

# Cabinet

Tuesday 13 June 2023

11.00 am

Rooms GO2A, B and C, 160 Tooley Street, London SE1 2QH

## Appendices

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# Equality Impact and Needs Analysis

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**Section 1: Equality impact and needs analysis details**


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<p><b>Proposed policy/decision/business plan to which this equality analysis relates</b></p>	<p>This analysis relates to the recommendations made to manage surplus capacity in Southwark's primary schools in order to manage down surplus capacity to a maximum of 10%.</p> <p>These recommendations are to reduce the Published Admissions Number (PAN) in seven primary schools and to amalgamate 3 primary schools.</p> <p><b>Recommendations to reduce the PAN:</b></p> <p>Bessemer Grange  Goose Green (academy)  Grange  St Joseph's Infants  Rye Oak  St Francis  St Paul's</p> <p><b>Recommendations to amalgamate:</b></p> <p>Comber Grove  Harris Free Primary (Free school/ Academy)  St Mary Magdalene</p> <p>It should be noted that where a recommendation has been made about an academy or free school, the school itself is its own admissions authority and Southwark Council cannot make a decision or propose any change to its PAN or whether it remains open. In these cases, the Council is working closely with the Regional Director (Academies) Multi-Academy Trusts or free schools themselves to support their decision-making and a full Equalities Impact Needs Analysis would need to be developed for those schools by the respective Trust.</p> <p>The recommendations are based on work undertaken by Isos Partnership alongside officers, councillors and school leaders.</p> <p>This work forms part of the Keeping Education Strong strategy (<a href="#">Appendix 1 Place planning across Southwarks Primary Schools A strategy for future-proofing quali.pdf</a>), ratified in December 2022, which has its own EQIA, based on data which was accurate at the time of writing.</p>
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	It should be acknowledged that the data in this analysis has been updated to reflect the current situation and so may be different from previous reports and analyses.
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<b>Equality analysis author</b>					
<b>Strategic Director:</b>	David Quirke-Thornton				
<b>Department</b>	Children's Services	<b>Division</b>	Education		
<b>Period analysis undertaken</b>	January-April 2023				
<b>Date of review (if applicable)</b>					
<b>Sign-off</b>	Nina Dohel	<b>Position</b>	Director of Education	<b>Date</b>	

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

### 1.1 Brief description of policy/decision/business plan

The Keeping Education Strong (KES) strategy was developed to manage the challenges arising from a continuing trend of falling rolls which has led to increasing surplus capacity in Southwark's Primary Schools. The strategy sets out a borough-wide approach to reduce surplus capacity down to a workable 10% from the current 22%.

Following the Cabinet approval of the Strategy in December 2022, work commenced to identify those schools where capacity significantly exceeded demand and to explore further criteria around rolls, quality, finance, buildings and local issues. This work produced a number of schools and council officers worked with an independent consultancy, Isos, to recommend options for managing their surplus capacity.

The options for change were to reduce Published Admissions Numbers (PAN) across seven primary schools and/ or to amalgamate three schools. In an amalgamation it is usual for one of the two schools being amalgamated to close. The primary schools identified represent a cross section of designations: community, voluntary aided and academy.

The positive impact of managing surplus capacity by reducing PAN is that the disruption is minimal for current pupils, school communities, and staff. However, it is a much slower way of reaching a sustainable level of surplus capacity, taking up to six years to come into full effect. In the meantime, while those changes run through, the school still needs to manage its finances carefully in order to be able to deliver the best quality of education, and it may struggle to balance budgets while managing the previous and current situations simultaneously. There are no negative impacts of reducing PANs identified here as these schools have already been working at the admissions numbers we are recommending they now formally reduce to.

The benefits of closing a school through amalgamation are that:

- children across both schools would receive more resource to support their learning and achievement.
- further strengthens the receiving school for the long term
- immediately reduces surplus capacity across the school system.
- for children in a closing school, there is a guaranteed place, with their friends, at the receiving school.
- staff would be moved across to the new school and there were no or fewer reductions in the workforce,

The negative effects of an amalgamation might be that:

- parents/ carers choose not to take up a place in the amalgamated schools. In this case, there are sufficient vacancies across Southwark's schools of which 97% are good or outstanding,
- where two schools merge, there may need to be a re-structure if the number of staff in the amalgamated school are more than is required. This could result in some redundancies,
- whilst children moving to a new school will be in fuller classes, which are better resourced, moving schools can be a disruptive experience for children and their families, with disruption to education and social groups and additional financial costs relating to travel and uniform. In this case we have planned mitigations for this in place, including a guaranteed place for children in the school their school is amalgamating with, financial support for uniforms and travel, open days for pupils, and coffee mornings for parents/families.
- a key negative impact of a merger is likely to be the anxiety it causes for some children who are emotionally unsettled by the move. Overall this should be outweighed by the positive impacts of being in a better resourced school mitigations to minimise how unsettling the move is for children, especially those who are already experiencing poor

mental health or learning difficulties. In these cases we have planned mitigations for this in place set out in the body of the report.

The remainder of this analysis details further the likely impact and mitigations on specific groups.

### 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>	<ul style="list-style-type: none"> <li>• Children (2-11 years old) attending a primary, infants, juniors or attached nursery setting in Southwark</li> <li>• Parents, carers and families of those children.</li> <li>• School staff (teaching or non-teaching)</li> <li>• Governors of those schools</li> <li>• Local Authority departments (Children's Social Care, Education)</li> </ul>
<b>Key stakeholders were/are involved in this policy/decision/business plan</b>	<ul style="list-style-type: none"> <li>• Head teachers of all primary schools in Southwark</li> <li>• Governors of all primary schools in Southwark</li> <li>• Elected members of Southwark Council</li> <li>• Leadership teams in Education and Children's and Adults' services</li> <li>• Finance, Sustainable development, Schools' HR, Legal, Communications colleagues</li> <li>• Directors of Diocesan Boards</li> <li>• Regional Director (Academy sector)</li> </ul>

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## Section 4: Pre-implementation equality impact and needs analysis

<p><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).</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential Socio-Economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p>The actions resulting from the KES strategy will be 7 PAN reductions, as well as closures or amalgamations of 3 schools.</p> <p>There are no negative impacts of reducing PANs identified here as these schools have already been working at the admissions numbers we are recommending they now formally reduce to.</p> <p>A proposal to amalgamate would have the greatest potential impact on children in Years 5 and 6 (ages 9-11) as they come to the end of their primary schooling.</p> <p>A strong benefit of an amalgamation is that all children whatever their age are guaranteed a place in the school with which their school is amalgamating.</p> <p>Outside of this broad consideration, the proposals to close schools will not disproportionately affect particular age groups.</p>	<p>The impact of amalgamation or closure would result in stronger long term socio-economic benefits as children will be attending a school that is better resourced and sustainable. Particularly for those most vulnerable.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-Economic data on which above analysis is based</b></p>
<p><a href="http://www.gov.uk">Statistics: school and pupil numbers - GOV.UK (www.gov.uk)</a></p>	<p>No data available</p>
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>Our admissions team will support children, families in securing a place in a good or outstanding school in the immediate area.</p> <p>In any school closure there will be a transition plan for years 5 and 6 in particular.</p>	

**Disability** - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Please note that under the PSED due regard includes:

Giving due consideration in all relevant areas to "the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in



particular, steps to take account of disabled persons' disabilities." This also includes the need to understand and focus on different needs/impacts arising from different disabilities.

**Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.**

There are no negative impacts of reducing PANs identified here as these schools have already been working at the admissions numbers we are recommending they now formally reduce to.

Although any change in school can have an unsettling effect on children, the amalgamation/closure of primary schools will have a negligible effect on disabilities for pupils.

We expect a positive impact as the facilities and services offered in remaining schools will be better resourced and further enhanced by the additional financial resource that additional pupils joining the school will bring.

**Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)**

There is insufficient contextual evidence to say whether disability is concentrated in particular socio-economic groups, more that disability may affect certain economically disadvantaged groups disproportionately, irrespective of prevalence.

Data is not available on socio-economic impact of school changes related to disability.

The impact of amalgamation or closure would result in stronger long term socio-economic benefits as children will be attending a school that is better resourced and sustainable. Particularly for those most vulnerable.

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

**Socio-economic data on which above analysis is based**

No central record of pupil or staff disability is maintained by the LA, but a proxy measure is the number of children with Education and Healthcare Plans (EHCPs), or pupils identified as "SEND Plus". The Source for this data is the School Census January 2023 (EHCPs and SEN Support)

School	Category	EHCP	SEND Plus
St Joseph's Infants RC	PAN Reduction	1.7%	9.5%
St Mary Magdalene CE	Amalgamation/closure	4.5%	32.1%
Comber Grove	Amalgamation/closure	2.4%	12.4%
Harris Free Peckham	Amalgamation/closure	2.4%	8.0%
Goose Green	PAN Reduction	2.0%	18.0%
Rye Oak	PAN Reduction	9.4%	28.9%
Grange	PAN Reduction	3.4%	21.5%
St Paul's CE Academy	PAN Reduction	1.6%	14.1%
Bessemer Grange	PAN Reduction	2.7%	12.8%
St Francis	PAN Reduction	4.1%	18.7%
Schools in Scope (PAN)		3.6%	17.6%
Schools in Scope (Amalgamations)		3.1%	17.5%
Schools in Scope		3.4%	17.6%
<b>Southwark</b>		<b>3.2%</b>	<b>14.3%</b>
<b>London</b>		<b>4.1%</b>	<b>11.7%</b>

As can be seen from the figures above, the schools where a PAN reduction is recommended have generally a lower level of EHCPs than Southwark as a whole, with the exception of St Francis which has an internal resource base and Rye Oak, which has a formal resource base.

For children with SEND Support, four of the seven schools recommended for a PAN Reduction have higher than the Southwark average percentage of pupils. Two of these (Rye Oak and St Francis) have Resource Bases, so you would expect to see this. However, Goose Green and Grange do not have Resource Bases.

For the schools where an amalgamation has been recommended, Comber Grove and Harris Free both have a percentage of children with EHCPs and SEN Support, which is lower than the Southwark average. However, St Mary Magdalene's has a percentage of children with EHCPs and SEN Support which is higher than the average.

Where the percentage is larger the number of children in the school is much smaller.

**Mitigating and/or improvement actions to be taken:**

Children from the schools affected who have EHCPs and SEND Plus are being closely supported to ensure their needs are met whichever schools they are proceeding to after amalgamation or closure.

The SEND service will review EHCPs for any children moving schools, and provide additional support for transition.

The educational psychology teams will work with school leaders and services to provide strategies for supporting children experiencing anxiety and/or are struggling with their mental health.

**Gender reassignment:**

- The process of transitioning from one gender to another.

**Gender Identity:** Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.

**Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.**

Information relating to gender reassignment is not collected about children in our primary schools. If this data was collected, it is likely to be in small numbers and may lead to identifiable data.

Southwark Schools ensure that they comply with the relevant provisions of the Equality Act 2010 and The Equality Act 2010: advice for schools, under which sexual orientation and gender reassignment are amongst the protected characteristics.

Southwark schools adhere to the 1998 Human Rights Act and 2004 Gender Recognition Act and follow statutory guidance in relation to gender reassignment.

There is no record of staff undergoing gender reassignment at any of the primary schools listed, but, were this to be the case, the same statutory guidance around equalities would be followed in any redeployment or redundancy process.

**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)**

There will be little or no potential socio-economic impact/ needs/issues arising from socio-economic disadvantage resulting from gender reassignment.

The impact of amalgamation or closure would result in stronger long term socio-economic benefits as children will be attending a school that is better resourced and sustainable. Particularly for those most vulnerable.

Equality information on which above analysis is based.	Socio-economic data on which above analysis is based
<p>Data is not collected for children, parents or carers on gender reassignment. In the 2021 Census, 0.6% of the UK population identified themselves as not having the same gender they were born with. In London, this rose to 1.4%, and Southwark, 1.2%. Such a percentage would mean that the lack of a transgender staff member would not be statistically significant. (Source, ONS Census 2021).</p> <p>There may be a number of children/ staff members going through any part of a gender reassignment process that we are unaware of. We would expect that they will be known to the school and the school is providing appropriate support. We signpost to advice, services and resources to support any child or adult going through this process.</p>	<p>No appropriate or useful data has been identified.</p>
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>Regular updates and reminders to schools to review that their policies and processes are up to date.</p> <p>Provide signposting to schools to advice/ support on gender reassignment.</p>	

<p><b>Marriage and civil partnership</b> – 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 couples. 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. <b>(Only to be considered in respect to the need to eliminate discrimination.)</b></p>	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
<p>The Marriage and Civil Partnership (Minimum Age) Act 2022, makes it illegal for a child under the under the age of 18 to enter a marriage in any circumstances.</p> <p>In relation to civil partnerships, both parties must be aged 18 or over.</p> <p>The marital status of the parents or carers of school pupils forms no part of the admissions process, and children are admitted based on religious or distance criteria alone.</p>	<p>As mentioned in the adjacent “potential impacts of the proposed policy”, the marital status of the parents or carers of school pupils forms no part of the admissions process. Children are admitted based on sibling, medical or distance criteria alone. Therefore there are no realistic socio-economic impacts, needs or issues arising from socio-economic disadvantage relating to marital status.</p>

<b>Equality information on which above analysis is based</b>	<b>Socio-economic data on which above analysis is based</b>
<p>As the legal age for marrying is 18 years old, this falls outside of the age scope for children of primary school age.</p> <p>Information on the marital/civil partnership status of parents and staff at Southwark schools is not available.</p> <p>In Southwark, 26.9% of adults over 16 years of age are married or in a civil partnership, compared with 39.7% for London 44.5% for England [source: ONS 2021 Census)</p>	<p>No data has been identified that suggests a socio-economic disadvantage arising from civil partnership as compared with marriage or single status.</p>
<b>Mitigating actions to be taken</b>	
<p>Marriage or civil partnership is a protected characteristic, protected under equalities and employment law.</p> <p>Due process under statutory guidance will be followed in any redundancy or redeployment process.</p>	<p>No appropriate or useful data has been identified.</p>

<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>	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
<p>Pregnancy and maternity are unlikely to directly involve children of primary age, and the LA does not collect data on primary school children who are pregnant. This would be a safeguarding issue.</p> <p>The pregnancy and maternity rate in Southwark has been falling for many years, so, given the extensive level of vacancies, it is also unlikely to affect parental choice.</p> <p>As regards staffing, school employees' contracts mean that they are paid for some of their pregnancy and maternity leave, and this would continue if a staff member were redeployed to another school. The pregnancy or maternity/ paternity leave status of a staff member or potential applicant should form no part of the recruitment or the redeployment process, so should not negatively impact on staffing.</p>	<p>As mentioned in the adjacent "<i>potential impacts of the proposed policy</i>", pregnancy/ maternity status of the parents/carers of school pupils forms no part of the admissions process, and children not are admitted based this status. Similarly, this status is not part of the recruitment process. Therefore there are no realistic socio-economic impacts, needs or issues arising from socio-economic disadvantage relating to pregnancy or maternity status.</p>
<b>Equality information on which above analysis is based</b>	<b>Socio-economic data on which above analysis is based</b>

<p>Fertility is measured at a range of rates and geographies by the ONS. These include the “GFR” and “TFR”. The “<i>General Fertility Rate (GFR)</i>” is the number of live births per 1,000 women aged 15-44. The Total Fertility Rate (TFR) is the number of births per woman aged 15-44</p>	<p>No appropriate or useful data has been identified.</p>															
<table border="1"> <thead> <tr> <th>Area</th> <th>GFR</th> <th>TFR</th> </tr> </thead> <tbody> <tr> <td>Southwark</td> <td>44</td> <td>1.14</td> </tr> <tr> <td>Inner London</td> <td>48</td> <td>1.28</td> </tr> <tr> <td>London</td> <td>56</td> <td>1.52</td> </tr> <tr> <td>England</td> <td>56</td> <td>1.62</td> </tr> </tbody> </table>	Area	GFR	TFR	Southwark	44	1.14	Inner London	48	1.28	London	56	1.52	England	56	1.62	
Area	GFR	TFR														
Southwark	44	1.14														
Inner London	48	1.28														
London	56	1.52														
England	56	1.62														
<p>(Source, GLA/ONS 2021 (latest figures))          From this, we can see Southwark has low fertility rate compared the rest of London and England. This is another explanation, together with outmigration – why pupil numbers in Southwark are falling.</p>																
<p><b>Mitigating and/or improvement actions to be taken</b></p>																
<p>We will encourage schools to review and update their policies in line with their statutory obligations towards the protected characteristics relating to pregnancy and maternity.</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>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p>The ethnic diversity of Southwark schools is much greater among our children and young people than our adult population. Southwark primary pupils are <b>78.5%</b> Black, Asian or minority ethnic, compared to <b>62.5%</b> of Southwark’s population as a whole.</p> <p>There are no negative impacts of reducing PANs recommended here as these schools have already been working at the admissions numbers we are recommending they now formally reduce to.</p> <p>The positive impact of reducing the PAN or amalgamating two schools into one will be that the school will be more sustainable financially in order to be able to provide a high quality of education.</p> <p>There is no evidence available to show that closure or amalgamations of schools and PAN reductions would be likely to reduce diversity in the area. Given the diversity of Southwark’s schools, it is more likely that the recommendations would increase diversity across more schools.</p> <p>Southwark schools adhere to the Equality Act 2010 and are committed to having a diverse workforce. Legally, an employer is not allowed to discriminate</p>	<p>The impact of amalgamation or closure would result in stronger long term socio-economic benefits as children will be attending a school that is better resourced and sustainable. Particularly for those most vulnerable.</p>

against job candidates or staff on the basis of race. Southwark school employers are expected to take measures to make their recruitment process more inclusive and their organisations more diverse.																						
<b>Equality information on which above analysis is based</b>		<b>Socio-economic data on which above analysis is based</b>																				
School	Category	Bangladeshi	Indian	Pakistani	Any Other Asian Background	Black African	Black Caribbean	Any Other Black Background	Chinese	White and Black African	White and Black Caribbean	White and Asian	Any Other Mixed Background	White British	White Irish	Gypsy / Roma	Traveller of Irish Heritage	Any Other White Background	Any Other Ethnic Group	Unknown / Missing	Total	Non White British
Besemer Grange Primary School	PAN Reduction	0.7	0.5	0.5	2.4	9.7	4.6	8.0	0.3	1.5	2.2	1.9	6.8	43.8	1.4	0.0	0.0	5.8	6.1	3.7	100	56.2
Comber Grove School	Amalgamation/Closure	4.3	0.5	0.0	1.4	28.4	11.1	3.4	1.9	2.4	4.3	0.5	1.4	7.7	0.5	0.0	0.0	14.9	7.7	9.6	100	92.3
Goose Green Primary School	PAN Reduction	1.6	0	0.9	0.3	18.2	11.9	5.0	0.0	1.6	7.2	2.5	9.4	20.4	0.0	0.0	0.0	8.5	7.2	5.3	100	79.6
Grange Primary School	PAN Reduction	5.2	0.5	1.4	1.4	24.3	4.6	6.3	0.8	3	3.3	0.5	4.9	14.4	0.3	0.0	0.0	6.5	13.1	9.5	100	85.6
Harris Free School Peckham	Amalgamation/Closure	2.2	1.3	0.0	1.3	27.8	9.6	5.2	0.9	1.7	7.8	0.4	9.1	6.1	0.4	0.0	0.0	8.3	12.6	5.2	100	93.9
Rye Oak Primary School	PAN Reduction	2.0	0.3	2.3	1.3	36.7	13.1	3.6	2.3	1	6.6	1.0	7.5	9.8	0.0	0.7	0.0	1.3	9.8	0.7	100	90.2
St Francis RC Primary School	PAN Reduction	0.0	0.0	0.3	0.6	58.8	5.0	6.2	0.0	0.0	0.0	0.0	2.5	0.8	0.0	0.0	3.6	0.3	21.8	0	100	99.2
St Joseph's Camberwell Catholic Schools' Federation (INFANTS)	PAN Reduction	0.0	0.7	0.0	0.7	65.5	3.6	2.9	1.4	0.7	0.7	0.0	0.7	3.6	1.4	0.0	0.0	6.5	8.6	2.9	100	96.4
St Mary Magdalene CofE Primary School	Amalgamation/Closure	0.0	0.0	0.0	1.7	33.9	11	26.3	0	0.8	0.0	0.0	10.2	2.5	0.0	0.0	0.0	5.1	0.8	7.6	100	97.5
St Paul's CE Primary School	PAN Reduction	4.1	1.0	1.0	0.0	43.1	10.3	8.7	0.5	3.1	1.0	0.0	2.1	10.8	0.0	0.0	0.0	3.1	9.7	1.5	100	89.2
Schools in Scope		2.0	0.5	0.6	1.1	34.6	8.5	7.6	0.8	1.6	3.3	0.7	5.5	12.0	0.4	0.1	0.4	6.0	9.7	4.6	100	88.0
Schools in Scope (PAN Reductions)	PAN Reduction	1.9	0.4	0.9	1.0	36.6	7.6	5.8	0.8	1.6	3.0	0.8	4.8	14.8	0.4	0.1	0.5	4.6	10.9	3.4	100	85.2
Schools in Scope (Amalgamations)	Amalgamation/Closure	2.2	0.6	0.0	1.5	30.0	10.6	11.6	0.9	1.6	4.0	0.3	6.9	5.4	0.3	0.0	0.0	9.4	7.0	7.5	100.0	94.6
Southwark Primary		2.3	0.7	0.7	1.8	25.2	6.3	5.2	1.3	2.1	3.3	1.7	6.5	21.1	0.4	0.1	0.1	9.3	7.7	4.0	100	78.9
A breakdown by ethnicity of the schools affected is given above. As can be seen, the ethnicity of the schools in scope (88.0%) is more diverse than the school population at large (78.9%), with the schools recommended for amalgamation being higher still (94.6%).																						
Areas where pupil rolls have fallen the most are amongst the most diverse in Southwark. Groups such as Black African and Black Caribbean are more likely to be affected than other groups. However, the most important issue is likely to be where children of any particular ethnicity are re-accommodated – the likelihood is that children would attend similarly diverse schools in the localities identified but better resourced.																						
<b>Mitigating and/or improvement actions to be taken</b>																						
In the process of identifying the most appropriate school to amalgamate with, the council takes into account maintaining a good level of diversity among other factors in order to deliver an excellent quality of education to all pupils.																						

**Religion and belief** - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

**Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.**

Statutory guidance when deciding this type of decision requires us to consider the balance of religious places in the borough, and the balance between different denominations. As regards staffing, there is no requirement for staff to practice (or not) any religion, so a reduction in the number of staff would not differentially effect one group of staff over another.

**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)**

There are no potential socio-economic impacts/ needs/issues arising from these changes nor any socio-economic disadvantage.

