health, and Head of Highways.

This AQAP will be subject to an annual review, appraisal of progress and reporting to the Cabinet Member for Leisure, Environment & Roads, and to the Health & Wellbeing Board. Progress each year will be reported in an Annual Status Report produced by Southwark, as part of our statutory London Local Air Quality Management duties.

# CONTENTS

SUMMARY .....	3
CONTENTS.....	8
FORWARD.....	11
1 - INTRODUCTION.....	13
2 - SOUTHWARK AIR QUALITY PRIORITIES.....	33
3 - DEVELOPMENT AND IMPLEMENTATION OF SOUTHWARK'S AIR QUALITY ACTION PLAN .....	35
4 – AIR QUALITY ACTION PLAN .....	37
APPENDIX A - REASONS FOR NOT PURSUING ACTION PLAN MEASURES.....	63

## Table of Figures

Figure 1 Modelled map of annual mean NO <sub>2</sub> concentrations (from the LAEI 2019).....	14
Figure 2 Modelled map of annual mean PM <sub>10</sub> (from the LAEI 2019) .....	15
Figure 3 Modelled map of annual mean PM <sub>2.5</sub> (from the LAEI 2019).....	16
Figure 4 Map of Southwark’s AQMA Boundary .....	18
Figure 5 Air Quality Focus Areas in Southwark .....	19
Figure 6 Tower Bridge Primary School green wall on Tower Bridge Road boundary .....	21
Figure 7 Walworth Low Emission Neighbourhood publicity material.....	22
Figure 8 NO <sub>x</sub> Emissions by source (from the LAEI 2019) .....	23
Figure 9 PM <sub>10</sub> Emissions by source (from the LAEI 2019).....	25
Figure 10. PM <sub>2.5</sub> Emissions by source (from the LAEI 2019).....	27
Figure 11. Map of the Southwark’s automatic continuous air quality monitoring stations .....	30
Figure 12. Southwark’s Nitrogen Dioxide diffusion tube survey 2021 .....	31
Figure 13Trend in annual mean NO <sub>2</sub> concentrations at Southwark’s air quality monitoring stations .. .....	32
Figure 14 .Trend in annual mean PM <sub>10</sub> concentrations at Southwark’s air quality monitoring stations .....	32

## Index of Tables

Table A	GLA Air Quality Focus Areas in Southwark .....	19
Table B	NO <sub>x</sub> Aggregated Emissions in Southwark for 2013-2019 (LAEI 2019).....	24
Table C	PM <sub>10</sub> Aggregated Emissions in Southwark for 2013 – 2019 (LAEI 2019) .....	26
Table D	PM <sub>2.5</sub> Aggregated Emissions in Southwark for 2013 – 2019 (LAEI 2019) .....	28
Table E	Southwark automatic continuous monitoring stations .....	29
Table F	Consultation Undertaken .....	35
Action Table 1	Monitoring and Core Statutory Duties Air Quality Action Plan.....	39
Action Table 2	Emissions from developments and buildings air quality action plan .....	42
Action Table 3	Public health and awareness raising air quality action .....	48
Action Table 4	Delivery servicing and freight air quality action plan.....	53
Action Table 5	Borough fleet actions air quality action plan .....	56
Action Table 6	Localised solutions air quality action plan .....	57
Action Table 7	Cleaner transport air quality action plan .....	59
Table G	Action Plan Measures Not Pursued and the Reasons for that Decision – <i>to be discussed with the GLA prior to finalisation</i> .....	63

# FORWARD

Southwark has been tackling the impact of poor air quality on human health for over 20 years, undertaking the first detailed assessment of local air quality in 2002.

Actions have been taken since this time that have resulted in improved air quality however there is still more to do as we learn about the harms of poor air quality. Air pollution has been listed as a cause of death by a coroner's inquest for the first time, emphasising the need to take urgent action to improve the air that we all breathe.

Air Quality is a public health priority for Southwark and actions to improve air quality are listed in the current and proposed council plan, climate change strategy and we will work to ensure it is recognised in all other Council strategies or plans. We encourage everyone to consider air quality in the choices they make and everything they do.

I am very pleased to promote the many air quality improvement projects Southwark have undertaken in the past, with the recognition that there is much more for us to do.

Major previous successes have included:

- Introducing School Streets at 23 schools to help improve the environment outside schools.
- We have undertaken air quality audits at 24 schools which has helped to identify action that can be taken in and around this sensitive environment.
- We have increased our monitoring of air quality by adding an extra 4 continuous air quality monitoring stations to provide a more detailed picture of air quality in Southwark.
- As new council fleet vehicles are procured emission considerations are at the forefront in the selection process for new council vehicles.

I am looking forward to seeing the completion of projects identified in this Air Quality Plan in particular the review and relaunch of airTEXT, a communication tool that is much needed to inform residents and visitors of the current air quality status in their area.

With the recent review undertaken by the World Health Organisation that resulted in a significant tightening of the guideline values there is a need to constantly strive to reduce air pollution to improve health outcomes.

This revised Air Quality Action Plan lists 65 actions that Southwark will undertake under the London Local Air Quality Management Framework. It gives clear actions and anticipated targets for delivery. These actions will be the minimum that Southwark will deliver.

We expect that new technology, new ideas, new partnerships and new funding opportunities will present themselves and we will consider how these can be applied for the benefit of Southwark residents as they appear.

Southwark fully supports the Mayor of London's aims for the improvement of air quality in London and we will be reporting annually to the Mayor on our progress with regard to the actions listed in this action plan and on the extra actions we take.

# 1 - INTRODUCTION

This plan outlines the actions that Southwark will deliver between 2022 and 2027 to reduce concentrations of air pollution, and exposure to air pollution; to affect positively the health and quality of life of residents and visitors to the borough.

It has been developed in recognition of the legal requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the London Local Air Quality Management statutory process<sup>4</sup>.

## 1.1 Summary of current air quality in Southwark

The 2019 UK Clean Air Strategy, provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the Government to protect human health. The Strategy objectives take into account limit values set under EU Directives. Member states are legally required to achieve by their target dates, and on leaving the EU, the UK has incorporated this requirement into national law.

Reviewing Southwark's monitoring data over the last few years show that Southwark is meeting all of the national objectives other than for Nitrogen Dioxide (NO<sub>2</sub>). The monitoring data in 2020 has been influenced by the reduced in traffic flows in response to the COVID-19 lockdowns. The 2016 London Atmospheric Emission Inventory concentration maps show that there are areas in Southwark that exceed the legal objectives.

For PM<sub>2.5</sub> the legal objective is far higher than the World Health Organisation (WHO) recommended guideline limit. For this reason, the Mayor's London Environment Strategy commits to meeting the 2005 WHO health-based guideline limits across London by 2030. Current air quality data indicates that Southwark is exceeding World Health Organisation guideline PM<sub>2.5</sub> limits. Developing measures to reduce PM<sub>2.5</sub> will be important to help the Mayor achieve this 2030 target.

Particular Matter (PM) is the term for a mixture of solid particles and liquid droplets found in the air. Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye. Others are so small they can only be detected using an electron microscope.

Particle pollution includes:

- **PM<sub>10</sub>** : inhalable particles, with diameters 10 micrometres and smaller; and
- **PM<sub>2.5</sub>**: fine inhalable particles, with diameters 2.5 micrometres and smaller. By comparison, the diameter of a single hair is about 70 micrometres – making it about 30 times larger than the largest fine particle.

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<sup>4</sup> LLAQM Policy and Technical Guidance. <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs>

# London Borough of Southwark Annual Mean NO<sub>2</sub> concentrations 2019

LAEI 2019

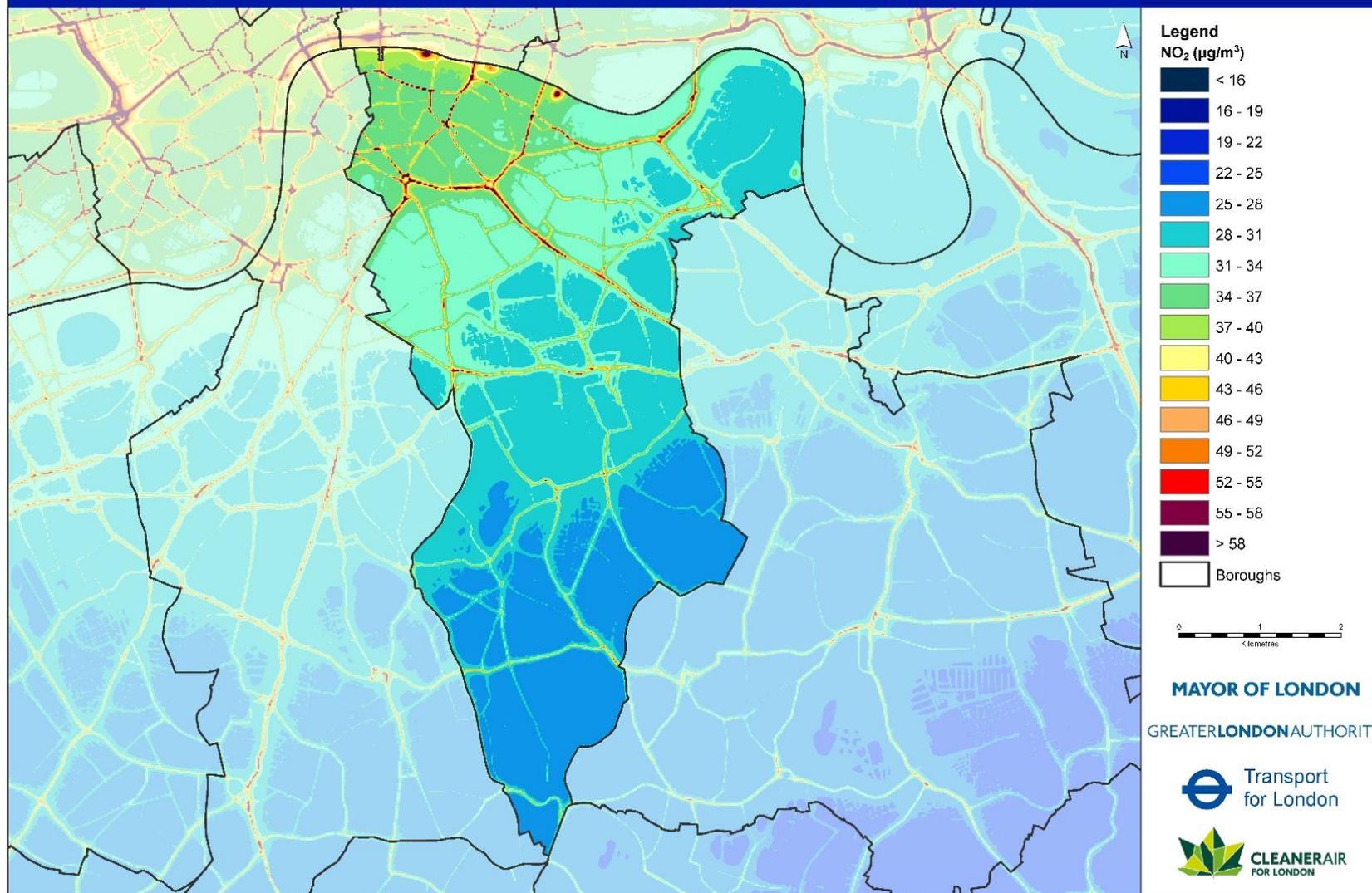


Figure 1 Modelled map of annual mean NO<sub>2</sub> concentrations (from the LAEI 2019)

London Borough of Southwark  
Annual Mean PM<sub>10</sub> concentrations 2019

LAEI 2019

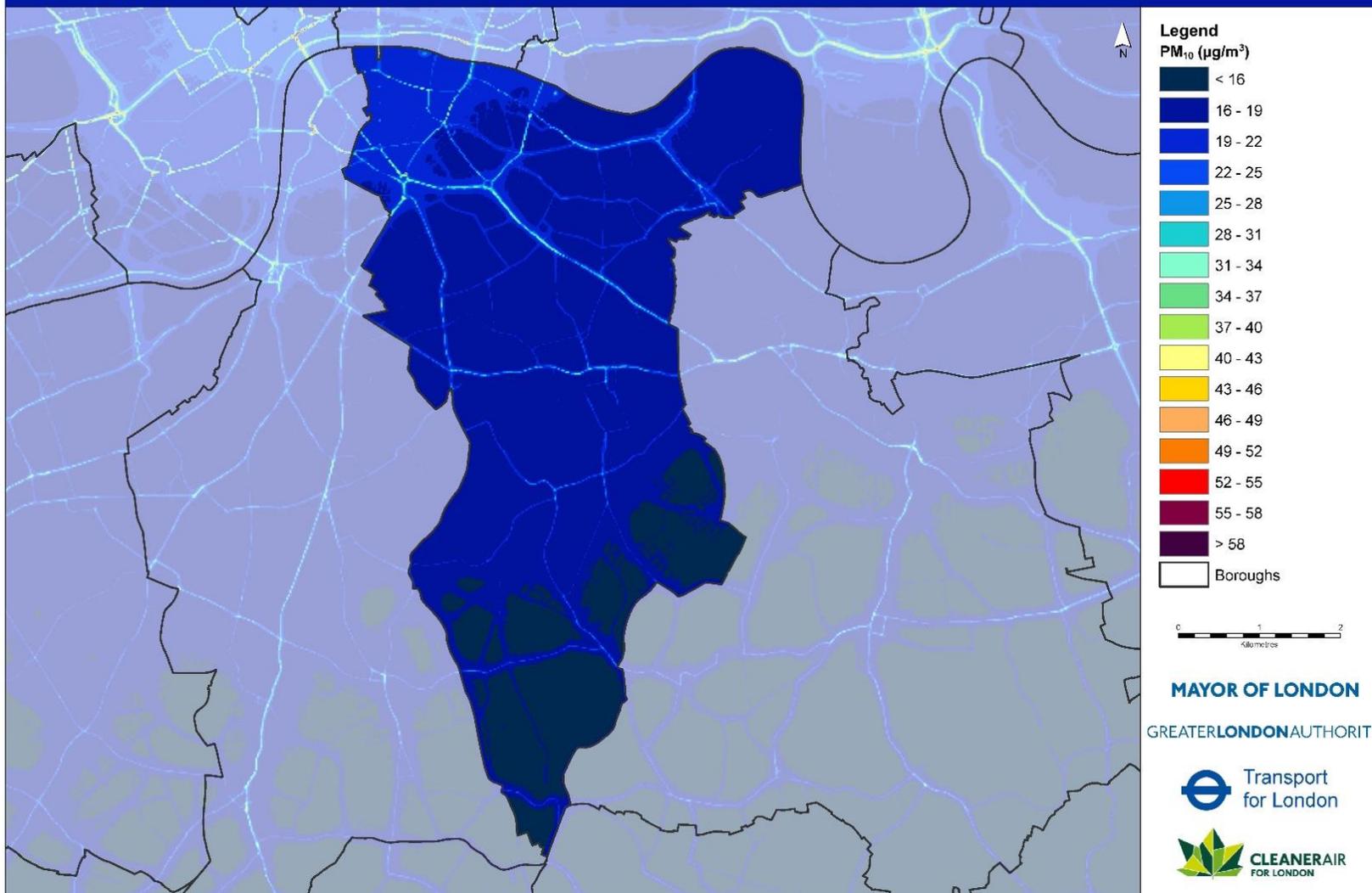


Figure 2 Modelled map of annual mean PM<sub>10</sub> (from the LAEI 2019)

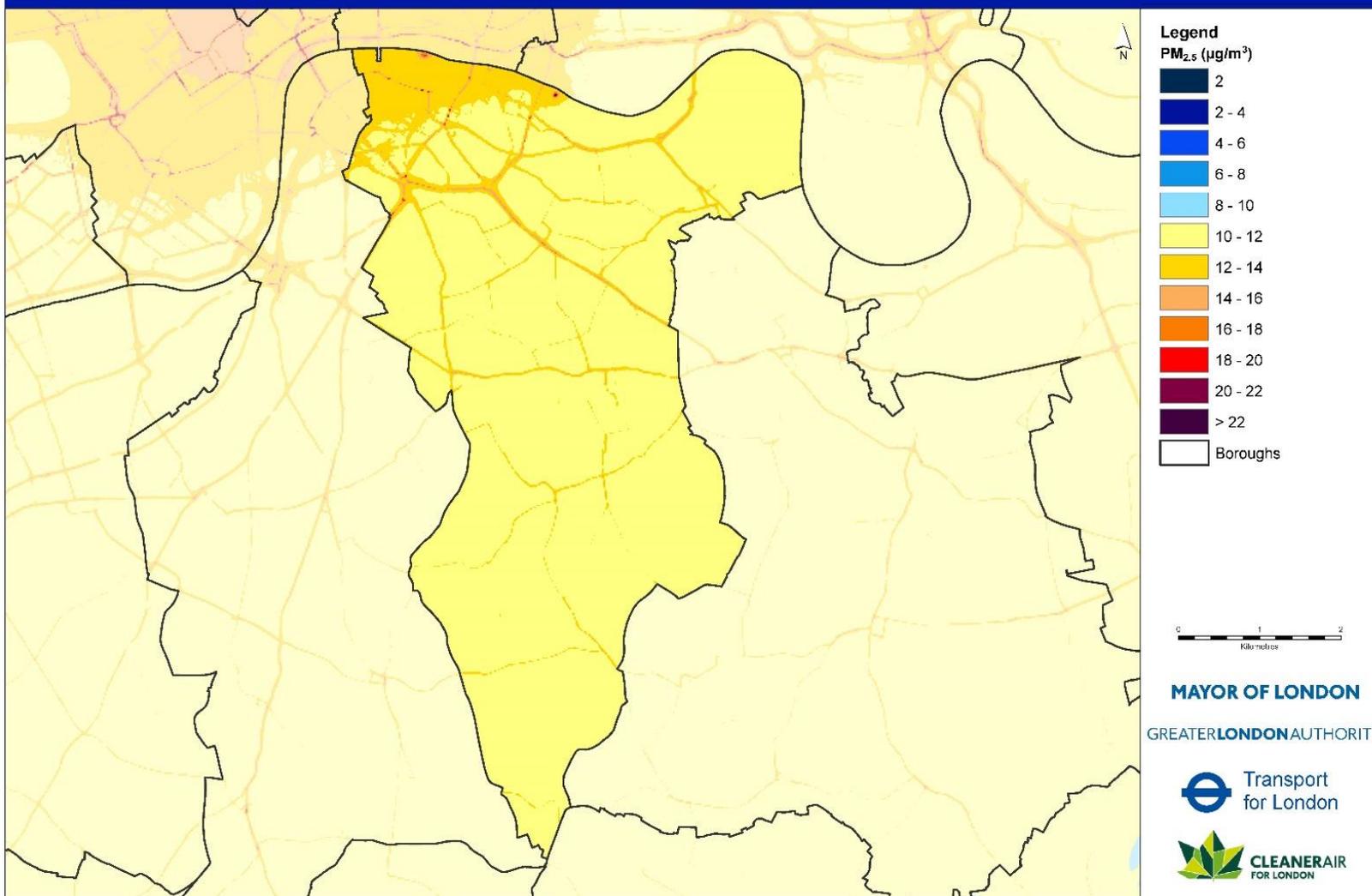


Figure 3 Modelled map of annual mean PM<sub>2.5</sub> (from the LAEI 2019)

The GLA have released an updated London Atmospheric Emission Inventory in December 2021 (LAEI 2021).

Figure 1 to Figure 3 above show the concentrations of Nitrogen Dioxide and Particulate Matter (PM<sub>10</sub> & PM<sub>2.5</sub>) for Southwark. These maps are based on the data from the London Atmospheric Emission Inventory for 2019 published in 2022.

In 2016, the Greater London Authority (GLA) calculated that 62% of Southwark's population was living in areas that exceeded the Nitrogen Dioxide annual mean concentration objective of 40µg.m<sup>-3</sup>, this has reduced to 2.4% for the 2019 projections. The Population Weighted Average Concentration for PM<sub>2.5</sub> in 2016 was 14.0µg.m<sup>-3</sup>, in 2019, the Population Weighted Average Concentration for PM<sub>2.5</sub> was calculated at 11.4µg.m<sup>-3</sup>.

In 2016 the highest concentrations in Southwark for PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>2</sub> were along main roads which are mostly TfL roads, and in the north-west (central London) of Southwark, where the road network is most dense.

World Health Organisation (WHO) recommends maximum levels that are lower than UK legal levels. The PM<sub>2.5</sub> WHO Air Quality Guideline 2021 air quality guideline (AQG) level has been reduced from 10µg.m<sup>-3</sup> to 5µg.m<sup>-3</sup>.

The concentrations for PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>2</sub> identified in the London Atmospheric Emission Inventory 2019 London wide maps exceed the revised WHO annual mean air quality guidelines throughout the Borough. Southwark Council will explore what additional measures can help meet the revised air quality guidelines for the interim targets. The stricter WHO Air Quality guideline values may not be achievable.

## 1.2 Air Quality Management Areas

An Air Quality Management Area (AQMA) was declared in Southwark in 2003.

The AQMA was declared for:-

**Nitrogen Dioxide.** Southwark was failing at the time of the declaration of the Air quality management area to meet EU annual average limit for this pollutant at some of our monitoring stations, and modelling indicates failure also at a number of other locations, and

**Particulate Matter (PM<sub>10</sub>).** Although we are meeting EU Limits we exceed the WHO air quality guideline for this pollutant, and we have a formal responsibility to work towards reductions of PM<sub>2.5</sub>, which is a fraction of PM<sub>10</sub>.

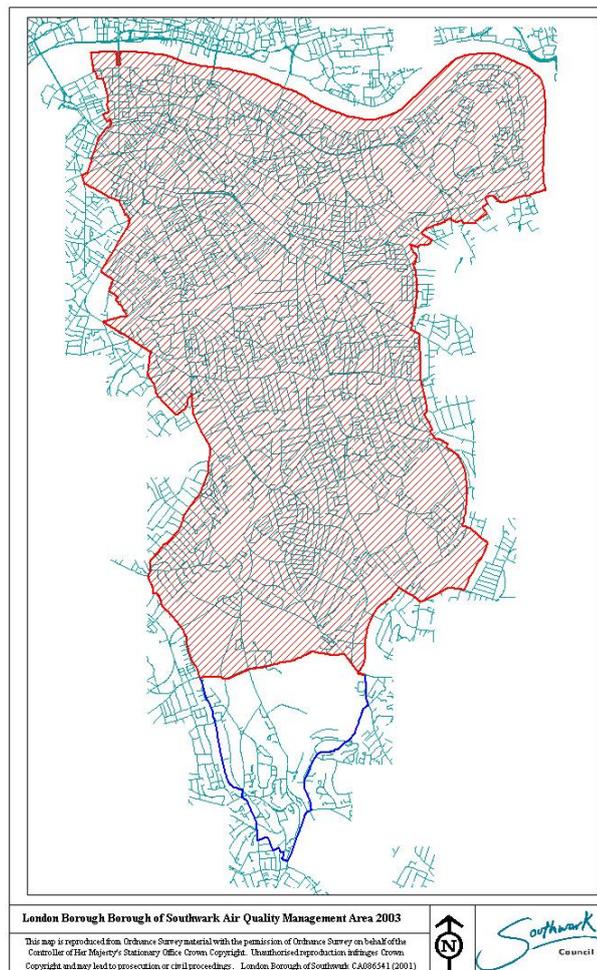
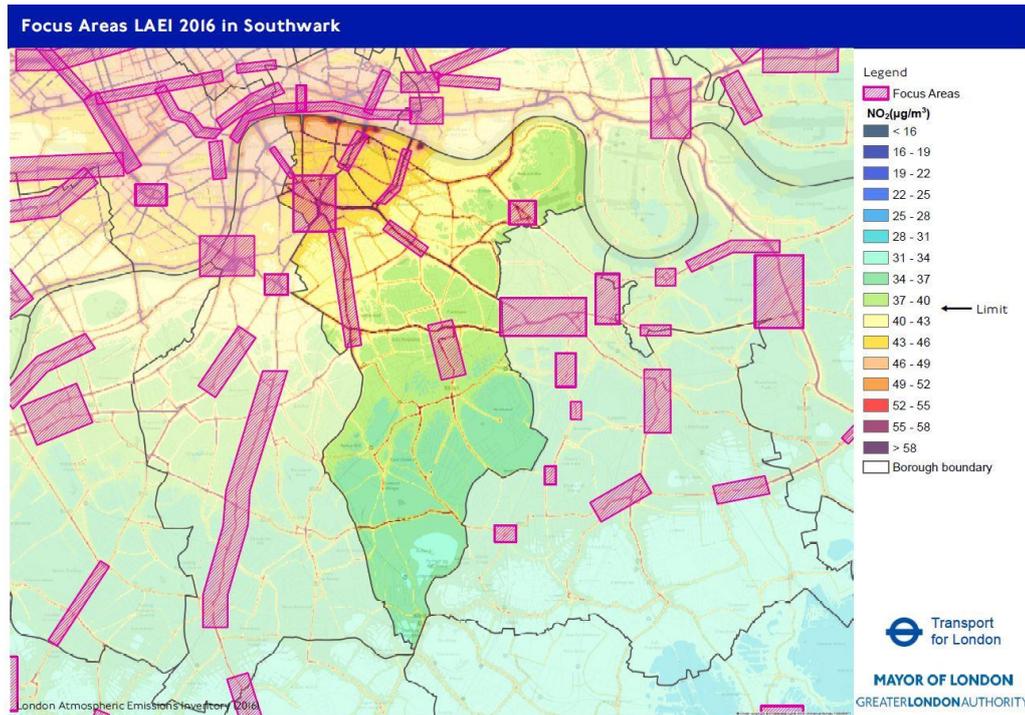


Figure 4 Map of Southwark's AQMA Boundary

### 1.3 Focus Areas

Air Quality Focus Areas (AQFA) are areas where high levels of pollution are combined with high levels of human exposure. There are seven AQFA in the borough. Revised AQFAs are due to be released by the GLA in autumn 2022. The only change in Southwark is expected to be a reduction in the size of area 152 at Elephant and Castle.



**Figure 5 Air Quality Focus Areas in Southwark**

These are listed in Table 1 below

GLA Focus Area ID	Name of Focus Area Description
151	A2 Old Kent Road from East Street to Trafalgar Avenue
152	Elephant and Castle to St George's Circus and Kennington Lane
153	London Bridge at Borough High Street
154	Lower Road / A200 Surrey Quays / Rotherhithe Old Road / Rotherhithe New Road
155	Peckham Town Centre
156	Tower Bridge Road A100
157	Walworth Road/Camberwell Road/Camberwell Green

**Table A GLA Air Quality Focus Areas in Southwark**

### 1.3.1 Old Kent Road

The Old Kent Road is an Opportunity Area, and will be redeveloped over the next decade, including a proposal to extend the Bakerloo Line to Lewisham from the Elephant and Castle under the Old Kent Road. As part of the planning area action plan work, Southwark has commissioned CERC to produce an air quality model for the opportunity area, to ensure that air quality improvements are incorporated in the various redevelopment projects. Southwark is taking part in the [CRP Clean Air Villages 4 project](#) - Freight Solutions for a Clean Air business recovery from COVID-19 in the Old Kent Road area.

### 1.3.2 Elephant & Castle

In Elephant & Castle AQFA a London Mayor's Air Quality Fund project included a dust suppressant trial on a construction site, to reduce the dust burden to neighbouring residential areas. A separate trial in this AQFA tested Nitrogen Dioxide reducing reactive surface coatings on new developments. The reports from these two trials can be found [here](#)

Transport for London have also remodelled the north and south roundabouts in this area to assist the movement of vehicles and bicycles throughout the junction.

<https://www.southwark.gov.uk/environment/air-quality/what-we-re-doing/air-quality-projects>

### 1.3.3 London Bridge / Borough High Street

A Business Low Emission Neighbourhood initiated by the GLA was set up in 2018 in this AQFA, as a partnership between Better Bankside Business Improvement District and Team London Bridge Business Improvement District. Some of the project benefits delivered by the BIDS can be found by following the links below:-

[Tooley Street Triangle](#)  
[Orchard-Lisle Living Wall](#)  
[Better Air Letters](#)

As a continuation of the Business Low Emission Neighbourhood, both BIDS have delivered the [Bikes for Business project](#) centred on the Low Line, which spans several Business Improvement Districts, and Walworth Road.

### 1.3.4 Lower Road

Past studies in the Canada Water / Lower Road area have considered removing the 1970's Lower Road / Rotherhithe New Road gyratory system. The latest project will introduce a segregated cycle lane and also a bus gate adjacent to Surrey Quays Station on Lower Road and the Lower Road and Rotherhithe New Road to change the one-way system to two-way traffic. Southwark will continue to monitor air quality in the area.

### 1.3.5 Peckham

As part of the London Streetscape / COVID-19 project, to help social distancing and improve the environment for walking and cycling, Rye Lane was closed to all vehicles between Peckham Rye and Hanover Place, from July 2020. From the 4<sup>th</sup> October 2021, an experimental traffic order allows buses, taxis and cyclists to use Rye Lane, and allows timed deliveries between 07:00 hours and 10:00 hours. Southwark will continue air quality monitoring on Rye Lane.

### 1.3.6 Tower Bridge

Southwark carried out a Mayor's Air Quality Fund project at Tower Bridge. The project aimed to reduce the number of idling vehicles during Tower Bridge lifts, by requesting drivers to switch off their engines as they will be stationary for a period of time. The details of the project can be found [here](#).

The Tower Bridge Primary School has installed an ivy wall on the boundary wall adjacent to Tower Bridge Road. The funding for the wall was part of Southwark's Clean, Greener and Safer Grant scheme. This wall acts as a barrier to reduce the air pollution from Tower Bridge Road effecting the school playground.



Figure 6 Tower Bridge Primary School green wall on Tower Bridge Road boundary

### 1.3.7 Walworth Road

Southwark successfully applied for Low Emission Neighbourhood Air quality Fund Grant for the Walworth LEN, which will be completed in 2022. The Walworth LEN publicity is shown in Figure 7 below



Figure 7 Walworth Low Emission Neighbourhood publicity material

Further details about Walworth Low Emission Neighbourhood can be seen at <https://ourhealthywalworthlen.commonplace.is/>

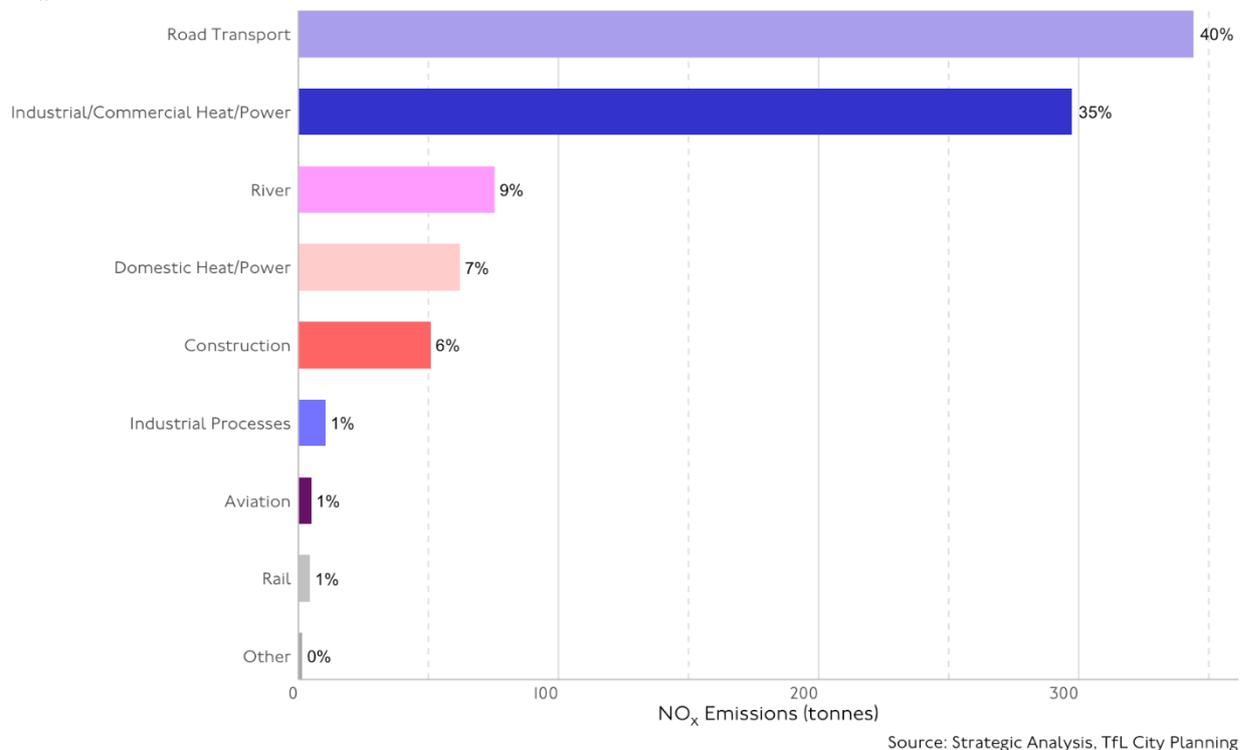
## 1.4 Sources of Pollution in Southwark

Pollution in Southwark comes from a variety of sources. This includes pollution from sources outside of the borough, and, in the case of particulate matter, a significant proportion of this comes from outside of London and even the UK.

### Sources of Nitrogen Dioxide pollution in Southwark

The main sources of NO<sub>2</sub> in the borough are road transport, particularly diesel vehicles, and domestic and commercial heating. The London Mayor's Low Emission Zone and the Ultra – Low Emission Zone, will contribute to future emissions reductions from road transport due to renewal of vehicles in the transport fleet.

LAEI - Emissions by Source  
NO<sub>x</sub> Emissions, Southwark, 2019



**Figure 8** NO<sub>x</sub> Emissions by source (from the LAEI 2019)

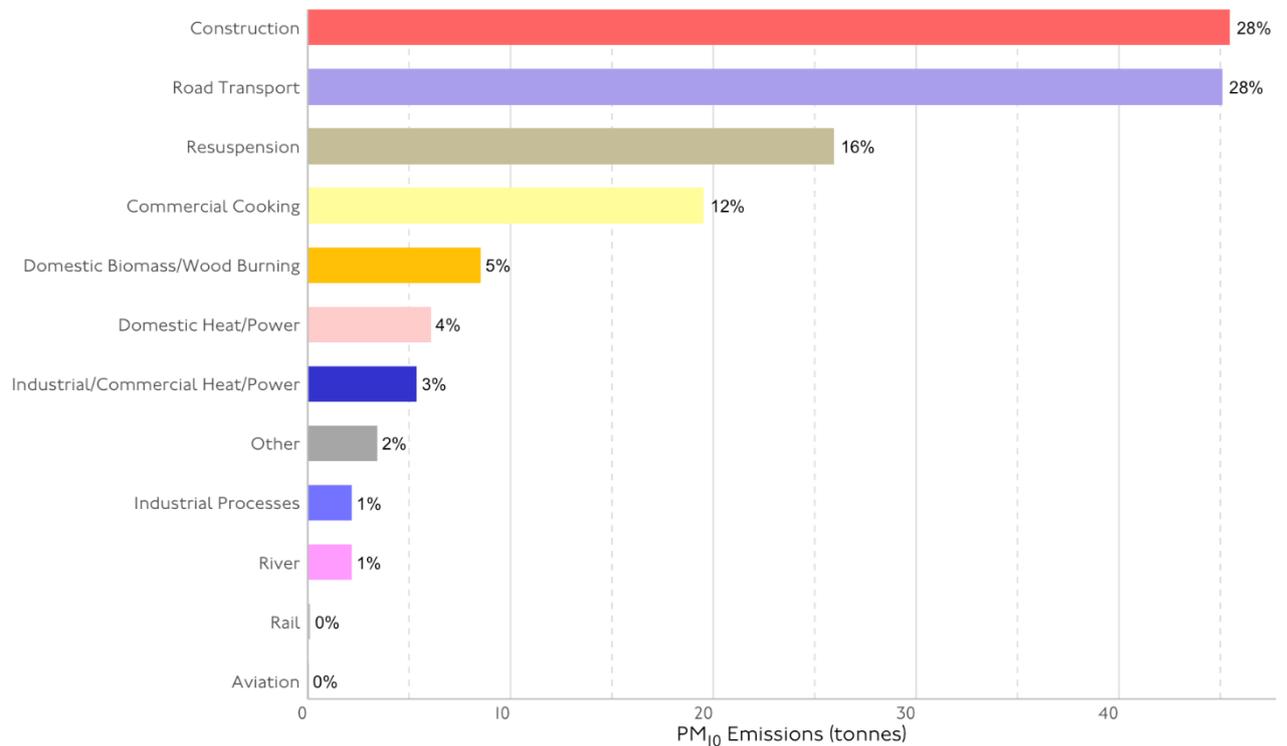
	Southwark 2013 NO <sub>x</sub> Emissions (tonnes per annual)	Southwark 2013 NO <sub>x</sub> Emissions (%)	Southwark 2016 NO <sub>x</sub> Emissions (tonnes per annual)	Southwark 2016 NO <sub>x</sub> Emissions (%)	Southwark 2019 NO <sub>x</sub> Emissions (tonnes per annual)	Southwark 2019 NO <sub>x</sub> Emissions (%)
<b>Domestic</b>	<b>89.89</b>	<b>7.04%</b>	<b>71.59</b>	<b>6.39%</b>	<b>63.90</b>	<b>7.52%</b>
Biomass	0.00	0.00%	0.00	0.00%	0.00	0.00%
Heat and Power Generation	89.60	7.01%	71.30	6.37%	63.61	7.49%
Machinery	0.29	0.02%	0.29	0.03%	0.30	0.03%
<b>Industrial and Commercial</b>	<b>361.06</b>	<b>28.26%</b>	<b>343.00</b>	<b>30.63%</b>	<b>355.06</b>	<b>41.80%</b>
Heat and Power Generation	288.85	22.61%	279.70	24.97%	293.53	34.56%
Commercial Cooking	0.00	0.00%	0.00	0.00%	0.00	0.00%
Construction	63.45	4.97%	52.66	4.70%	50.98	6.00%
Gas Leakage	0.00	0.00%	0.00	0.00%	0.00	0.00%
Industrial Processes	8.73	0.68%	10.61	0.95%	10.51	1.24%
Waste	0.03	0.00%	0.03	0.00%	0.03	0.00%
<b>Miscellaneous</b>	<b>1.63</b>	<b>0.13%</b>	<b>1.42</b>	<b>0.13%</b>	<b>1.19</b>	<b>0.14%</b>
Accidental Fires	1.01	0.08%	0.83	0.07%	0.67	0.08%
Agriculture	0.62	0.05%	0.59	0.05%	0.52	0.06%
Forestry	0.00	0.00%	0.00	0.00%	0.00	0.00%
<b>Resuspension</b>						
Resuspension	0.00	0.00%	0.00	0.00%	0.00	0.00%
<b>Transport</b>	<b>824.97</b>	<b>64.57%</b>	<b>703.92</b>	<b>62.85%</b>	<b>429.23</b>	<b>50.53%</b>
Aviation	6.25	0.49%	6.24	0.56%	4.92	0.58%
Rail	4.55	0.36%	4.47	0.40%	4.57	0.54%
River	57.59	4.51%	75.17	6.71%	75.54	8.89%
Road Transport	756.58	59.22%	618.05	55.19%	344.19	40.52%
<b>Grand Total</b>	<b>1277.56</b>	<b>100.00%</b>	<b>1119.93</b>	<b>100.00%</b>	<b>849.38</b>	<b>100.00%</b>

**Table B** NO<sub>x</sub> Aggregated Emissions in Southwark for 2013-2019 (LAEI 2019)

## Sources of particulate (PM<sub>10</sub>) pollution in Southwark

Construction work associated with the redevelopment of Southwark is the largest source of Particulate Matter (PM<sub>10</sub>) emissions. Particulate Matter (PM<sub>10</sub>) from road transport is the next largest source of emissions, with private cars being the largest source.

LAEI - Emissions by Source  
PM<sub>10</sub> Emissions, Southwark, 2019



**Figure 9** PM<sub>10</sub> Emissions by source (from the LAEI 2019)

	Southwark 2013 PM <sub>10</sub> Emissions (tonnes per annual)	Southwark 2013 PM <sub>10</sub> Emissions (%)	Southwark 2016 PM <sub>10</sub> Emissions (tonnes per annual)	Southwark 2016 PM <sub>10</sub> Emissions (%)	Southwark 2019 PM <sub>10</sub> Emissions (tonnes per annual)	Southwark 2019 PM <sub>10</sub> Emissions (%)
<b>Domestic</b>	<b>19.93</b>	<b>10.58%</b>	<b>14.46</b>	<b>6.99%</b>	<b>14.71</b>	<b>8.97%</b>
Biomass	13.60	7.22%	8.53	4.12%	8.53	5.20%
Heat and Power Generation	6.32	3.36%	5.92	2.86%	6.18	3.77%
Machinery	0.01	0.00%	0.01	0.00%	0.01	0.00%
<b>Industrial and Commercial</b>	<b>72.25</b>	<b>38.34%</b>	<b>101.45</b>	<b>49.04%</b>	<b>72.89</b>	<b>44.45%</b>
Heat and Power Generation	5.37	2.85%	5.07	2.45%	5.33	3.25%
Commercial Cooking	18.63	9.88%	18.63	9.00%	19.52	11.90%
Construction	45.96	24.39%	75.25	36.38%	45.47	27.73%
Gas Leakage	0.00	0.00%	0.00	0.00%	0.00	0.00%
Industrial Processes	1.88	1.00%	2.10	1.01%	2.17	1.33%
Waste	0.41	0.22%	0.41	0.20%	0.41	0.25%
<b>Miscellaneous</b>	<b>3.91</b>	<b>2.08%</b>	<b>3.87</b>	<b>1.87%</b>	<b>3.00</b>	<b>1.83%</b>
Accidental Fires	3.58	1.90%	3.34	1.62%	2.46	1.50%
Agriculture	0.33	0.17%	0.53	0.26%	0.54	0.33%
Forestry	0.00	0.00%	0.00	0.00%	0.00	0.00%
<b>Resuspension</b>	<b>29.18</b>	<b>14.10%</b>	<b>28.93</b>	<b>13.98%</b>	<b>25.94</b>	<b>15.82%</b>
Resuspension	29.18	14.10%	28.93	13.98%	25.94	15.82%
<b>Transport</b>	<b>63.16</b>	<b>33.52%</b>	<b>58.16</b>	<b>28.12%</b>	<b>47.43</b>	<b>28.92%</b>
Aviation	0.03	0.02%	0.03	0.02%	0.02	0.01%
Rail	0.11	0.06%	0.12	0.06%	0.12	0.07%
River	2.29	1.21%	2.16	1.04%	2.16	1.32%
Road Transport	60.73	32.23%	55.85	27.00%	45.12	27.52%
<b>Grand Total</b>	<b>188.44</b>	<b>100.00%</b>	<b>206.87</b>	<b>100.00%</b>	<b>163.97</b>	<b>100.00%</b>

**Table C** PM<sub>10</sub> Aggregated Emissions in Southwark for 2013 – 2019 (LAEI 2019)

## Sources of Particulate (PM<sub>2.5</sub>) pollution in Southwark

The predominant sources of PM<sub>2.5</sub> in Southwark is from road transport, 30% of the total emissions, with emissions from commercial cooking producing 26% of the total, heating and electricity generation producing 25% of the total emissions, and construction producing 7.5% of the total emissions. There are controls over emissions from road transport with ULEZ, and from construction sites through planning permissions. Emissions from commercial cooking and heating are controlled only through the planning process, by requiring adequate dispersion of flue gases and suitable filtration.