<p>In considering the designations of schools that have had a PAN reduction or amalgamation recommended, there is a range, so not just one type of school is affected.</p>																																	
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>																																
<p>The percentages of religious/non-religious places (Non-R) in Southwark are given in the table below, both before (2022 and 2023) and after the proposals in 2024</p> <table border="1" data-bbox="236 546 839 680"> <thead> <tr> <th>Type</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>RC</td> <td>16%</td> <td>16%</td> <td>17%</td> </tr> <tr> <td>CE</td> <td>14%</td> <td>13%</td> <td>14%</td> </tr> <tr> <td>Non-R</td> <td>70%</td> <td>70%</td> <td>70%</td> </tr> </tbody> </table> <p>No substantive change in the percentage of non-religious places has been identified. As regards staffing, other than the Head or Deputy, there is no explicit requirement for staff to be practicing Christians for Church Schools, and no record of staff's religious belief is maintained. It is therefore unlikely that a closure or amalgamation or PAN reduction will have any discernible effect on staff's religious belief education in Southwark. Similarly, any restructuring as regards staff is also unlikely to have repercussions on one religious group or another.</p> <p>Extracted from the 2021 Census.</p> <table border="1" data-bbox="236 1137 691 1585"> <thead> <tr> <th>Religion</th> <th>Southwark</th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>46%</td> </tr> <tr> <td>Buddhist</td> <td>1%</td> </tr> <tr> <td>Hindu</td> <td>10%</td> </tr> <tr> <td>Jewish</td> <td>0%</td> </tr> <tr> <td>Muslim</td> <td>7%</td> </tr> <tr> <td>Sikh</td> <td>0%</td> </tr> <tr> <td>Other/No religion/not stated</td> <td>37%</td> </tr> </tbody> </table> <p>(Source, ONS Census 2021)</p>	Type	2022	2023	2024	RC	16%	16%	17%	CE	14%	13%	14%	Non-R	70%	70%	70%	Religion	Southwark	Christian	46%	Buddhist	1%	Hindu	10%	Jewish	0%	Muslim	7%	Sikh	0%	Other/No religion/not stated	37%	<p>No data available.</p>
Type	2022	2023	2024																														
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<p><b>Mitigating and/or improvement actions to be taken</b></p>																																	

As there have been no negative impacts relating to religion or belief identified, no mitigating or improvement actions are proposed.

**Sex** - A man or a woman.

**Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.**

If there was a significant imbalance in the provision or uptake of places at schools in Southwark then the closure and amalgamations of schools, or the net reduction of PANs *may* effect this. However, all primary schools are both co-educational and there is no entrance requirement based on gender.

**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)**

There are no potential socio-economic impacts or issues arising from disadvantage as regards the closure/amalgamation of schools and/or the reduction of PANs with respect to the gender of pupils.

As regards staffing, it could be that female staff are affected more, due to their prevalence in the workforce

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

**Socio-economic data on which above analysis is based**

School	Category	% of cohort	
		Female	Male
Bessemer Grange Primary School	PAN Reduction	46.7	53.3
Comber Grove School	Amalgamation/Closure	45.9	54.1
Goose Green Primary School	PAN Reduction	52.7	47.3
Grange Primary School	PAN Reduction	46.0	54.0
Harris Free School Peckham	Amalgamation/Closure	49.5	50.5
Rye Oak Primary School	PAN Reduction	46.9	53.1
St Francis RC Primary School	PAN Reduction	49.7	50.3
St Joseph's Camberwell Catholic Schools' Federation (INFANTS)	PAN Reduction	52.6	47.4
St Mary Magdalene CofE Primary School	Amalgamation/Closure	55.4	44.6
St Paul's CE Primary School	PAN Reduction	48.4	51.6
Schools in Scope (PAN Reductions)	PAN Reduction	48.4	51.6
Schools in Scope Amalgamations)	Amalgamation/Closure	49.6	50.4
Schools in Scope		48.7	51.3
<b>Southwark Total</b>		<b>49.4</b>	<b>50.6</b>

A breakdown of gender for each school is given above, extracted from the Schools Census for 2022/23. Schools across the borough are balanced more or less 50:50, with slightly more boys than girls (+1.2%). Of the schools "in scope", there are slightly fewer (-0.7%) girls than the Southwark average, but no real difference between the different varieties of schools in scope. The figures are too small to bear any realistic statistical analysis or conclusions.

**Mitigating and/or improvement actions to be taken**

As there have been no negative impacts relating to gender identified, no mitigating or improvement actions are proposed.



<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; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</b>																																								
<p>The LA has no statutory duty to collect information about the sexual orientation of primary school children. However, the percentages of primary school children who are LGBTQ+ are likely to mirror society in general.</p> <p>Schools have equalities duties towards LGBTQ+ children and all schools in Southwark adhere to these. Parents should have confidence that any school they choose for their child will be mindful of these duties.</p> <p>Pupils may have parents or carers who are LGBTQ+. In either case, admissions do not take into account the sexual orientation of the child or parent/carers.</p>	No socio-economic impacts/needs/issues arising from socio-economic disadvantage linked to school changes have been identified in relation to sexual orientation.																																								
<b>Equality information on which above analysis is based</b>	<b>Socio-economic data on which above analysis is based</b>																																								
<p>The prevalence of different sexualities was covered in the 2021 Census for the first time. This is not (yet) available at a ward level, but the figures for Southwark show the following figures for the population over 16.</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Straight or Heterosexual</th> <th>Gay or Lesbian</th> <th>Bisexual</th> <th>Pansexual</th> <th>Asexual</th> <th>Queer</th> <th>All other sexual orientations</th> <th>Not answered</th> <th>Non heterosexual</th> </tr> </thead> <tbody> <tr> <td>Southwark</td> <td>82.71</td> <td>4.53</td> <td>2.57</td> <td>0.67</td> <td>0.07</td> <td>0.17</td> <td>0.06</td> <td>9.21</td> <td>8.07</td> </tr> <tr> <td>London</td> <td>86.19</td> <td>2.23</td> <td>1.52</td> <td>0.37</td> <td>0.05</td> <td>0.06</td> <td>0.04</td> <td>9.54</td> <td>4.27</td> </tr> <tr> <td>England</td> <td>89.37</td> <td>1.54</td> <td>1.29</td> <td>0.23</td> <td>0.06</td> <td>0.03</td> <td>0.02</td> <td>7.46</td> <td>3.17</td> </tr> </tbody> </table> <p>Southwark is lower than the national and London average for heterosexuality and more than twice the London average for gay and lesbian residents over 16</p>	Area	Straight or Heterosexual	Gay or Lesbian	Bisexual	Pansexual	Asexual	Queer	All other sexual orientations	Not answered	Non heterosexual	Southwark	82.71	4.53	2.57	0.67	0.07	0.17	0.06	9.21	8.07	London	86.19	2.23	1.52	0.37	0.05	0.06	0.04	9.54	4.27	England	89.37	1.54	1.29	0.23	0.06	0.03	0.02	7.46	3.17	<p>There appear to be no clear socio-economic impacts/needs/issues arising from socio-economic disadvantage for people based on sexual orientation in relation to schools, no appropriate or useful data has been identified.</p>
Area	Straight or Heterosexual	Gay or Lesbian	Bisexual	Pansexual	Asexual	Queer	All other sexual orientations	Not answered	Non heterosexual																																
Southwark	82.71	4.53	2.57	0.67	0.07	0.17	0.06	9.21	8.07																																
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<b>Eligibility for Free School Meals</b>	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan.</b>	<b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
<p>Southwark has a high proportion of pupils who are eligible for free school meals (<a href="#">Free school meals: guidance for schools and local authorities - GOV.UK (www.gov.uk)</a>). Southwark already funds a free school meal for all primary school children but the national eligibility information provides a useful tool for identifying socio-economic disadvantage.</p> <p>Five of the seven schools recommended for a PAN reduction have a percentage of pupils eligible for free school meals that is higher than the Southwark average and all of the schools recommended for an amalgamation do.</p> <p>There will be no impact of a PAN reduction on these pupils but a possible impact from amalgamation might be that parents struggle to find additional funding to pay for things like a new school uniform, transport to school, that is in a different location, etc.</p>	<p>In the medium-long term, the impact of amalgamation or closure would result in stronger long term socio-economic benefits as children will be attending a school that is better resourced and sustainable. Particularly for those most vulnerable.</p> <p>In the immediate-short term, a possible impact from amalgamation might be that parents struggle to find additional funding to pay for things like a new school uniform, transport to school, that is in a different location, etc.</p>
<b>Equality information on which above analysis is based</b>	<b>Socio-economic data on which above</b>

			analysis is based
School	Category	FSM %	See column to the left
Bessemer Grange School	PAN Reduction	19.3	
Comber Grove School	Amalgamation/Closure	37.6	
Goose Green Primary School	PAN Reduction	42.0	
Grange Primary School	PAN Reduction	45.4	
Harris Free School Peckham	Amalgamation/Closure	56.1	
Rye Oak Primary School	PAN Reduction	53.8	
St Francis RC Primary School	PAN Reduction	33.5	
St Joseph's Camberwell Infants	PAN Reduction	36.2	
St Mary Magdalene CofE Primary School	Amalgamation/Closure	46.4	
St Paul's CE Primary School	PAN Reduction	42.4	
<b>School in Scope</b>		<b>41.3</b>	
Schools in Scope (PAN Reduction)	PAN Reduction	38.9	
Schools in Scope (Amalgamations)	Amalgamation/Closure	46.7	
<b>Southwark</b>		<b>34.0</b>	
<b>Mitigating and/or improvement actions to be taken</b>			
Once a school amalgamation is proposed and agreed following the statutory process, then a range of support is available to pupils moving to the "new" school, and to the existing community of the new school, to help them to transition smoothly. This includes: helping with the cost of buying a new uniform; open and welcome days for new pupils; coffee mornings for parents/ carers/ families and staff; support from the admissions team for parents and carers, etc.			

### 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

In respect of the 16 rights listed, the proposal to reduce PAN numbers and amalgamate schools will not affect any of those listed. This said, the "The first sentence of Article 2 of Protocol No. 1 guarantees an individual right to education. The second guarantees the right of parents to have their children educated in conformity with their religious and philosophical convictions". The proposed school changes will not endanger this freedom, as there are numerous school places available in schools across Southwark.

### Information on which above analysis is based

At the last census time in January 2023, there were 5,790 spare places in Southwark primary schools.
<b>Mitigating and/or improvement actions to be taken</b>
As there have been no negative impacts relating to human rights identified, no mitigating or improvement actions are proposed or required.

## Conclusions

### **Summarise main findings and conclusions of the overall equality impact and needs analysis for this area:**

There is minimal impact of the proposed changes of the recommendations of the Keeping Education Strong Strategy. There will be no impact on schools where we propose PAN reductions as these schools have already been operating for some years at the pupil admissions numbers we are proposing to reduce to. Instead the formal reduction enables the schools to plan for class sizes and resourcing more efficiently and reliably.

For schools where an amalgamation is proposed, it is not an option to do nothing. Taking no action would mean that children in those schools will be disadvantaged further by not receiving a quality of education that will increase their life chances, particularly for the most vulnerable children. Mitigations are in place to support families to find places in vibrant, good and outstanding schools able to provide a consistently high quality of education and experience of schooling.

## **Section 5: Further equality actions and objectives**

<b>5. Further actions</b>			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
<b>Number</b>	<b>Description of issue</b>	<b>Action</b>	<b>Timeframe</b>
1	A proposal to amalgamate would have the greatest potential impact on children in Years 5 and 6 (ages 9-11) as they come to the end of their primary schooling.	Our admissions team will support children, families in securing a place in a good or outstanding school in the immediate area.  In any school closure there will be a transition plan for years 5 and 6 in particular.	During statutory consultation and until the schools have amalgamated/closed.
2	Although any change in school can have an	Children from the schools affected who have	During statutory consultation and until the

	<p>unsettling effect on children, the amalgamation/closure of primary schools will have a negligible effect on disabilities for pupils.</p>	<p>EHCPs and SEND Plus are being closely supported to ensure their needs are met whichever schools they are proceeding to after amalgamation or closure.</p> <p>The SEND service will review EHCPs for any children moving schools, and provide additional support for transition.</p> <p>The educational psychology teams will work with school leaders and services to provide strategies for supporting children experiencing anxiety and/or are struggling with their mental health.</p>	<p>schools have amalgamated/closed.</p>
3	<p>There may be a number of children/ staff members going through any part of a gender reassignment process that we are unaware of. We would expect that they will be known to the school and the school is providing appropriate support.</p>	<p>We signpost to advice, services and resources to support any child or adult going through this process.</p> <p>Regular updates and reminders to schools to review that their policies and processes are up to date.</p> <p>Provide signposting to schools to advice/ support on gender reassignment.</p>	<p>During statutory consultation and until the schools have amalgamated/closed.</p>
4	<p>The pregnancy or maternity/ paternity leave status of a staff member or potential applicant should form no part of the recruitment or the redeployment process, so should not negatively impact on staffing.</p>	<p>We will encourage schools to review and update their policies in line with their statutory obligations towards the protected characteristics relating to pregnancy and maternity.</p>	<p>During statutory consultation and until the schools have amalgamated/closed.</p>
5	<p>There is no evidence available to show that closure or amalgamations of schools and PAN reductions would be likely to reduce diversity in the area. Given the diversity of Southwark's schools, it is more likely that the recommendations would</p>	<p>In the process of identifying the most appropriate school to amalgamate with, the council takes into account maintaining a good level of diversity among other factors in order to deliver an excellent quality of education to all pupils.</p>	<p>During statutory consultation and until the schools have amalgamated/closed.</p>

	increase diversity across more schools.		
6	Parents struggle to find additional funding to pay for things like a new school uniform, transport to school, that is in a different location, etc.	Once a school amalgamation is proposed and agreed following the statutory process, then a range of support is available to pupils moving to the “new” school, and to the existing community of the new school, to help them to transition smoothly. This includes: helping with the cost of buying a new uniform; open and welcome days for new pupils; coffee mornings for parents/ carers/ families and staff; support from the admissions team for parents and carers, etc.	In the first term of amalgamation/closure.

#### 6. Review of implementation of the equality objectives and actions


### Implementation Equality Impact and Needs Analysis



## Southwark Primary Places planning – final report

### Purpose of the work

Isos Partnership was commissioned to support the London Borough of Southwark over the autumn and spring terms, to provide independent comment on and further develop their strategy for addressing the over-supply of primary places and the associated financial risks for primary schools.

Prior to the start of this project, Southwark had already made significant progress in developing a strategy to address the trend of declining pupil numbers and the subsequent over-supply of places in the primary phase. Working with school leaders and councillors, the local authority had established a set of principles to guide their work, had initiated the analysis to identify how many pupil places and/or forms of entry may need to be taken out of the system and in which areas and had begun to engage schools, including governors, in these difficult decisions.

The purpose of this project has therefore been to scrutinise and test the analysis carried out by Southwark across Primary schools which are potentially at risk from falling rolls and make a series of recommendations for possible future school reorganisations based on an objective analysis of the data. These recommendations were discussed and refined with the team of project officers within Southwark before developing a summary set of provisional proposals that could be more widely shared with the school leaders, elected members and affected schools. This report contains our recommendations.

### Methodology

The work with Southwark has had three distinct stages. Dr Helen Jenner and Natalie Parish (Isos Partnership Director) have worked together and individually to support different stages of the project.

Stage One - Autumn Term 2022 - Confirming direction of travel.

A desk top analysis of published information was undertaken to ensure the perspectives arrived at by LA officers reviewing the LA data, were mirrored using publicly available information. To collate the data, we accessed the January 2022 School Census, all DFE comparator websites, and Borough admissions brochures.<sup>1</sup> This was therefore a limited picture but gave insight into the issues that would need further exploration for a more

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<sup>1</sup> <https://schools-financial-benchmarking.service.gov.uk/Help/DataSources>  
<https://explore-education-statistics.service.gov.uk/find-statistics/school-pupils-and-their-characteristics>

## Appendix 2

detailed and up-to-date analysis and recommendations. The DFE comparator websites provide information on pupil population; equalities, for example SEN percentages, free school meals, which enabled us to keep inclusion and diversity in mind in our initial analysis; finance and expenditure; and the quality of education. The information was helpful in giving insight into the scale of the challenge, and to confirm that LA officers' analysis and Isos Partnership analysis had reached similar conclusions.

The analysis enabled us to confirm the Southwark estimations of the scale of change required, and to start to work with officers to develop our support for a more detailed second phase of work, which could consider more detailed information about the geographic and demographic area. This very early analysis was shared with officers. (Appendix A)

### Stage Two - Early Spring Term 2023 - Collating Agreed Data to begin considering possibilities

Southwark identified 49 schools where there was evidence for a trend of declining pupil number entering at reception and/or across the school, and were therefore deemed in scope for the purposes of this projects. Schools were deemed in scope if they had experienced:

- i) A drop between 2019 and 2022 of all school rolls by 5% or more and/or
- ii) More than 20% vacancies across the whole school

Schools in Southwark that were deemed in scope were provided with their core data by the LA in January 2023, they were invited to comment on the data to ensure accuracy and flag any other issues.

During this period the Local Authority provided Isos with the school level data, and full information on dates of previous and planned organisational change within the primary sector. Isos took this data and reviewed alongside DFE data looking in more detail at small geographical areas, as well as looking at groups of schools (Federations, MATs and faith groupings). Isos identified schools where changes could be made based on local clusters, linked to the 5 Planning Areas.

### Stage Three. Later Spring Term 2023 Agreed Analysis

Five workshops were held with LA officers to discuss these initial ideas for meeting the declining school population needs. These workshops enabled Isos to check their rationale for decision making, and refine their understanding of the likely impact of changes, both on provision and the sustainability of quality future provision.

The workshops helped us to refine suggestions for change, which have been considered based on smaller geographical clusters as well as the Planning Areas already established.

A meeting with the Lead Member was helpful in understanding the information Councillors would like before they are asked to reach decisions, and the principles they would like to be observed as part of the Southwark School Organisational Change Strategy.



## Appendix 2

### Current context

There are currently 26,399 places from reception year up to year 6 in Southwark's primary schools. **These are filled by 20,694 children, leaving 5,705 places empty in primary schools across the borough.** This is a borough-wide vacancy rate of 22%.<sup>2</sup>

Vacant places are not distributed equally between schools. Some primary schools in Southwark are full. At the other end of the spectrum, some schools have more than half of their places empty. There are many factors which are leading to a fall in primary aged children in Southwark – a phenomenon which is observable right across London. These are chiefly falling birth rate, reduced immigration, housing pressures, higher numbers of families moving out of London post Covid and benefit changes leading to relocation of families as set out in the Southwark Strategy in December 2022.

The current situation has been alleviated by actions that Southwark has taken historically. Between 2019 and 2023, a total of 495 places have already been removed from the school system through a mixture of reducing forms of entry and closing schools.

### Recommendations for the scale of further reductions needed

The information that Southwark shared with us indicated that, in addition to the 495 places that have already been removed from the system, there is more action underway right now to reduce the number of primary school places in Southwark further.

#### Changes already underway:

The first way in which primary surplus capacity is being reduced is through agreed reductions in Published Admission Numbers (PANs). Between 2019 and 2023, 17 schools agreed to reduce their PANs and two schools will lose bulge classes, as listed in Appendix B. These changes will take several years to work through the system. For example, a school that reduced its primary admission number from 60 to 30 in 2019 would continue to experience a reduction in the overall places up until 2026 (when the cohort of children in reception in 2019 enters Year 6). **Once all these agreed PAN reductions have worked their way through the system, this will lead to a further reduction of 2,100 places.**

#### Further reductions:

The second way in which primary surplus capacity is being reduced is through proposed closures and amalgamations of schools. At present, consultation is underway to close Townsend school, close St Francesca Cabrini RC school and amalgamate Coburg and Camelot schools. Discussions are also underway around a potential amalgamation of St Jude's and Charlotte Sharman. **As and when these changes have been completed a further 1,170 primary places will have been removed.**

However, at the same time there are a small number of schools (mainly free schools or academies) which have opened or expanded in recent years and are filling to reach their

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<sup>2</sup> Pupil numbers based on October 2022 Census returns.

## Appendix 2

planned capacity. This will lead to a small increase of 228 places. A list of schools where changes are already planned is included in Appendix B.

Despite the action that has already been taken, the analysis that we have undertaken suggests that there is further to go. Once all the changes described above have been achieved, **we estimate that there will still be 2,663 vacant places in Southwark's primary schools.**

It is not desirable to get to a position of zero vacancies. There needs to be some flexibility in the system for parental choice and movement of pupils in year, particularly in an inner city environment where pupil mobility tends to be higher. The accrued experience of local areas over time suggest that Southwark should be aiming for a vacancy level of about 10% - or between 2000 and 2100 places on current pupil numbers. That means that to ensure a primary school system that is sustainable, based on the current number of pupils, Southwark still needs to remove around 600 places.

A primary school is structured around class sizes of 30, therefore a single form entry primary school has 210 pupils, a two-form entry primary school has 420 pupils and so on. When removing places from the primary system, it is therefore expedient to do so in multiples of 210. **To stabilise the system, based on current numbers of pupils, we therefore recommend looking to remove a further 630 places** – this could be achieved by 3 schools each reducing their Primary Admission Number by one form of entry (this would take several years to have full impact), or by closing or amalgamating schools, or some combination of these actions.

The reduction by 630 places that we are recommending, in addition to the changes Southwark already have in train, **is a minimum.** It is what should come out of the primary education system based on **current pupil numbers.**

Unfortunately, projections by the Greater London Authority, based on birth rates and projected pupil yield from housing developments, suggest that over the next five years, the number of primary aged pupils in Southwark will continue to fall. According to GLA projections, in 2026/27 there will be 1,143 fewer primary aged children in Southwark than there are today.

If these projections are accurate, that would suggest **that Southwark may need to lose a further 1,143 places, on top of the 630 that we already know we need to take out.** This would equate to five further units of 210.