### LAEI - Emissions by Source

PM<sub>2.5</sub> Emissions, Southwark, 2019

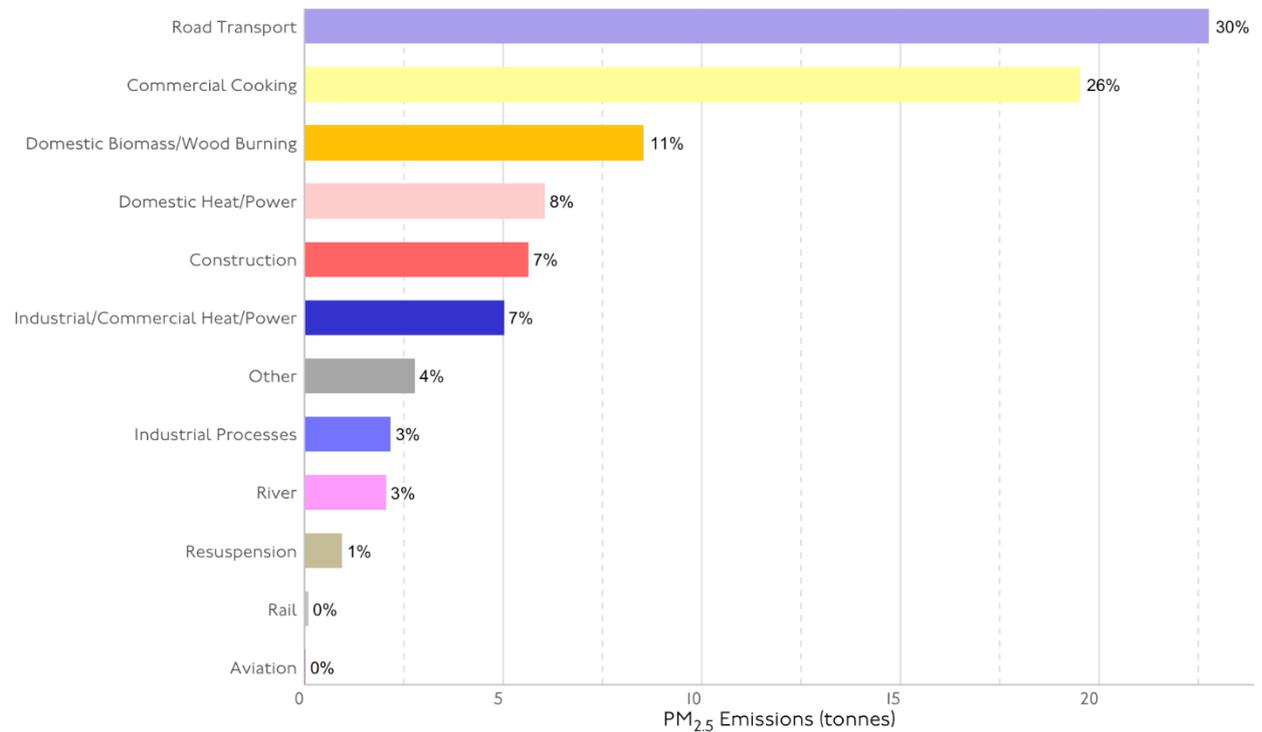


Figure 10. PM<sub>2.5</sub> Emissions by source (from the LAEI 2019)

	Southwark 2013 PM <sub>2.5</sub> Emissions (tonnes per annual)	Southwark 2013 PM <sub>2.5</sub> Emissions (%)	Southwark 2016 PM <sub>2.5</sub> Emissions (tonnes per annual)	Southwark 2016 PM <sub>2.5</sub> Emissions (%)	Southwark 2019 PM <sub>2.5</sub> Emissions (tonnes per annual)	Southwark 2019 PM <sub>2.5</sub> Emissions (%)
<b>Domestic</b>	<b>19.91</b>	<b>21.32%</b>	<b>14.44</b>	<b>16.84%</b>	<b>14.69</b>	<b>19.42%</b>
Biomass	13.60	14.56%	8.53	9.95%	8.53	11.27%
Heat and Power Generation	6.30	6.75%	5.91	6.89%	6.16	8.14%
Machinery	0.01	0.01%	0.01	0.01%	0.01	0.01%
<b>Industrial and Commercial</b>	<b>31.97</b>	<b>34.24%</b>	<b>34.46</b>	<b>40.19%</b>	<b>32.68</b>	<b>43.20%</b>
Heat and Power Generation	5.05	5.41%	4.73	5.51%	4.97	6.57%
Commercial Cooking	18.63	19.95%	18.63	21.73%	19.52	25.80%
Construction	6.05	6.48%	8.64	10.07%	5.64	7.46%
Gas Leakage	0.00	0.00%	0.00	0.00%	0.00	0.00%
Industrial Processes	1.88	2.01%	2.10	2.45%	2.17	2.87%
Waste	0.37	0.40%	0.37	0.44%	0.38	0.50%
<b>Miscellaneous</b>	<b>3.43</b>	<b>3.68%</b>	<b>3.22</b>	<b>3.76%</b>	<b>2.40</b>	<b>3.17%</b>
Accidental Fires	3.33	3.56%	3.10	3.62%	2.28	3.02%
Agriculture	0.10	0.11%	0.12	0.14%	0.11	0.15%
Forestry	0.00	0.00%	0.00	0.00%	0.00	0.00%
Resuspension	1.07	1.14%	1.06	1.23%	0.95	1.25%
Resuspension	1.07	1.14%	1.06	1.23%	0.95	1.25%
<b>Transport</b>	<b>37.00</b>	<b>39.62%</b>	<b>32.55</b>	<b>37.97%</b>	<b>24.93</b>	<b>32.96%</b>
Aviation	0.03	0.03%	0.03	0.04%	0.02	0.03%
Rail	0.08	0.09%	0.09	0.10%	0.09	0.12%
River	2.18	2.33%	2.05	2.39%	2.05	2.71%
Road Transport	34.71	37.17%	30.38	35.44%	22.77	30.09%
<b>Grand Total</b>	<b>93.38</b>	<b>100.00%</b>	<b>85.73</b>	<b>100.00%</b>	<b>75.66</b>	<b>100.00%</b>

**Table D** PM<sub>2.5</sub> Aggregated Emissions in Southwark for 2013 – 2019 (LAEI 2019)

## 1.4 Monitoring of Air Quality in Southwark

Southwark monitors air quality with automatic continuous air quality monitors, Nitrogen dioxide diffusion tubes, and low cost air quality sensors.

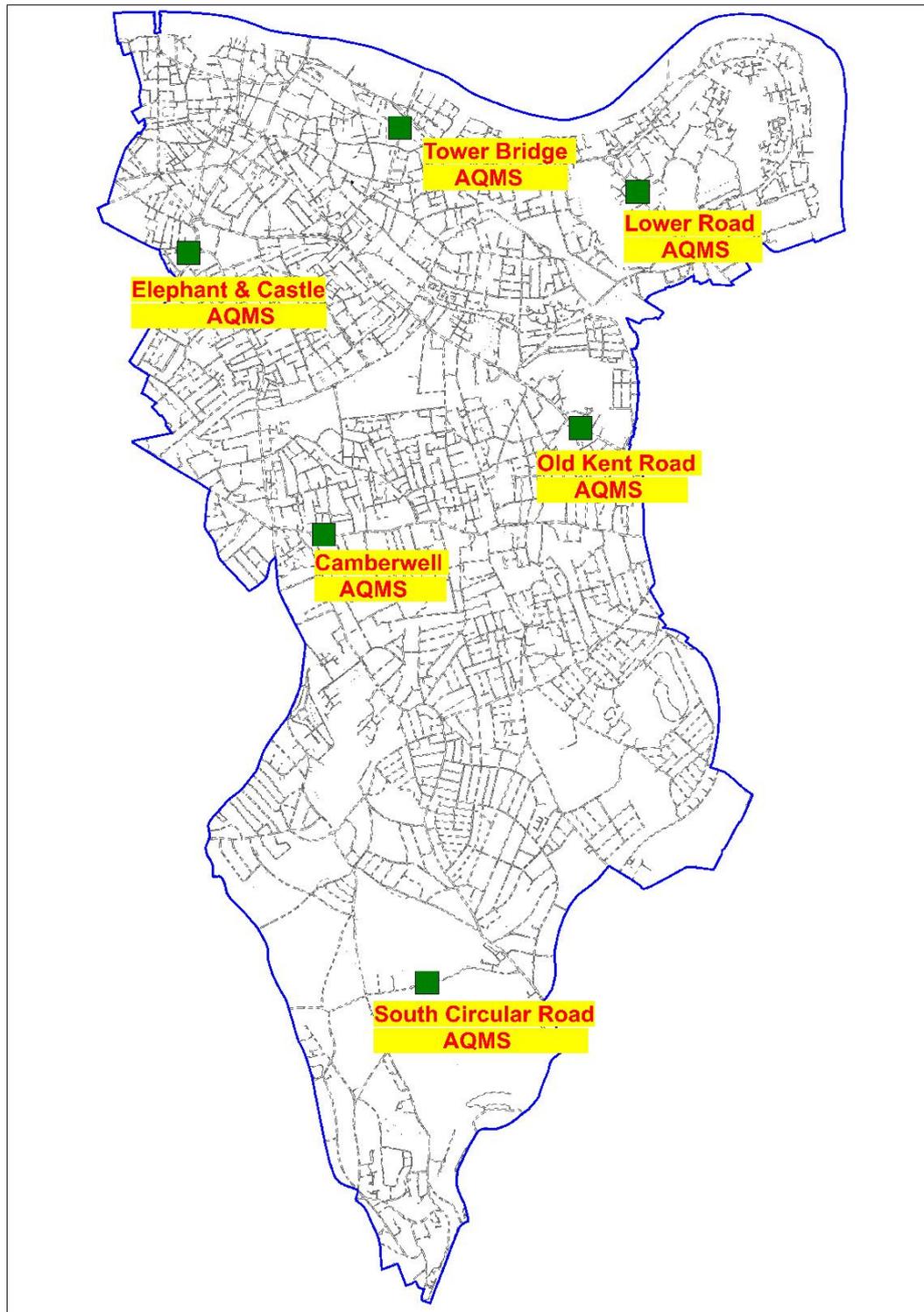
The automatic continuous monitors are listed in Table E below.

Site Reference	Location of the site	Monitoring
SWK 5	Old Kent Road	Nitrogen Dioxide and Particulate Matter (PM <sub>10</sub> & PM <sub>2.5</sub> )
SWK 9	Old Kent Road	Particulate Matter (PM <sub>10</sub> & PM <sub>2.5</sub> )
SWK 6	Elephant & Castle	Nitrogen Dioxide, Particulate Matter (PM <sub>10</sub> & PM <sub>2.5</sub> ) and Ozone
SWK 8	Tower Bridge Road	Nitrogen Dioxide and Particulate Matter (PM <sub>10</sub> & PM <sub>2.5</sub> )
SWK A	Lower Road	Nitrogen Dioxide and Particulate Matter (PM <sub>10</sub> & PM <sub>2.5</sub> )
SWK B	Vicarage Grove	Nitrogen Dioxide and Particulate Matter (PM <sub>10</sub> & PM <sub>2.5</sub> )
SWK C	South Circular Road	Nitrogen Dioxide and Particulate Matter (PM <sub>10</sub> & PM <sub>2.5</sub> )

**Table E Southwark automatic continuous monitoring stations**

In 2021, Southwark has 88 Nitrogen Dioxide diffusion tube monitoring locations. The location of these sites can be seen Figure 12 below.

Southwark also monitors the air quality using various low – cost sensors. These low cost sensors are not reference monitors, and they produce indicative data. They are used by highway projects to show relative variation over time in air quality data.



**Figure 11 Map of the Southwark's automatic continuous air quality monitoring stations**

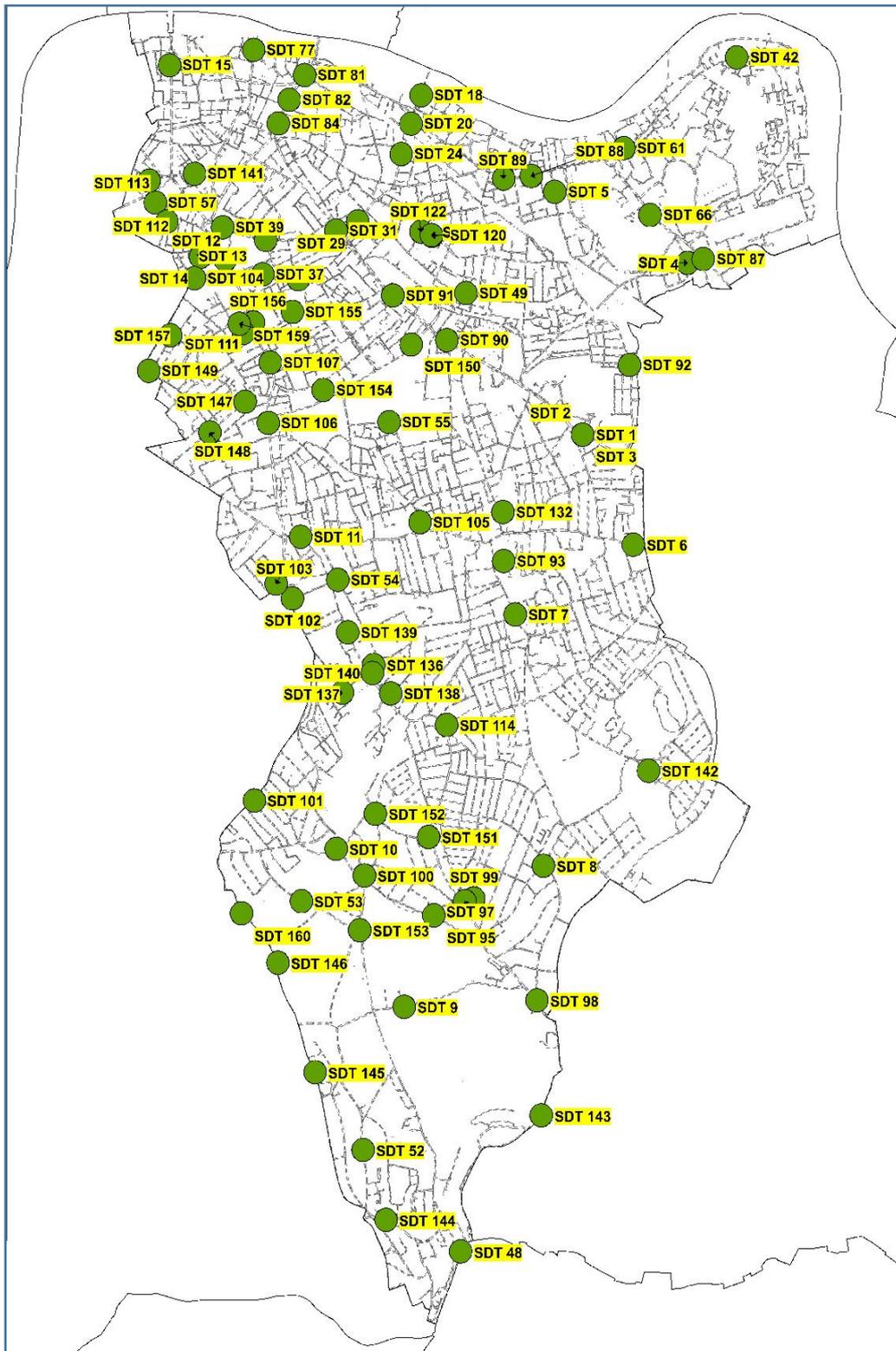


Figure 12 Southwark’s Nitrogen Dioxide diffusion tube survey 2021

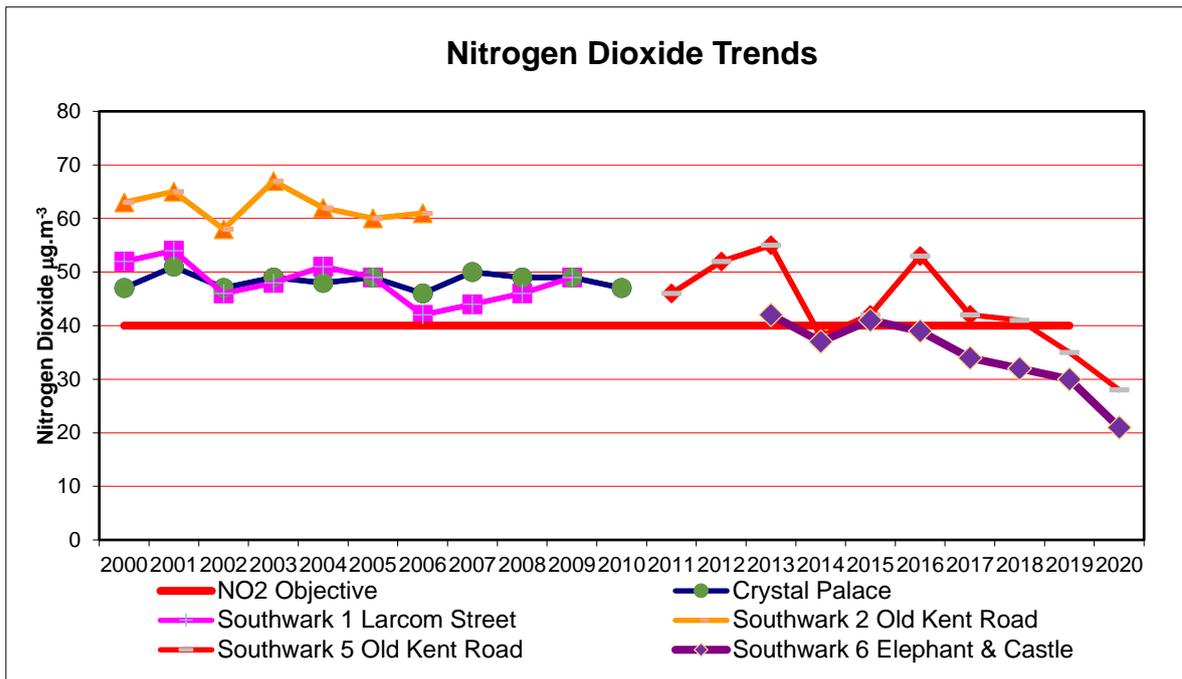


Figure 13 Trend in annual mean NO<sub>2</sub> concentrations at Southwark’s air quality monitoring stations

Figure 13 above shows historic NO<sub>2</sub> data trends from Southwark automatic air quality monitoring stations, indicating an improvement in Southwark’s air quality since 2003. This trend is also shown for PM<sub>10</sub> in Figure 14 below.

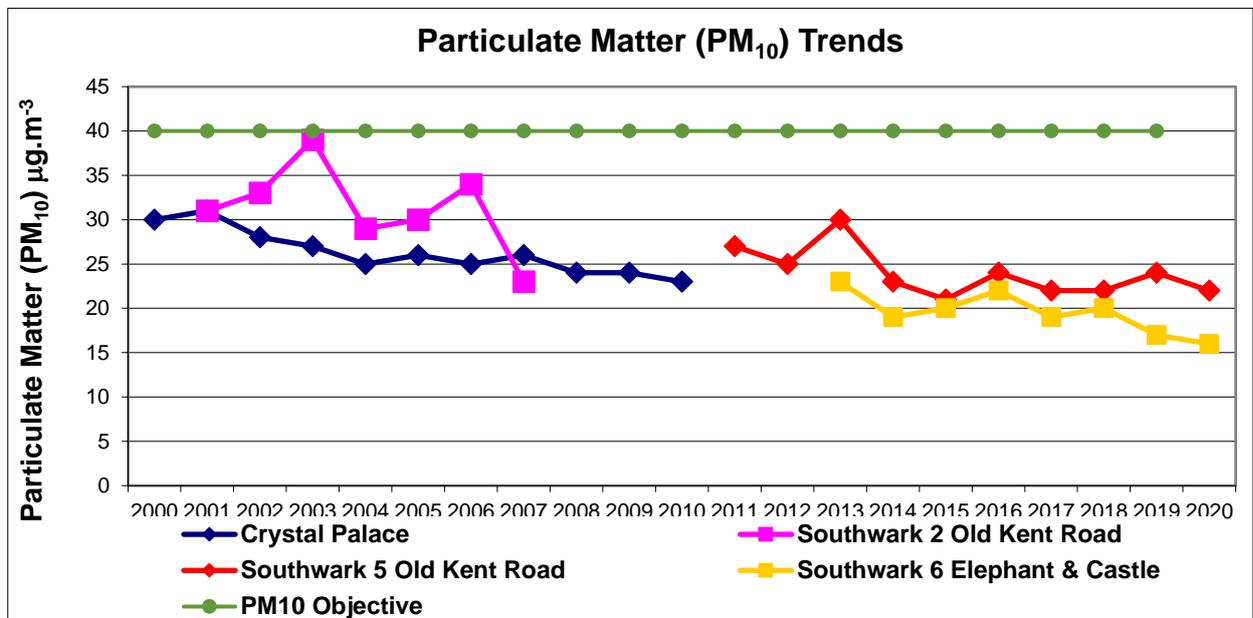


Figure 14 Trend in annual mean PM<sub>10</sub> concentrations at Southwark’s air quality monitoring stations

# 2 - SOUTHWARK AIR QUALITY PRIORITIES

## Themes

- 1 **Monitoring and other core statutory duties:** evaluating air quality monitoring throughout Southwark to enhance compliance with our core statutory objectives;
- 2 **Emissions from development and buildings:** emissions from construction alone accounts for approximately 40% of the PM<sub>10</sub> emissions across Southwark, and therefore work in this area is important in reducing particulate concentrations. This will focus on air quality mitigation through the planning system and aligns with the Council's sustainability objectives;
- 3 **Public health and awareness raising:** increasing awareness can drive behavioural change to lower emissions as well as reducing exposure to air pollution. For example, increasing awareness of the impact of solid fuel burning can help shift attitudes and facilitate overall behaviour change;
- 4 **Delivery servicing and freight:** re-evaluating delivery servicing and freight vehicles, as these are usually heavy-duty diesel-fuelled vehicles with high primary NO<sub>2</sub> emissions;
- 5 **Borough fleet:** Southwark's fleet includes a mixture of light and specialist heavy-duty vehicles, we will continue to lead by example by making improvements in our own fleet by being tailpipe emission free by 2030, (subject to operational requirements)
- 6 **Localised solutions:** these seek to improve the environment of neighbourhoods through a combination of measures such as Streetspace Measures, traffic filtering, parking schemes, biodiversity and climate change projects;
- 7 **Cleaner transport:** road transport is the main source of air pollution in London and Southwark. We will continue to reduce vehicle mileage by incentivising and facilitating changes to walking, cycling, public transport and ultra-low emission vehicles (such as electric);
- 8 **Schools and communities:** implementing initiatives that target susceptible groups to ensure those most at risk are not disproportionately affected by the impacts of poor air quality, and implement recommendations of Southwark's School Air Quality Audits;
- 9 **Lobbying:** Southwark will continue to lobby and influence regional and national organisations and stakeholders on policies and issues beyond Southwark's influence to introduce progressive measures aimed at improving air quality.