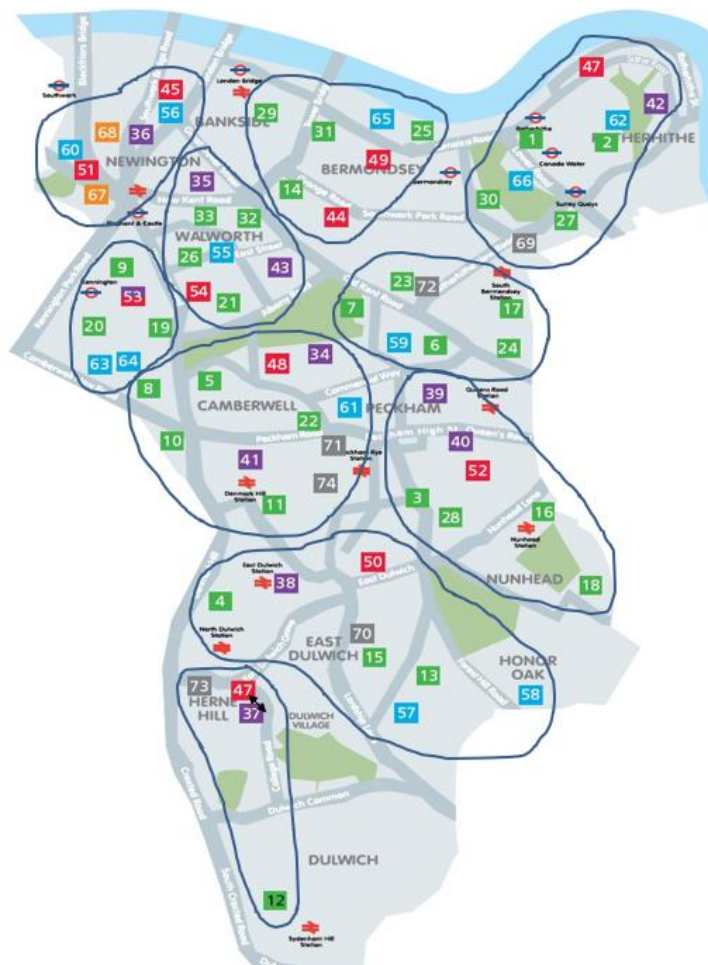
However, we do not know how accurate the population projections will be. We therefore recommend that Southwark continues to keep a watching brief on actual numbers and sets **a target to take out a minimum of 630 and a maximum of 1,773 places over the next five years.** This equates to between 3 and 8 forms of entry. To manage the uncertainty of fluctuating pupil numbers we recommend that Southwark approaches this reduction in phases and prioritises options that build flexibility into the system.

## Appendix 2

## Analysis of where reductions should take place

The distribution of primary school vacancies across Southwark is not even. There are some areas of the borough with significantly higher levels of vacancy than others. At the same time, further reductions in pupil numbers is more likely to affect some areas of the borough than others. It is therefore important that the 3 to 8 forms of entry are removed from the right areas. If not, there will remain over capacity in some bits of the borough and in others there will not be enough places to meet parental demand.

In order to assist in determining where reductions should take place, we split Southwark schools in 10 clusters for the purposes of analysing pupil numbers. We attempted to base these on natural 'geographies' that correspond to the different neighbourhoods in Southwark. The map below shows the clusters that we used for our analysis.



In each cluster we considered data on:

- the number of pupil vacancies in primary schools now
- the number of pupil vacancies there will be when all the planned changes have come into effect
- the projected decrease in primary pupil numbers up until 2025/26 according to GLA estimates
- the number of first choice preferences for schools in that area for September 2023

## Appendix 2

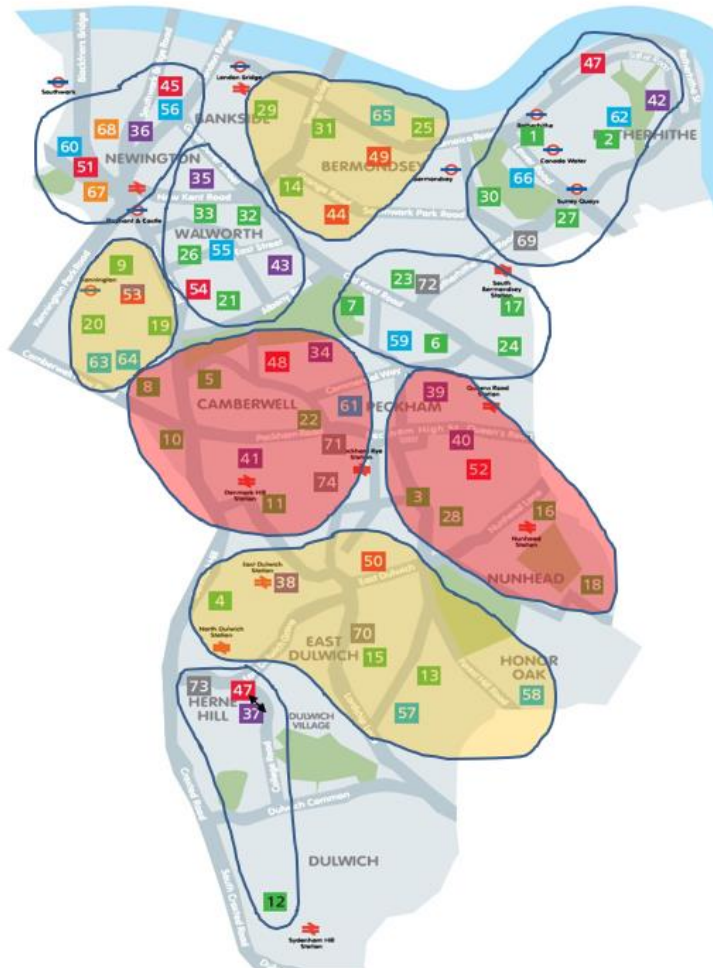
We used this information to identify how the maximum of eight forms of entry reduction might be distributed across the cluster areas. This is shown in the table and map below:

## Appendix 2

Cluster	Pupils now	Places now	Vacancies now	%	First place prefs Sept 2023	Reception places in excess of first choices	Places after planned changes	Vacancies after planned changes	%	2026/27 projected pupils	Projected vacancies 2026/27	%	Reduction needed to meet 10% target	Possible whole forms of entry reduction
Newington (PA1)	1399	1860	461	25%	182	58	1470	71	5%	1237	233	16%	110	0
Bermondsey (PA2)	1782	2100	318	15%	213	87	2100	318	15%	1690	410	20%	241	1
Rotherhithe (PA2)	2826	3270	444	14%	442	8	3150	324	10%	2680	470	15%	202	0
Walworth (PA1)	2040	2610	570	22%	204	156	2100	60	3%	1803	297	14%	117	0
Kennington (PA1 & PA4)	1452	1845	393	21%	180	75	1755	303	17%	1267	488	28%	362	1
Old Kent Road (PA1, PA2 & PA3)	1969	2865	896	31%	247	143	2100	131	6%	1799	301	14%	121	0
Camberwell (PA3 & PA4)	3240	4170	930	22%	384	156	3570	330	9%	2792	778	22%	499	2
Peckham (PA3)	1771	2535	764	30%	194	136	2310	539	23%	1526	784	34%	631	3
North and East Dulwich (PA3, PA4 & PA5)	2853	3720	867	23%	408	102	3360	507	15%	2790	570	17%	291	1
Herne Hill and Dulwich village (PA5)	1362	1424	62	4%	292	-86	1442	80	6%	1408	34	2%	-107	0

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The map shows colour coded yellow those clusters where a 1 form of entry reduction may be needed, and red those areas where two or more forms of entry reduction may be needed by 2026/27.



What this analysis shows is that many of the planned reductions in place numbers that are already underway are likely to have most impact in the North of the borough – particularly Newington, Walworth and the Old Kent Road areas. It is therefore the middle of the borough – Kennington, Camberwell, Peckham and Nunhead where this analysis suggests there will be the greatest oversupply of places in future.

**Our recommendations, therefore, are that over the next five years Southwark should look to reduce primary numbers by around 1 form of entry in the Bermondsey, Kennington and North Dulwich areas, around 2 forms of entry in the Camberwell area and up to 3 forms of entry in the Peckham and Nunhead area.**

However, these recommendations can only be a guide. One of the things that we cannot know, at the moment, is how parental choice will respond to some of the changes already underway. To take a concrete example, our analysis at present assumes that the impact of closing Townsend school will chiefly be felt by schools in the Walworth cluster, meaning that current vacancies there are used by families that would otherwise have gone to Townsend. However, it may be that families choose instead to travel North to schools in the

## Appendix 2

Bermondsey or Newington clusters, or West to schools in the Kennington cluster. It is impossible to know the actual impact until changes have taken place. It is therefore recommended that Southwark repeats this analysis at frequent intervals to test the geographical impact of changes to pupil numbers and adjust plans accordingly if necessary.

### Assessment of which schools may be affected by reductions

In assessing which schools may be affected by reductions we have limited our analysis to those schools which have been deemed in scope by Southwark. We have also been guided by the principles that are important to Southwark. These are:

- Assuring future sustainability for schools
- Ensuring minimum possible disruption
- Protecting the education estate
- Recognising that change is essential
- Avoiding, or minimising, the impact of closure
- Supporting diversity and equality

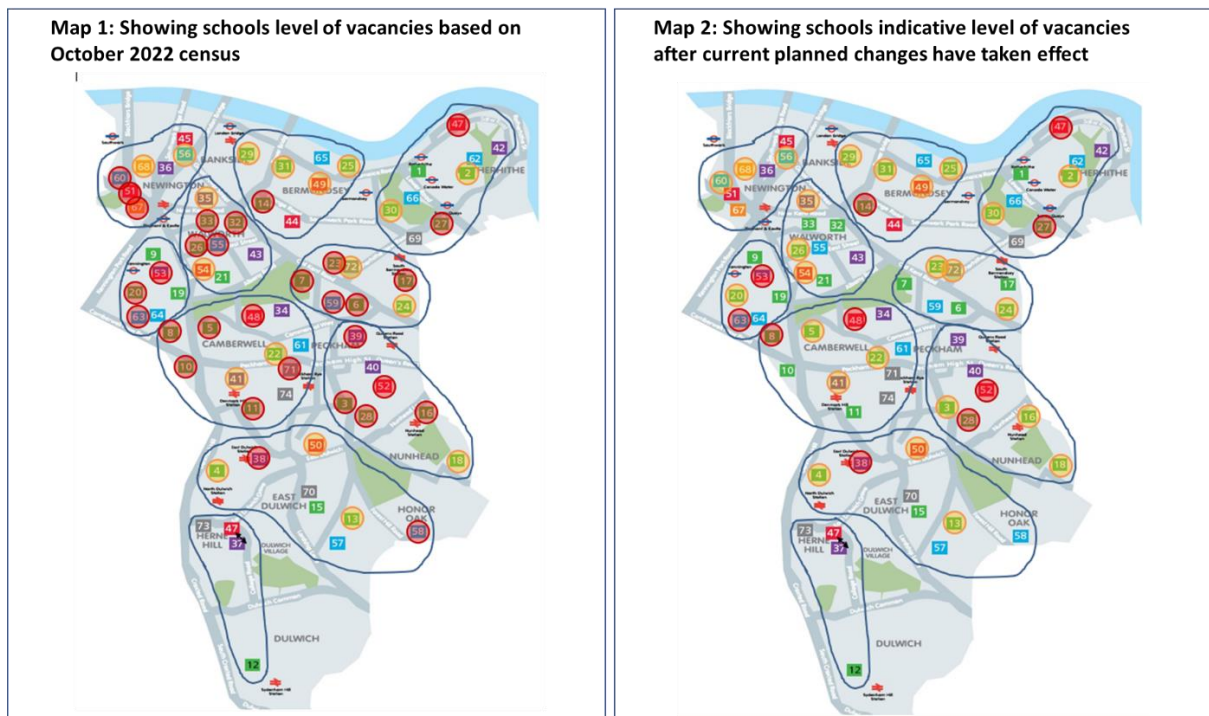
Beyond these principles, we have been guided by our geographical analysis outlined above and taken into account four key pieces of data:

- 1) A calculation of the expected vacancy rate in a school, after any already agreed changes have been implemented.
- 2) Evidence of financial risk – either large in-year deficit or a cumulative deficit.
- 3) Quality of education
- 4) First place preferences for September 2023

Experience shows that it is difficult to maintain the quality of education in a school carrying much more than a 10% vacancy rate – once there are fewer than 27 children per class it is difficult for schools to afford the full range of services. Where population figures are showing trends falling below this level they were considered to be at risk in our analysis, those schools with high deficits and those where quality of education is less than good were also highlighted as being at risk.

The first map below colour codes schools based on the current level of vacancy, according to the October 2022 census. Those schools with more than 10% vacancies are circled in orange. Those with more than 25% vacancies are circled in red. The second map shows an approximation of how those levels of vacancy might change, after the planned changes that are in the pipeline have all fed through the system. For the sake of simplicity, we have used some very basic rules to underpin this analysis. We have assumed that where a school is reducing PAN that will just have an impact on the school itself; where a school is amalgamating that pupils will transfer to the amalgamated school and where a school is closing pupils will go to the nearest school of the same type (community, CofE, RC etc). The real-world will, of course, be infinitely more complex than this but we have used this as a simple basis upon which to illustrate how the planned changes could impact on vacancy levels.

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Following our risk analysis of schools, we considered a possible approach to phasing the work, identifying schools where Southwark leaders could begin to take action in the shorter term and also looking ahead to where further capacity may need to be removed in the medium to long term:

**Phase 1** – includes those schools in which possible reductions in pupil numbers should be considered and discussed in order to meet the minimum reduction of 3 forms of entry required based on current pupil numbers. These are schools in the cluster areas where most reduction is thought necessary.

**Phase 2** – includes those schools where further exploration is required but may be candidates for reducing by a further 5 forms of entry if the number of primary aged children continues to decline.

**Phase 3** – includes those schools unlikely to be involved in pupil reductions in the near future but which are in areas where populations could continue to fall so will need regular review.

In general, our consideration of the phases is based on weighing up a series of inter-related factors. These are:

- Our assessment of whether an individual school is currently at risk in terms of pupil numbers, financial sustainability, or quality of education.
- Where schools are located – specifically aiming to bring forward action in areas of the borough with a significant over-supply of places.
- Whether the proposed reduction in places is something that might be relatively quick to achieve or may take longer to broker and work through.



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- Whether there are other changes (such as a neighbouring school closing) that need to happen and where the full impact needs to be understood, before proceeding.

These are not hard and fast ‘rules’ but they are factors that we have taken into consideration in suggesting the phasing of possible changes, and which schools might be involved at each stage. For each school we have suggested a possible course of action to pursue and a rationale for this. This detail is included in Appendix C.

A summary of the three phases, the possible number of schools involved at each phase, and the potential for places reductions, is set out below. It will be apparent that across groups 1 and 2 there are more than 8 possible reductions in forms of entry. This is prudent as it is likely that not all will be achieved.

Phase	Possible number of schools involved	Potential for reduction in forms of entry
1	14	8.5 to 9.5
2	14	6
3	20	None at present

### Expected impact of proposed reductions

If Southwark were to be successful in reducing by 8 further forms of entry as recommended, and if overall population estimates prove to be accurate, we calculate that in 2025/26 the overall vacancy rate in Southwark’s primary schools would be 9.8%, and the vacancy rate in reception year should be 11.1%. This is very close to the target set of 10%. However, as we have cautioned throughout, this analysis is based on snap-shot in time and will require regular review to ensure that both the totality of place reductions remains accurate as more information becomes available about pupil numbers, and that the geographical targeting of those place reductions remains sensible as more information comes to light about the real-world impact of planned changes.

### Recommendations

Our recommendation is that Southwark councillors and officers work with schools to both ensure that currently planned reductions are realised and that up to 8 further forms of entry are removed from primary schools in a phased approach. It will be necessary to continue to monitor real-time data on numbers of pupils and the impact of changes to primary pupil numbers to ensure that this reduction remains on-track and that it is geographically targeted to the right areas. Our suggestions for which schools might be approached is set out in Appendix C. This is based on a snap-shot in time and will require careful monitoring and adjustment as the programme of changes is realised.

As councillors and officers work with schools to reach final decisions about the changes to make we make the following observations.

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1. Any changes required are done so to ensure Southwark maintains excellent primary education whilst addressing population change. To not change would lead to unplanned decline as some schools become unaffordable.
2. The most effective and least stressful organisational changes are those where the school leadership and governors understand and support the rationale, even if the change proposal brings some sadness.
3. It is important to recognise that parental preference will always be difficult to predict so assumptions that amalgamating schools will lead to a particular change in pupil population should always be carefully reviewed.
4. Communications is absolutely key – discussing a particular school publically too soon can lead to further decline in numbers, but schools also find being left with uncertainty drains staff pupils and parents morally, affecting the quality of education.
5. Although many of the schools most significantly affected have higher levels of FSM than the borough average, reducing the number of schools will increase the capacity to meet the needs of the most vulnerable. Equality Impact assessments for each change process should help ensure sufficient finances to meet the needs of the vulnerable and to strengthen diversity in the schools.

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### Appendix A – Phase one analysis

#### Southwark Primary Pupil Place Planning

##### Preparatory Work

During the Autumn Term 2022 Isos Partnership undertook a top level analysis of pupil place issues for Southwark pupil place planning, based on data accessible on line, prior to accessing Southwark’s strategy and without specific knowledge of the individual schools, their location, or the communities that attend them.

To collate the data we accessed:

the January 2022 School Census, (<https://www.gov.uk/government/statistics/schools-pupils-and-their-characteristics-january-2022>) – this includes snapshot data about the number of children in every school on census day in January

DFE comparator websites, (<https://schools-financial-benchmarking.service.gov.uk/SchoolSearch/Search?nameId=&suggestionUrn=&locationorpostcode=&LocationCoordinates=&option=on&openOnly=true&lacodename=Southwark&SelectedLocalAuthorityId=210&searchtype=search-by-la-code-name>) – these are informed by key data collected by the DFE, including School Capacity returns.

Children and Maternity Statistics (ChiMAT) information for 2021, (<https://www.gov.uk/government/statistics/2022-child-health-profiles>) – this includes data on child birth rates

DFE School Capacity data (<https://explore-education-statistics.service.gov.uk/find-statistics/school-capacity/2021-22>) – this includes pupil population forecasts

Borough admissions brochure. (<https://www.southwark.gov.uk/schools-and-education/school-admissions/primary-admissions/applying-for-a-primary-school-place>)

This introductory work was undertaken to give Isos and Southwark early insight into the issues that would need further exploration for a more detailed and up-to-date analysis and recommendations. It provided a tool to independently “stress test” the work undertaken by the Southwark Place Planning Team

##### Numbers across Southwark

The largest cohort year in Southwark appeared to be Year 9, all years below that show a constant decline, apart from Year 2. The birth rate is not yet increasing.

This indicates that lower numbers of children is a trend, rather than a blip, and Southwark are correct to be taking strategic and operational action to address this.

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### Primary Capacity

If we consider Year 9 as the current highest possible number of primary spaces needed in the last 10 years, the spare capacity (based on 2020/21 data) was around 9 FE (around 8%) in comparison with current PANs. In 2019/20 The Local Authority and schools were proactive in reducing Forms of Entry and in having discussions with particularly vulnerable schools regarding mergers, without this action the gap from need would have remained around 17 FE (around 13%).

The reductions so far, and our recommendations have taken into account a flexibility buffer, in that in the unlikely event in the next 10 years, numbers were to return to above the Year 9 position, there would still be significant spare capacity in the system simply by restoring PANs to September 18 levels.

This is important because it means councillors and other stakeholders can be confident that any future reductions will not over reduce spare capacity in primary schools.

DFE Finance benchmark figures indicate at least 25 schools show some financial challenge. 8 of these have negative reserve figures. Of these 6 have negative in year spend and negative reserves. Two of these six schools have already reduced their PAN which will enable them to reduce staffing as part of financial recovery planning.

Across the Borough 40 schools were showing some level of pressure from vacancies in 2022, in 24 of these their reception numbers are below the level needed for financial efficiency (based on their PAN). Based on work in other Boroughs Isos estimates that where reception figures fall below 27 in a one form entry school the costs of providing the necessary school infrastructure, a full curriculum range and meeting individual educational needs starts to become financially challenging. Below 25 it is likely to become educationally limiting, potentially leading to a reduced curriculum offer, sometimes mixed age classes and less leadership expertise.

Following this analysis, we estimated that across the borough the removal of 17 forms of entry at Primary level (9 currently planned and a further 8 to be identified) would still leave 6 FE capacity for parental preference, and a number of schools that could easily re increase their PAN if necessary.

Based on 2020/21 figures, this would give capacity of 105 FE (3150 places) with flexibility to increase to 110 (3300) if required. Allowing 5% for parental preference based on Jan22 reception figures – with access to allow for up to 10% if required. (These figures are updated in our main report once DFE data for 2021/2 and local information were available)

From the available Local Authority information we could see that it would be possible to analyse by planning area and to identify possible groups of schools well located for PAN reductions. At this stage of analysis, we looked at the 5 Planning Areas and provided a top level summary for the areas that, based on 2021 data, appeared to be facing the greatest challenges. For information, we have included as examples Planning Area 1 (which from

## Appendix 2

2021 statistics had the largest capacity challenge), and Planning Area 5 (which had the least capacity challenge)

The DFE benchmarking also provides information on equalities and diversity, but not on quality of buildings or local environment. Whilst these aspects have been born in mind further analysis will be crucial as we move to next stage considerations in the Spring and Summer Terms.

### **Planning Area 1**

There are 115 children fewer in reception classes in Planning Area 1, than there are in Year 6. Despite four schools having reduced their PAN in this area (St George's Cathedral, Charlotte Sharman, Keyworth and Robert Browning) there was still an overall vacancy rate of around 20 % vacancy in the Reception numbers for Jan 22. There seems to be a particular density of schools in the Walworth area.

Three schools are already in the position of having in year over spends and no reserves and one had a large in year deficit. Several schools may face financial constraint if numbers fall further.

Eleven of the schools appear to show signs of unaffordable vacancy levels – which is likely to become an increasing problem if numbers continue to fall.

Two schools seem to be located close to each other and between them only have enough reception children for 1 FE.

Faith schools in the area reflect varying demand, but overall have over capacity, only 1 of the 6 faith schools has reduced its PAN in recent years, despite there being around 2 FE spare capacity across the faith schools in this planning area.

There is a need to reduce capacity in this area. We understood that some discussions and changes have already taken place and the Spring Term analysis would help us plan further changes.

### **Planning Area 5**

In planning area 5 the number of children enrolling in Reception is going up. Further analysis is needed as this could either be population growth or parental preference from other planning areas causing a southward drift of children.

Even with this possible southward drift in some schools there are more forms of entry than are necessary (allowing for parental choice between 5-8%).

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None of the schools in Area 5 has currently reduced their PAN, but 2 schools appear to have a significant challenge to fill reception places. Four schools appear to be facing financial challenge.

Without knowledge of parental preference data it is difficult to analyse where children might move IF PAN was reduced in any of the schools in this planning area.

### **Variation Across Southwark**

There appears to be significant risk across the Borough, however analysis of Area 5 suggests that there may be southward population drift into the area, mitigating the pressure in that area.

Parts of Planning Area 1 appear to be particularly crowded for primary schools, and there may be some “border” issues for particular schools at both primary and secondary level. Isos understands that this is an area where possible changes are already being considered. These changes will impact on our Spring Term analysis and recommendations.

### **Stress-testing Southwark work to date**

There was strong agreement between our independent analysis of published data and the premises in the agreed Southwark Strategy. Southwark officers’ analysis of the challenge and number of schools at risk appears to be appropriate and as accurate as possible in a period where population change is especially volatile.

We agreed with Southwark that the planned more detailed area analysis with possibly at risk schools would give further information for Isos Partnership to be able to make recommendations for further changes that may be needed. Based on our early analysis we would consider around 35-45 schools are likely to be affected by the impact of a reducing population. The level of vacancies appears to be increasing in all planning areas, although the impact is less obvious in Planning Area 5. The planned forms of entry changes seem appropriate, we will use updated data to confirm what further changes may be needed in our Spring Term 2023 work.

As part of next stages work we needed further information on where new and existing changes had been planned and agreed and in which years changes were expected to impact. This was necessary for us to be able to evaluate the balance between implemented changes, planned changes and new recommendations.

We recommended that it may be useful to look at smaller planning areas (ie not necessarily Planning Areas as a whole) where schools are feeling particular impact.

We also recommended that it may also be helpful to look at data across Catholic/C of E and MATs in the Borough to support the Diocese and MAT leaders with their thinking.

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## Appendix 2

## Appendix B - List of schools in Southwark where planned changes have been agreed

Name of school	Planned change	Date decided	Places reduction
Bellenden Primary School	Reduce by 1FE	2019	90
Brunswick Park Primary School	Reduce by 0.5FE	2019	45
Camelot Primary School	Reduce by 0.5FE and merge with Coburg	2019 & 2023	45
Charlotte Sharman Primary	Reduce by 1FE and merge with St Jude's	2019 & TBC	90
St Jude's C of E	Merge with Charlotte Sharman	TBC	210
Coburg School	Merge with Camelot	2023	210
Crawford Primary School	Reduce by 1FE	2019	120
Dog Kennel Hill School	Reduce by 1FE	2023	210
English Martyrs RC Primary School	Reduce by 1FE	2022	210
Harris Primary Academy Peckham Park	Reduce by 1FE	2021	150
Harris Primary Free School Peckham	Reduce by 1FE	2022	180
Hollydale Primary School	Reduce by 0.5FE	2019	45
Ilderton Primary School	Reduce by 1FE	2023	210
Keyworth Primary School	Reduce by 1FE	2019	90
Phoenix Primary School	Reduce by 1FE	2019	60
Robert Browning Primary School	Reduce by 1FE	2019	90
St Francis RC Primary School	Reduce by 1FE	2023	210
St George's Cathedral School	Reduce by 1FE	2019	90
Townsend	Closure	2023	210
St Francesca Cabrini	Closure	2023	210



## Appendix 2

## Appendix C – Proposals and rationale

## Phase 1

School name	Proposal	Rationale
Grange	Reduce PAN to 1FE	Small class sizes increasing financial pressure. Reduction to 1 FE would increase viability and therefore capacity to improve quality of Education. There are nearby schools with spaces, and first preferences would not be affected as they are below 30
St Paul's CofE	Reduce PAN to 1FE Discuss possibility of school amalgamation with the SDBE MAT.	0.5 PAN Reduction, review sustainability longer term. Concerns over quality of education. Very low numbers from R to Year 4. Parental preference would not be affected by reduction to 1FE. Longer term viability may need to be considered.
St Joseph's Catholic Infants	Reduce to 1FE, amalgamate with junior school	Infant School reducing to 1FE, 1 FE will work through to juniors. Schools may be more financially viable as a Primary. Schools share a site. Year 1 and Reception numbers below 40. If current low numbers in the infant school feed through to the junior school, without PAN reduction, it will have an impact on sustainability for the junior school.
St Joseph's Catholic Juniors		
Comber Grove	Possible amalgamation of Comber Grove with a nearby school. If an amalgamation is not an option may have to consider closure of Comber Grove.	Comber Grove first preferences too small to be viable, with implications for finances and quality of education. Amalgamation is more comfortable for families than straightforward closure, and there are potential schools with spaces nearby that could provide an option for amalgamation.
Goose Green	Explore possible reduction in 1FE discuss possible options with MAT	Goose Green runs risk of expensive class sizes by filling at just over 30. Reducing to 1FE is more sustainable for schools in partnership (Goose Green and Dog Kennel Hill in same MAT). As First Preferences below 30 parental preference will not be badly affected.  Dog Kennel Hill already reducing to 1 FE - the two schools may be sustainable as part

## Appendix 2

Dog Kennel Hill		of MAT, possibly with closer forms of joint working / sharing assets or site.
St Mary Magdalene	Possible amalgamation with a nearby school. If an amalgamation is not an option may have to consider closure.	St Mary Magdalene numbers look unsustainable financially in the long term, despite school currently managing within budget. Low first preference means fewer children affected. Capacity available in nearby schools
Rye Oak	Reduce PAN to 1 FE	Has been operating consistently at around 1FE (just above and below 30 pupils) but has PAN of 2 FE, other schools in area have already experienced PA reductions. Possible implications for resources base and staffing across the school/resource base.
Harris Primary Academy Peckham Park	Explore merger as 1FE school with Harris	Financially costly. Neither school full, low applications, both Harris schools. Peckham School very close to The Belham. Two schools .6m apart flat walk, schools could decide how best to configure.
Harris Primary Free School Peckham		
Bessemer Grange	Possible reduction to 2FE	School runs risk of expensive class sizes by filling at just over 60. (Highest year group 76. Current first preferences 57). Spaces in nearby schools (Dog Kennel .5m uphill; Goose Green.6 flat). School likely to be financially viable at 2 FE, and as first preferences are below 60 parental preference will not be affected.

**1. The 49 schools requiring further evaluation, based on agreed criteria**

Alfred Salter Primary School	Ark Globe Academy	Bellenden Primary School	Bessemer Grange Primary School	Brunswick Park Primary School
Camelot Primary School	Charlotte Sharman Primary School	Cobourg Primary School	Comber Grove School	Crawford Primary School
Dog Kennel Hill School	English Martyrs' Roman Catholic Primary School	Friars Primary Foundation School	Galleywall Primary School	Goodrich Community Primary School
Goose Green Primary and Nursery School	Grange Primary School	Harris Primary Academy Peckham Park	Harris Primary Free School Peckham	Hollydale Primary School
Ilderton Primary School	Ivydale Primary School	John Donne Primary School	John Keats Primary School	Keyworth Primary School
Michael Faraday School	Oliver Goldsmith Primary School	Peter Hills with St Mary's and St Paul's CofE Primary School	Phoenix Primary School	Pilgrims' Way Primary School

### Appendix 3: Supplementary data

Riverside Primary School	Robert Browning Primary School	Rotherhithe Primary School	Rye Oak Primary School	Saint Joseph's Catholic Primary School, the Borough
Snowsfields Primary School	St Anthony's Catholic Primary School	St Francis RC Primary School	St George's Cathedral Catholic Primary School	St George's Church of England Primary School
St James' Church of England Primary School	St John's and St Clement's Church of England Primary School	St Joseph's Catholic Infants School	St Jude's Church of England Primary School	St Mary Magdalene Church of England Primary School
St Paul's Church of England Primary School	Surrey Square Primary School	Tower Bridge Primary School	Victory Primary School	

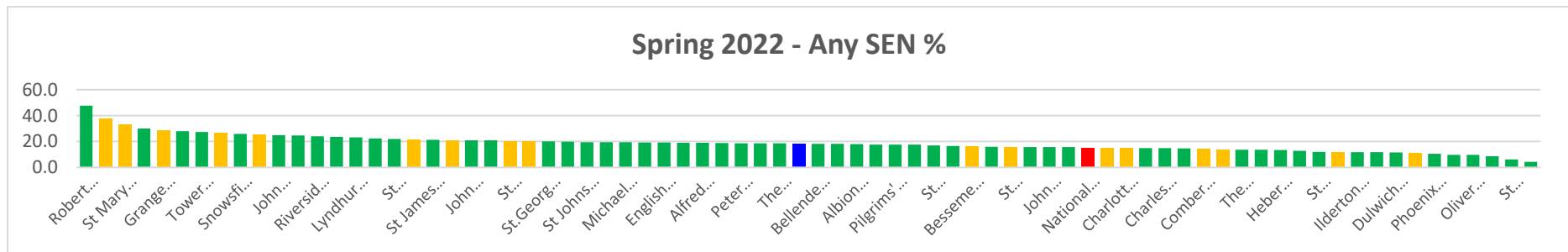
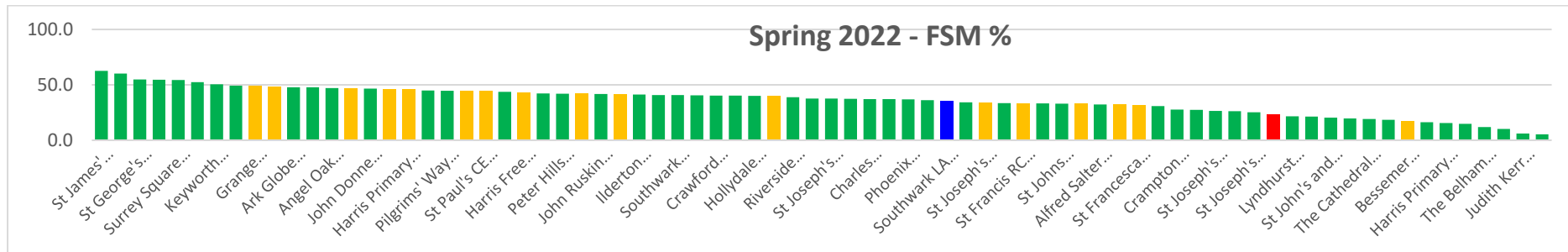
## Appendix 3: Supplementary data

### 2. Equalities piano charts for all Southwark primary schools

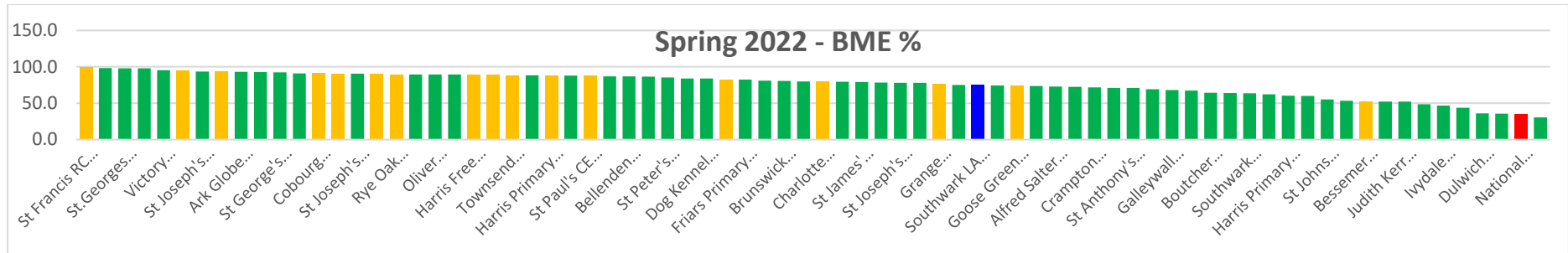
Red= National average

Blue= Southwark average

Yellow bars represent a school that is currently recommended to make a change (PAN reduction/ amalgamation)



Appendix 3: Supplementary data



Appendix 3: Supplementary data

3. Actions taken since 2019

PA	Primary School	Previous PAN	Agreed PAN	Reduction
1	St George's Cathedral RC	60	30	-30
	Charlotte Sharman	60	30	-30
	English Martyrs RC	60◇	30◇	-30◇
	Keyworth	90	60	-30
	St John's Walworth‡	30‡	0‡ (closed)	-30‡
	Robert Browning	60	30	-30
2	Phoenix*	120*	90*	-30*
	Ilderton◇	60◇	30◇	-30◇
3	Hollydale	45	30	-15
	Bellenden	60	30	-30
	Camelot	75	60	-15
	Ivydale	120	90	-30

### Appendix 3: Supplementary data

	St Francis RC◇	60◇	30◇	-30◇
	Harris Primary Free Peckham¶¶	60¶¶	30¶¶	30¶¶
	Harris Peckham Park†	60†	30†	-30†
	St Francesca Cabrini RC† ‡	30* 60†	0 *(closing) 30†	-30* -30†
4	Brunswick Park	75	60	-15
	Comber Grove	45	30	-15
	Dog Kennel Hill◇	60◇	30◇	-30◇
	Crawford	90	60	-30
<b>Total agreed</b>		1,350 (45FE)	780 (26FE)	-570 (19FE)

*School PAN reductions by school, by planning area – PANs reduced from September 2019 unless otherwise noted*

*\*PAN reduction from September 2020 onwards*

*†PAN reduction from September 2021 onwards*

*¶¶PAN reduction from September 2022 onwards*

*◇PAN reduction agreed from September 2023 onwards*

*‡ Closure of school agreed from September 2021*

*\* School closing in September 2023*



Appendix 3: Supplementary data

4. Criteria for further evaluation

**Recommendation Template: PRIMARY**

**Criterion/ Principle: Pupil Roll Trends and Projections**

**Instructions:**

**Data provider: Please provide the data requested below in the format requested.**

- a. Provide the rolls from Reception to Year 6 for the past 5 years
- b. Provide the unused capacity from Reception to Year 6 for the past 5 years

[Name of School]	PAN Reception	Intake	PAN Reception Spaces	PANs Total	Total School Numbers	Spare capacity Y-6	% spare capacity	% points above 20%
2022/23								
2021/22								
2020/21								
2019/20								
2018/19								

- c. Provide the roll projections from Reception to Year 6 for next 5 years
- d. Provide the projected capacity if nothing changes

[Insert Name of School]	PAN Reception	Intake	PAN Reception Spaces	PANs Total	Total School Numbers	Spare capacity Y-6	% spare capacity	% points above 20%
2022/23								
2023/24								

Appendix 3: Supplementary data

2024/25								
2025/26								
2026/27								

## Appendix 3: Supplementary data

### Recommendation Assessment Template: PRIMARY

Criterion/ Principle: Quality of provision

Instructions:

Data provider: Please provide the data requested below in the format requested.

Name of School	Existing Ofsted Grade (and date)	
	1	Outstanding
	2+	Good, re-inspection in two years with view to being graded as outstanding
	2	Good
	2-	Good, re-inspection in two years with view to being graded as requires improvement
	3	Requires improvement
	4	Inadequate

Name of School	Ofsted Grade (expected)	Assessment by link adviser informed by school improvement overview
	Current assessment of evidence at time of the evaluation.	Write a summary narrative here explaining current assessment based on evidence gathered by SELA team – ideally bullet points Impact of school within LA – hub, engaged in school –to- school support.

## Appendix 3: Supplementary data

### **Recommendation Assessment Template: PRIMARY**

#### **Criterion/ Principle: Budget health**

#### **Instructions:**

#### **Data provider: Please provide**

**1. A RAG rating of the budgetary health of the school, where red = in very poor health, amber = in poor health and green= in good health.**

Ratings should take into account:

- a. The year-end financial position for the past 5 years,
- b. Financial projections/ forecast for the next 3 financial year(s) and include assumptions these are based on.
- c. Internal Audit Assurance level from latest report and high priority recommendations
- d. Any existing intelligence about rolls, staffing, capital, reserves/ deficits, loans and repayments.

**2. A brief summary explaining the rating and any anomalies that the recommendation maker should be aware of (eg high level of maternity leave/ agency cover this year)**

# Criteria templates: Quality of Buildings and Estate

**Recommendation Assessment Template: PRIMARY**

**Criterion/ Principle: Quality of estate & buildings**

**Instructions:**

**Data provider: Please provide the data requested below in the format requested.**

A) How old is the building?

B) How easy would it be to bring the school up to a net zero standard? (grade this from 0= impossible and/ or very costly, to 5= simple and/ or inexpensive)

	Yes/ No/ No information held	Any further comment
Does the school have a condition survey from DfE?		
Have there been any major changes to the building(s) since the last condition survey?		
Has the survey identified any major issues with the building(s) (e.g. asbestos/ health and safety issues)?		
Is the school compliant with all relevant regulations [to be based on health and safety info]?		

Does the school have a maintenance programme in place?		
Does the school have a full time premises manager or equivalent?		
Is the building listed?		
Is the building in a conservation area?		
Is there sufficient play space for the existing and projected number of pupils (consult rolls officer)?		
Is there sufficient floor space for existing and projected number of pupils?		
Is it an appropriate space for its use?		
Has this building been built or expanded recently as part of the 2009 expansion programme?		

# Criteria templates: Local Issues

Recommendation Assessment Template: PRIMARY

Criterion/ Principle: Local issues

Instructions:

Data provider: Please provide the data requested below in the format requested.

	Yes/ No	Any additional comment
Is it the only school of its designation in a 0.5 mile radius?	Yes= Green No= Red	
Is there a Resource Base in the school?	Yes= Green No = Red	
Is it on the border with other boroughs (ie would we lose the children from that school to other boroughs)?	Yes= Green No= Red	
Is there a Nursery or provision for 2 year olds in the school?	Yes= Green No= Red	
What percentage of the children in this school are from other boroughs?	High percentage= Green Low percentage = Red	
Are there any issues that you are aware of that should stop this school being put forward for consideration for change?	Yes (and what)= Green No= Red	
Are there any issues that you are aware of that should support this	Yes = Red No= Green	

school being put forward for consideration for change?		
Are alternative options covered by the congestion or low emission zones? (would parents incur more cost sending their children to another school?)	Yes= Green No= Red	
What percentage of children has an EHCP?	Over X% = Green Under X% = Red	
Any other issues to consider not covered by other templates (please just note them)	Note the issues in the additional comment column	

Majority Green= recommendation not to change  
Majority Red= recommendation to make a change

APPENDIX 1 – LOCATION OF TOWNSEND PRIMARY SCHOOL



## Appendix 2 – Statutory Notice for Closure



## Proposed closure of Townsend Primary School, Townsend St, London, SE17 1HJ

Southwark Council has published proposals to close Townsend Primary School, with effect from 31<sup>st</sup> August 2023, which is stage two of the Statutory Process. Stage one involved the previous consultation, earlier in the academic year

Within four weeks from the date of publication of this proposal (**17<sup>th</sup> April 2023**) – stage 2 of the statutory process - any person may object to or make comments on the proposal by emailing them to [vilma.edwards@southwark.gov.uk](mailto:vilma.edwards@southwark.gov.uk). This period is stage three of the statutory process. After the end of the four week representation period, within two months, the council's cabinet will meet in June 2023 to take the final decision on whether to close. This will be stage four in the process.

Should the decision to close Townsend Primary School be taken, all children attending Townsend Primary School will be offered places at alternative schools in line with parental preferences and/or within the area for September 2023. The closure forms stage five in the statutory process

A copy of the proposal can be viewed on the school website at <https://townsendprimary.co.uk/wp-content/uploads/2023/04/Statutory-Proposal-To-close-Townsend-Primary-School.pdf>, and paper copy of the proposal can be requested via email to: [vilma.edwards@southwark.gov.uk](mailto:vilma.edwards@southwark.gov.uk).

You can also respond in writing to: Vilma Edwards, SELA, Children's and Adults' Services, Southwark Council, 160 Tooley Street, London SE1 2QH or by email to the address above.

All responses must be received no later than 5pm on the **15<sup>th</sup> May 2023**



## Appendix 3 Statutory Proposal - To close Townsend Primary School

### Statutory Proposal - To close Townsend Primary School

Southwark Council publishes these proposals under section 15(1) of the Education and Inspections Act 2006 to close Townsend Primary School with effect from 31<sup>st</sup> August 2023.

Category	Information																																				
<b>1. Contact details</b>																																					
a. School contact details and category	Townsend Primary School is a Community Primary School Townsend Primary School's address is Townsend Street, London SE17 1HJ.  Townsend Primary School's phone number is 020 7703 2672, and email <a href="mailto:office@townsend.southwark.sch.uk">office@townsend.southwark.sch.uk</a>																																				
b. Local Authority contact details	The London Borough of Southwark, 160 Tooley Street, LONDON, SE1 2QH. Phone number is 020 7525 5000																																				
<b>2. Implementation</b>																																					
The date on which it is proposed to close the school or, where it is proposed that the closure be implemented in stages, the dates of and information about each stage.	Townsend Primary School is proposed to be closed from the 31 <sup>st</sup> August 2023 onwards.																																				
<b>3. Reason for closure</b>																																					
3. A statement explaining the reason why closure of the school is considered necessary.	3. The closure of Townsend Primary School is considered necessary because it is no longer financially sustainable. The pupil roll has fallen consistently over the past five years resulting in reduced funding which the school receives based on pupil numbers. From the start of the next academic year, the funding gap due to falling pupil numbers is anticipated to be approximately £596,000, incurring further debt every year thereafter, due to the number of vacant places if the school remains open. The Council believe that, were Townsend Primary School to remain open, a new reduced staffing model would be required from September 2023, which would not enable children to continue receiving the high quality education they deserve and need.																																				
<b>4. Pupil Numbers and Admissions</b>																																					
4. The numbers (distinguishing between compulsory and non-compulsory school age pupils), age range, sex, and special educational needs of pupils (distinguishing between boarding and day pupils) for whom provision is currently made at the school.	4. There is no pre-school/nursery at Townsend Primary School and therefore, there are no non-compulsory school age pupils. Townsend does not include any boarding pupils. There are 111 pupils on roll (as at January 2023 Census Day), 4 children have an EHCP and a further 29 are supported with SEND action plus. A breakdown of children on roll by age group is shown in the table below: <table border="1" data-bbox="587 1684 1359 1845"> <thead> <tr> <th>Year</th> <th>R</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Girls</td> <td>7</td> <td>12</td> <td>10</td> <td>4</td> <td>11</td> <td>16</td> <td>7</td> <td>67</td> </tr> <tr> <td>Boys</td> <td>4</td> <td>5</td> <td>10</td> <td>12</td> <td>9</td> <td>9</td> <td>15</td> <td>64</td> </tr> <tr> <td><b>Total</b></td> <td><b>11</b></td> <td><b>17</b></td> <td><b>20</b></td> <td><b>16</b></td> <td><b>20</b></td> <td><b>23</b></td> <td><b>22</b></td> <td><b>111</b></td> </tr> </tbody> </table>	Year	R	1	2	3	4	5	6	Total	Girls	7	12	10	4	11	16	7	67	Boys	4	5	10	12	9	9	15	64	<b>Total</b>	<b>11</b>	<b>17</b>	<b>20</b>	<b>16</b>	<b>20</b>	<b>23</b>	<b>22</b>	<b>111</b>
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<b>5 to 7. Displaced pupils</b>																																					
5. A statement and supporting evidence about the need for school places in the area including whether there is sufficient capacity to	5. Demand for reception places in the area has reduced dramatically in the last 5 years, the local authority took action in 2018/19 to reduce this excess by formally reducing the published admission number at twelve schools.																																				