## Our 10 key priorities are:-

1. Adopt the 2005 WHO guidelines for PM<sub>2.5</sub> with a target of compliance by 2030, and review the emerging policies from the GLA in respect of the 2021 WHO guidelines
2. Enforce Non-Road Mobile Machinery (NRMM) air quality policies in Southwark.
3. Minimise emissions from construction by developing Southwark's own Air Quality section within an Environmental Supplementary Planning Document (SPD) and code of construction practice which goes above and beyond the GLA Supplementary Planning Guidance (SPG);
4. Continue to raise awareness and encourage behaviour changes through air quality campaigns.
5. Assess potential impact of installing Ultra-Low Emission Vehicle (ULEV) infrastructure (electric vehicle charging points, rapid electric vehicle charging points).
6. Provision additional electric vehicle charging infrastructure by installing a further 1000 Electric Vehicle charging points in Southwark by 2026.
7. Assess the air quality benefits of actions in the Borough's Strategies.
8. Provide new cycling and walking infrastructure and assess air quality impacts of new infrastructure.
9. Encourage people to switch to less polluting cars, with lower parking fees for zero emissions and smaller vehicles across the whole borough.
10. Lobby Central Government to control and reduce emissions that are out of Southwark's control.

This action plan sets out how we will effectively deliver against the above broad themes and key priorities, thereby improving air quality where it is within our control and through leading by example. However, these are local measures aimed at tackling air pollution, and air pollution by its very nature is transboundary.



# 3 - DEVELOPMENT AND IMPLEMENTATION OF SOUTHWARK'S AIR QUALITY ACTION PLAN

## 3.1 Consultation and Stakeholder Engagement

In developing/updating the action plan we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table F. In addition we have undertaken the following stakeholder engagement:

- Southwark Council consultation hub
- Public notices in Council Offices
- Advertisement in Southwark Life (council publication)
- Advertisements in Southwark News (local independent newspaper)

Yes/No	Consultee
Yes	the Environment Agency
Yes	Transport for London and the Mayor of London (who will provide a joint response)
Yes	all neighbouring local authorities
Yes	other public authorities as appropriate
Yes	bodies representing local business interests and other organisations as appropriate See Appendix A.

**Table F** Consultation Undertaken

### 3.2 Steering Group

Southwark's Steering Group, meets regularly under a formal structure, with senior officers from the following teams recruited into the group's regular membership ('primary members'):-

- Environmental Protection
- Public Health
- Planning Policy
- Sustainable Services
- Highways
- Climate Change

Other services/teams would be invited to the Air Quality Action Plan Group meetings when items relevant to their delivery responsibilities are placed on the agenda:-

- External Affairs
- Legal Services
- Public Realm
- Parks
- Ecology & Trees
- Development Control
- Children's Services & Educational Development
- Housing Services & Housing Energy
- Fleet Management
- IT
- Communications
- Procurement

The Terms of Reference of the AQAPSG:-

- 1) The Air Quality Action Plan Steering Group (AQAPSG) will meet every three months.
- 2) The first meeting of the AQAPSG will comprise of Directors or nominated representatives from the following business areas:

- Environmental Protection
- Public Health
- Planning Policy
- Sustainable Services
- Highways
- Climate Change

## 4 – AIR QUALITY ACTION PLAN

Action Tables 1 to 7 shows the draft Southwark’s Air Quality Action Plans. It contains:

- a list of the actions that form part of the plan;
- the responsible individual and departments/organisations who will deliver this action;
- estimated cost to the council;
- expected benefit in terms of emissions and concentration reduction;
- the timescale for implementation
- the outputs, targets and Key Performance Indicators
- how progress will be monitored.

The actions have been grouped into seven categories:

- Monitoring and core statutory duties;
- Emissions from developments and buildings;
- Public health and awareness raising;
- Delivery servicing and freight;
- Borough fleet actions;
- Localised solutions; and:
- Cleaner transport

GLA nine key selected measures:

The LLAQM Borough Air Quality Action Matrix says that all boroughs should be focusing on these nine key selected actions as a priority. These are the most effective to tackle exposure and/or emissions, and require concerted and consistent action across London to secure impact as soon as possible. However, this doesn’t preclude boroughs also having additional locally-appropriate priorities.

- Enforcing the Non-Road Mobile Machinery (NRMM) Low Emission Zone
- Promoting and enforcing smoke control zones
- Promoting and delivering energy efficiency retrofitting projects in workplaces and homes
- Supporting alerts services such as Airtex, and promoting the Mayor’s air pollution forecasts
- Reducing pollution in and around schools, and extending school audits to other schools in polluted areas
- Installing Ultra Low Emission Vehicle (ULEV) infrastructure
- Improving walking and cycling infrastructure
- Regular Car Free days/temporary road closures in high footfall areas
- Reducing emissions from council fleets

There are nine elements that the GLA requires to be included in the Air Quality Action Plan. As a result 11 actions have been developed these are:

- 2.11 - Promoting and delivering energy efficiency and energy supply retrofitting projects in all buildings workplaces and homes through EFL retrofit programmes such as RE:FIT, RE;NEW, DEEP and through Borough carbon offset funds.
- 2.12 - Southwark's Smoke Control Area is fully promoted and enforced.
- 3.4 - Southwark supports airTEXT and promotes and shares the GLA high pollution alert services.
- 3.5 - Improve the uptake of Air Quality information to vulnerable persons in the Borough.
- 3.6 - Provide air quality information leaflets at health care facilities, libraries, pharmacies and other frequently used facilities.
- 3.7 - Promote School Air Quality Audits to all schools in the Borough.
- 3.8 - Reducing pollution in and around schools.
- 5.1 - Reducing emissions from Council Fleets.
- 7.3 - Regular temporary car free days and pedestrianisation schemes in line with proposal 4.2.1a of the London Environment Strategy.
- 7.5 - Using parking policy to reduce pollution emissions.
- 7.6 - Provision of infrastructure to support walking and cycling.
- 7.7 – Installation of ultra – low emission vehicle infrastructure charging points.

Action Table 1 Monitoring and Core Statutory Duties Air Quality Action Plan

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Processes	People
	Action Reference Number	Description of action to be implemented	Name of Council Department with responsibility for action implementation	Anticipated cost of action implementation £ = 0 – 50k ££ = 50 – 100k £££ = >100k	High = 3 Medium = 2 Low = 1	Proposed timescale for implementation	What the key performance Indicators for implementation will be	Links to separate document or a reference.			
Southwark's legal duty to monitor air pollution and Air Quality Action Plan	1.1	Maintain the Authority's automatic air quality monitoring stations in the Borough	Environment & Leisure - Regulatory Services – Environmental Protection Team	£	No emissions / concentrations benefits but critical in terms of understanding emissions	Ongoing for maintenance of monitors	All monitors maintained and over 90% data capture annually. The data from the monitoring all the sites can be found at <a href="https://www.londonair.org.uk/london/asp/publicbulletin.asp?la_id=28&amp;MapType=Google">https://www.londonair.org.uk/london/asp/publicbulletin.asp?la_id=28&amp;MapType=Google</a>	Details of our monitoring can be found here: <a href="https://www.southwark.gov.uk/environment/air-quality/air-quality-monitoring-data">https://www.southwark.gov.uk/environment/air-quality/air-quality-monitoring-data</a>  Air quality monitoring data is used to inform the location and type of future air quality improvement projects.	EPT Officer. Supported by contracted Local Site Operator, and Maintenance contract.	Review LSO and Site Maintenance reports. Contract monitoring. Contract re-tendering.	Internal Contractors.
	1.2	Maintain the Authority's Nitrogen Dioxide Diffusion Tube Survey in the Borough in accordance with current guidance	Environment & Leisure - Regulatory Services – Environmental Protection Team	£	No emissions / concentrations benefits but critical in terms of understanding emissions	Ongoing	All Diffusion tube results to be published within 5 weeks of collection on the website	Details of our monitoring can be found here: <a href="https://www.southwark.gov.uk/environment/air-quality/air-quality-monitoring-data">https://www.southwark.gov.uk/environment/air-quality/air-quality-monitoring-data</a>	EPT Officer, supported by external accredited laboratory service.	Monthly timetabled deployment. Cold chain storage and chain of custody.	External laboratory.
	1.3	Work with the GLA Breathe London Project	Environment & Leisure - Regulatory Services – Environmental Protection Team	£	No emissions / concentrations benefits but critical in terms of understanding emissions	Ongoing	Southwark has several sites in Borough, details to be reported annually.	Details of the project can be found here <a href="https://www.breathelondon.org/">https://www.breathelondon.org/</a>	Automatic data reporting to Breathe London website.	Calibration, deployment, service and maintenance	GLA. Global Action Plan. Local community organisations
	1.4	Prepare and produce all London Local Air Quality Management Framework reports as required.	All departments	£	No emissions / concentrations benefits	Ongoing	Submission of the Annual Status Report to the GLA  KPI – Report submitted by the 31 <sup>st</sup> May each year	All the annual status Reports can be found at <a href="https://www.southwark.gov.uk/environment/air-quality/what-we-re-doing/air-quality-strategies-plans-and-letters?chapter=2">https://www.southwark.gov.uk/environment/air-quality/what-we-re-doing/air-quality-strategies-plans-and-letters?chapter=2</a>			EPT. Air Quality Steering Group.

140

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Processes	People
Southwark's legal duty to monitor air pollution and Air Quality Action Plan	1.5	New publicly consulted Air Quality Action Plan every 5 years	All departments	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide depending on the nature of the measures	Ongoing	The next full revised Air Quality Action Plan is due 2028.  KPI - This plan will be reviewed annually to ensure that it is up to date.	The present Air Quality Action Plan can be found at <a href="https://www.southwark.gov.uk/environment/air-quality/what-we-re-doing/air-quality-strategies-plans-and-letters">https://www.southwark.gov.uk/environment/air-quality/what-we-re-doing/air-quality-strategies-plans-and-letters</a>		Member briefing Internal consultation Public consultation Adoption through Cabinet	Lead Member Air Quality Steering Group All stakeholders Cabinet
	1.6	Review the Authority's Air Quality Management Area and air quality action plan annually	Environment & Leisure - Regulatory Services – Environmental Protection Team	£	No emissions / concentrations benefits	Ongoing	Review every year when preparing the Annual status report  ASR will have an annual progress report published within it.	The current Air Quality Management Area can be found at <a href="https://www.southwark.gov.uk/assets/attach/3635/Southwark-air-quality-management-area-order-2003.pdf">https://www.southwark.gov.uk/assets/attach/3635/Southwark-air-quality-management-area-order-2003.pdf</a>		Member briefing Internal consultation Statutory consultation Adoption through Cabinet	Lead Member Air Quality Steering Group All stakeholders Cabinet
	1.7	Respond to all appropriate air quality consultations	Environment & Leisure - Regulatory Services – Environmental Protection Team	£	Possible reduction in emissions of Particulate Matter and Nitrogen Dioxide depending on the nature of the consultation 1 - 3	Ongoing	Consultation to be responded within consultation timetable.			Internal approvals/ member briefing	EPT Officer Lead Member Air Quality Steering Group
	1.8	Support the introduction of a new or revised Clean Air Act that improves public protection from atmospheric pollution	Environment & Leisure - Regulatory Services – Environmental Protection Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 - 3	Ongoing	To lobby Government for the introduction of the Clean Air Act and / or GLA to introduce new Clean Air provisions within a London Local Authority Act.			Internal approvals/ member briefing	GLA London Councils All Stakeholders
	1.9	Respond to Defra Environment Act 2021 consultation in setting a PM <sub>2.5</sub> target to improve public protection from Particulate Matter (PM <sub>2.5</sub> ) atmospheric pollution	Environment & Leisure - Regulatory Services – Environmental Protection Team	£	Reduction in emissions of Particulate Matter 2 - 3	Ongoing	To lobby Government for the inclusion of WHO PM <sub>2.5</sub> guidelines into the Environment Act 2021 regulations  KPI – Report annually			Internal approvals/ member briefing	London Councils All Stakeholders
	1.10	Promote delivery of information on Pollen.	Environment & Leisure - Regulatory Services – Environmental Protection Team	£	No emissions / concentrations benefits		airTEXT distributes information on Pollen which is available through a daily text.				

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Processes	People
Southwark's legal duty to monitor air pollution and Air Quality Action Plan	1.11	To adopt the World Health Organization air quality guidelines	Environment & Leisure - Regulatory Services – Environmental Protection Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	2022	L.B. Southwark to adopt the guidelines as part of Air Quality Action Plan and work with the Mayor of London towards meeting the standard by 2030  <b>KPI – Report annually</b>			As AQAP (Member briefing Internal consultation Statutory consultation Adoption through Cabinet)	As AQAP (Lead Member Air Quality Steering Group All stakeholders Cabinet)
	1.12	Review best practice and technical guidance on the use of Low Cost Sensors	Environment & Leisure - Regulatory Services – Environmental Protection Team	£	No emissions / concentrations benefits but critical in terms of understanding emissions	Ongoing	QA and QC report on performance of low cost sensors will be published in the ASR.		EPT Officers	EPT Work plan	EPT Officers Professional and Technical air quality forums
	1.13	Embed air quality considerations in all new Council policies.	All Departments	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1	Ongoing	<b>Report annually in the ASR.</b>			Internal policy reviews	Southwark Policy Officers

Action Table 2 Emissions from developments and buildings air quality action plan

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementati on	Outputs, Targets and KPIs	Further information	Technical	Processes	People
	Action Reference Number	Description of action to be implemented	Name of Council Department with responsibility for action implementation	Anticipated cost of action implementation £ = 0 – 50k ££ = 50 – 100k £££ = >100k	High = 3 Medium = 2 Low = 1	Proposed timescale for implementation	What the key performance Indicators for implementation will be	Links to separate document or a reference.			
Emissions from developments and buildings	2.1	Ensuring emissions from construction are minimised by developers fully complying with Southwark’s Technical Guidance for Demolition and Construction	Chief Executive Development Control and Environment & Leisure - Regulatory Services – Environmental Protection Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 - 3	Ongoing	All major sites to submit an Air Quality Assessment in accordance the current version of the GLA’s guidance “the Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance”  Review Highways standard contract terms in 2025-2026 to address idling at road works and generator types.  <b>All applications met the requirements of the technical guide.</b>	Southwark’s Technical Guidance for Demolition and Construction can be found at <a href="https://www.southwark.gov.uk/assets/attach/3011/Technical-Guidance-for-Demolition-Construction.pdf">https://www.southwark.gov.uk/assets/attach/3011/Technical-Guidance-for-Demolition-Construction.pdf</a>	Planning policy on Air Quality  EPT guidance and GLA guidance on air quality	EPT response to consultation on Planning Applications  Planning Officer report to Planning Committee	EPT Officers Planning Officers Developers Air Quality consultants Planning Committee Planning Inspectorate
	2.2	All Major development sites to submit a demolition management (DMP) and / or Construction Management Plan (CMP)	Chief Executive Development Control and Environment & Leisure - Regulatory Services – Environmental Protection Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 - 3	Ongoing	Annual reporting of number of Demolition Management Plans and Construction Management Plans that have been reviewed  <b>KPI – Number of reviews of Demolition Management Plans and Construction Management Plans</b>		EPT review of D/CMP	Planning consent prior approval condition. EPT consultation on discharge of condition	EPT Officers Planning Officers Developers
	2.3	Ensuring all medium and high risk sites have real – time PM monitoring on site and that the information from this monitoring is easily accessible to the public	Chief Executive Development Control and Environment & Leisure - Regulatory Services – Environmental Protection Team	£ - ££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 - 3	Ongoing	Annual reporting of number of sites that are reporting site monitoring  <b>Number of construction sites with site monitoring.</b>  <b>Review technical guide to ensure appropriate mitigation and dust management responses.</b>	Create a business case for a construction monitoring officer.	Information and data publication standards	Secured through compliance with D/CMP planning condition OR secured by s.106 agreement.	Planning Enforcement Officers OR Development Control Officers s.106 compliance

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Processes	People
Emissions from developments and buildings	2.4	Ensuring emissions from construction are minimised by developers by submitting a transport logistics assessment in accordance with Transport for London's TfL) Construction Logistics guidance	Chief Executive - Development Control	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 - 3	Ongoing	All major sites to submit a Transport Logistics in accordance the current version of the TfL guidance  Control of construction vehicles delivery times to reduce impact on local communities congestion and air quality  <b>KPI - 100% of all major sites</b>	The TfL's Construction Logistics guidance can be found at <a href="http://www.tfl.gov">www.tfl.gov</a>  LBS revised Movement plan	All relevant technical guidance		TfL
	2.5	Produce a construction code of practice for minor sites to be used as informative	Chief Executive Development Control and Environment & Leisure - Regulatory Services - Environmental Protection Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 - 3		Information to be secured by either planning conditions or s106 agreements  <b>KPI - annual reporting of informative issued</b>	The GLA's "The Control of Dust and Emissions during Construction and Demolition Supplementary planning guidance can be found at <a href="http://www.gla.gov.uk">www.gla.gov.uk</a>	EPT review of submitted Air Quality Assessment	Planning consent prior approval condition. EPT consultation on discharge of condition	EPT Officers Planning Officers Developers
	2.6	Minimise emissions from construction by ensuring all construction site Non-Road Mobile Machinery (NRMM) comply with the London Environment Strategy Policy 4.2.3a	Environment & Leisure - Regulatory Services - Environmental Protection Team and Mayor's Air Quality Fund South London NRMM Enforcement Project - Lead authority - currently L.B. Merton	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	Ongoing	All relevant Planning applications to include the appropriate NRMM condition  <b>KPI - 100% of all relevant applications</b>  Southwark to maintain an updated list of construction sites on a quarterly basis  <b>KPI - Four lists each year</b>  Southwark to subscribe to the Mayor's Air Quality Fund South London NRMM Enforcement Project  <b>KPI - Annual subscription paid</b>  Mayor's Air Quality Fund South London NRMM Enforcement Project to submit regular reports to Southwark  <b>KPI - Four reports each year</b>  Southwark's Environment Protection Team to investigate all non-compliant sites as reported by the NRMM Lead Authority  <b>KPI - All non - compliant sites investigated</b>	London Borough of Merton are contracted to undertake construction site NRMM inspection visits as part of a pan London project.	NRMM Regulations	Construction site inspections	NRMM Lead Authority EPT Officers

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Processes	People
Emissions from developments and buildings	2.7	Ensuring emissions from construction and demolition sites are minimised by developers to comply with the London Environment Strategy Policy 4.2.3	Chief Executive Development Control and Environment & Leisure - Regulatory Services – Environmental Protection Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 - 3	Ongoing	All major sites to submit an Air Quality Assessment in accordance the current version of the GLA's The Control of dust and emissions during Construction and Demolition Supplementary Planning Guidance"  <b>KPI - 100% of all relevant applications</b>  <b>KPI – Annual reporting of the number of NRMM conditions / s106 interventions</b>	The GLA's "The Control of Dust and Emissions during Construction and Demolition Supplementary planning guidance can be found at <a href="http://www.gla.gov.uk">www.gla.gov.uk</a>  Create a business case for a construction monitoring officer.	EPT review of submitted Air Quality Assessment	Planning consent prior approval condition. EPT consultation on discharge of condition	EPT Officers Planning Officers Developers
	2.8	Continue to control emissions from permitted processes via inspection and enforcement	Environment & Leisure - Regulatory Services – Environmental Protection Team	£	Environment & Leisure - Regulatory Services – Environmental Protection Team 1	Ongoing	Annual reporting of number of inspections in accordance with LAPPC risk regime and number of enforcement notices.  <b>KPI – Report to be submitted to Defra by the due date</b>		All relevant technical guidance	Processing applications. Issuing permits. Inspection and enforcement	EPT Officers
	2.9	Enforce Air Quality Neutral Policy and Air Quality Positive Policy	Chief Executive Development Control and Environment & Leisure - Regulatory Services – Environmental Protection Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	Ongoing	All Planning applications with boilers or other heat sources to be given a standard planning condition which requires pre-occupation information or testing reports to be submitted to Planning  <b>KPI - 100% of all relevant applications</b>		All relevant technical guidance	Review of combustion source information by EPT in consultation with climate change team	Planning Policy team Climate change team EPT Officers
	2.10	Master planning and redevelopment areas aligned with the Air Quality Positive and Healthy Streets approach	Chief Executive – Planning Policy Chief Executive - Development Control Environment & Leisure - Highways	£ - £££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3		<b>KPI Complete review of Southwark Plan in the context of air quality (consistent with Climate Action Plan A.1.iii)</b>  <b>KPI – Respond to the Movement Plan consultation to include improvements to air quality in 2022 - 2023</b>	Southwark Plan Policy 65 Movement Plan			EPT Planning Policy Teams, Development Control Highways