Category	Information																														
<p>accommodate displaced pupils.</p> <p>6. Details of the schools or further education colleges at which pupils at the school to be discontinued will be offered places, including</p> <p>6(a) any interim arrangements</p> <p>6 (b) the provision that is to be made for those pupils who receive educational provision recognised by the local authority as reserved for children with special educational needs; and</p> <p>6 (c) in the case of special schools, the alternative provision made by local authorities other than the local authority which maintain the school.</p> <p>7. Details of any other measures proposed to be taken to increase the number of school or FE places available in consequence of the proposed discontinuance.</p>	<p>This school is situated in the Southwark's school place planning area 1 – (PA1) – “<i>Borough, Bankside and Walworth</i>”, which comprises 18 other schools. Demand in this locality has decreased substantially, due to consistently falling birth rates, as well as a variety of socio-economic factors that have led to fewer families living in the area. The table below shows reception year figures, capacity, vacancies and percentage of vacancies.</p> <table border="1" data-bbox="592 439 1310 600"> <thead> <tr> <th>Year</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>Places</td> <td>945</td> <td>810</td> <td>810</td> <td>795</td> <td>765</td> </tr> <tr> <td>Uptake</td> <td>658</td> <td>612</td> <td>608</td> <td>587</td> <td>558</td> </tr> <tr> <td>Vacancies</td> <td>286</td> <td>198</td> <td>202</td> <td>208</td> <td>207</td> </tr> <tr> <td>%</td> <td>30%</td> <td>24%</td> <td>25%</td> <td>26%</td> <td>27%</td> </tr> </tbody> </table> <p>6. The local authority has confirmed that there are over <b>650</b> vacancies across years R to 6 at 9 other primary schools within 0.6 miles of Townsend Primary School, which indicates there is sufficient capacity to accommodate displaced pupils, subject to parental preferences made through an admissions process. 6 of the schools (and 440 vacancies) are non-denominational. A coordinated admissions process will be delivered by the local authority for all families with a child on roll at Townsend Primary School to enable them to apply for an alternative school of preference for September 2023. Parents also have the option to apply to schools, which are further away as there are some families travel from outside of the immediate area to enable their children to attend Townsend The School Admissions Team at the Local Authority can provide information and contact details for schools; they can be contacted at the following email address: <a href="mailto:schooladmissions@southwark.gov.uk">schooladmissions@southwark.gov.uk</a></p> <p>6a) there are no interim arrangements required</p> <p>6b) there is no SEND specialist reserved provision at this school - this section does not apply. There are 4 children with EHCPs – transition arrangements for these children into alternative schools are being managed by caseworkers on the local authority's Special Educational Needs and Disability (SEND) team to ensure appropriate placements are made.</p> <p>6c) Townsend Primary School is not a special school, this does not apply</p> <p>7. There is no need for additional places to be provided in order to accommodate the children displaced by the closure of Townsend Primary School, as there are currently, over 650 spare places within half a mile of the school available across year groups to accommodate displaced pupils, including 440 vacancies at 6 non-denominational schools.</p>	Year	2019	2020	2021	2022	2023	Places	945	810	810	795	765	Uptake	658	612	608	587	558	Vacancies	286	198	202	208	207	%	30%	24%	25%	26%	27%
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Category	Information
<b>8. Impact on the community</b>	
<p>8. A statement and supporting evidence about the impact on the community of the closure of the school and any measures proposed to mitigate any adverse impact.</p>	<p>8. The decision to propose closure of Townsend Primary School has been taken to protect the education of children attending the school, and ensure that, should the school close they can have a managed transition to other local schools. Southwark Council acknowledge that the closure of the school will have an impact on the community, and be deeply felt by many families/local residents due to the significant, community links and emotional ties developed and held by generations at Townsend Primary School. However, given the significant level of capacity at high quality schools in the locality and across Southwark as a whole, families will be able to access alternative school places in the community. The closure of Townsend may enable some of the surrounding schools with low rolls to strengthen their intake and as a result, to become more financially viable.</p> <p>No mitigation will be required because of the availability of alternative school places at other schools in the local community.</p>
<b>9. Rural primary schools</b>	
<p>9. Where proposals relate to a rural primary school designated as such by an order made for the purposes of section 15, a statement that the local authority or the governing body (as the case may be) considered section 15(4).</p>	<p>9. Townsend Primary School is not in an area that has been classified as "rural", nor has it been designated as such by an order made for the purposes of section 15.</p>
<b>10. Balance of denominational provision</b>	
<p>10. Where the school has a religious character, a statement about the impact of the proposed closure on the balance of denominational provision in the area and the impact on parental choice.</p>	<p>10. The school does not have a religious character</p>
<b>11. Maintained nursery schools</b>	
<p>11. Where proposals relate to the discontinuance of a maintained nursery school, a statement setting out</p> <p>(a) the local authority's assessment of the quality and quantity of the alternative provision compared to the school proposed to be discontinued and the proposed arrangements to ensure the expertise and specialism continues to be available; and</p>	<p>11. Townsend is a 4-11 primary school and includes no nursery provision, this section does not apply</p> <p>(a) Not applicable</p>

Category	Information
(b)the accessibility and convenience of replacement provision for local parents.	(b)Not applicable
<b>12. Sixth form provision</b>	
<p>12. Where the school proposed to be discontinued provides sixth form education, the effect for 16 to 19 year olds in the area that the closure will have in respect of</p> <p>(a)their educational or training achievements;</p> <p>(b)their participation in education or training; and</p> <p>(c)the range of educational or training opportunities available to them.</p>	12. Townsend is a 4-11 primary school, it does not include sixth form provision, this section does not apply.
<b>13. Special Educational Needs Provision</b>	
13. Where existing provision that is recognised by the local authority as reserved for pupils with special educational needs is being discontinued, a statement as to how the local authority or the governing body (as the case may be) believe the proposals are likely to lead to improvements in the standard, quality and/or range of the educational provision for these children	13. There is no special educational needs provision reserved for SEND pupils at Townsend, so no specialist provision is proposed for discontinuation.
<b>14-15 Travel</b>	
14. Details of length and journeys to alternative provision.	14. All children on roll at the school could be offered a place within 0.6 miles of their existing school – there are 9 schools with more than 650 places, across year groups R to 6 available within this area, 440 of which are at 6 non-denominational schools. Every parent however, is able to make a preference for an alternative school inside or outside this area. The commuting distance of children, currently attending Townsend is not likely to be substantively affected as they transition into alternative schools. It is therefore not expected that journeys to and from alternative schools provided will be lengthier than at present due to availability but longer journeys may occur as a result of parental preference of schools outside of the local area.
15. The proposed arrangements for travel of displaced pupils to other schools including how the proposed arrangements will mitigate against increased car use.	15. As outlined above, the pupils displaced by the school closure may not be unduly inconvenienced by lengthier travel, as there a substantial amount of provision within walking distance of Townsend Primary School. This would help to mitigate against any increase in car use, as no more car journeys will be necessary than at present.

Category	Information
<b>Making objections to or comments on these proposals</b>	<p>Within four weeks from the date of publication of these proposals, by 5 pm on <b>15th May 2023</b> any person may object to or make comments on the proposals or, request a paper copy of the proposal by emailing</p> <p><a href="mailto:vilma.edwards@southwark.gov.uk">vilma.edwards@southwark.gov.uk</a></p> <p>or by post to: <i>Vilma Edwards, SELA, Children's Services, Southwark Council, 160 Tooley Street, London SE1 2QH</i></p>

Signed  
Nina Dohel  
Director of Education

## APPENDIX 4 – EQUALITY IMPACT AND NEEDS ASSESSMENT



***Equality Impact & Needs Analysis –  
Proposed closure of Townsend  
Primary School in September 2023***

***April 2023***

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## Guidance notes

### Things to remember:

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

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

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

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

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

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

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

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and [www.southwarkadvice.org.uk](http://www.southwarkadvice.org.uk)).

Whilst the equality analysis is being considered, Southwark Council recommends considering Socio-Economic implications, as socio-economic inequalities have a strong influence on the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce socio-economic inequalities and this is reflected in its values and aims. For this reason, the council recommends considering socio-economic impacts in all equality analyses, not forgetting to include identified potential mitigating actions.

Similarly, it is important for the Council to consider the impact of its policies and decisions in relation to tackling the climate emergency. This includes both the potential carbon emissions of a policy or decision and its potential effect on the borough's biodiversity. You are asked to consider the impact on climate of your policy and decision under discussion by competing the Climate impact section below.

### Section 1: Equality impact and needs analysis details

<b>Proposed policy/decision/business plan to which this equality analysis relates</b>	The proposed closure of Townsend Primary School on the 31 <sup>st</sup> August 2023
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<b>Equality analysis author</b>	Ric Euteneuer				
<b>Strategic Director:</b>	David Quirke-Thornton				
<b>Department</b>	Children's' & Adults'	<b>Division</b>	Education		
<b>Period analysis undertaken</b>	March 2023				
<b>Date of review (if applicable)</b>	March 2024				
<b>Sign-off</b>	Nina Dohel	<b>Position</b>	Director of Education	<b>Date</b>	



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

### 2.1 Brief description of policy/decision/business plan

Townsend Primary School is a one form of entry (1FE) primary school, on Larcom Street, London SE17 1NQ. Since 2017, the school has struggled to fill the 30 places it is able to admit each year. This academic year 11 children initially took up Reception class places, 17 joined Reception the previous year. Only 2 families applied to Reception for 2023/24. This low level of admissions has had a considerable financial impact on the school over the years, which has led to a substantial and growing in year financial deficit, which is unsustainable and shows little prospect of being able to be addressed. Given the vacancy levels in the vicinity of the school, the consideration of closure proposals is recommended.

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

### 3. Service users and stakeholders

<p><b>Key users of the department or service</b></p>	<ul style="list-style-type: none"> <li>• Children (2-11 years old) attending a primary, infants, juniors or attached nursery setting in Southwark</li> <li>• Parents, carers and families of those children.</li> <li>• School staff (teaching or non-teaching)</li> <li>• Governors of those schools</li> <li>• Local Authority departments (Children’s Social Care, Education)</li> </ul>
<p><b>Key stakeholders were/are involved in this policy/decision/business plan</b></p>	<ul style="list-style-type: none"> <li>• Head teachers of all primary schools in Southwark</li> <li>• Governors of all primary schools in Southwark</li> <li>• Members of the Council</li> <li>• Leadership teams in Education and Children’s and Adults’ services</li> <li>• Finance, Sustainable development, Schools’ HR, Legal, Communications colleagues</li> </ul>

## Section 4: Pre-implementation equality impact and needs analysis

This section considers the potential impacts (positive and negative) on groups with ‘protected characteristics’, the equality information on which this analysis is based, any mitigating actions to be taken and importantly any improvement actions to promote equality and tackle inequalities. It is important to also understand impacts as including needs of different groups. **Due regard is about considering the needs of different protected characteristics in relation to each part of the duty as relevant and proportionate to the area at hand.**

An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts. It is important to consider any actions which can be considered to advance equality of opportunity through positive actions, for example. The columns include societal issues (discrimination, exclusion, needs etc.) and socio- economic issues (levels of poverty, employment, income). 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 socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantage.

**Socio-economic disadvantage may arise from a range of factors, including:**

- *poverty*
- *health*
- *education*
- *limited social mobility*
- *housing*
- *a lack of expectations*
- *discrimination*
- *multiple disadvantage*

The public sector equality duty (**PSED**) requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of under represented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values: that we will

- *Always work to make Southwark more equal and just*
- *Stand against all forms of discrimination and racism*

<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; this also includes needs in relation to each part of the duty.</b>	<b>Potential Socio-Economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
The closure of Townsend Primary School could ostensibly reduce choice for parents wanting a secular education in the locality for their child. It could potentially affect all age groups from 4-11 (children) and parents (generally 18-50) differentially. This, however, does not take into account the <i>i) reduction in pupils numbers and applications for the school</i> <i>ii) reduction in the births in the locality</i> <i>iii) the outmigration of children from the locality and Southwark as a whole</i>	As outlined in the adjacent " <i>potential impacts (positive and negative) of proposed policy</i> " column, the potential socio-economic impacts of closing the school as regards to age will be minimal. Closing the school will not effectively change the intake and relative demographics of the children attending other schools in the locality.

<p>Due to i), ii) and iii), there has been a considerable fall in demand for places at the school, and numbers have fallen to an extent that a 1 form entry (1FE) school is no longer viable to staff and run. Therefore, the loss of “choice” will largely be theoretical.</p>	<p>As most of the pupils attending the school live locally, and this is the case with other local schools, the closure of Townsend will not in itself change the local demographics or socio-economic profile.</p>																																																																																																						
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-Economic data on which above analysis is based</b></p>																																																																																																						
<p>i) The reduction of pupil numbers at the school is self-evident – there has been a near <b>34%</b> loss of pupils (<b>56</b> children) since 2019 (<i>Source, School Censuses 2019-23</i>)</p> <table border="1" data-bbox="245 618 804 869"> <thead> <tr> <th>Year</th> <th>R</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>21</td> <td>20</td> <td>24</td> <td>26</td> <td>28</td> <td>23</td> <td>25</td> <td>167</td> </tr> <tr> <td>2020</td> <td>22</td> <td>21</td> <td>20</td> <td>24</td> <td>23</td> <td>27</td> <td>25</td> <td>162</td> </tr> <tr> <td>2021</td> <td>20</td> <td>26</td> <td>24</td> <td>25</td> <td>27</td> <td>24</td> <td>29</td> <td>175</td> </tr> <tr> <td>2022</td> <td>17</td> <td>20</td> <td>23</td> <td>20</td> <td>27</td> <td>25</td> <td>25</td> <td>157</td> </tr> <tr> <td>2023</td> <td>11</td> <td>17</td> <td>20</td> <td>16</td> <td>20</td> <td>25</td> <td>22</td> <td>131</td> </tr> </tbody> </table> <p>(<i>Source, School Censuses 2019-23</i>)</p> <p>In terms of applications for the school, the numbers show a steep fall overall both in terms of first choices and choices overall</p> <table border="1" data-bbox="245 1016 877 1133"> <thead> <tr> <th>Year</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>1<sup>st</sup></td> <td>19</td> <td>17</td> <td>12</td> <td>11</td> <td>2</td> </tr> <tr> <td>All</td> <td>46</td> <td>52</td> <td>43</td> <td>45</td> <td>3</td> </tr> </tbody> </table> <p>(<i>Source, Applications records - LBS 2019-2023</i>)</p> <p>ii) the school is situated in the “North Walworth” ward of the Council, but takes pupils in from further afield – 56% of the pupils come from this ward. Of the pupils from within Southwark, 74% come from planning area 1 (Borough, Bankside &amp; Walworth). Another 18% of the pupils come from planning area 2 (Bermondsey and Rotherhithe) and the remaining 9% of pupils of the existing roll come from outside these PAs but within Southwark (4%) or outside Southwark (5%). Most of the latter come from Lambeth and Lewisham (2% each) <u>All</u> of these localities have seen a reduction in births (including Lewisham) over the last 5 years, and this is projected to continue in the near future (<i>Source, ONS Census and Birth data 2021-22</i>)</p>	Year	R	1	2	3	4	5	6	Total	2019	21	20	24	26	28	23	25	167	2020	22	21	20	24	23	27	25	162	2021	20	26	24	25	27	24	29	175	2022	17	20	23	20	27	25	25	157	2023	11	17	20	16	20	25	22	131	Year	2019	2020	2021	2022	2023	1 <sup>st</sup>	19	17	12	11	2	All	46	52	43	45	3	<p>The North Walworth ward Census 2021 data shows that there is a higher percentage of the population aged 0-19 lives in the ward (30%) than lives in the borough (21%); this said, there are a greater concentration of schools in the locality than the borough as a whole.</p> <p>The under 4 component of the ward population has fallen by 279 (20%) since 2011.</p> <table border="1" data-bbox="909 909 1430 1245"> <thead> <tr> <th>Age</th> <th>2011</th> <th>2021</th> <th>+/-</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>0-4</td> <td>1,345</td> <td>1,071</td> <td>-279</td> <td>-20%</td> </tr> <tr> <td>5-9</td> <td>1,009</td> <td>1,132</td> <td>+123</td> <td>+12%</td> </tr> <tr> <td>10-14</td> <td>1,215</td> <td>1,183</td> <td>-32</td> <td>-3%</td> </tr> <tr> <td>15-19</td> <td>1,088</td> <td>1,157</td> <td>+149</td> <td>+14%</td> </tr> <tr> <td><b>0-19</b></td> <td><b>4,657</b></td> <td><b>4,543</b></td> <td><b>-114</b></td> <td><b>-2%</b></td> </tr> </tbody> </table> <p>(<i>Source ONS Census 2021</i>)</p> <p>Overall the under 19 component of the population has fallen and the 0-4 cohort are the future primary pupils in the ward, therefore it is likely that pupil numbers in this ward will continue to fall (<i>Source, ONS Census 2021</i>)</p>	Age	2011	2021	+/-	%	0-4	1,345	1,071	-279	-20%	5-9	1,009	1,132	+123	+12%	10-14	1,215	1,183	-32	-3%	15-19	1,088	1,157	+149	+14%	<b>0-19</b>	<b>4,657</b>	<b>4,543</b>	<b>-114</b>	<b>-2%</b>
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iii) In terms of outmigration, there has been net outmigration of pupils aged from 0-15 in recent years, and this continues to be the case – the net migration figures by age below (GLA migration estimates, 2023)	
<b>Mitigating and/or improvement actions to be taken</b>	
As there have been no negative impacts relating to age identified, no mitigating or improvement actions are proposed.	

<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. Please note that under the PSED due regard includes:</p> <p>Giving due consideration in all relevant areas to “the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.” This also includes the need to understand and focus on different needs/impacts arising from different disabilities.</p>																
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>															
<p>The closure of Townsend Primary School will have a negligible effect on disabilities, as the facilities, adaptations and services offered on the school campus for pupils and staff will be available at other schools to which they may move. All children with EHCPs will be offered an alternative suitable placement to meet their needs</p>	<p>There will be little or no potential socio-economic impacts arising from socio-economic disadvantage as regards disability, as schools in the locality are as accessible as Townsend and there are numerous school within close travelling distance of the school</p>															
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which analysis is based</b></p>															
<p>No central record of disability is maintained by the LA, but a proxy measure is the number of children with Education and Healthcare Plans (EHCPs), or children who have been identified as SEND Plus at a variety of geographies. Townsend Primary has around the same level of EHCPs nationally and Londonwide, but slightly below Southwark’s average. The SEND Plus percentage is above local, regional and national averages.</p>	<p>As there is no perceptible potential socio-economic impacts/needs/issues arising from socio-economic disadvantage for people with disabilities, no data has been identified.</p>															
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<p>(Source, School Census January 2023- EHCPs and SEN Support, DfE Statistics 2022)</p>																

<p>In terms of staffing, no register of staff disability is maintained – disability does not form part of the selection process for staff recruitment or redundancy, so is unlikely to affect disabled staff disproportionately. In England, in the 2021 Census, a smaller proportion but larger number of people were disabled (17.7%, 9.8 million), compared with 2011 (19.3%, 9.4 million). In Southwark, the prevalence is 18.6%, and in London, 15.8%, so Southwark has a higher than England and London average.</p>	
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>As there have been no negative impacts relating to disability identified, no mitigating or improvement actions are proposed.</p>	

<p><b>Gender reassignment:</b> - The process of transitioning from one gender to another. <b>Gender Identity:</b> Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's recorded sex or can differ from it.</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p>Gender reassignment is unlikely to involve children of primary age. As regards staffing, there are no staff undergoing gender reassignment at Townsend at present, but, were this to be the case, the gender would form no part of the recruitment or indeed the redeployment process, so would not negatively impact on staffing.</p>	<p>There will be little or no potential socio-economic impacts/needs/issues arising from socio-economic disadvantage resulting from gender reassignment, as this will not affect pupils and is unlikely to affect parents/carers and staff.</p>
<p><b>Equality information on which above analysis is based.</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p>Data is not collected for children, parents or carers on gender reassignment. It is likely to be such a small number as to make it statistically insignificant. In the 2021 Census, 0.6% of the UK population identified themselves as not having the same gender they were born with. In London, this rose to 1.4%, and Southwark, 1.2%. Such a percentage would mean that the lack of a transgender staff member would not be statistically significant. (Source, ONS Census 2021)</p>	<p>As there is no perceptible potential socio-economic impacts/needs/issues arising from socio-economic disadvantage for people with gender reassignment, no appropriate or useful data has been identified.</p>
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>As there have been no negative impacts relating to gender reassignment identified, no mitigating or improvement actions are proposed.</p>	

**Marriage and civil partnership** – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. **(Only to be considered in respect to the need to eliminate discrimination.)**

<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b></p>	<p><b>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>												
<p>Marriage or civil partnership is unlikely to directly involve children of primary age, although they may be the children of married or unmarried parents or civil partners. The marital status of the parents or carers of school pupils forms no part of the admissions process, and children are admitted based on religious or distance criteria alone</p> <p>As regards staffing, no records of the marital status of Townsend staff are kept at the school at present, but, were this to be the case, the marital or civil partnership status of a staff member or potential applicant would form no part of the recruitment or indeed the redeployment process, so would not negatively impact on staffing.</p>	<p>As mentioned in the adjacent “potential impacts of the proposed policy”, the marital status of the parents or carers of school pupils forms no part of the admissions process.</p> <p>Children are admitted based on sibling presence, medical needs or distance criteria alone. Therefore there are no realistic socio-economic impacts, needs or issues arising from socio-economic disadvantage relating to marital status</p>												
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<p>No records are maintained on the marital or civil partnership status of parents &amp; carers, or staff members of Townsend Primary School, so it would be challenging to evidence any level of discrimination or disadvantage. Figures at a ward, borough, regional and national level for the percentage of the local population by marital and civil partnership status are given below. Old Kent Road ward is slightly higher than the Southwark average, but some way adrift on London and England averages (<i>Source, ONS Census 2021</i>)</p> <table border="1" data-bbox="240 1935 911 2049"> <thead> <tr> <th>Area</th> <th>%</th> <th>Area</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>North Walworth</td> <td>27.5</td> <td>England</td> <td>44.5</td> </tr> <tr> <td>Southwark</td> <td>26.4</td> <td>London</td> <td>39.7</td> </tr> </tbody> </table>	Area	%	Area	%	North Walworth	27.5	England	44.5	Southwark	26.4	London	39.7	<p>As there is no perceptible potential socio-economic impacts/needs/issues arising from socio-economic disadvantage for people with gender reassignment, no appropriate or useful data has been identified.</p>
Area	%	Area	%										
North Walworth	27.5	England	44.5										
Southwark	26.4	London	39.7										

<b>Mitigating actions to be taken</b>
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As there have been no negative impacts relating to gender reassignment identified, no mitigating or improvement actions are proposed.
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<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.
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<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</b>
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Pregnancy and maternity are unlikely to directly involve children of primary age.	As mentioned in the adjacent “potential impacts of the proposed policy”, the pregnancy or maternity status of the parents or carers of school pupils forms no part of the admissions process, and children are admitted based on religious or distance criteria alone. Similarly, this status would not form part of the recruitment process. Therefore there are no realistic socio-economic impacts, needs or issues arising from socio-economic disadvantage relating to pregnancy or maternity status.
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As regards staffing, Townsend staff’s contracts mean that they are paid for some of their pregnancy and maternity leave; the pregnancy status of a staff member or potential applicant would form no part of the recruitment or indeed the redeployment process, so would not negatively impact on staffing.	
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<b>Equality information on which above analysis is based</b>	<b>Socio-economic data on which above analysis is based</b>
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Fertility is measured at a range of rates and geographies by the ONS. These include the “GFR” and “TFR”. The “ <i>General Fertility Rate (GFR)</i> ” is the number of live births per 1,000 women aged 15-44. The Total Fertility Rate (TFR) is the number of births per woman aged 15-44	As there is no perceptible potential socio-economic impacts/needs/issues arising from socio-economic disadvantage for people with pregnancy or maternity status, no
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Area	GFR	TFR	appropriate or useful data has been identified.
Southwark	44	1.14	
Inner London	48	1.28	
London	56	1.52	
England	56	1.62	

(Source, GLA/ONS 2021 (latest figures))

From this, we can see Southwark has low fertility rate compared the rest of London and England. This is another explanation, together with outmigration – why pupils numbers in Southwark are falling.

**Mitigating and/or improvement actions to be taken**

As there have been no negative impacts relating to pregnancy or maternity status identified, no mitigating or improvement actions are proposed.

**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; this also includes needs in relation to each part of the duty.**

**Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)**

A potential impact of the proposed closure could be that the pupils could potentially be placed in less diverse schools than the school proposed for closure Presently, the school is 89.9% Black and Minority Ethnic (BME) (i.e. non-White UK) –. For the local ward (North Walworth), the BME population is 68.2%. For the planning area the school is in (planning area 1 – PA1), the total percentage of BME pupils are 87.7%. As a whole, Southwark primary pupils are 78.9% BME as regards of Southwark’s population as a whole is 62.5%. The likelihood is that children will be reaccommodated in local schools in PA1, and that these schools will share the same level of diversity that the school presently has. There is no evidence therefore to show that closing the school would be likely to change the ethnic make-up of local alternative schools, as schools in the same planning area are as diverse as Townsend –In terms of staffing, the school’s workforce will – over time – find work in other local schools. As race will not form part of the selection process of staff, then no discernible effects as regards race will be noted or action required.

A potential impact of the closure could be that the school becomes less diverse socio-economically than it is at present. This is thought unlikely, as there has been no major development near the school, and the school’s intake is predominately from PA1.

What is evident is that people in Southwark are having less children, and those that are tend to be from the families that have remained, and are the same socio-economic class as the present parents and carers – just fewer of them.



<b>Equality information on which above analysis is based</b>						<b>Socio-economic data on which above analysis is based</b>
A table giving the relative percentages of the local population at schools and in the locality is given below						The Census 2021 and School Census 2023 figures opposite show that the school population is considerably more diverse than the population at large, and provided the children attending school remain inborough, that the population of Southwark will continue to become more diverse as time advances. Evidence is given elsewhere that the birth rate is falling in the locality, under “pregnancy and maternity”.
<b>Group</b>	<b>Townsend</b>	<b>North Walworth</b>	<b>PA1</b>	<b>Southwark pupils</b>	<b>Southwark population</b>	
Bangladeshi	3.8%	2.7%	5.0%	2.3%	1.8%	
Indian	0%	3.5%	0.7%	0.7%	2.0%	
Pakistani	0.3%	1.6%	0.4%	0.7%	0.7%	
Other Asian Background	1.3%	3.1%	3.0%	1.8%	2.7%	
Black African	36.7%	16.3%	27.6%	25.2%	15.7%	
Black Caribbean	6.3%	5.1%	6.1%	6.3%	5.9%	
Any Other Black Background	5.1%	3.8%	7.8%	5.2%	3.5%	
Chinese	0%	3.5%	1.3%	1.3%	2.7%	
Mixed - White & Black African	0%	1.0%	1.9%	2.2%	1.2%	
Mixed - White & Caribbean	5.7%	2.0%	2.6%	3.3%	2.1%	
Mixed - White & Asian	0%	1.2%	1.1%	1.7%	1.5%	
Any Other Mixed Background	5.7%	2.4%	6.5%	6.5%	2.4%	
White British	10.1%	31.8%	12.3%	21.1%	35.5%	
White Irish	0%	2.2%	0.2%	0.4%	2.0%	
Gypsy / Roma	0%	0.6%	0.0%	0.1%	0.5%	
Traveller of Irish Heritage	0%	0.1%	0.0%	0.1%	0.1%	
Any Other White Background	8.2%	14.8%	8.0%	9.3%	13.4%	
Any Other Ethnic Group	15.8%	6.0%	12.2%	7.7%	1.0%	
Unknown / Missing	1.3%	1.3%	3.3%	4.1%	5.3%	
<b>Non-White UK</b>	<b>89.9%</b>	<b>68.2%</b>	<b>87.7%</b>	<b>78.9%</b>	<b>64.5%</b>	
<i>(Source, Pupil Census, 2022, ONS Census 2021)</i>						

<b>Mitigating and/or improvement actions to be taken</b>
As there have been no negative impacts relating to race identified, no mitigating or improvement actions are proposed.

<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.	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
<p>The removal of 30 places from a school with no religious foundation could potentially remove choice and the availability of secular primary places in Southwark and beyond. Additionally, guidance when deciding this type of decision requires us to consider the balance of religious places in the borough,</p> <p>All of this said, the effect on the provision of secular places is likely to be minimal – for one, the take up of such places has been falling for years – as indeed it has for other denominational provision. Secondly, the effect</p>	<p>Religious schools in the past have often had a markedly different intake to academy, foundation and community schools, socio-economically. As Townsend is not a religious school, this is not the case. The school is amongst the most diverse schools in Southwark</p>

of a loss of 30 places (1FE), seen in the context of the overall number of places is also minimal.

As regards staffing, selection of staff for alternative employment is unlikely to be affected by the religion of the staff member

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

The percentages of religious/non-religious places (Non-R) in Southwark are given in the table below, both before (2022 and 2023) and after the proposals in 2024

Type	2022	2023	2024
RC	3,615	3,555	3,495
CE	3,149	2,895	2,865
Non-R	15,690	15,324	14,724

As a percentage of places this is shown below. Secular places (Non-R remain at 70% throughout)

Type	2022	2023	2024
RC	16%	16%	17%
CE	14%	13%	14%
Non-R	70%	70%	70%

The uptake of places are shown below

Type	2022	2023	2024
RC	2,874	2,686	2,483
CE	2,310	2,185	2,106
Non-R	15,690	15,324	14,724

This shows the demand for secular places has increased, but only by 1% of pupils overall

Type	2022	2023	2024
RC	14%	13%	13%
CE	11%	11%	11%
Non-R	75%	76%	76%

As noted above, there is no requirement for staff to be of a particular religion or none and therefore no record of staff's religious belief is maintained. It is therefore unlikely that a school closure will have any discernible effect on secular/non-religious education in Southwark as regards staffing and as regards pupil choice. Similarly, any restructuring as regards staff is also unlikely to have repercussions on any particular religious group or another.

**Mitigating and/or improvement actions to be taken**

As there have been no negative impacts relating to religion or belief identified, no mitigating or improvement actions are proposed.

**Socio-economic data on which above analysis is based**

Non-religious parents may wish for a secular education, but this is unlikely to be based on socio economic background. A table is given overleaf of the level of religious observance extracted from the 2021 Census. No breakdown of Christian faith is recorded for North Walworth ward. No religious register is kept of staff or pupils.

Religion	NW	Southwark
Christian	44%	46%
Buddhist	1%	1%
Hindu	1%	10%
Jewish	1%	0%
Muslim	13%	7%
Sikh	0.2%	0%
Other/No religion/not stated	39%	37%

(Source, ONS Census 2021)

This shows that there is a slightly lower level of Christian religious belief in the North Walworth, but no solid conclusions can be drawn from this.

<b>Sex - A man or a woman.</b>																																																																					
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<p>If there was a significant imbalance in the provision or uptake of places at the school then the closure of the school may affect this. Prevalence of male to female pupils in the both at the school and in the locality are approaching 50:50, so the school closing will not have an effect on the mix of pupils in terms of gender</p> <p>Similarly as regards staffing, a large proportion of the staff are female, but this is normal for primary schools of any type across the UK</p>																																																																					
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<p>The percentage of girls to boys varies from year to year. At reception, there are more girls than boys, across all year groups the same proportions in reverse. Overall, numbers are more or less equal</p>																																																																					
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<p>The number of female staff on the workforce are generally high. It is not felt that the closure therefore will disproportionately affect women more than men, save that there are more female staff than male across most of our schools in any case</p>																																																																					
<b>Mitigating and/or improvement actions to be taken</b>																																																																					
<p>As there have been no negative impacts relating gender identified, no mitigating or improvement actions are proposed.</p>																																																																					

<b>Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes</b>								
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>								
<b>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</b>								
<p>At age 4-11, it is unlikely that children will have identified with one sexuality or another, but they may have parents or carers who are LGBTQ+. In either case, admissions do not take into account the sexuality of the child or parent/carer. Closing the school will therefore have no differential effect on parents whatever their sexuality. Similarly, with regard to staff, sexuality or sexual orientation forms no part of the selection for recruitment or redundancy, so a closure will not disproportionately affect staff members as regards their sexual orientation.</p>								
<p>There are no potential socio-economic impacts or issues arising from disadvantage as regards the closure of the school with respect to the sexual orientation of pupils, parents/carers or staff.</p>								
<b>Equality information on which above analysis is based</b>								
<b>Socio-economic data on which above analysis is based</b>								

The prevalence of different sexualities was covered in the 2021 Census for the first time. This is not (yet) available at a ward level, but the figures for Southwark show the following figures for the population over 16.

Area	Straight or Heterosexual	Gay or Lesbian	Bisexual	Pansexual	Asexual	Queer	All other sexual orientations	Not answered	Non heterosexual
Southwark	82.71	4.53	2.57	0.67	0.07	0.17	0.06	9.21	8.07
London	86.19	2.23	1.52	0.37	0.05	0.06	0.04	9.54	4.27
England	89.37	1.54	1.29	0.23	0.06	0.03	0.02	7.46	3.17

As mentioned above, there are no potential socio-economic impacts as regards the closure of the school or issues arising from disadvantage with respect to the sexual orientation of pupils, parents/carers or staff. The figures for prevalence are given in the column adjacent to this one.

Southwark is lower than the national and London-average for heterosexuality and more than twice the London average for gay and lesbian residents over 16.

#### **Mitigating and/or improvement actions to be taken**

As there have been no negative impacts relating to sexual orientation identified, no mitigating or improvement actions are proposed or required.

#### **Human Rights**

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

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

In respect of the 16 rights listed, the proposal to close Townsend will not affect any of those listed. This said, the "First Protocol", this states "*The first sentence of Article 2 of Protocol No. 1 guarantees an individual right to education. The second guarantees the right of parents to have their children educated in conformity with their religious and philosophical convictions*". Removal of a single form of entry from Townsend Primary School will not endanger this freedom, as there are numerous school places available in schools within walking distance of Townsend, both religious and non-religious. This proposal will also not affect the rights of staff members.

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

At the last census time, there were 5,790 spare places in Southwark primary schools, including 1,540 spare places in Planning Area 1, 22% for each respectively. For non-religious education, there are numerous alternative schools very close to Townsend with numerous spare places available

#### **Mitigating and/or improvement actions to be taken**

As there have been no negative impacts relating to human rights identified, no mitigating or improvement actions are proposed or required.

## Conclusions

**Summarise main findings and conclusions of the overall equality impact and needs analysis for this area:**

### **Section 5: Further equality actions and objectives**

<b>5. Further actions</b>			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
<b>Number</b>	<b>Description of issue</b>	<b>Action</b>	<b>Timeframe</b>
As no mitigating or improvement actions to promote equality and tackle inequalities have been proposed, no further actions are required or proposed			

<b>5.1 Equality and socio-economic objectives (for business plans)</b>				
Based on the initial analysis above, please detail any of the equality objectives outlined above 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>Objective and measure</b>	<b>Lead officer</b>	<b>Current performance (baseline)</b>	<b>Targets</b>	
			<b>Year 1</b>	<b>Year 2</b>
Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

<b>6. Review of implementation of the equality objectives and actions</b>
As no mitigating or improvement actions to promote equality and tackle inequalities have been required or proposed, no further reviews of <b>the equality objectives and actions</b> are required

## **7. Implementation Equality Impact and Needs Analysis**

No issues as regards equalities and needs have been identified – therefore no mitigating or improvement actions to promote equality and tackle inequalities have been proposed as a result of this analysis.

### **Section 5: Further actions and objectives**

<b>Further actions</b>
Based on the initial analysis above, please detail the key mitigating actions or the areas identified as requiring more detailed analysis.
<b>No negative impacts of the arrangements have been identified, so no mitigating actions are required, and no actions will derive from these specific proposals.</b>

Number	Description of issue	Action	Timeframe
N/A	N/A	N/A	N/A

#### 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.

**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.**

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.

**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.**

Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2
N/A	N/A	N/A	N/A	N/A

**Appendix 5 – Responses from the Consultation**

Two responses were received from the Representation

One from the School governing body and one from the Liberal Democrat Group on the Council. These are outlined below

**From the Governing Body**

**From:** Norma McCance

**Sent:** Monday, May 15, 2023 3:43 PM

**To:** Edwards, Vilma <[Vilma.Edwards@southwark.gov.uk](mailto:Vilma.Edwards@southwark.gov.uk)>

**Subject:** Proposed Closure of Townsend Primary School – Stage 3

Dear Vilma

**Proposed Closure of Townsend Primary School – Stage 3**

I wish my comments/objections below to be registered as part of the statutory process

1. The LA has proposed the closure of Townsend school in each of the last two academic years. Though the failure of the first proposal was entirely due to the LA, as acknowledged by David Quirke-Thornton, it has caused unacceptable pressure and stress to be placed on our staff by trapping them in this emotionally draining process for two years. While Governors have praised their unfailing commitment and achievements over this period, as the employers of Townsend staff the LA should acknowledge that their duty of care has fallen short of what their employees have a right to expect.
2. Governors disagree with this second proposal to close Townsend school by August 31<sup>st</sup> of this year because it means our children (and staff who wish to remain in Southwark) will be required to move to other schools with an uncertain future. Lack of strategic planning by the LA means some pupils may be forced to attend 3 primary schools before entering the secondary phase. This is totally unacceptable on educational and well-being grounds, yet no guarantees have been given to parents.

Yours faithfully,  
Norma McCance

Chair of Governors  
Townsend Primary School

From the Liberal Democrat Group



Liberal Democrat Group Office  
Southwark Council  
160 Tooley Street  
London SE1P 5LX

15th May 2023

To whom it may concern,

I am writing to you in response to the consultation on the closure of Townsend School.

We are very saddened to see the closure of another primary school in Southwark. This is a deeply upsetting event for pupils, families, teachers, supporting staff and the wider community. It is heartening that the children affected should be able to find alternative places at nearby schools due to the availability across the area.

We trust that their families and the teachers will support the children to settle in well to their new schools without too much disruption to their education and friendships. We urge you to take proactive steps to address the wider ramifications that school closures will have on teachers, supporting staff jobs and also the maintenance of the school buildings and sites.

We acknowledge that falling pupil rolls are due to many factors including the squeeze on family budgets and the lack of affordable housing. The gentrification of the area around Townsend Primary School cannot be ignored as a factor in its closure and in fact was highlighted by representatives of the school last year. We are deeply concerned that many areas of Southwark and the capital are becoming hollowed out and not affordable to families. Since 2010, we have lost over 2000 council homes and, since 2016, only 17.6% of homes built in Southwark were social or affordable rent. Providing the affordable housing we need is critical to keeping our communities together and keeping our schools open.

As the opposition group, we remain committed to working on a cross-party basis to address this important issue and to alleviate the impact school closures have upon our communities. We urge you to continue to consult widely with experts on the best way to manage falling school rolls, to join forces with other London boroughs to lobby the Conservative government to ensure that our capital remains an attractive place for families and to be open to genuine scrutiny of decision-making by Southwark Council's cabinet members.

Yours sincerely,

**Councillor Rachel Bentley**

Vice-Chair of the Education and Local Economy Committee

North Bermondsey Ward  
CllrRachel.Bentley@southwark.gov.uk



**Draft**

**Good Food  
Southwark:  
Sustainable Food  
Strategy 2023-2026**

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# Executive Summary

## Our vision:

We want a sustainable food system in Southwark to improve health and wellbeing for our population, to reduce inequalities and to protect the planet.

## Context

Food has been described as “the single biggest lever to optimise human health and environmental sustainability on earth.”<sup>i</sup> In Southwark, there are opportunities to change our food system to make it more equitable for local people. This strategy sets out how we will create the conditions for a sustainable food system.

This strategy has been developed by Southwark Council in partnership with Southwark Food Action Alliance. It describes our long-term ambitions for our food system. To deliver this strategy, we will develop a joint action plan which sets out the actions we will take as a partnership to achieve these ambitions.

## Our core principles

Our strategy is underpinned by three core principles.

1. Collaboration as food partners – Our work is strengthened by working collaboratively to achieve a shared vision. We want to make best use of our individual strengths as food partners and learn from each other.
2. Sustainable, affordable food as a shared goal – Food is a core part of how we can improve the lives of residents in Southwark. We will continue to identify opportunities to work with people and organisations who may not traditionally see themselves as part of the food system.
3. Social justice and fairness - We will take a social justice approach in our work, recognising that we need to reduce inequalities and address equity if we are to achieve our ambitions.

## Our strategy

There are five priorities in our strategy. Underpinning each of these priorities is the ambition to reduce inequalities and close the gap in life chances in Southwark.

- 1) **A good food partnership** – A good food partnership can help us to join up our efforts to improve the local food system.
- 2) **Strong and connected communities** – A sustainable food system should bring communities together, helping people to build connections through food.
- 3) **Food security and the Right to Food** – A sustainable food system should deliver food security and nutrition for all. The principle of Right to Food advocates access to food as a basic human right and a statutory obligation.

- 4) **Healthy people, healthy planet** – A sustainable food system should enable access to good nutrition for health and wellbeing and have a neutral or positive impact on the natural environment.
- 5) **A good food economy and affordable food offer** – A sustainable food system should benefit the local economy, through good jobs, affordable food, community-led enterprises and healthy businesses.

Underpinning each of these priorities is the ambition to reduce inequalities and close the gap in life chances in Southwark.

### **How you can help**

Everyone in Southwark can help contribute to achieving a sustainable food system. As an organisation, you can take action such as joining Southwark Food Action Alliance, paying the London Living Wage or making your food provision healthier and better for the environment. As an individual, you can take action by eating a more sustainable diet, reducing waste or joining a local or national food campaign.

**GET INVOLVED ● MAKE A PLEDGE ● SIGN  
UP TO BE A FOOD HERO**

[www.southwarkfoodhero.org.uk](http://www.southwarkfoodhero.org.uk)

# Our vision for Sustainable Food in Southwark

We want a sustainable food system in Southwark to improve health and wellbeing for our population, to reduce inequalities and address equity and to protect the planet.

## What is a sustainable food system?

A food system includes all of the organisations and people that are involved with the production, distribution, consumption and disposal of food, and how they do it.<sup>ii</sup> A sustainable food system is a system that delivers food security and nutrition for all, tackles inequity whilst benefitting society and the economy, and protecting the planet.<sup>iii</sup>

## Introducing our partnership

This strategy has been developed by Southwark Council in partnership with Southwark Food Action Alliance members.

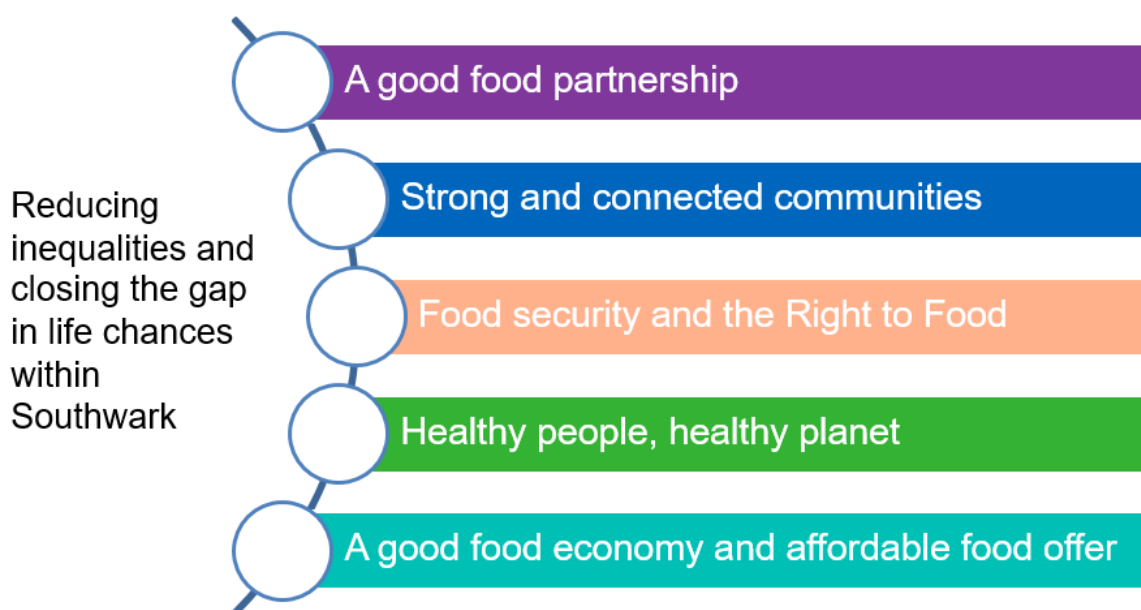
## Southwark Food Action Alliance

The Southwark Food Action Alliance (SFAA) is an independent collective of local food providers and distributors, charities and community partners, residents, businesses, and public sector representatives, coming together to deliver a joined-up holistic food systems approach that increases food security and reduces food inequity in Southwark. The alliance was formed as a direct response to an increase in demand for services tackling food insecurity, a need for a strategic approach and oversight, and an understanding that improved food security is linked to building more resilient communities with improved health outcomes.

## Southwark Council

Southwark Council has long recognised the importance of food for the wellbeing of Southwark's residents. The council has a number of programmes focused on reducing food insecurity in the borough, and was one of the first councils in the UK to roll out provision of free healthy school meals to all children in primary schools and is now piloting targeted approaches for free secondary meals. In many of the council's functions – from waste collection to urban planning – there is potential to shape the food system in the borough. Southwark Council is a member of the Southwark Food Action Alliance and has an independent role to play in the delivery of this strategy.