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Processes	People
Emissions from developments and buildings	2.11	Promoting and delivering energy efficiency and energy supply retrofitting projects in all buildings through Energy for Londoners (EFL) retrofit programmes such as RE:FIT, RE:NEW, DEEP and through Borough carbon offset funds.  (GLA mandatory action)	Housing and Modernisation Technical services	£ - £££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	Ongoing	<p><b>KPI – Implement improvements to Council Medium combustion plant to reduce emissions and improve monitoring by 2025</b></p> <p><b>KPI – Retrofit to improve energy efficiency at five libraries and three children centres by 2024</b></p>	See Climate Plan D.1.iii, D.1.iv, D.1.vii, D.2.ix, & E.2  Additional planning enforcement resource to ensure developments implement energy and air quality requirements as planned.	Technical survey of council owned medium sized combustion plant	Contract procurement	EPT Officers  Housing maintenance officers  Contractor  GLA
	2.12	Southwark's Smoke Control Area is fully promoted and enforced  (GLA mandatory action)	Chief Executive Development Control Environmental Protection Team and Environment & Leisure Regulatory Services Noise & Nuisance Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1		<p>Enforce the requirements of the Clean Air Act in the Borough</p> <p><b>KPI - 100% of service requests investigated</b></p> <p>Enforce the requirements of the Environment Act in the Borough to control the sale of unauthorised solid fuels.</p> <p>KPI – At least one campaign per year.</p> <p><b>KPI – When appropriate formal action to be taken in 100% of cases.</b></p> <p>Publicise on a regular basis that whole of Southwark is a Smoke Control Zone</p> <p><b>KPI – At least one campaign per year.</b></p> <p>Attend the GLA Wood Burning Working Group and contribute to the outcomes of the group.</p>	Southwark's Smoke Control Area can be found at <a href="https://www.southwark.gov.uk/assets/attach/1468/smoke-control-order-2009.pdf">https://www.southwark.gov.uk/assets/attach/1468/smoke-control-order-2009.pdf</a>	All relevant technical guidance	Service requests	EPT officers  Noise and Nuisances team
	2.13	Ensuring adequate, appropriate and well located green space and infrastructure is included in new and existing developments	Chief Executive Development Control	£ to £££	No emissions reductions, but there is a small reduction in concentration near green infrastructure. 1		<p><b>KPI - The number of new green infrastructure granted through the planning process in the year</b></p> <p><b>KPI - The number of new green infrastructure implemented in the year</b></p>		All relevant technical guidance	Planning applications and approvals	Development control officers  Planning committee

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementati on	Outputs, Targets and KPIs	Further information	Technical	Processes	People
Emissions from developments and buildings	2.14	Reducing emissions from all Combustion Plant	Chief Executive Development Control and Environment & Leisure - Regulatory Services – Environmental Protection Team	£ to £££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	Ongoing	All developments to comply with the London Plan heating hierarchy and that air quality and carbon emissions are fully assessed in planning applications  <b>KPI - 100% of all relevant applications</b>  <b>KPI – Annual reporting of the number of conditions / s106 interventions</b>  <b>KPI – Number of ultra-low NO<sub>x</sub> boilers / heat pumps installed in the year</b>		EPT review of relevant planning application documents, in consultation with Climate Change team	Planning applications and approvals	Development control  EPT Officers  Climate Change team  Applicants  Air Quality consultants
	2.15	To reduce emissions of Particulate Matter from commercial kitchens especially PM <sub>2.5</sub>	Environment and Leisure Environmental Protection Team	£	Reduction in emissions of Particulate Matter 1 - 2	When resources are available	Devise and complete a pilot project to produce technical guidance for kitchen operators to reduce emissions of PM <sub>2.5</sub> .	Project is likely to establish levels of pollution in Southwark from kitchen outlets.	Guidance on exhaust flue gas filtration and smoke control	Capital bids  Project design and procurement  Member briefing	EPT officers  Future project partners  Commercial catering operation
	2.16	Embed air quality in designs of estates	Chief Executive – Regeneration Team and Chief Executive – Development Control Chief Executive – Planning Policy	£ - £££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	2022 - 2027	<b>KPI - Number of Design Briefs included air quality principles produced</b>  <b>KPI - Number of Air Quality Positive Estates built in the year</b>	Walking and cycling design criteria EVCP Charging	All relevant technical guidance	Writing design briefs  Procurement	Development Control  Planning Policy

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Processes	People
Emissions from developments and buildings	2.17	Reducing emissions from Combustion Plant in heating networks	Emissions from developments and buildings	£ to £££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	Ongoing	<p>Officers to regularly update the borough – level energy masterplan and identify opportunities for new heat networks as well as extending or inter-connecting existing networks to support cleaner, lower carbon heat supply.</p> <p>Installation of heat pumps on site in three locations - Consort, Newington &amp; Wyndham</p> <p>KPI – Confirmation of the completion of all 3 sites</p> <p><b>KPI – Annual reporting of the number of conditions / s106 interventions</b></p> <p><b>Complete feasibility studies (with input from residents) which will allow every estate in the borough to design plans to move away from gas as an energy source</b></p> <p>KPI - Procurement of ten detailed feasibility studies to set the scope for upcoming major decarbonisation works at high priority estates. Southwark will be consulting with residents as part of the works process.</p> <p>Identifying combustion sources where cost effective carbon reduction with substantial air quality benefits</p> <p>KPI – Annual reporting of energy use in Council owned buildings.</p>	Climate Action Plan E.2.ii  Climate Action Plan E.2.iii	Development Control review of Energy Masterplan, in consultation with Climate Change team	Internal review	Development control  Climate Change team

Action Table 3 Public health and awareness raising air quality action

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
	Action Reference Number	Description of action to be implemented	Name of Council Department with responsibility for action implementation	Anticipated cost of action implementation £ = 0 – 50k ££ = 50 – 100k £££ = >100k	High = 3 Medium = 2 Low = 1	Proposed timescale for implementation	What the key performance Indicators for implementation will be	Links to separate document or a reference.			
Public health and awareness raising	3.1	Public Health having shared responsibility for borough air quality issues	Environment & Leisure - Public Health Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1		<p>Director of Public Health to chair Air Quality Steering Group</p> <p><b>KPI – Annual progress report</b></p> <p>The Public Health Team actively involved with Air Quality Projects</p> <p><b>KPI – Annual progress report</b></p> <p>Biennial review of Southwark’s Joint Strategic Needs Assessment (Air Quality) (‘Air Quality JSNA’).</p> <p><b>KPI – Annual progress report</b></p> <p>Air Quality is a Health and Wellbeing Board priority</p> <p><b>KPI –Annual report to the Health and Wellbeing Board</b></p>	Southwark’s Air Quality JNSA can be found at <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a>		EPT – public health internal consultation / collaboration on air quality projects JSNA review	Director of Public Health Public Health Team EPT Health and Wellbeing Board
	3.2	Work with the Public Health Team to strengthen engagement with Southwark Clinical Commissioning Group and GP surgeries	Environment & Leisure - Public Health Team & Environmental Protection Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide by undertaking the measures in this Action Plan	Ongoing	<b>KPI - Report annually on the progress</b>				Southwark CCG Public Health Team EPT

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
Public health and awareness raising	3.3	Engagement on air quality issues with Business through the Borough's Business Improvement Districts.	Chief Executive - Economic Development in partnership with the Borough's Business Improvement Districts. Environment & Leisure Regulatory Services – Environmental Protection Team.	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1	Ongoing	<b>KPI – Number of businesses actively engaged on air quality</b>  <b>KPI – Number of businesses acting to reduce emissions</b>	Staffing resource dependant.			Economic Development Team EPT BIDs
	3.4	Southwark supports Airtex and promotes and shares the GLA high pollution alert services (GLA mandatory action)	Environment & Leisure - Public Health Team Environment & Leisure - Regulatory Services – Environmental Protection Team	£	No emissions / concentrations benefits but helps avoid or mitigate the effects of high exposure	Ongoing	Southwark annual subscription to the Airtex service operated by Cambridge Environmental Research Consultants (CERC)  To promote the Airtex service through the GP's and other health providers  <b>KPI - Number of Airtex subscribers in the Borough.</b>  To cascade the London Mayors High and very High pollution alerts  <b>KPI –100% High and Very High alerts cascaded.</b>		Air Quality Monitoring Stations  London Air Quality Network  Airtex alerts system  GLA alerts system	Promotion of airText  Operation of air quality alerts cascade system to Schools, Care Homes, and GP Surgeries	GLA CERC EPT Schools Care Homes GP Surgeries
	3.5	Improve the uptake of Air Quality information to vulnerable persons in the Borough (GLA mandatory action)	Environment & Leisure - Regulatory Services – Environmental Protection Team  Children and Adult Services - Public Health Team	££	None	2023 Ongoing	Implementation of recommendations in the Air Alert Discovery project  <b>KPI - Annual Communication Plan and campaign of relevant air quality improvement topics</b>		All relevant technical documents	Commission or deliver in house an air quality information campaign	EPT Communications team

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
Public health and awareness raising	3.6	Provide air quality information leaflets at health care facilities, libraries, pharmacies and other frequently used facilities  (GLA mandatory action)	Children and Adult Services - Public Health Team  Environment & Leisure - Regulatory Services – Environmental Protection Team	£ - ££	None	2023	KPI - Annual progress reports	Considering including indoor air quality information following report from Chris Whitty.		EPT – public health internal consultation / collaboration on air quality projects	EPT Public Health team Relevant partners and stakeholders working in this area, e.g. Impact on Urban Health charity
	3.7	Promote School Air Quality Audits to all schools in the Borough  (GLA mandatory action)	Environment & Leisure - Regulatory Services – Environmental Protection Team  Environment & Leisure – Sustainable Travel	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide	Ongoing	To promote the London Mayor’s School Pollution Helpdesk and GAP’s online ‘school air quality audit’ and other promotion materials to all schools.  A school audit evaluation report will be produced.	STARs program encourage use of sustainable travel, discouraging car use.  Southwark has completed a schools audit programme.	Schools’ air quality audit template	Audit Procurement	EPT Education External air quality auditors
	3.8	Reducing pollution in and around schools  (GLA mandatory action)	Environment & Leisure Highways  Environment & Leisure - Regulatory Services – Environmental Protection Team	£ - £££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide	Ongoing	Implementation of recommendations from the Southwark Schools’ Air Quality Audits  At least one recommendation from each air quality audit is implemented annually.  Idling signage will be offered to all schools. Develop priority list for new schools streets to be put in place.  Develop a list of schools that would benefit from green screens.  KPI - Implement 9 new school streets before 2026.	Council will implement a hierarchy of measures in order to reduce emissions or reduce exposure to poor air quality around schools.	School audit reports		EPT Education Highways

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
Public health and awareness raising	3.9	Encourage schools to join the TfL STARS accredited travel planning programmes	Environment & Leisure – Sustainable Travel Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1	Ongoing	Proportion of schools in Southwark with STARS Bronze, Accreditation each year  Proportion of schools in Southwark with STARS Silver Accreditation each year  Proportion of schools in Southwark with STARS Gold Accreditation each year  The total number of schools in Southwark is 94		TfL guidance		EPT Highways Sustainable travel team Education TfL
	3.10	Assess the feasibility of Street Space measures around educational and health premises	Environment & Leisure - Highways	££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2	2022	<b>KPI - Annual progress report</b>  Implement an additional 3 school streets every year.  Review of all schools to determine any potential measures to reduce traffic near schools to be undertaken completed before 2024.	Climate Action Plan G.4.iv			
	3.11	To create school super zones in the Borough	Children and Adult Services - Public Health Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 2		Annual progress report  <b>KPI – Number of School Super zones in the Borough</b>				Public Health
	3.12	To create school walking maps for all schools in the Borough	Environment & Leisure – Sustainable Travel Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 2	2022 - 2027	Annual progress report  <b>KPI – Number of School walking maps in the Borough</b>			Capital bid	Highways sustainable travel team
	3.13	Raising awareness about indoor air quality	Environment & Leisure – Environment Protection Team	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1	When funding is available	To produce a toolkit on domestic and commercial indoor air pollution and how to reduce personal exposure  <b>KPI – Indoor Air Quality produced</b>	Indoor air quality projects are being undertaken in partnership with Impact on Urban Health.		Capital bid	

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
Public health and awareness raising	3.14	<p>Review the progress of recommendation 13 of the Chief Medical Officers report 2017</p> <p>a) Southwark Clinical Commissioning Group (CCG) Groups should analyse local air quality monitoring data for breaches of air pollution standards, and publish these alongside the local hospital data for impacts on admissions for respiratory and cardiovascular disease and</p> <p>b) Public Health England should aggregate and analyse progress annually for a national public report to NHS England</p>	Children and Adult Services - Public Health Team	£	No emissions / concentrations benefits but critical in terms of understanding emissions	When resources are available	<p>KPI - Annual progress report</p> <p>Work with NHS to develop a method to analyse air quality and correlation with admission and outpatient presentation data for air pollution related conditions</p>				<p>Southwark CCG</p> <p>Public Health team</p> <p>Public Health England</p>

Action Table 4 Delivery servicing and freight air quality action plan

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
	Action Reference Number	Description of action to be implemented	Name of Council Department with responsibility for action implementation	Anticipated cost of action implementation £ = 0 – 50k ££ = 50 – 100k £££ = >100k	High = 3 Medium = 2 Low = 1	Proposed timescale for implementation	What the key performance Indicators for implementation will be	Links to separate document or a reference.			
Delivery servicing and freight	4.1	Develop an AQAP guidance to support procurements and contracts that impacts on air quality.	Environment & Leisure – Environment Protection Team  All Departments	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	Ongoing	Council approach to consider impacts of air quality in Southwark when procuring goods and services.  Develop guidance for all departments to consider the impact of their procurement on air quality in Southwark.  Air quality considerations included within the specification or terms of procurement or contracts as most appropriate.  Develop a robust monitoring process to review effectiveness of air quality guidance on the procurement process  <b>KPI – Guidance developed</b>  Report on the number of contracts with air quality criteria as a specification of the contract on an annual basis  Review TfL report findings into fleet vehicle speed limiters and consider inclusion in Fleet procurement policy.	AQAP and Climate Action Plan will be linked to within the council’s Fairer Future Procurement Framework (FFPF).  Procurement of Council vehicles will comply with Fleet Policy.	Air Quality Procurement guidance		EPT  Contract Officers
	4.2	Installing bookable permit only loading bays at pilot projects.	Environment and Leisure - Highways	££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 -3	2023 - 2027	Annual progress reporting  <b>KPI – Number of bookable permit holder only Loading Bays in the Borough</b>	Delivery servicing and freight, subject to Lead Member approval		Trial in Walworth LEN and Bankside (Kerb dock)	EPT Parking services Highways External contractors

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
Delivery servicing and freight	4.3	Explore with the Port of London Authority (PLA) the methods of control of shipping emissions and use of shipping to mitigate land based emissions	Environment & Leisure – Environment Protection Team	£££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 -3	2023 - 2027	Annual progress reporting.  <b>KPI – Reduction in NOx, PM<sub>10</sub> &amp; PM<sub>2.5</sub> emissions</b>  <b>Review riverside hotspot indicated by LAEI and consider further actions.</b>  Submit consultation response on any future revision of PLA Air Quality Strategy.	The PLA has identified methods of control of shipping emissions in the PLA's Air Quality Strategy (2020)			EPT PLA
	4.4	Support and engagement with river and rail movement projects.	Environment & Leisure – Environment Protection Team  Environment and Leisure - Highways	£££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 -3	2023 - 2027	Participation in three projects associated with river freight.	Projects may also include rail freight.  Explore greater use of the Thames for freight and delivering into the borough, minimising impact of polluting vehicles on roads Climate Action Plan 1.2.ii		CRP projects CEVA IoUH	EPT Highways External contractors

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
Delivery servicing and freight	4.5	Reducing emissions from delivering to local businesses and residents	Environment and Leisure - Highways	£££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	Ongoing	<p>Percentage increase in Ultra Low emission Vehicles in Southwark.</p> <p>Monitor survey information from cargo bikes e.g. bikes from bikes for business.</p> <p>Support click and collect projects.</p> <p>Use connections to businesses and markets to facilitate shorter supply and distribution chains</p> <p><b>KPI - Work with the Business Improvement Districts to understand best practice in supporting local supply chains and how this can be rolled out to other areas of the borough Climate Action Plan S.3.i</b></p> <p>Develop and deliver a Sustainable Freight and Last Mile Delivery Hubs Plan by 2026 that prioritises areas of greatest need and potential Climate Action Plan S.3.ii</p> <p>Support businesses to switch to zero pollution delivery vehicles, working with them to shift more local deliveries to electric cargo bikes – Climate Action Plan S.3.iii</p> <p>Support and engage in all available projects that increase the use of cargo bikes and e-cargo vehicles.</p> <p><b>KPI - Number of projects that supported.</b></p>	Information on vehicles will be gathered using anonymised vehicle registration details.			Highways BIDs  Climate Change  Climate Change  Climate Change

Action Table 5 Borough fleet actions air quality action plan

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
	Action Reference Number	Description of action to be implemented	Name of Council Department with responsibility for action implementation	Anticipated cost of action implementation £ = 0 – 50k ££ = 50 – 100k £££ = >100k	High = 3 Medium = 2 Low = 1	Proposed timescale for implementation	What the key performance Indicators for implementation will be	Links to separate document or a reference.			
Borough fleet actions	5.1	Reducing emissions from Council Fleets (GLA mandatory action)	Environment & Leisure – Fleet Services	£££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 - 3	Ongoing	<p>Smarter Driver training for all fleet drivers</p> <p><b>KPI All new drivers to receive training within six months of starting in Southwark</b></p> <p>Monitor the mileage and Fuel use reports passed to Business Unit Managers</p> <p><b>KPI – Reduce fossil fuel usage by 10% per year</b></p> <p>Every commercial vehicle procured to undergo full sustainability evaluation Climate Action Plan K.3.i</p> <p><b>KPI - Work towards the Southwark's commercial fleet being tailpipe emission free by 2030 (subject to operational requirements)</b></p> <p><b>KPI – Proportion of vehicles within the Fleet that are electric, hydrogen, or hybrid.</b></p> <p>Fleet Strategy to promote sustainable travel.</p> <p><b>KPI – Monitor and report on the EVCP at Tooley Street and Queens Road monthly</b></p> <p><b>Review of services to determine if activities can be replaced with e-bike or cargo bike.</b></p> <p>Identify new locations as part of EV strategy Climate Action Plan K.3.ii</p> <p>Design and implement a strategic plan to trial low emissions vehicles into the LGV/HGV fleet (including waste and highways) Climate Action Plan K.3.iii</p>	Fleet Strategy to be published			Fleet Services

Action Table 6 Localised solutions air quality action plan

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
	Action Reference Number	Description of action to be implemented	Name of Council Department with responsibility for action implementation	Anticipated cost of action implementation £ = 0 – 50k ££ = 50 – 100k £££ = >100k	High = 3 Medium = 2 Low = 1	Proposed timescale for implementation	What the key performance Indicators for implementation will be	Links to separate document or a reference.			
Localised solutions	6.1	Green infrastructure	Chief Executive – Regeneration Chief Executive – Development Control Environment & Leisure – Highways	£ - £££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide	Ongoing	Monitoring and reporting of the impact of the Green Infrastructure projects.  <b>KPI - Number of Green Infrastructure projects implemented by Southwark during the year.</b>  Identify potential green corridors between key green spaces/Sites of Importance for Nature Conservation - Climate Action Plan V.2.i  <b>KPI - Review definition of green corridors within the early review of New Southwark Plan and consult on including within formal planning policy</b>	In accordance with Right tree right place principles.  Pollarding of trees in accordance with the maintenance programme in the <a href="#">Tree Strategy</a>			
	6.2	Street Space Measures	Environment & Leisure Climate Change Environment & Leisure – Highways Environment & Leisure – Regulatory Services – Environmental Protection Team	£££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	To be completed by December 2022  From January 2023	Complete the MAQF Low Emission Neighbouring in the Walworth Area  Explore the opportunities to introduce further Streetspace Measures in Southwark when funding is available.  <b>KPI: Review the 10 Streetspace Measures over the next 18 months Climate action Plan F.1.iv</b>	Movement Plan consultation in Autumn 2022.		Evaluation report	EPT GLA Highways
	6.3	Explore the feasibility with the Environment Agency to stop issuing D7 waste exemption: burning waste in the open registration.	Environment & Leisure – Regulatory Services – Environmental Protection Team	£	Reduction in emissions of Particulate Matter 1 -2	From January 2022	<b>KPI - Annual Reporting on progress</b>				

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
Localised solutions	6.4	To lobby the Central and the GLA for policy changes to improve air quality in Southwark	Chief Executive – External Affairs	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	Ongoing	<b>KPI - Annual Reporting on progress</b>  Create evidence base for case to TfL for reducing emissions from buses. To include mapping all major traffic derived pollution areas including bus stops/interchanges.	Collaborate and lobby transport operators including Transport for London to make bus journeys quicker, more reliable and zero emission - Climate Action Plan H.1.i: and Use our position as a council and through regional bodies that Southwark sits on to lobby the Mayor of London to decarbonise bus and rail networks - - Climate Action Plan H.1.iv			
	6.5	Apply for Mayor's Air Quality Funds and Defra Air Quality Grant to deliver air quality projects in Southwark	All	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	Ongoing	<b>KPI - Annual Reporting on progress and project reports.</b>				EPT
	6.6	To align the measures in Southwark's Climate Strategy and this action plan	Environment & Leisure Climate Change and Environment & Leisure – Regulatory Services – Environmental Protection Team	£ - £££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	Ongoing	<b>KPI - Alignment of Councils strategies and Plans</b>	Climate Action Plan Corporate delivery Plan Movement Plan Fleet Strategy New Southwark Plan		Review of each other's strategies and action plans	EPT Climate Change Team