## What do we want to achieve through our sustainable food strategy?



- 1) **A good food partnership** – A good food partnership can help us to join up our efforts to improve the local food system.
- 2) **Strong and connected communities** – A sustainable food system should bring communities together, helping people to build connections through food.
- 3) **Food security and the Right to Food** – A sustainable food system should deliver food security and nutrition for all. The principle of Right to Food advocates access to food as a basic human right and a statutory obligation.
- 4) **Healthy people, healthy planet** – A sustainable food system should enable access to good nutrition for health and wellbeing and have a neutral or positive impact on the natural environment.
- 5) **A good food economy and affordable food offer** – A sustainable food system should benefit the local economy, through good jobs, affordable food, community-led enterprises and healthy businesses.

Underpinning each of these priorities is the ambition to reduce inequalities and close the gap in life chances in Southwark.

## The Southwark Context

### Food in Southwark

Southwark is an inner London borough situated on the south bank of the River Thames, with Lambeth to the west and Lewisham to the east. Southwark is home to over 307,000 people<sup>iv</sup>. It has a young population; the average age in Southwark is 32.4 years.

There is a diversity of food cultures within Southwark's communities. Southwark is home to a large number of residents born outside of the UK. The top country of birth

outside the UK was Nigeria, with people being born in Italy, Jamaica, Spain and Ghana making up a notable proportion of Southwark's population. Provision of culturally appropriate ingredients is important in Southwark.

There is a culture of food growing in Southwark; over 200 food growing plots have been created on social land since March 2021. Nevertheless, Southwark is a densely populated urban area, which limits the amount of food produced in the borough. Most food consumed in Southwark is imported from out of the borough.

Southwark benefits from a multitude of people and organisations working on improving Southwark through food. There are groups in the borough focused on reducing waste, building community networks through food and tackling food insecurity. Southwark's food partnership, SFAA, was established in 2017 and has been growing ever since.

Southwark has a diverse food retail environment, comprised of 82 supermarkets, five regular street markets selling fresh food, 325 convenience stores and five food pantries. Many local food retailers are actively trying to improve the food environment for people in Southwark, for example over 35 convenience stores have signed up to a pilot to increase stock of healthier products. Nevertheless, in some parts of the borough, there are limited options to buy affordable, healthy products.

According to the Survey of Londoners (2022), almost one in six of Southwark residents are food insecure<sup>v</sup>. Being food insecure means that, at times, a person's food intake was reduced and their eating patterns were disrupted due to a lack of money and other resources for obtaining food. Food insecurity is often driven by having insufficient income to access a healthy, nutritious diet. This can be caused by low wages, rising costs of living and debt.

The inequalities related to food insecurity are stark, disproportionately affecting those on low incomes, Black, Asian and minority ethnic groups, people with disabilities or isolated. For more detailed information on how food insecurity is affecting our different communities, please see [Wider determinants of health - Southwark Council](#)

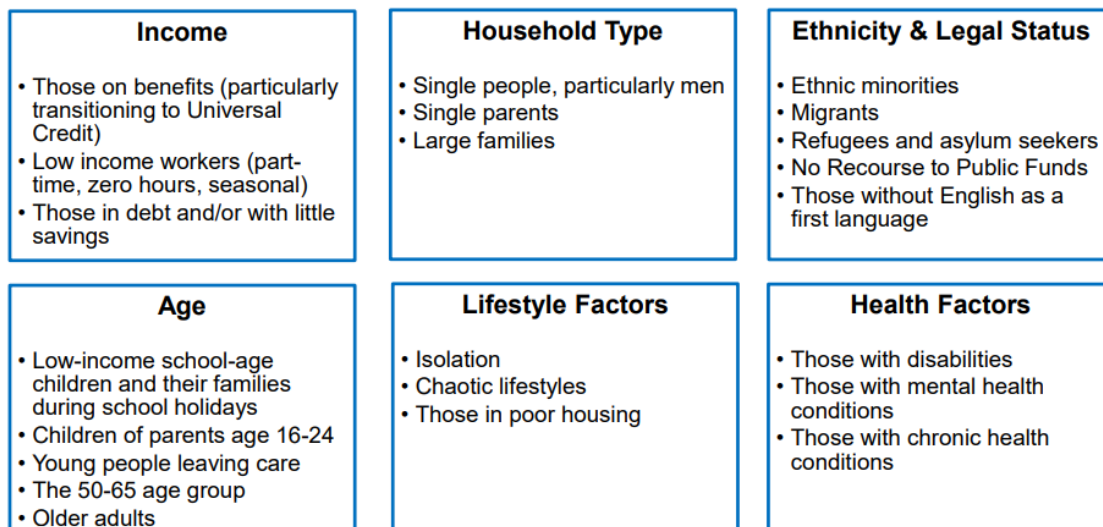


Figure 2: Summary of groups at higher risk of food insecurity in Southwark, Household Food Insecurity JSNA – Southwark Council, 2021.

# Our work to tackle food insecurity

This strategy builds on previous work in the borough to increase household food security and a fairer food system. The food partnership have worked together for six years and have successfully developed a range of complementary services.

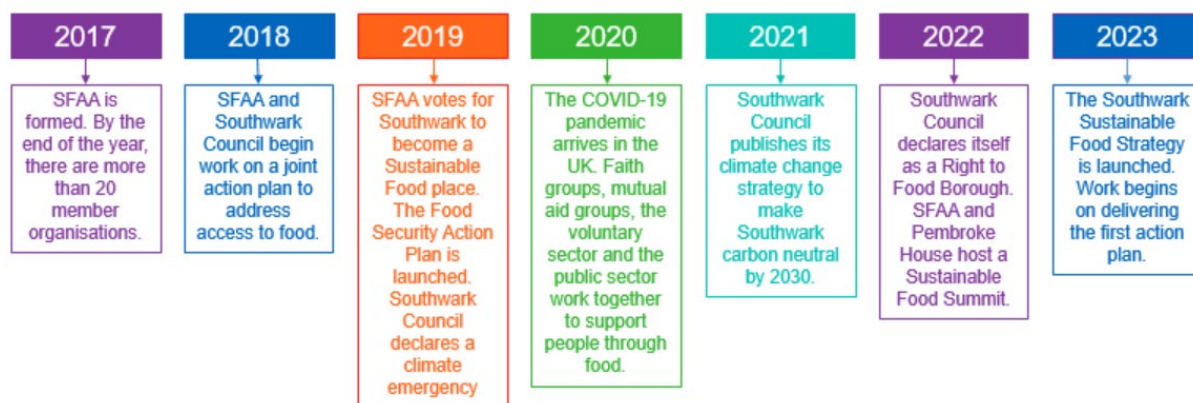


Figure 3: Timeline of food milestones in Southwark.

## Key achievements of our local food partnership

- **Affordable food**
  - 5 pantries selling healthy foods at subsidised prices
  - 8 community cafes offering low-cost meals in social environments.
- **A network of dignity champions to cascade training**
  - Enhancing food support to promote dignity, choice and involvement.
- **Taking a 'cash first' approach alongside emergency food aid**
  - Signposting cash support, income maximisation and money advice.
- **Free, healthy school meals**
  - For all nursery and primary pupils to benefit from a hot and nutritious lunch.
- **Holiday food and activities programme**
  - Offers nutritious meals and enriching activities to children over Easter, summer and winter. In 2022, over 90,000 meals were provided.
- **Providing more opportunities to grow food**
  - The Council's Allotment Expansion Guarantee has created over 200 new food-growing plots in the borough.
- **Saving over 500 tonnes of surplus food from going to waste each year**
  - Working to establish low emission, cost saving logistics for redistribution.
  - Established 5 community fridges to share surplus food and support.
- **Engaging businesses to develop a healthier offer**
  - 35 convenience stores now stock healthier affordable products.
- **The neighbourhood food model**
  - Establishing better food systems at a neighbourhood level, connecting markets, growers, cafes, schools and pantries.
- **Southwark is a designated Fairtrade borough**
  - The council and local communities have committed to coming together to promote the use and sale of Fairtrade products.



# Developing our Sustainable Food Approach

We recognise the need to evolve our food response to have a greater focus on sustainability. This acknowledges the need for long-term strategy to address the root causes of food insecurity, protect the planet and improve health for people in Southwark. Food has been described as “the single biggest lever to optimise human health and environmental sustainability on earth.”<sup>vi</sup>

This strategy has been developed following a series of workshops with Southwark Food Action Alliance members and wider stakeholders, including a Food Summit in early 2022, an engagement series for anchor institutions involved in food procurement, and a Strategy Development workshop with Sustain in summer 2022. As food is such a cross-cutting issue, a wide range of Council teams have been involved in discussions on the strategy including public health, climate change, markets, events, procurement, communities and local economy. The strategy draws on evidence and best practice to help us understand more about our challenges and how best to address them. The strategy also reflects other food commitments we have in Southwark, London, the UK and internationally.

## Delivery

### Delivering the strategy

This strategy will be delivered by Southwark Council in partnership with Southwark Food Action Alliance members.

### Action plan

As a partnership, we will develop a Sustainable Food Action Plan to set out the actions each partner will take to move towards this long-term vision. This action plan will be reviewed and updated annually.

### Timeframes

Our vision of a sustainable food system is a long-term ambition. Transforming our food system will take time and in some areas, change will be gradual. This strategy will help us to create the conditions we need to move towards a sustainable food system. We will refresh our strategy in 2026 and develop new actions, building on what we have already achieved.

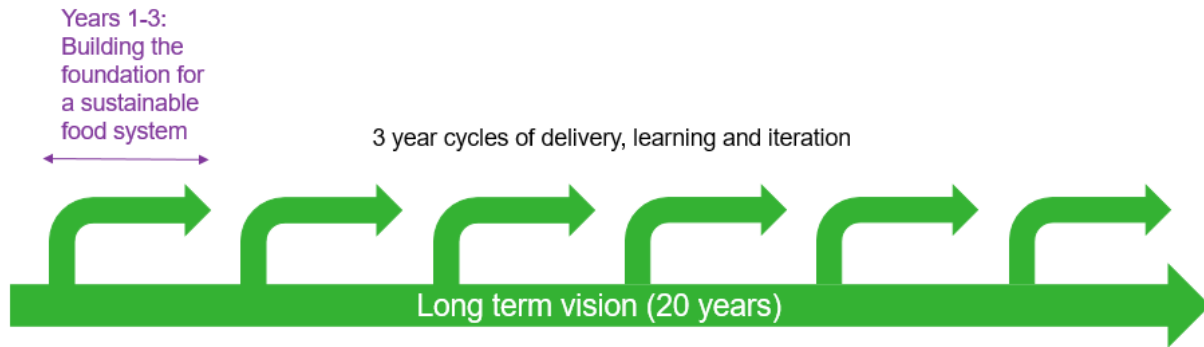


Figure 4: Timeframes for Sustainable Food Strategy – Southwark Food Action Alliance Steering Group, 2023

## Governance

The Council are the lead organisation responsible for delivery of the strategy and it is proposed that the Health and Wellbeing Board take an overseeing role, given the strong relationship to the Joint Health and Wellbeing Strategy demonstrated in its objective 4.1 'Improve food security and access to healthy and sustainable food'.

We will also establish an executive advisory group in the first year of this strategy to ensure:

1. That all partners are able to monitor delivery of our commitments;
2. That we can bring in new partners that we need to achieve our aims, such as education colleagues and healthcare providers.

# The Sustainable Food Strategy

Our strategy is underpinned by three core principles:

1. **Collaboration as food partners** – Food is an opportunity to bring people, communities, and organisations together. Our work is strengthened by working collaboratively to achieve a shared vision. We want to make best use of our individual strengths as food partners and learn from each other.
2. **Sustainable, affordable food as a shared goal** – Food is a core part of how we can improve the lives of residents in Southwark. We will work alongside those working on other agendas (for example, climate, education, health, the local economy) recognising that we have shared goals. We will continue to identify opportunities to work with people and organisations who may not traditionally see themselves as part of the food system.
3. **Social justice and fairness** – Food insecurity is shaped by unfairness in the distribution of wealth and opportunities within our society. We will take a social justice approach in our work, recognising that we need to reduce inequalities and address inequity if we are to achieve our ambitions. For the food system, this includes paying a fair price for food production, paying fair wages and making healthy food more accessible to our communities, considering affordability and cultural needs.

## A good food partnership

### **Aim 1 - Create a strong local food partnership that brings people together and builds connections across sectors.**

A local food partnership is a place for collaboration where we come together across organisations, sectors and communities to work as partners to create a better food future for everyone in Southwark. Our strategy involves creating the conditions for a sustainable food system. This starts with building the mechanisms that support and underpin a sustainable food partnership.

Southwark Food Action Alliance currently has over 90 members, including voluntary organisations, community centres, the Council, foodbanks, faith groups, food growing groups, food businesses, housing associations, the NHS, national charities and campaign groups, Citizens Advice Southwark, academics and more. A strong food partnership will require involvement of a broader cross-section of partners, including local food businesses, procurement professionals, schools and local residents.

We want food to be a key consideration when decisions are taken at a local level. Our food system is shaped by multiple factors, including national and global policy. There is plenty of work that takes place locally which affects the food system – from the delivery of Southwark's markets to community food composting. Developing a way to embed sustainable food in all policies will help people working on other agendas to improve the food system through their work.

#### **How will we achieve this**

- Build good governance processes so that Southwark Food Action Alliance is accountable, transparent, democratic and representative of local communities
- Strengthen the existing partnership, identifying opportunities for collaboration and addressing gaps in the membership, in particular from under represented communities who are most affected by food insecurity to shape solutions
- Develop guidance to help colleagues across the Council embed sustainable food in their work.

## Strong and connected communities

### **Aim 2 – Use sustainable food to strengthen our communities and sense of belonging**

We want to use food as an opportunity to build connections and celebrate our culture. We can learn together how to grow, cook, eat sustainably and nutritiously and reduce our food waste. Coming together around food is good for our emotional, social and community wellbeing. It can also help us to improve our physical health, improve the environment and build stronger community ties.

The environment in which we eat our food is also important. We want to ensure that all people in Southwark have easy access to welcoming and safe spaces to eat food in the local community.

Community approaches that can bring us together include:

- community cooking
- community growing
- inclusive community meals and community cafes that provide a safe space
- celebrating foods from different cultures.

### **How will we achieve this**

- Develop active and thriving food networks at the neighbourhood level which connect residents with local sustainable food activities
- Protect and increase food growing spaces in the borough through planning policy and the new land commission
- Strengthen the voice of local and diverse communities in the work that we do
- Identify opportunities to develop and test community approaches to sustainable food, particularly intergenerational approaches that reach across communities and to those at higher risk of isolation, in particular engaging with and providing opportunities for older people
- Develop a stronger culturally appropriate food offer for the diverse communities in Southwark.

#### **Case study: Neighbourhood Food Models**

Neighbourhood food models work to build a better food system in the local neighbourhood.

The approach involves capacity building for local food organisations, building social connections through food, creating a network of neighbourhood assets and improving the neighbourhood economy.

There are three neighbourhood food models in Southwark, operating in:

- Walworth
- Rotherhithe, Surrey Docks and North Bermondsey

- Kingswood Estate and Dulwich Wood ward.

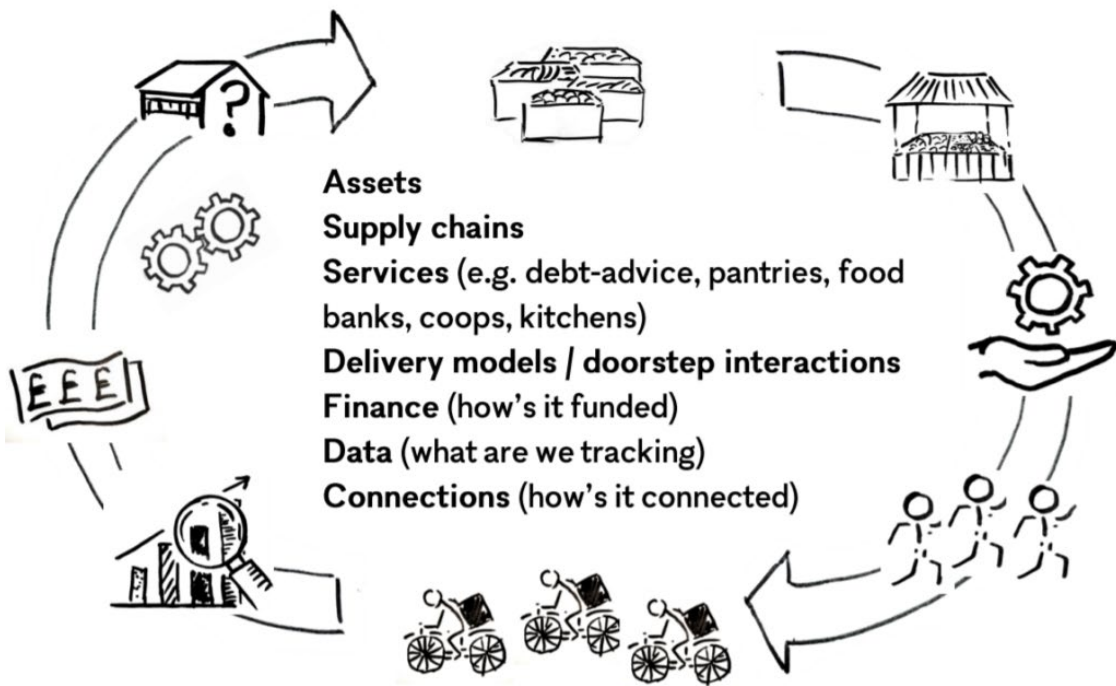
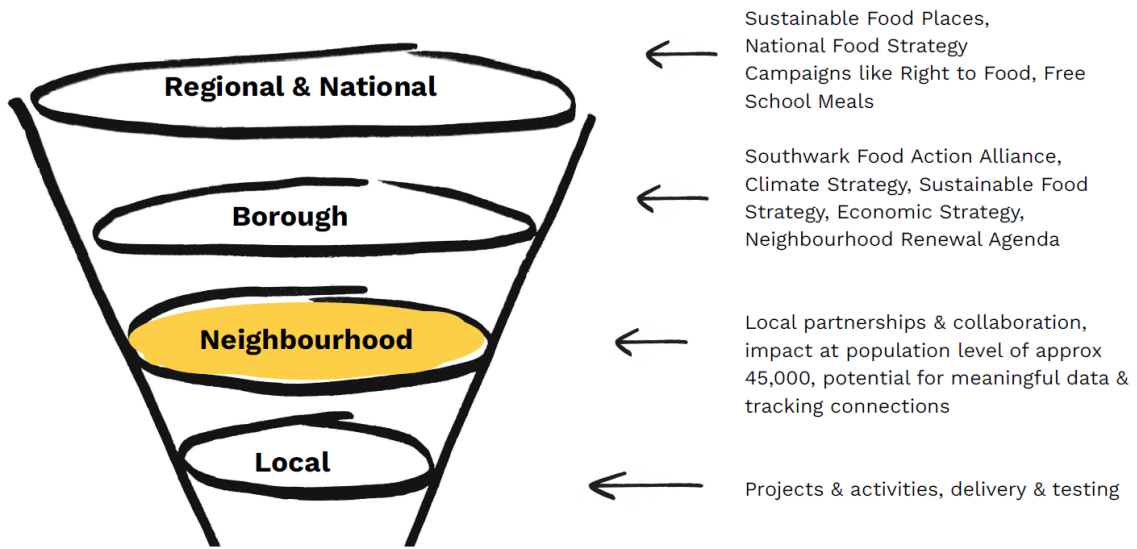


Figure 5: A neighbourhood approach, Walworth Neighbourhood Food Model, 2023.

## Food security and the Right to Food

### Aim 3 – Make Southwark a Right to Food Borough

We want to work together to address the structural and policy issues that cause food insecurity and underpin inequity, such as low incomes, with the long-term aim of seeing a Southwark where people are not reliant on charitable food aid.

Almost one in six of Southwark residents are food insecure<sup>vii</sup>. The Southwark Foodbank receives 10 times more referrals now than it did in 2009<sup>viii</sup>. Over time, wages and benefits have failed to keep up with London living costs. The need for foodbanks in one of the richest countries in the world is unacceptable. The national Right to Food campaign advocates for the right to food to be enshrined in UK law.

Being a Right to Food borough means that we take hunger seriously and want all of us to be able to put enough nutritious food on the table for ourselves and our families. At the moment, there are large differences in diet and health between the best and least well off among us and we need to narrow this gap to give everyone a chance for a longer, healthier life.

Affordability of food is a key aspect of food security. We want everyone to be able to buy healthy, affordable food close to home. Southwark has areas where there are no affordable shops within an easy walk offering fresh, healthy foods. This limits food buying options to convenience stores where it can be up to three times more expensive to buy a weekly shop and there may not be fresh, healthy food on offer<sup>ix</sup>. There are also areas with a high density of establishments selling fast and junk food in relation to healthy options. In Southwark, there is a north-south divide in the borough in terms of obesity levels and numbers of fast food outlets, with the north having high levels of both.

A separate Right to Food action plan has been developed focused on actions Southwark Council will take in this area. This is included at Appendix 1.

#### How will we achieve this

- Take a 'cash first' approach to food insecurity, by championing the London Living Wage and signposting people to income maximisation services.
- Focus in particular on priority groups for Right to Food:
  - Children and young people (including low-income families – especially lone parents – and young people aged 11-25 years)
  - Food insecure adults (including adults entitled to benefits and adults in working poverty and debt)
  - Black, Asian and minority ethnic groups
  - Older people and those with long-term conditions (including older adults, those unable to leave their homes and people with long-term conditions and disabilities)
- Campaign for national action to address the causes of poverty and mitigate the impact of the rising cost of living.

- Enable local convenience stores to expand their offer of fresh and healthy food by becoming Good Food Retailers
- Explore opportunities to increase access to affordable food models such as food pantries in the borough
- Provide pathways to advice and practical help by having key professionals and volunteers trained in:
  - [The Dignity Principles](#): This framework supports good mental health for those in crisis by emphasising kindness, respect, humanity, choice and empowerment
  - Screening for risk of hunger and malnutrition and developing improved referral pathways for access to food, financial and employment advice, and wider support.

### **Case study: Food vouchers for low-income families**

Food vouchers increase access to healthy food for low-income families. A pregnant parent with a nine-month old and a two-year old could receive up to £31 per week to spend on healthy food.

#### **Rose Vouchers**

The Council and partners are investing in Rose vouchers. Rose Vouchers for Fruit and Veg is an initiative from Alexandra Rose charity to support families on low incomes, including those with no recourse to public funds, to buy fresh fruit and vegetables.

Families receive £4 of Rose Vouchers for each child every week, or £6 if the child is under one year old. Vouchers are redeemable at local markets and greengrocers. Rose Vouchers are distributed at children and family centres within Southwark, linking families to existing health and wellbeing activities in the borough.

The Rose Voucher model increases access to healthy foods and maintains local markets as important sources of healthy, low-cost food.