Action Table 7 Cleaner transport air quality action plan

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
	Action Reference Number	Description of action to be implemented	Name of Council Department with responsibility for action implementation	Anticipated cost of action implementation £ = 0 – 50k ££ = 50 – 100k £££ = >100k	High = 3 Medium = 2 Low = 1	Proposed timescale for implementation	What the key performance Indicators for implementation will be	Links to separate document or a reference.			
Cleaner transport	7.1	Transport and air quality policies and projects are integrated	Environment & Leisure – Highways Environment & Leisure – Regulatory Services – Environmental Protection Team	£ - £££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 - 3	Ongoing	KPI - The number of Healthy Streets projects delivered during the year. KPI - The number of walking and cycling infrastructure projects delivered during the year.	Corporate Delivery Plan			EPT Highways
	7.2	Discouraging unnecessary idling by taxis and other vehicles	Environment & Leisure – Parking	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1	Ongoing	KPI - Percentage of drivers complying with requests from Civil Enforcements Officers to switch the vehicle’s engine off. KPI - Respond to consultations on Public Carriage Vehicles. KPI - Lobby Government on strengthening idling legislation.	Enforcement section in the Movement Plan			Parking enforcement
	7.3	Regular temporary car free days and pedestrianisation schemes in line with proposal 4.2.1a of the London Environment Strategy (GLA mandatory action)	Environment & Leisure - Sustainable Travel	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide in the local area of the event 1		KPI - Undertake 8 car free events. KPI - Number of new controlled pedestrian crossings (annual target) – 5 per year KPI - Number of level access/dropped kerb uncontrolled pedestrian crossings installed (annual target)				EPT Sustainable travel team
	7.4	Support the London Mayor to extend the Ultra-Low Emission Zone to the current LEZ boundary  Review Mayor proposals for Road Charging	Environment & Leisure – Highways	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 1 -3	2024	KPI - Support implementation of ULEZ extension. KPI - Respond to consultations on Road charging.	Recent consultation included questions on road charging.		Response to ULEZ consultations	Highways

160

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
Cleaner transport	7.5	Using parking policy to reduce pollution emissions (GLA mandatory action)	Environment & Leisure – Highways	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 - 3	2025	Implement borough-wide controlled Parking regime  KPI Coverage of 94% of the Borough by 2025 Climate Action Plan G.4.iii	Alignment with Climate Action Plan, subject to approval of Council Parking Policy 2022.			
	7.6	Installation of Ultra – low emission Vehicle infrastructure charging points (GLA mandatory action)	Environment & Leisure – Highways  Environment & Leisure – Trading Services	£££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 - 3	Ongoing	KPI - Percentage of electric vehicles registered in Southwark  KPI – Install a further 1000 Electric Vehicle charging points in Southwark by 2026.  KPI - Implement a borough-wide strategy for EV infrastructure by 2023	Infrastructure strategy being discussed. Need to identify lead team.  Avoiding in conflict in reallocation of road space			
	7.7	Provision of infrastructure to support walking and cycling (GLA mandatory action)	Environment & Leisure - Highways  Environment & Leisure – Climate Change	£ to £££	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 - 3	Ongoing	KPI - Increase signed cycle coverage by 7km. KPI - 1000 secure cycle hangers installed across Southwark by 2026. Climate Action Plan F.1.i KPI – Install an additional 30 cycle stands per year. KPI – At least 1 kilometre of new segregated cycle lane installed every year. Climate Action Plan F.1.ii  KPI - Number of new cycle-hire docking stations in the Borough  Improve access to walking in the borough and actively promote this as a zero-carbon method of transport  Deliver the Equal Pavements Pledge, working with older people, those with disabilities and limited mobility to make sure Southwark’s streets are accessible for everyone  KPI - Number of Equal Pavement Pledge projects associated with improving walking. Climate Action Plan F.1.vi:  Provide free cycle training for residents, including for young people, those with disabilities and cargo bike training Climate Action Plan F.1.iv	Climate Fund Transport for all charity - Equal pavement pledge.  Review of existing Cycling strategy to occurring 2023 and update to new terminology, revised routes and new proposals in conjunction with TfL and cycling groups.  Ongoing projects -			Highways

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information	Technical	Process	People
Cleaner transport	7.8	Review ability for bus lanes on borough roads to be used by non-emergency ambulances for patient transport.	Environment & Leisure – Highways	£	Reduction in emissions of Particulate Matter and Nitrogen Dioxide 2 - 3	2023	KPI - Annual report of progress				

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# APPENDIX A - REASONS FOR NOT PURSUING ACTION PLAN MEASURES

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
e.g. Localised solutions	e.g. Low Emission Neighbourhoods	e.g. we have been unable to obtain funding, although we have developed an outline plan for LEN in xx location and will try to obtain funding for delivery of this over the coming year

**Table G** Action Plan Measures Not Pursued and the Reasons for that Decision – *to be discussed with the GLA prior to finalisation*

If you have any comments on this AQAP please send them to Southwark Environmental Protection at:

Environmental Protection Team,  
Regulatory Services,  
Environment & Leisure,  
3<sup>rd</sup> Floor Hub 1, 160 Tooley Street  
London. SE1 2QH  
Telephone: - 020 7525 3551  
Email: - [environmental.protection@southwark.gov.uk](mailto:environmental.protection@southwark.gov.uk)



**Proposed Air Quality Management Order**

**Environment Act 1995 Part IV Section 83(1)**

**London Borough of Southwark Council**

**Air Quality Management Area Order**

London Borough of Southwark Council, in exercise of the powers conferred upon it by Section 83(1) of the Environment Act 1995, hereby makes the following Order.

This Order may be cited and referred to as the Southwark Air Quality Management Area Order 2023 and shall come into effect on 1 January 2023.

This Order varies the London Borough of Southwark Air Quality Management Order 2003 dated 1 June 2003 ('the 2003 Order').

The area shown on the attached map edged in red is to be designated by variation under this Order as an air quality management area (the designated area).

The designated area of the Southwark Air Quality Management Area as varied by this Order incorporates the whole borough of said Council.

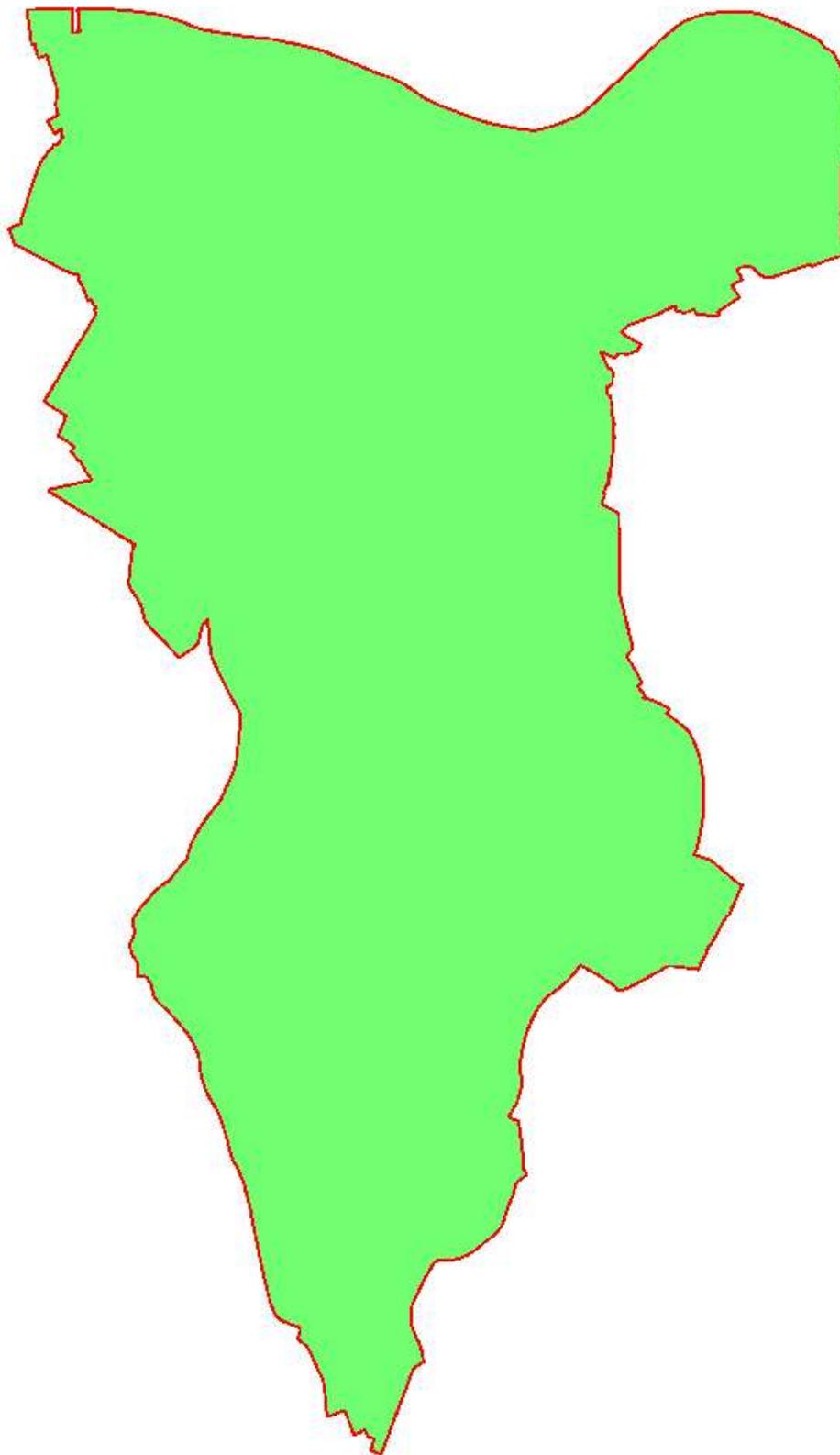
For the avoidance of doubt, this varied Order does not un-declare any pollutants in respect of which the 2003 Order was designated.

This Order shall remain in force until it is varied or revoked by a subsequent order.

The Common Seal of London Borough of Southwark Council was hereto affixed on [date] and signed in the presence of /on behalf of said Council.

.....

## Proposed Southwark Air Quality Management Area 2022



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London Borough of Southwark ((0)100019252)



**LOCAL DEVELOPMENT ORDER – DISTRICT  
HEATING NETWORK  
DECEMBER 2022**

**APPENDICES**

No.	Title
Appendix A	Draft Local Development Order
Appendix B	Area covered by the Local Development Order
Appendix C	Equalities analysis
Appendix D	Phasing plan for SELCHP extension



# **Local Development Order Southwark District Heating Network**

**December 2022**

**Contents**

Statement of Reasons

Local Development Order - Southwark District Heating Network

Map showing affected Land by LDO

**London Borough of Southwark Council**  
**SELCHP District Heating Network Local Development Order**

**Town and Country Planning Act 1990 (as amended)**

**Statement of Reasons**

**Description of Development Permitted by this Local Development Order**

The Local Development Order (“LDO”) grants planning permission for the development of a District Heating Network (DHN) comprising of pipes, cables and wires, heat exchange equipment, street furniture, informational signage and ancillary engineering works within defined areas of land in the borough of Southwark and shown on the attached map, subject to conditions.

**Justification for creating this Local Development Order**

The principal aim of the LDO is to encourage the uptake and implementation of a DHN in accordance with Southwark’s Local Plan policy P70 Energy.

Southwark Council is keen to promote and support the development of an extension to the existing DHN from the SELCHP Energy Recovery Facility. By distributing heat to multiple users through an underground pipe network, several thousand homes and businesses can be connected to a local, sustainable heat source.

The SELCHP Energy Recovery Facility located in the London Borough of Lewisham outside the eastern edge of the Old Kent Road Opportunity Area boundary provides a key opportunity to provide a low-carbon heating solution for new and existing development in the Old Kent Road and North Peckham areas.

The aims are:

- To maximise emissions reduction of CO<sub>2</sub> to meet the borough target to becoming carbon neutral by 2030.
- To support regeneration and enable developers to meet building regulations and planning policy requirements.
- Improve air quality through reduction of NO<sub>x</sub> emissions.

*Background*

*District Heat Networks*

Heat networks can deliver space heating, hot water, and /or cooling from a central source or sources to a wide range of buildings. Heat networks can benefit from economies of scale and can make use of otherwise inaccessible low-carbon sources such as heat from energy from waste, or heat recovered from industry or environmental sources such as ground and river source heat.

Heat networks currently provide 2% of UK heat demand and the Climate Change Committee (CCC) estimated in 2015 that with Government support, they could provide 15% by 2050 in a least-cost pathway to meeting carbon targets.

### *SELCHP*

The South East London Combined Heat and Power facility was opened in 1994 to address the challenges from the increasing scarcity of and environmental problems of landfill. It is located in the London Borough of Lewisham, between New Cross Gate and Surrey Quays stations. The facility receives and incinerates black bag waste which cannot be recycled. The facility is operated by Veolia.

In 2013, Southwark Council and Veolia entered into an agreement to harness the wasted heat energy from the burning of household waste and enable it to be delivered through a network of underground pipes to the boiler houses on several Southwark Council estates to provide heating and hot water to residents, replacing the reliance on gas-burning boilers. This network currently provides heating and hot water for 2,700 properties in the Bermondsey area.

Following the successful operation of this District Heating Network, Southwark Council and Veolia now wish to extend this agreement and deliver a low-carbon heating source to additional Council estates and new developments in the borough.

Unlike statutory undertakers like electricity and water companies, DHN operators do not have permitted development rights to install pipes and utilities equipment. Implementation of the LDO would avoid the need for multiple planning applications by granting permitted development rights for Veolia to lay the pipes and equipment needed to facilitate the DHN extension, streamlining the process and creating more certainty for Veolia.

### *Climate context*

The Council regards the DHN as the key to unlocking long-term decarbonisation of heat in the borough. Heat is responsible for a third of the UK's greenhouse gas emissions. Heat in buildings accounts for 23% of total UK emissions. In 2021, the central government laid legislation proposing to reduce greenhouse gas emissions by 78% by 2035 compared to 1990 levels.

Under the Climate Change Act 2008, Southwark, as a local authority, has a legal obligation to deliver climate action both across our own estate (assets owned by the council) and the wider local authority area.

In 2019 Southwark Council declared a climate emergency and in response, have published the roadmap to becoming carbon neutral by 2030 in the Climate Change Strategy 2021. Priority 1 Greener Buildings sets out that Southwark must ensure buildings are built to minimise carbon emissions in their use in order to be carbon neutral by 2030. Delivery of the LDO will help the achieve two of the actions required

by the strategy:

- Theme C. Low-carbon technologies and practices are encouraged within the borough's buildings. The goal is to maximise the use of low-carbon technologies for new and existing homes. The immediate action is to identify households not currently serviced by district heating that can be switched onto SELCHP or equivalent district heat system. Alongside this Identify areas of the borough that cannot be served by heat networks and must look at communal ASHP, CHP or secondary source heat pumps.
- Theme E. Decarbonise council housing. The goal is to replace gas with low-carbon technologies. The immediate action is to increase the number of council-owned homes to the extended SELCHP network where feasible.

Analysis of Southwark Council's operations and assets shows the council's own carbon footprint of 432 ktCO<sub>2</sub>e. The major contributors to this total are the council's buildings which account for 16% of total emissions.

The extension of the SELCHP heat network offers the opportunity to decarbonise the Council owned housing estates in the Old Kent Road and North Peckham area, as well as enabling new development in the Old Kent Road Opportunity Area to easily connect. The existing DHN has saved 7,700ktCO<sub>2</sub> a year since its inception in 2013.

Throughout 2018 and 2019, the Council and its consultants conducted heat mapping, masterplanning and detailed feasibility studies concerning the opportunities to expand the use of low-carbon heating in the borough. It was found that expanding the existing SELCHP District Heat Network represented the lowest whole-life cost means to achieving carbon, air quality and other policy objectives.

### *Building regulations and planning policy requirements*

In the context of a global climate crisis, governments at all levels are responding by updating building regulations and planning policy to achieve a reduction in greenhouse gas emissions within the built environment. The LDO and subsequent connection to the DHN will allow development to remain viable by providing a cost-effective solution to increased regulatory and policy requirements.

Updates to Part L to the national Buildings Regulation 2021 require development proposals to have stricter performance targets, and the Standard Assessment Procedure (SAP) model design methodology now includes consideration of energy use of DHNs, allowing developments which connect to achieve a higher carbon reduction.

The London Plan 2021 expects major developments to achieve net-zero by following the Mayor's energy hierarchy. Connection to the DHN would help achieve the 'Be Clean' part of the hierarchy which is aimed at reducing buildings' operational emissions.

At the local level, the Southwark Plan 2022 policy P70 requires an ambitious on-site carbon reduction of 100 per cent for major residential development and 40 per cent carbon reduction for major commercial development. It also requires that all major

developments connect to or future-proof development to be able to connect to an existing or planned decentralised energy network.

The Old Kent Road is envisaged to see significant growth over the next 20 years as planned for in the Old Kent Road Area Action Plan. One of the targets is to achieve a net zero carbon Area Action Plan. The LDO will provide certainty for new development seeking to connect to the DHN.

### *Air Quality*

There is a strong link between poor air quality and negative health outcomes. These can range from exacerbation of respiratory conditions such as asthma and chronic respiratory disease, through to an increase in emergency admissions to hospital. Poor air quality disproportionately affects the health outcomes of the very young, the elderly, the ill and the poor. The Council has an ambition and a legal obligation to improve air quality in the borough.

The main atmospheric pollutants of concern in Southwark are Nitrous Dioxide (NO<sub>2</sub>) and Particulate Matter (PM). The main source of these pollutants locally is traffic emissions but domestic heating also makes a significant contribution with commercial and domestic gas heating is estimated to contribute nearly 30% of local NO<sub>2</sub> emissions. The extension of the DHN and use of a renewable energy source over gas boilers which release harmful pollutants through the combustion process will mean an improvement in air quality and therefore better health outcomes for Southwark residents.

### **Statement of Policies that this Local Development Order will implement**

The LDO is consistent with and will help deliver national, London-wide, and local planning policies and guidance.

#### *National Planning Policy Framework 2021*

The National Planning Policy Framework (NPPF) advises that local planning authorities should consider using Local Development Orders to set the planning framework for areas or categories of development, where the impacts would be acceptable, and in particular where this would promote economic, social or environmental gains for the area, such as boosting enterprise and promoting low carbon technologies to reduce the impacts and mitigate the effects of climate change. In particular, the framework states that local planning authorities should actively support energy efficiency improvements and have a positive strategy to promote renewables.

Section 182 of the Planning Act 2008 puts a legal duty on local authorities to include policies on climate change mitigation and adaptation in Development Plan Documents. Section 14 of the National Planning Policy Framework (NPPF) details how the planning system should meet the challenge of climate change, flooding and coastal change. Paragraph 153 requires the planning system to help to:

Shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

Paragraph 154 states that new development should be planned for in ways that:

- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

Paragraph 155 states that to help increase the use and supply of renewable and low carbon energy and heat, plans should:

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
- b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

Paragraph 156 requires:

Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.

### *London Plan 2021*

Policy *GC6 Increasing efficiency and resilience* of the *London Plan 2021* sets out that in order to help London become a more efficient and resilient city, those involved in planning and development must seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050.

*Policy SI2 Minimising greenhouse gas emissions* requires major development to be net zero-carbon by reducing operational greenhouse gas emissions and minimising energy demand in accordance with the energy hierarchy:

1. be lean: use less energy and manage demand during operation
2. be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
3. be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
4. be seen: monitor, verify and report on energy performance.

*Policy SI3 Energy infrastructure* sets out that boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development.

## *Southwark Plan 2022*

### *P70 Energy*

All development

Energy Hierarchy

1. Development must minimise carbon emissions on site in accordance with the following energy hierarchy:
  - Be lean (energy efficient design and construction); then
  - Be clean (low carbon energy supply); then
  - Be green (on site renewable energy generation and storage).

Major development

2. Development must reduce operational greenhouse gas emissions and minimise both annual and peak energy demand. This must be in accordance with the following energy hierarchy:
  - Be lean (energy efficient design and construction); then
  - Be clean (low carbon energy supply); then
  - Be green (on site renewable energy generation and storage); then
  - Be seen (monitor, verify and report on energy performance); then
  - Offset residual carbon emissions to reach zero carbon target.
3. Major development must be net zero-carbon.
4. Major residential development must reduce carbon emissions on site (100% on 2013 Building Regulations).  
In exceptional circumstances, any shortfall must be secured off site through planning obligations or as a financial contribution
5. Major non-residential development must reduce carbon emissions on site by a minimum of 40% on 2013 Buildings Regulations\*. Any shortfall must be secured off site through planning obligations or as a financial contribution.

6. Development proposals referable to the Mayor must calculate whole life cycle carbon emissions through a nationally recognised assessment and demonstrate actions taken to reduce life cycle carbon emissions.

#### Decentralised energy

7. Major development must be designed to incorporate decentralised energy in accordance with the following hierarchy:
  - Connect to an existing or planned decentralised energy network; then
  - Be future-proofed to connect to a planned decentralised energy network; or
  - Implement a site-wide low carbon communal heating system; and
  - Explore and evaluate the potential to oversize the communal heating system for connection and supply to adjacent sites and, where feasible be implemented.

\*Building Regulations 2013. If these are updated, the policy threshold will be reviewed.

#### *Old Kent Road Area Action Plan*

##### *AAP3: Climate Emergency*

Old Kent Road will have a net zero carbon Area Action Plan. We are committed to tackling the Climate Emergency by achieving carbon neutrality by 2030. All new development will achieve net zero carbon.

#### New development

We will reduce carbon emissions to net zero by ensuring new development achieves the highest on site performance. We require the highest environmental building standards and net zero electricity and heating systems. Any on site shortfall to achieving net zero carbon will require a financial contribution. All new developments will be required to connect to or enable future connection to a District Heat Network. A connection to a District Heat Network (DHN) provides a supply of low carbon heat to homes, businesses and public buildings. There is currently a single District Heat Network (SELCHP DHN) for Old Kent Road. SELCHP is a waste incinerator in Lewisham which generates heat and electricity that can be used to power homes. We support the delivery of further DHNs with low or net zero heat sources that use land efficiently.

Gas boilers are the largest source of carbon emissions within the borough, so new gas boilers in new developments will not be permitted unless they are an interim solution before a low carbon solution is implemented. Energy consumption will be reduced so new residents and businesses will have lower energy bills.

Over time, on site building standards and performance will improve resulting in less energy use, reduced heating requirements and lower carbon emission shortfalls. At this stage, the energy hierarchy priority will be reviewed.

#### Targets:

1. Achieve a net zero carbon Area Action Plan; and
2. We will deliver the SELCHP District Heat Network for Old Kent Road to heat residential and non-residential uses; and
3. Connect as many housing estates in the Old Kent Road Opportunity Area to a District Heat Network as possible

#### Planning Applications

Major development and minor new build development must:

1. Connect to a District Heat Network; and
2. Adhere to the energy connection hierarchy for the Old Kent Road Opportunity Area (Table 1) in order of priority. Communal or individual gas boilers will not be supported; and
3. Accommodate future connection to a District Heat Network;
  - If connection to a District Heat Network is proposed but the District Heat Network has not yet been delivered, an alternative low carbon on site heating solution must be implemented if the District Heat Network is not delivered. The alternative heating solution must follow the energy hierarchy and calculate its performance and any financial contribution resulting from a net zero carbon emission shortfall; and
  - The performance and financial contribution of the alternative heating solution is secured as a cap in the Section 106 agreement. The trigger for payment of the financial contribution is the post occupation of a completed phase or development; and
  - If during the course of construction, connection to the District Heat Network becomes possible and replaces the alternative heating solution, the performance and any carbon offset financial contribution is recalculated with the District Heating Network as the heating source and secured through Section 106 agreement. This may also require an amendment to the original planning permission.
4. Include an Energy Statement that:
  - Sets out the rationale if the development is not connecting to a District Heat Network; or
  - Demonstrates the strategy for the alternative and final heat sources if connection to a District Heat Network is proposed.

**London Borough of Southwark****Southwark District Heating Network Local Development Order (“the Order”)**

1. This Order is made by the London Borough of Southwark (“the Council”) under section 61A(2) of the Town and Country Planning Act 1990 (as amended).
2. This Order applies to the land specified in Part I.
3. This Order grants planning permission for the development detailed in Part II, subject to the limitations specified in Part III and subject to the conditions set out in Part IV (“the Conditions”).
4. Any development not granted in accordance with article 3 above continues to require planning permission in accordance with the provisions of the Town and Country Planning Act 1990 (as amended).
5. This Order takes effect on the date it is adopted by the Council and will expire on 31 March 2028, subject to any subsequent decision by the Council relating to its withdrawal, modification or extension.

Made under the Common Seal of the London Borough of Southwark this [date]  
day of [month] [year]

Authorised Signatory

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### **Part I - Area covered by this Local Development Order**

Within the London Borough of Southwark, planning permission is hereby granted for the installation of district heating apparatus as specified in Part II - Description of Development, within the areas shown on the plan attached to this Order at Part IV.

### **Part II - Description of Development**

In pursuance of the powers under the above Act, the London Borough of Southwark hereby gives notice that planning permission has been approved for the carrying out of the development referred to below, subject to the conditions listed under Part III:

Development of a district heating network, including pipes, cables and wires, heat exchange equipment, street furniture, informational signage and ancillary engineering works, subject to conditions.

### **Part III - Development not permitted**

Development is not permitted by this Order if it constitutes, consists of or comprises:

- above ground cabinets, buildings or structures of greater than 1.5 cubic metres in volume or greater than 1.4m in height;
- any sign of greater than 500 square centimetres in area;
- works within a designated conservation area where:
  - above ground cabinets, buildings or structures of greater than 1.0 cubic metres in volume or greater than 1m in height;
  - any sign of greater than 250 square centimetres in area.
- any thermal energy generating plant or equipment;
- EIA development as defined by Regulation 2 (1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011;
- any works within the curtilage of a Listed Building;
- any above-ground development on land within 25 meters to the curtilage of a Listed Building;
- within areas to which a Direction under Article 4 of the Town and Country Planning (General Permitted Development) Order 1995 is in force, development of a type described in that Direction;

## Part IV

### *Preamble*

In these conditions:

“**the council**” means Southwark Council

“**the development**” means the works authorised by the Order; “**the Local Planning Authority**” means Southwark Council;

“**the Order**” means the Southwark District Heating Network Local Development Order.

### *Other Statutory Requirements*

Whilst the LDO grants planning permission for certain types of development as described in Part I and Part II, it does not grant other consents that may be required under other legislation. It will remain the responsibility of the developers to ensure that all other statutory requirements beyond the scope of the planning system are adhered to. Although not an exhaustive list, particular attention is drawn to the following relevant legislation:

#### *European*

- Directive 92/43/EEC (Habitats);
- Directive 85/337/EEC (amended by Directive 97/11/EC) (Environmental Impact Assessment).

#### *National*

- The Highways Act 1980;
- New Roads and Street Works Act 1991
- Wildlife and Countryside Act 1981;
- Planning (Listed Buildings and Conservation Areas) Act 1990;
- Ancient Monuments and Archaeological Areas Act 1979;
- Hedgerow Regulations 1997;
- Town and Country Planning Act (Trees) Regulations 1999;
- Conservation of Habitats and Species Regulations 2010 (as amended);
- The Environmental Permitting (England and Wales) Regulations 2010;
- Health and Safety Executive;
- Building Regulations;
- The Town and Country Planning Act 2007 (Control of Adverts)(England);
- The Planning Act 1990 (Hazardous Substances);
- The Planning Regulations 1992 (Hazardous Substances).

Failure to comply with the relevant statutory requirements could result in any development being unlawful and may result in appropriate enforcement action being taken by the council and/or other agencies. It is the responsibility of the developer / development to be in accordance with all relevant legislation.

## Expiry

Subject to any subsequent decision by the Local Planning Authority relating to its withdrawal, modification or extension, this Order will expire on 31<sup>st</sup> March 2028.

Reason: To ensure that the development is commenced and completed within a reasonable period of time.

## Reinstatement

Prior to the expiry of sixty days from date of completion of temporary works, the site of the temporary works shall be reinstated to the condition which existed prior to such works taking place.

Reason: To ensure that all land over the heating networks is reinstated promptly and to an appropriate standard.

## Trees

No development affecting trees or hedgerows shall commence until:

- a. An arboricultural impact assessment shall be undertaken by a competent arboriculturist and an Arboricultural Method Statement shall be submitted and approved in writing by the Local Planning Authority which demonstrates that reasonable consideration has been given to the retention and protection of significant value trees.
- b. All works are identified as in accordance with NJUG Volume 4 Guidelines for the planning, installation and maintenance of utility apparatus in proximity to trees. Issue 2: 2007, or as otherwise agreed in writing by the Local Planning Authority. No trenches, pipe runs or services or foundations for roads or pathways shall be dug or excavated within 5.0 metres of the base of any tree on the site or of any tree on land adjoining the site unless otherwise shown on the approved drawings. Details shall include cross sections showing the use of a permeable, non-dig or cellular confinement system suitable for supporting the load of vehicles within any tree root protection areas. All works shall adhere to BS5837: Trees in relation to demolition, design and construction (2012) and National Joint Utility Group, Guidance 10 - Volume 4 Guidelines For The Planning, Installation And Maintenance Of Utility Apparatus In Proximity To Trees (Issue 2).
- c. where any trees having a stem diameter of 100mm or greater are intended to be lopped, pruned or felled in connection with the carrying out of development in relation to that phase, a scheme identifying those

trees and setting out how the works are to be carried out in conformity with BS5837:2012 and BS:3998:2010 has been submitted to and approved in writing by the Local Planning Authority;

- d. where trees having a stem diameter of 100mm or greater are to be felled in relation to that phase, a scheme for their replacement (at a ratio of 1:1 (14-16cm girth replacement) for Category C trees OR as equivalent to the stem girth/CAVAT value of a Category A or Category B tree; whichever is greater) has been submitted to and approved in writing by the Local Planning Authority, including provision for the replanting of any trees which require replacement in consequence of accidental damage during the construction period; and
- e. a scheme for the protection, during the period of construction, of all retained mature trees in the vicinity of the development in relation to that phase identifying their location and species and conforming with BS5837:2012, and NJUG Vol.4. Version 2:2007 and a method statement including particulars relating to working methods, temporary protective fencing, location of hoardings and areas prohibited for use by contractors, has been submitted to and approved in writing by the Local Planning Authority.
- f. Any sections of hedgerow to be removed will need to be replanted with appropriate native shrubs and trees together with appropriate protection measures.
- g. a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before (within 24 hours) any vegetation is removed between March and August inclusive, and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the LPA at least 3 days prior to works being carried out.

The developer shall subsequently comply with the schemes approved under the requirements of this condition.

Reason: So that the Council may be satisfied the adequate protection of existing trees, which represent an important visual amenity in the area, and the proposed tree replacement scheme is in accordance with paragraphs: 8, 11, 12, 15 and 16 of the National Planning Policy Framework 2021; policies G1 Green Infrastructure, G5 Urban Greening and G7 Trees and Woodlands of the London Plan 2021; and policies P56 Protection of amenity, P57 Open space, P66 Reducing noise pollution and enhancing soundscapes, P14 Design quality, P13 Design of places, P60 Biodiversity and P61 Trees of the Southwark Plan 2022.

## **Tree & Hedgerow Maintenance**

If within a period of five years from the date of the planting of any tree, hedge or shrub that replacement tree, hedge or shrub, or any replacement, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the Local Planning Authority, seriously damaged or defective, another tree, hedge or shrub of the same species and size as that originally planted shall be planted in the same location no later than the first available planting season, unless the Local Planning Authority agrees in writing that a different species, size and / or location may be substituted. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason: To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff, in accordance with paragraphs: 8, 12, 15 and 16 of the National Planning Policy Framework 2021; policies SI 4 Managing heat risk, SI 13 Sustainable drainage, G1 Green Infrastructure, G5 Urban Greening and G7 Trees and Woodlands of the London Plan 2021; and policies P13 Design of Places, P14 Design Quality, P56 Protection of Amenity, P57 Open Space and P60 Biodiversity of the Southwark Plan 2022.

## **Biodiversity and Protected Species**

Prior to commencement of development, a Preliminary Ecological Appraisal (carried out as per the Guidelines for PEA by CIEEM) will be carried out and submitted to the LPA. Where protected species may be affected, any relevant surveys should be carried out and submitted as part of the PEA. Any recommended mitigation to avoid adverse impacts on protected species or other sensitive ecological receptors (as identified in the PEA) shall be carried out in full. The PEA should identify areas of shrubbery or any areas where there is potential for nesting and set out the measures of mitigation which will be taken to avoid disturbing wildlife during nesting season.

Reason: to avoid impacts on protected species and ensure no net loss of biodiversity as per the paragraph 109 of the National Planning Policy Framework 2021 and to confirm presence or likely absence of a protected species and ensure works are carried out to avoid adverse harm to a protected species.

## **Importation of Soils**

Any soil or soil forming materials brought to site for use in soft landscaping, public open space or for filling and level raising shall be tested for contamination and suitability for use. A methodology for testing these soils shall be submitted to, and approved in writing by, the Local Planning Authority prior to these materials being imported onto site. The methodology shall include information on the source of the

materials, sampling frequency, testing schedules and criteria against which the analytical results will be assessed (as determined by risk assessment). Testing shall then be carried out in accordance with the approved methodology. Relevant evidence and verification information (for example, laboratory certificates) shall be submitted to, and approved in writing by, the Local Planning Authority prior to these materials being imported onto the site. All sampling shall comply to BS:3882:2015 Specification for Topsoil.

Reason: To ensure that contaminated soils are not imported to the site and that the development shall be suitable for use with respect to land contamination in accordance with the National Planning Policy Framework 2021; and Southwark Plan 2022 Policies: P68 Reducing flood risk, P63 Land for waste management, P64 Contaminated land and hazardous substances.

### **Development within Designated Conservation Areas**

Within designated conservation areas, above ground development must reflect the guidance set out in the relevant conservation area appraisal for that area. Any new structure including cabinets and poles (excluding signs) shall be coloured or painted black and maintained as such.

Reason: To minimise visual impact of new development within designated conservation areas and preserve the character of designated conservation areas in accordance with policy P20 Conservation area.

### **Archaeology**

No development shall commence until a desk-based archaeological assessment has been conducted followed by a written scheme of investigation submitted to and approved in writing by the Local Planning Authority.

The desk-based assessment and written scheme of investigation will refer to an area around the proposed route. Any further works to be carried out which deviate from the defined area shall require a new desk-based assessment and subsequent written scheme of investigation to be submitted to and approved by the Local Planning Authority.

The written scheme of investigation will include a detailed scheme showing the complete scheme and arrangement of subterranean groundworks, including the construction methods. The submitted documents should show how archaeological remains will be protected by a suitable mitigation strategy.

The development shall only be carried out in accordance with the approved detailed scheme.

Reason: In order that all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve

archaeological remains by record and/or in situ in accordance with P23 Archaeology of the Southwark Plan 2022 and the National Planning Policy Framework 2021.

### **Unexpected Land Contamination**

The Local Planning Authority shall be notified in writing immediately where unexpected significant contamination is encountered during any development works and operations in the affected part of the site shall cease.

Where remediation of unexpected significant contamination is considered by the Local Planning Authority to be necessary, a Remediation Statement shall be submitted to and approved in writing by the Local Planning Authority prior to the recommencement of development on the affected part of the site. The Remediation Statement shall include a programme for all remediation works and for the provision of verification information.

Remediation works shall be carried out in accordance with the approved Remediation Statement. On completion of those works, the Verification Report(s) shall be submitted to the Local Planning Authority in accordance with the approved programme. The site or phase of a site shall not be brought into use until such time as all necessary verification information has been approved in writing by the Local Planning Authority.

Reason: To enable the local planning authority to ensure that unexpected contamination at the site will be addressed appropriately and that the development will be suitable for use in accordance with policy P64 Contaminated land and hazardous substances of the Southwark Plan 2022.

### **Construction management details**

No development shall commence until a Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority, which shall include the following details:

- a. the proposed hours of works taking into account the proximity of potential sensitive receptors;
- b. details of the methods to be employed for the prevention of mud, grit, dust and dirt being carried onto the public highway from the development; and
- c. details of the methods to be employed to minimise the potential for the creation of dust from the development; and
- d. details of the methods to be employed to minimise noise and vibration from the development; and
- e. details of the means of protecting water and waste water infrastructure; and
- f. Site perimeter representative sample , noise, monitoring; and
- g. A commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated

by the Mayor of London to follow current best construction practice, including the following:-

- Southwark Council's Technical Guide for Demolition & Construction at <http://www.southwark.gov.uk/construction>
- Section 61 of Control of Pollution Act 1974,
- The London Mayor's Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition',
- The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites',
- BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise',
- BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration'
- Relevant Stage emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards <http://nrmm.london/>

All construction work shall be undertaken in strict accordance with the approved CEMP and other relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

Community liaison will be the responsibility of the developer with arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents' liaison meetings, etc.). Contractors will also be expected to liaise with the Local Authority to help manage and coordinate construction impacts.

Reason: To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with policies P50 Highways impacts and P56 Protecting amenity of the Southwark Plan 2022; policy T4 Assessing and mitigating transport impacts of the London Plan 2021; and the National Planning Policy Framework 2021.

## **Part V**

Map

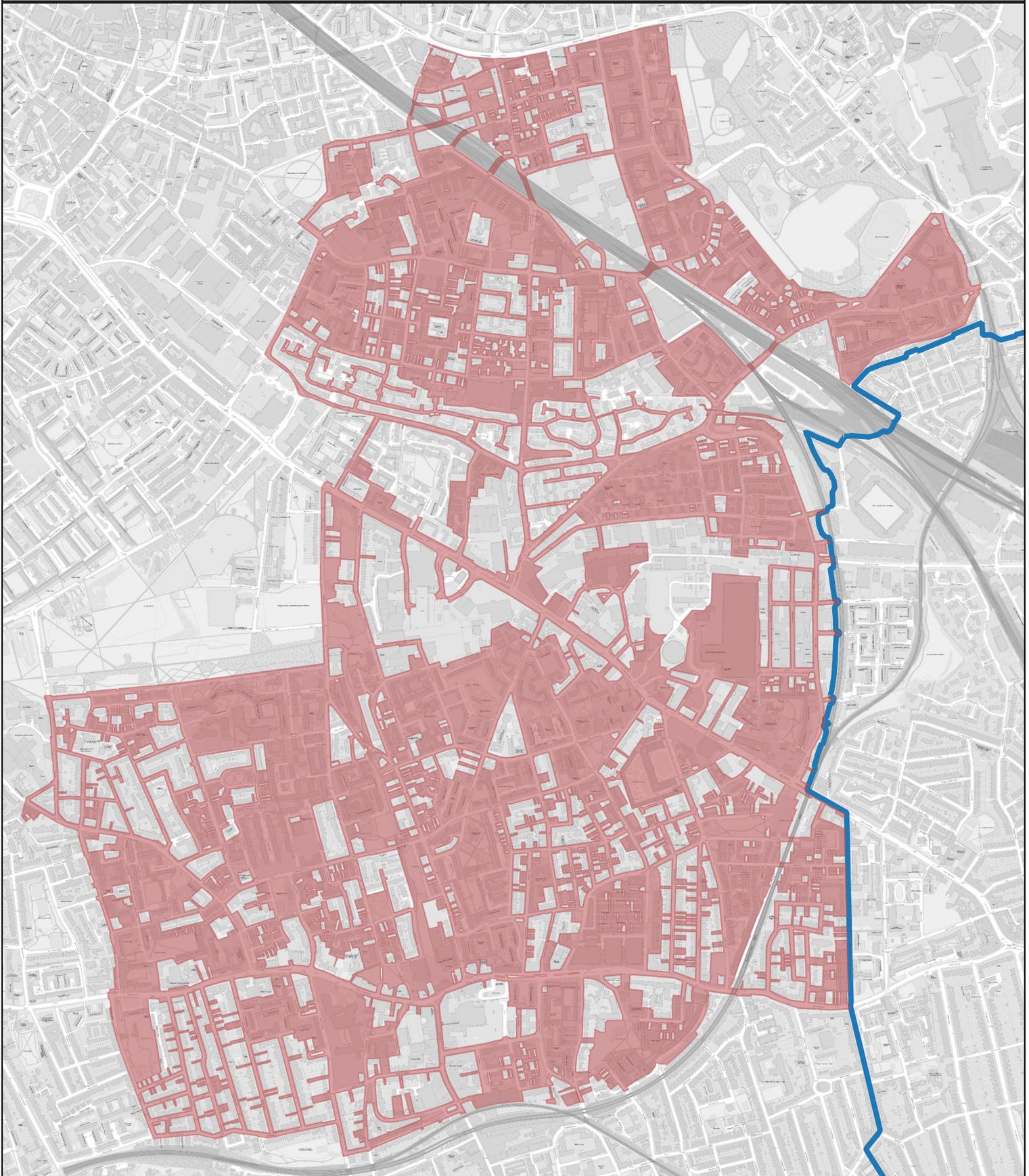


**LOCAL DEVELOPMENT ORDER – DISTRICT  
HEATING NETWORK  
DECEMBER 2022**

**APPENDICES**

No.	Title
Appendix A	Draft Local Development Order
Appendix B	Area covered by the Local Development Order
Appendix C	Equalities analysis
Appendix D	Phasing plan for SELCHP extension

# Land which the Local Development Order applies



**Key**

-  Southwark boundary
-  Local Development Order



0 250 500 m





**LOCAL DEVELOPMENT ORDER – DISTRICT  
HEATING NETWORK  
DECEMBER 2022**

**APPENDICES**

<b>No.</b>	<b>Title</b>
Appendix A	Draft Local Development Order
Appendix B	Area covered by the Local Development Order
Appendix C	Equalities analysis
Appendix D	Phasing plan for SELCHP extension

## 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](http://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**

<b>Proposed policy/decision/business plan to which this equality analysis relates</b>		Southwark Local Development Order – District Heating Network			
<b>Equality analysis author</b>		Ali Weatherup			
<b>Director</b>		Stephen Platts			
<b>Department</b>		Planning and Sustainable Growth (Old Kent Road)	<b>Division</b>		Chief Executive
<b>Date of analysis</b>		October 2022			
<b>Sign-off</b>	Tim Cutts	<b>Position</b>	Senior Regeneration Manager	<b>Date</b>	06 December 2022

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

<b>Brief description of policy/decision/business plan</b>
<p>Local Development Orders can be used by local authorities to grant permitted development rights to encourage particular types of development in defined locations.</p> <p>Veolia and Southwark Council wish to construct a District Heating Network (DHN) to deliver heat and hot water to 3,000 properties on Council estates in the Old Kent Road/North Peckham area through insulated pipework underground. Heat networks are useful because they mean not all properties need to have their own boiler. This has advantages in terms of installation cost, air quality, fuel price, ease of maintenance, and the ability to use low-carbon technologies. The energy source for the DHN will come from waste heat energy recovered from the SELCHP facility through the incineration of municipal waste. This is considered to be a renewable energy source and promotes circular economy principles.</p> <p>Unlike statutory undertakers like electricity and water companies, DHN operators do not have permitted development rights to install pipes and utilities equipment. Implementation of the LDO would avoid the need for multiple planning applications by granting permitted development rights for Veolia to lay the pipes and equipment needed to facilitate the DHN extension, streamlining the process and creating more certainty for Veolia.</p>

### Section 3: Service users and stakeholders

<b>Service users and stakeholders</b>	
<b>Key users of the department or service</b>	The DHN will impact the residents who live within the Council estates which are planned to connect – approximately 3,000 properties. Future phases of the project could mean that new development in the Old Kent Road would be able to connect to the DHN which would impact residential and commercial units.
<b>Key stakeholders were/are involved in this policy/decision/business plan</b>	Veolia, Local Authority's Environmental Protection Team; Environment and Leisure Department; Housing and Modernisation Department; Transport for London; Southwark Highways; Borough Archaeologist; Design and Conservation Team; Councillors; Finance and Governance Department; Chief Executive Department.

### 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.

<b>Age</b> - 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).	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>

It is anticipated that the development permitted by the LDO would have an overall positive impact on the protected characteristic of age. Residents of all ages will benefit from a more reliable and efficient source of heating and hot water. This should have the knock-on effect of lower heating bills. This could have a positively disproportionate impact on older people who have higher heating requirements. In general, elderly people need more warmth to stay comfortable and spend more time at home than those of working or school age. Any change in the cost of heating would therefore affect older people more.

There is a strong body of evidence which shows that short term exposure to high levels of pollution has a range of adverse health impacts such as asthma and chronic respiratory disease, through to an increase in emergency admissions to hospital.

In the short term, construction of the DHN may therefore have a negative impact on older and younger people because of increased dust and pollution in the local area. Poor air quality disproportionately affects the health outcomes of the very young and the elderly.

In the long term, the DHN should improve air quality of the area as it will reduce the reliance on gas boilers which emit harmful pollution. This will benefit residents of all ages but particularly young children and the elderly who are more likely to suffer health problems related to air quality.

The development permitted by the LDO will have positive health impacts on the protected characteristic of age through improving the reliability and effectiveness of the Council's heat networks. Both young children and older people are susceptible to cold related illnesses, so making heat supply as affordable and reliable as possible will reduce health inequality.

<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>
<p>With regard to age, 17.3% of the population in Southwark is over the age of 60, and 22.6% of the population are 19 or under (2018).</p> <p>Source: <a href="https://fingertips.phe.org.uk/profile/child-health-profiles/data#page/12/gid/1938133222/pat/6/par/E12000007/ati/102/are/E09000028">https://fingertips.phe.org.uk/profile/child-health-profiles/data#page/12/gid/1938133222/pat/6/par/E12000007/ati/102/are/E09000028</a></p> <p>Public Health England suggest that 7% of adult deaths in Southwark may be attributable to particulate air pollution (measured as fine particulate matter PM2.5). This equates to around 90 deaths per year in the borough.</p> <p>Source: <a href="https://www.southwark.gov.uk/assets/attach/4407/Air-Quality-Strategy-Action-Plan-Final-Version.pdf">https://www.southwark.gov.uk/assets/attach/4407/Air-Quality-Strategy-Action-Plan-Final-Version.pdf</a></p>	
<b>Mitigating actions to be taken</b>	
<p>Construction of the DHN will be temporary and take place in localised phases along the highway so higher levels of dust and pollution will only effect a small area at a time. The levels of pollution and dust will be monitored throughout the construction as agreed in the conditions for the LDO. The methods for reducing pollution and monitoring on-site impacts will be set out in the Construction Environmental Management Plan. The CEMP is required by a planning condition attached to the LDO.</p> <p>The cost of energy and the resulting impacts on residents will be monitored by the Housing and Modernisation department when the network is implemented and operational.</p>	

<p><b>Disability</b> - 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.</p>	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
<p>During construction of the DHN the accessibility and mobility of the local area may be affected. In particular, construction could cause difficulties in relation to increased traffic due to lane closures, reduction in parking due to parking suspensions, the construction activities blocking access to homes shops, bus stops and pavements as well as effects on</p>	<p>As with the protected characteristic of age, poor air quality disproportionately impacts those who are already ill. Some disabilities, such as those related to the respiratory system, may suffer more from exposure to the air pollution.</p>

<p>wayfinding. This would have a disproportionate impact on those who have limited mobility.</p> <p>The development permitted by the LDO will have a positive impact on the protected characteristic of disability in relation to economic issues due to the improved control and efficiency of the heat networks which should have the knock-on effect of lower heating bills. Disability here is identified as a characteristic which would lead to unequal impact due to people with disabilities sometimes needing more warmth in their homes to remain comfortable, though of course this depends greatly on the specific disability. This could have a positively disproportionate impact on people with disabilities who have higher heating requirements. Any change in the cost of heating would therefore effect disabled people more.</p>	<p>In the short term, with the construction of the DHN this would have a disproportionate negative impact on the protected characteristic of disability due to increased traffic emissions and dust particles arising from the development. However, in the long term, the implementation of the DHN would reduce the harmful emissions from domestic gas heating.</p> <p>The development permitted by the LDO will have positive health impacts on the protected characteristic of disability through improving the reliability and effectiveness of the heating and hot water system. Some disabilities, particularly those related to mobility, leave people more susceptible to cold related impacts and illnesses.</p> <p>For those who have mental health issues, a reduction in energy bills may have a positive impact as it will lower any stress and anxiety felt around finances.</p> <p>Overall, making heat supply as affordable and reliable as possible will reduce health inequality.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Health data on which above analysis is based</b></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>Source: data set DWP- 2019 PIP &amp; DLA figures.</p>	

In 2016, 1550 people in Southwark were claiming benefits as a disabled person.

Source:

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

### **Mitigating actions to be taken**

Construction of the DHN will be temporary and take place in localised phases along the highway so higher levels of dust and pollution will only effect a small area at a time. The levels of pollution and dust will be monitored throughout the construction as agreed in the conditions for the LDO. The methods for reducing pollution and monitoring on-site impacts will be set out in the Construction Environmental Management Plan.

Good access and mobility would also be addressed in the Construction Environmental Management Plan. The CEMP would set out the necessary diversions and how they will be signposted to maintain access. The CEMP will also set out how disabled parking will be maintained. The CEMP is required by planning condition attached to the LDO.

The cost of energy and the resulting impacts on residents will be monitored by the Housing and Modernisation department when the network is implemented and operational.

**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)**

Development permitted by the LDO is anticipated to have no particular positive or negative impacts on the protected characteristic of gender reassignment.

Development permitted by the LDO is anticipated to have no particular positive or negative health impacts on the protected characteristic of gender reassignment.

#### **Equality information on which above analysis is based**

#### **Health data on which above analysis is based**

Data on the percentage of residents in the borough who have undergone transition from the gender they were assigned at birth to another gender is not available. JSNA Factsheet 2017-18 Protected Characteristics advises that currently there are no standard national sources of transgender statistics. However, GIRES (the

Gender Identity Research and Education Society) estimate that 0.6-1% of the population may experience gender dysphoria.

Source: <https://www.southwark.gov.uk/assets/attach/5718/JSNA-Factsheet-2017-Protected-Characteristics-20171130.pdf>

### **Mitigating actions to be taken**

As no negative impacts with regards to gender reassignment have been identified, no migrating actions are required. The impact on the protected characteristic of gender reassignment will continue to be monitored and any unforeseen issues which arise as a result of the LDO will be mitigated against appropriately.

<p><b>Pregnancy and maternity</b> - 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><b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b></p>	<p><b>Potential health impacts (positive and negative)</b></p>
<p>During construction of the DHN the accessibility and mobility of the local area may be affected. In particular, construction could cause difficulties in relation to increased traffic due to lane closures, reduction in parking due to parking suspensions, the construction activities blocking access to homes shops, bus stops and pavements as well as effects on wayfinding. As stated under the protected characteristic of disability, the measures outline above would have a disproportionate impact on those who have limited mobility – this includes heavily pregnant people who sometimes find that their mobility is impaired towards the later stages of pregnancy.</p>	<p>Development permitted by the LDO is anticipated to have no particular positive or negative health impacts on the protected characteristic of pregnancy and maternity.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Health data on which above analysis is based</b></p>
<p>JSNA Factsheet 2017-18 Protected Characteristics states that the fertility rate in Southwark is significantly below that of London and England. No further explanations are given but it noted that both maternities and live births have decreased more significantly for Southwark than London and England.</p> <p>Source: <a href="https://www.southwark.gov.uk/assets/attach/5718/JSNA-Factsheet-2017-Protected-Characteristics-20171130.pdf">https://www.southwark.gov.uk/assets/attach/5718/JSNA-Factsheet-2017-Protected-Characteristics-20171130.pdf</a></p>	
<p><b>Mitigating actions to be taken</b></p>	
<p>Mitigating actions will be the same as set out in the protected characteristic of disability. Good access and mobility would be addressed in the Construction Environmental Management Plan, which is required by planning condition attached</p>	

the LDO. The CEMP would set out the necessary diversions and how they will be signposted to maintain access. The CEMP will also set out how disabled parking will be maintained.

**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)**

Development permitted by the LDO is anticipated to have no particular positive or negative impacts on the protected characteristic of race.

Globally, however, the effects of climate change are felt unevenly around the world. It is well documented that the global south is disproportionately affected by climate change. The risk and impact of rising sea levels, floods, droughts, failed crops and other climate impacts is much higher in the global south, and this has been exacerbated by man-made climate change. The impact of these disasters can sometimes significantly impact societies and economies and with economic impact often follows adverse health impacts such as from malnutrition. Development permitted by the LDO, will contribute to the decarbonisation of the borough's housing stock and reducing the borough's overall emissions, which will have a positive, if small in global terms, impact on the extent of manmade climate change.

Southwark has a very diverse population and residents may have family members and connections to communities in nations where the effects of climate change are already being felt.

There is a strong link between climate change and public health. Climate change is already impacting health in a myriad of ways, including by leading to death and illness from increasingly frequent extreme weather events, such as heatwaves, storms and floods, the disruption of food systems, increases in disease which can be transmitted to humans from animals, and food-, water- and vector-borne diseases, and mental health issues. As with economic and social impacts, this will be felt more acutely by the global south and by the most vulnerable in society. Addressing climate change will also address the subsequent health impacts which come along side rising global temperatures.

<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>
<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>Source:  <a href="http://modern.gov.southwark.gov.uk/documents/s72803/Appendix%201%20Best%20start%20in%20life%20Southwark%20school%20standards%20report%202017.pdf">http://modern.gov.southwark.gov.uk/documents/s72803/Appendix%201%20Best%20start%20in%20life%20Southwark%20school%20standards%20report%202017.pdf</a></p> <p>The Community Capacity programme 2017-18: Data and policy context, which shows that Southwark has 29% of the borough's population were born in non-EU countries.</p> <p>Source:  <a href="http://thesource/assets/legacy/getasset?id=fAA3ADMAOQA5AHwAfABUAHIAdQBIAHwAfAAwAHwA0">http://thesource/assets/legacy/getasset?id=fAA3ADMAOQA5AHwAfABUAHIAdQBIAHwAfAAwAHwA0</a></p>	
<b>Mitigating actions to be taken</b>	
<p>The carbon reduction achieved by implementing the DHN will be monitored and continue to form part of the council-wide climate change strategy. One of the challenges of decarbonising buildings is that they need to be monitored going forward to ensure that the operational performance of buildings continues to align with net-zero goals. To further the Council's climate change strategy, there needs to be a responsibility taken by the Council to monitor and report on the performance of its own building stock now and into the future.</p>	

<p><b>Religion and belief</b> - 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.</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b></p>	<p><b>Potential health impacts (positive and negative)</b></p>

Development permitted by the LDO is anticipated to have no particular positive or negative impacts on the protected characteristic of religion and belief.	Development permitted by the LDO is anticipated to have no particular positive or negative health impacts on the protected characteristic of religion and belief.
<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>
<p>Census data 2011 identified the following belief make-up of the borough:</p> <p>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>Source: <a href="https://www.southwark.gov.uk/health-and-wellbeing/public-health/health-and-wellbeing-in-southwark-jsna/southwark-profile">https://www.southwark.gov.uk/health-and-wellbeing/public-health/health-and-wellbeing-in-southwark-jsna/southwark-profile</a></p>	
<b>Mitigating actions to be taken</b>	
<p>As no negative impacts with regards to religion and belief have been identified, no mitigating actions are required. The impact on the protected characteristic of religion and belief will continue to be monitored and any unforeseen issues which arise as a result of the LDO will be mitigated against appropriately.</p>	

<b>Sex</b> - A man or a woman.	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
Development permitted by the LDO is anticipated to have no particular positive or negative impacts on the protected characteristic of sex.	Development permitted by the LDO is anticipated to have no particular positive or negative health impacts on the protected characteristic of sex.
<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>
<p>Census 2011 data: Female: 50.5%/ Male: 49.5%</p> <p>In 2018, there were 158,418 men and 158,838 living in Southwark.</p> <p>Source: <a href="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">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</a></p>	

<b>Mitigating actions to be taken</b>
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As no negative impacts with regards to sex have been identified, no migrating actions are required. The impact on the protected characteristic of sex will continue to be monitored and any unforeseen issues which arise as a result of the LDO will be mitigated against appropriately.
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<b>Sexual orientation</b> - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes
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<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
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Development permitted by the LDO is anticipated to have no particular positive or negative impacts on the protected characteristic of sexual orientation.	Development permitted by the LDO is anticipated to have no particular positive or negative health impacts on the protected characteristic of sexual orientation.
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<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>
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Southwark has the second largest gay or lesbian population in London at 5% with our neighbouring borough Lambeth as the highest.	
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Source: <a href="https://www.southwark.gov.uk/health-and-wellbeing/public-health/health-and-wellbeing-in-southwark-jsna/southwark-profile">https://www.southwark.gov.uk/health-and-wellbeing/public-health/health-and-wellbeing-in-southwark-jsna/southwark-profile</a>	
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<b>Mitigating actions to be taken</b>
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As no negative impacts with regards to sexual orientation have been identified, no migrating actions are required. The impact on the protected characteristic of sexual orientation will continue to be monitored and any unforeseen issues which arise as a result of the LDO will be mitigated against appropriately.
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<b>Socio-economic disadvantage</b> – 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.
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<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
<p>Socio-economic disadvantage continues to be a major cause of inequality for people living in Southwark. A person's family economic and social position can have an impact of their income, health, living conditions or occupation.</p> <p>The development permitted by the LDO is anticipated to have a positive impact on the protected characteristic of socio-economic disadvantage. The first phase of the extension of the DHN is planned to provide heat and hot water to approximately 3,000 homes on Southwark Council estates so the benefits will be felt mostly by those from a disadvantaged socio-economic background.</p> <p>Improving the reliability of heating and hot water within the home can increase a resident's quality of life in numerous ways – the ability to study and concentrate, mental health, reduced stress and better sleep. While these things are true across the whole spectrum of socio-economic background, those who are disadvantaged may experience these effect more acutely and have fewer resources available to help them overcome such impacts.</p> <p>Improvements in the affordability of heating and hot water within the home will have the obvious effect of reducing financial hardships experienced by economically disadvantaged persons.</p>	<p>Health inequalities arise from a complex set of interactions between socio-economic, geographic and cultural factors. Southwark remains one of the most deprived Borough's in the country and deprivation has an adverse impact on health.</p> <p>Development permitted by the LDO is anticipated to have a positive health impact on the protected characteristic of socio-economic disadvantage. Improving the reliability of heating and hot water within the home will lead to improved living conditions and a reduction in damp which can lead to severe health conditions. The NHS advises that mould cause by damp in the home can produce allergens, irritants, toxic substances, trigger asthma attacks, and in extreme circumstances cause death. Being comfortable at home will also improve mental health, reduce stress and lead to better sleep quality.</p> <p>Improvements in the affordability of heating and hot water within the home will have the obvious effect of reducing financial hardships experienced by economically disadvantaged persons which will have a positive impact on mental health and stress.</p> <p>All members of the community within Southwark's Air Quality</p>

	<p>Management Area are affected by poor air quality. A report by the Environment Agency found that areas of the worst exposure to poor air quality generally correlated with areas of deprivation, however this correlation is more complex in London. In general, more deprived areas are likely to experience higher levels of pollution but there is considerable local variation.</p> <p>The area covered by the LDO are mainly within LSOAs in the top 5 deciles of the Index of Multiple Deprivation 2019. Therefore, it is likely that there will be a disproportionate impact from poor air quality due to the construction of the DHN. However, in the long term, implementation of the DHN should improve air quality in the area, resulting in a positive impact on the protected characteristic of socio-economic disadvantage.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Health data on which above analysis is based</b></p>
<p>The English Indices of Deprivation 2015 show that Southwark is the 40th most deprived local authority area in England (out of 326) and the 8th most deprived in London.</p> <p>Source: <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/465791/English_Indices_of_Deprivation_2015_-_Statistical_Release.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/465791/English_Indices_of_Deprivation_2015_-_Statistical_Release.pdf</a></p> <p>The Indices of Multiple Deprivation interactive map shows deprivation levels by LSOA.</p> <p>Source: <a href="https://dclgapps.communities.gov.uk/imd/iod_index.html">https://dclgapps.communities.gov.uk/imd/iod_index.html</a></p> <p>The JSNA Factsheet 2018-19 Demography reviewed the 2015 data against current data and found there was improvement in the ranking for Southwark but noted that this does not necessarily indicate that absolute levels of deprivation in the borough have reduced. Further, Southwark is ranked as one of the most</p>	

deprived local authorities in England on both the average rank (12th) for quality of it local environments.

Source: <https://www.southwark.gov.uk/assets/attach/7379/JSNA-Factsheet-2018-19-Demography-20180725.pdf>

Additionally there is a significant income deprivation affecting children and older persons with Multi-Ward Profiles 2019 - South Southwark noting that children living in households claiming benefits in May 2017 were at 18.5% for Southwark against the national average of 13.5%.

Source: <https://www.southwark.gov.uk/assets/attach/10643/Multi-Ward-Area-Profiles-South-Final.pdf>

### **Mitigating actions to be taken**

Mitigating actions will be similar to those for the protected characteristics of age and disability - cost of energy and the resulting financial impacts on residents will be monitored by the Housing and Modernisation department when the network is implemented and operational.

### **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**

Not tackling climate change locally and globally can ultimately impact the Right to Life enshrined in the Humans Rights Act. The IPCC found that a global rise above 1.5°C would lead to climate-related risks to human health, livelihoods, food security, human security, water supply and economic growth. One of the possible impacts in Southwark (as well as the rest of the UK) of global climate change, is hotter summers and colder winters both of which can lead to loss of life.

The extension of the DHN will contribute to the decarbonisation of Southwark's buildings and Southwark's pathway to net zero carbon overall, therefore reducing the negative impacts of climate change globally and locally.

### **Information on which above analysis is based**

Emissions modelling for the Southwark Climate Change Strategy indicates the urgent need to move away from gas boilers as the primary source of heating in the borough. To achieve the overall reductions for the model as many homes as possible will need to be connected to the SELCHP DHN or an equivalent DHN. This includes 17,00 homes already on district heating networks plus around 50% of other homes.

Source: <https://www.southwark.gov.uk/assets/attach/48607/Climate-Change-Strategy-July-2021-.pdf>

### **Mitigating actions to be taken**

The carbon reduction achieved by implementing the DHN will be monitored and continue to form part of the council-wide climate change strategy to ensure that it is the most effective technology to reduce carbon contributions in the Council's own building stock.

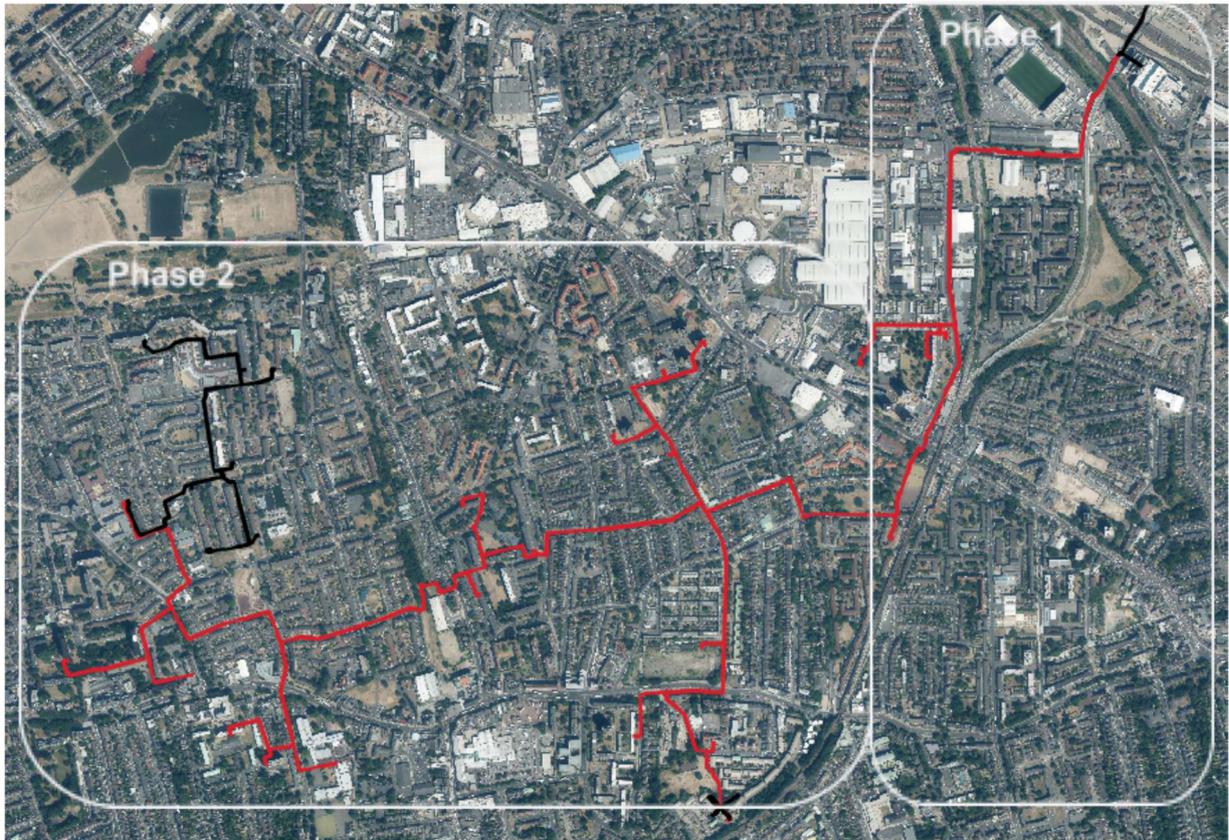


**LOCAL DEVELOPMENT ORDER – DISTRICT  
HEATING NETWORK  
DECEMBER 2022**

**APPENDICES**

<b>No.</b>	<b>Title</b>
Appendix A	Draft Local Development Order
Appendix B	Area covered by the Local Development Order
Appendix C	Equalities analysis
Appendix D	Phasing plan for SELCHP extension

**Appendix D: Phasing plan for SELCHP extension**



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