For further information, see the Alexandra Rose Charity website:

<https://www.alexandrarose.org.uk/rose-vouchers/impact/>

#### **Healthy Start**

Healthy Start is a national scheme. Pregnant women and families receive a pre-paid card that can be used to buy healthy food and milk. Families in receipt of certain benefits receive £4.25 each week from the tenth week of pregnancy and for children between the ages of one to four, and £8.50 per week for children under the age of one. We are working to improve uptake of Healthy Start in Southwark.

For further information, see the Healthy Start website:

<https://www.healthystart.nhs.uk/>



## Healthy people, healthy planet

### Aim 4a – Improve health through our food response

We want to provide a whole-person response to food insecurity, recognising the link between food insecurity, financial worries, mental ill-health and isolation.

Those of us with mental health conditions, long-term conditions and disabilities may have reduced ability to work and may receive lower pay for our work. People with pre-existing health conditions and disabilities may also have to spend more on essential goods such as heating and food. These factors contribute towards people with mental health conditions, disabilities and long-term illness being at high risk of food insecurity. Social isolation can also drive food insecurity, particularly for older people, who may lose interest in food or struggle to access and prepare food. Food insecurity can also affect mental health and isolation. The experience of being unable to access healthy, nutritious food can lead to anxiety, depression and isolation.

We want to prioritise healthy diets and nutrition in the food system. Food insecurity is often associated with overweight and obesity. Explanations include the higher cost of nutritious foods, the stress of living with food insecurity, and physiological adaptations to food restriction.

In the UK, 1 in 3 of us are obese<sup>x</sup> which increases our chances of having heart attacks, strokes, cancer and diabetes. Levels of excess weight in childhood in Southwark are consistently above London and national levels. Diets which are healthier for us, including more fruit, vegetables, nuts, lentils, beans and peas and less red meat and processed foods, are also better for the planet, so it is a win-win<sup>xi</sup>.

#### How will we achieve this

- Promote a 'no wrong door' approach to those reporting food insecurity, signposting and referring appropriately to food help and other relevant support and advice. These would include financial wellbeing, energy, mental health and access to social services
- Ensure weight management and diabetes programmes are in place for target groups and that these promote healthy, sustainable eating and signpost people to food support services.
- Through the School Meals Transformation programme, encourage schools to adopt a whole school approach to food: supporting pupils to make healthy food choices throughout the day, serving nutritious food in social and welcoming dining rooms, championing food knowledge, cooking and growing on the curriculum.
- Pilot an extension of the Council's Free Healthy School Meal offer to secondary school pupils in families receiving benefits but not entitled to the Government's Free School Meals.

## **Aim 4b - Promote and provide planet-healthy diets**

We know that diets need to change to prevent catastrophic damage to our planet. Food is the second largest producer of greenhouse gas emissions (with energy being the largest).<sup>xii</sup> Climate change impacts the health of people in Southwark by contributing to air pollution and rising food prices, and harms the natural environment.<sup>xiii</sup>

In Southwark, we have set a target to be carbon neutral by 2030<sup>xiv</sup>. Eating seasonal, planet-healthy diets and reducing food waste can help to reduce greenhouse gas emissions. More than half of the greenhouse gas emissions caused by food come from farm animals, with beef and lamb responsible for half of these<sup>xv</sup>. Plant-based proteins, such as beans and lentils, create 70 times less greenhouse gas emissions than beef and use 150 times less land<sup>xvi</sup>. We can link the extinction of 33 species in the UK to food production<sup>xvii</sup>. Finally, 70% of the land in the UK is used for producing food<sup>xviii</sup>, with 85% of that land used to either graze animals or produce animal feed<sup>xix</sup>. Freeing up land for rewilding can help to store and capture more carbon, to protect against global warming.

To achieve planet friendly diets, we can focus on:

- Fruits and vegetables – ideally up to 50% in every meal
- Eating seasonal food where possible
- Favouring plant-based proteins, such as nuts, peas, lentils and beans
- A less and better (better meaning higher welfare) approach to meat and dairy products.
- Eating sustainable fish and seafood
- Avoiding ultra-processed foods, particularly meat
- Reducing food waste.

### **How will we achieve this:**

- Use procurement, education, campaigns and cooking skills to move towards better and less meat and dairy and increase vegetables, nuts and pulses in diets
- Use our connections to businesses and markets to facilitate shorter supply and distribution chains
- Promote diets which will lower greenhouse gas emissions and improve health
- Deliver targeted campaigns to individuals and organisations on reducing food waste and explore opportunities to reduce waste with our local markets
- Trial community food composting schemes
- Encourage schools to offer climate-friendly meals

## A good food economy and affordable food offer

### **Aim 5 – Champion sustainable and affordable food, through using our buying power and helping to develop community-led and local enterprises**

We want our sustainable food sector to be thriving, keeping wealth in the borough, minimising food miles and creating good jobs. To increase the uptake of sustainable food, we need a strong local ecosystem of community-led initiatives such as food cooperatives, community cafes and kitchens, as well as opportunities for new and emerging small businesses, market stalls, suppliers, cafes, takeaways, and restaurants.

One of the ways to accelerate building wealth at the local level is through procurement. Through the process of buying supplies and services, there is an opportunity to support sustainable food priorities. For example, Southwark schools serve 3.3 million meals per year. By insisting on minimum sustainable food standards in public sector contracts and to use local suppliers whenever possible, we can ensure that public money from taxes is well spent and will benefit our health, local people and the health of the planet.

We can also shape the affordability of food in our local area through the Council's work on planning, markets and commercial property. This can help us to improve access to local, healthy affordable food for Southwark residents.

#### **How will we achieve this**

- Provide advice and access to funding opportunities for the creation of new community-led and local enterprises
- Create opportunities for more sustainable food as part of Southwark's Thriving High Streets work
- Pilot the effectiveness of place-based buy-local campaigns
- Ensure markets and Council commercial property supports access to healthy, affordable food
- Ensure affordable food retail is built into the Council approach to planning and regeneration
- Work with food retailers to increase access to a range of healthy, affordable food
- Develop a shared Council approach to sustainable food procurement for contracts, sub-contracts and arms-length commissioning. This will include commitments to reduce and monitor food waste and have a benchmark for shared food standards.
- Through the School Meal Transformation Programme, to provide training and support to School Business Managers on healthy sustainable procurement practices.

**Case study: Access to healthy, good quality food**

The quality of food that we consume matters. We have increased access to healthy food in Southwark through our school meals transformation programme, the “Good Food Retail” work, our Holiday Activities and Fun programme and Rose vouchers.

We will build on this work by focusing on environmental changes. The food environment is known to influence the food choices of individuals, the quality, and quantity (portion sizes) of the food and eating patterns. This involves exploring what is in the direct control of the Council, including planning and our commercial properties. We can also explore how we can influence retailers, working with colleagues across London to achieve change.

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# How you can help

Everyone in Southwark can help contribute to achieving a sustainable food system by taking the following actions:

## As an organisation

- Join Southwark Food Action Alliance. Get in touch with us at [sfaa@pecan.org.uk](mailto:sfaa@pecan.org.uk)
- Commit to paying the London Living Wage to all employees
- Offer up physical space you are not using. Our food partnership members are always looking for venues to help them deliver their activities. Get in touch with us at [sfaa@pecan.org.uk](mailto:sfaa@pecan.org.uk) and we can match you to an organisation
- Offer training to our members. Key training needs include health and safety, food hygiene, project management, collating and monitoring impact, database management. Get in touch with us at [sfaa@pecan.org.uk](mailto:sfaa@pecan.org.uk) and we can discuss further.
- Train professionals in [The Dignity Principles](#) and screening for risk of hunger and malnutrition.
- Talk to local people about what food would be culturally appropriate for them and find ways to make this available.
- Recognise the interconnectivity between food insecurity, financial worries, isolation and mental health and learn where to signpost people to additional support.
- Consider how you might be able to make your food provision healthier for people and the planet.

## As an individual

- Eat a more sustainable diet where you can. This involves reducing meat consumption and food waste. The [Eatwell Guide](#), [Planetary Health Diet](#) and the [One Blue Dot](#) can help with this.
- Opt for food options with limited packaging which leads to less waste.
- Get involved with a local or national food campaign.

**GET INVOLVED ● MAKE A PLEDGE ● SIGN UP TO BE A FOOD HERO**

[www.southwarkfoodhero.org.uk](http://www.southwarkfoodhero.org.uk)

## Acknowledgements

We would like to thank the following groups for helping to develop this strategy:

- Southwark Food Action Alliance members, who have helped to develop ideas through five events held since October 2021
- Food Matters, who provided mentoring and workshop facilitation
- Sustain, who spoke with local food business owners and key local institutions to develop recommendations on procurement and building a good food economy
- Researchers who helped us to understand the food support needed by older people and housebound adults, and 11-25 year olds
- The London College of Communications Climate Studio, who worked on an innovation project with 100 young people to design ideas for a preferred sustainable food future

## Glossary

Food insecurity - “Limited or uncertain availability of nutritionally adequate and safe foods or limited or uncertain ability to acquire acceptable food in socially acceptable ways [e.g. without resorting to emergency supplies, scavenging, stealing or other coping strategies].”<sup>xx</sup>

Food system – A term used to describe all of the organisations and people that are involved with the production, distribution, consumption and disposal of food, and how they do it.

Procurement – The name of the process that businesses and organisations use to buy supplies, such as food, or services, such as catering.

Sustainable food system – A food system that delivers food security and nutrition for all whilst benefitting society and the economy, and protecting the planet.

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- <sup>i</sup> Food in the anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems. The Lancet. Willet et al 2019
  - <sup>ii</sup> Sustainable Food Systems: Concept and framework. Food and Agriculture Organisations of the United Nations: 2018. ([Accessed February 2022](#))
  - <sup>iii</sup> Sustainable Food Systems: Concept and framework. Food and Agriculture Organisations of the United Nations: 2018. ([Accessed February 2022](#))
  - <sup>iv</sup> [Southwark Council, Census 2021 First Results: Population on Census Day, 2022](#)
  - <sup>v</sup> Greater London Authority 2019. Survey of Londoners
  - <sup>vi</sup> Food in the anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems. The Lancet. Willet et al 2019
  - <sup>vii</sup> Greater London Authority 2019. Survey of Londoners
  - <sup>viii</sup> Household food insecurity joint strategic needs assessment. Southwark Council. 2019 (refreshed 2021). With additional internal 2022 data from Southwark Foodbank.
  - <sup>ix</sup> Southwark Healthy Basket Study (commissioned by Southwark Council) - Reid, 2020
  - <sup>x</sup> Health survey for England, 2019: Adult and Child Overweight and Obesity. NHS Digital, 2020
  - <sup>xi</sup> Food in the anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems. The Lancet. Willet et al 2019
  - <sup>xii</sup> National Food Strategy Independent Review: Part Two. DEFRA [www.gov.uk](http://www.gov.uk). July 2021.
  - <sup>xiii</sup> Southwark Council, Tackling the Climate Emergency Together, July 2021.
  - <sup>xiv</sup> [Tackling the Climate Emergency Together. Southwark Council, July 2021](#)
  - <sup>xv</sup> Reducing food’s environmental impacts through producers and consumers. Science. Poore and Nemecek, 2018
  - <sup>xvi</sup> National Food Strategy Independent Review: Part Two. DEFRA [www.gov.uk](http://www.gov.uk). July 2021.
  - <sup>xvii</sup> Sustainable Food Systems for a Healthier UK: A discussion paper. Faculty of Public Health. Bash and Donnelly, 2019
  - <sup>xviii</sup> National Food Strategy Independent Review: Part Two. DEFRA [www.gov.uk](http://www.gov.uk). July 2021.
  - <sup>xix</sup> Total global agricultural land footprint associated with UK food supply 1986–2011. Global Environmental Change, 43. de Ruiter, et al, 2017
  - <sup>xx</sup> Food Standards Agency – Low Income Diet and Nutrition Survey. 2007

## APPENDIX 2

<b>Right to Food Plan – Southwark Council</b>				
<b>Priority 1 – Ensuring good nutrition from conception and throughout childhood</b>				
<b>No.</b>	<b>Action</b>	<b>Who will deliver this</b>	<b>Timeframe</b>	<b>Indicator of success</b>
1	Improve uptake of Healthy Start by 65% to 85% by 2026	Public Health	Annual measure	Uptake of Healthy Start Vouchers (%)
2	Uphold the quality of meals served in nurseries and schools by (i) embedding stronger oversight of meal standards through better monitoring and clearer accountability, supported by conditions of grant, (ii) providing council led support for school food commissioning with an emphasis on quality and sustainability, Alongside, <b>encouraging schools to take a whole school approach to food.</b>	Public Health	Stronger oversight - Ongoing  Council-led support for school food commissioning - Q3 23/24 and beyond	MI on settings inspected and by survey shows quality provision  Grouped commissioned contract taken up by 60% of primary schools; 25% secondary schools  High take up of meals for all stages of education
3	Deliver pilot expanding offer of free secondary school meals to children of families claiming Universal Credit	Education, Public Health	September 2023 – July 2024	Successful evaluation of impact of secondary school meals pilot and programme continued beyond Y1.
4	Scope opportunities for securing long-term funding for existing programmes (Holiday Activities and Fun Programme, Rose Vouchers, free healthy school meals)	Public Health	June 2024	Recommendations developed



5	Explore the feasibility of a council led 'opt out' application process for benefits related Free School Meals (FSM)	Education, Benefits, Public Health	December 2023	Southwark Council has determined what is feasible (or not) for a local 'opt out scheme'
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<b>Priority 2 – Ensuring good access to help, support and advice for food insecure adults</b>				
<b>No.</b>	<b>Action</b>	<b>Who will deliver this</b>	<b>Timeframe</b>	<b>Indicator of success</b>
1	Support frontline and Council staff to identify food insecure people, provide signposting and act as champions for dignity	Public Health	November 2023	Delivery of training to 100 front line Council staff
2	Work with SFAA members to ensure they offer 'no wrong door' to residents experiencing food insecurity, including homeless people, asylum seekers, refugees and people with no recourse to public funds. Work with partners to identify and promote pathways into health and social care, income maximisation and employment services	Public Health	On-going	Number of community food groups trained and committed to a 'no wrong door' approach, including referrals to partners in the 'Worrying about money' leaflet
3	Sign up 20 more convenience stores to be "Good Food Retailers" offering healthier lines of food and a point of sale for Healthy Start benefit cards	Public Health	March 2024	Number of convenience stores signed up as good food retailers (target: 20)
4	Use planning policy and area action plans to create better access to affordable food through markets, shops and transport links	Sustainable Growth	October 2025	Opportunities identified to increase access to affordable food

5	Champion the London Living Wage across the borough	Southwark Cabinet	On-going	Increase in number of London Living Wage employers in the borough
6	Develop plan to increase access to affordable food models such as pantries in the borough	Public Health	December 2023	Plan in place with target groups and geographical areas identified

<b>Priority 3 – Reducing inequalities and closing the gap in food security for Black, Asian and minority ethnic groups</b>				
<b>No.</b>	<b>Action</b>	<b>Who will deliver this</b>	<b>Timeframe</b>	<b>Indicator of success</b>
1	Map emergency food provision in the borough for different food cultures and identify how to fill in gaps	Public Health	March 2024	Map established
2	Increase use of 'Worrying about money' leaflet within faith groups in the borough	Public Health	End December 2024	Increase in number of faith groups using cash first responses to food insecurity

<b>Priority 4 – Improving provision for older adults and those with health conditions and disabilities</b>				
<b>No.</b>	<b>Action</b>	<b>Who will deliver this</b>	<b>Timeframe</b>	<b>Indicator of success</b>
1	Implement recommendations from needs assessment on older people's food security	Public Health	October 2023	Implementation plan in place
2	Implement malnutrition screening programme in the community for older adults	Public Health, Adult Social Care	March 2024	Malnutrition screening programme in place in 5 new settings

<b>Priority 5 – Awareness raising across the system</b>				
<b>No.</b>	<b>Action</b>	<b>Who will deliver this</b>	<b>Timeframe</b>	<b>Indicator of success</b>
1	Campaign for Right to Food issues such as the Right to Food enshrined in national law, universal school meals, free school meals auto-enrolment, holiday hunger, food standards for asylum seeker accommodation centres	Southwark Cabinet	On-going	Council statements acknowledge issues and set out clear asks of national government
2	Increase the voice of people with lived experience of food insecurity and financial hardship by establishing an advisory panel that is representative of our local communities.	Public Health	December 2023	Lived Experience Advisory panel established.

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# **Sustainable Food Strategy 2023 - 26: Equality and Health analysis**

**May 2023**

## Section 1: Equality analysis details

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<b>Proposed policy/decision/business plan to which this equality analysis relates</b>	Southwark Sustainable Food Strategy 2023-2026
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<b>Equality analysis author</b>	Rebecca Harkes – Policy Officer for Health Inequalities		
<b>Strategic Director:</b>	David Quirke-Thornton		
<b>Department</b>	Children and Adults	<b>Division</b>	Public Health
<b>Period analysis undertaken</b>	April to May 2023		
<b>Date of review (if applicable)</b>	October 2023		

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

### 1.1 Brief description of policy/decision/business plan

The Sustainable Food Strategy has been developed by Southwark Council in partnership with Southwark Food Action Alliance.

The strategy has been developed to shape and guide our work on sustainable food from 2023-26. The vision it sets out is a sustainable food system in Southwark to improve health and wellbeing for our population, reduce inequalities and protect the planet.

There are five priorities in the strategy:

- 1) **A good food partnership** – A good food partnership can help us to join up our efforts to improve the local food system.
- 2) **Strong and connected communities** – A sustainable food system should bring communities together, helping people to build connections through food.
- 3) **Food security and the Right to Food** – A sustainable food system should deliver food security and nutrition for all. The principle of Right to Food advocates access to food as a basic human right and a statutory obligation.
- 4) **Healthy people, healthy planet** – A sustainable food system should enable access to good nutrition for health and wellbeing and have a neutral or positive impact on the natural environment.
- 5) **A good food economy and affordable food offer** – A sustainable food system should benefit the local economy, through good jobs, affordable food, community-led enterprises and healthy businesses.

Underpinning each of these priorities is the ambition to reduce inequalities and close the gap in life chances in the borough.

The strategy will be delivered by Southwark Council and Southwark Food Action Alliance, our local food partnership. A partnership action plan will be developed following agreement of the strategy.

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

2. Service users and stakeholders	
<p><b>Key users of the department or service</b></p>	<p>Engagement with residents has taken place through:</p> <ul style="list-style-type: none"> <li>- Development of the Household Food Insecurity JSNA and the Older Adults Food Insecurity Needs Assessment</li> <li>- Roundtables, workshops and surveys on food provision in the borough</li> <li>- Southwark Food Action Alliance, a network of local food providers, voluntary and community groups, residents, businesses and public sector representatives</li> <li>- A Food Summit in early 2022</li> <li>- A project with 100 young people to design a preferred sustainable food future.</li> </ul> <p>Further resident engagement will be required to shape an action plan. Recruitment of residents will take place through our community food organisations and faith groups, ensuring that this is shaped by a diversity of voices. There will also be opportunities to embed further resident engagement into the development of the action plan, such as emerging findings from Southwark 2030.</p> <p>The strategy also proposes the establishment of mechanisms to ensure local people with lived experience of food insecurity continue to shape the delivery of this work.</p>
<p><b>Key stakeholders were/are involved in this policy/decision/business plan</b></p>	<p>Southwark Food Action Alliance members shaped this strategy, particularly PECAN and Pembroke House who sat on the SFAA steering group and Food Matters who gave strategic advice.</p> <p>Within the council, this work has been led by the Public Health team with input from other council departments (including Climate Change, Local Economy and Communities).</p>

## 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 policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
<p><b>Positive:</b> The sustainable food strategy has a potential positive impact on all age groups. However, the Right to Food section targets three priority groups on the basis of age: children and young people, food insecure adults (including adults entitled to benefits and adults in working poverty and debt) and older adults. This reflects how food insecurity affects people differently over the life course, including the long-term impact that food insecurity can have on children's life chances and the factors which influence food insecurity for older adults.</p> <p><b>Negative:</b> There are no expected negative impacts on the basis of age.</p>	<p><b>Positive:</b> Focusing on food insecurity for <b>children and young people</b> should have a positive health impact. Food insecurity has a detrimental impact on children's health and disproportionately impacts those from low income backgrounds, contributing to health inequalities. Children in food insecure households are more likely to develop asthma, depression and other chronic conditions. Their growth and development are impaired. Learning is poorer, and can affect life chances.</p> <p>Although food insecurity is only one factor that can contribute to malnutrition in <b>older adults</b>, it is an important driver. Bereavement, ill health and social isolation can lead to older people losing interest in food, while increasing frailty can make it harder for older people to access and prepare food. Malnutrition screening in the community should help to identify older adults who are affected. The strategy highlights the importance of community approaches for meals, which should help to tackle social isolation.</p>
<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>
<p><a href="#">Southwark Council. 2021. Tackling Household Food Insecurity. Southwark's JSNA</a></p> <p><a href="#">Greater London Authority. 2022. Survey of Londoners</a></p>	<p><a href="#">Southwark Council. 2021. Tackling Household Food Insecurity. Southwark's JSNA</a></p>



<b>Mitigating actions to be taken</b>	
The recommendations from the draft older adults food insecurity needs assessment are currently being explored within the council. This section of the equality impact analysis should be revisited as an implementation plan is developed.	

<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 policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
<p>The sustainable food strategy has a potential positive impact on disabled people as a target group in the Right to Food plan.</p> <p><b>Positive:</b> The strategy aims to address the link between food insecurity and low incomes. Disabled people are more likely to be unemployed and receive disproportionately lower incomes. The strategy takes a 'cash first' approach to food insecurity including championing the London Living Wage and signposting those accessing emergency food provision to cash first support.</p> <p>Rising costs of living can have a disproportionate impact on disabled people, who often have to spend more on essential goods such as heating and food. The strategy focuses on addressing the affordability of food.</p> <p><b>Negative:</b> There are no expected negative impacts on the basis of disability.</p>	<p>Food insecurity is often associated with overweight and obesity. Explanations include the higher cost of nutritious foods, the stress of living with food insecurity, and physiological adaptations to food restriction.</p> <p>Food insecurity can also affect mental health and isolation. The experience of being unable to access healthy, nutritious food can lead to anxiety, depression and isolation.</p> <p>Actions to tackle food insecurity and affordability are expected to have a positive health impact.</p>
<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>
<p><a href="#">Census 2021 Profile: Health, Disability and Unpaid Care</a></p> <p><a href="#">Southwark Council. 2021. Tackling Household Food Insecurity. Southwark's JSNA</a></p> <p><a href="#">GLA: Cost of living poll results</a></p>	<p><a href="#">Southwark Council. 2021. Tackling Household Food Insecurity. Southwark's JSNA</a></p>

<b>Mitigating actions to be taken</b>
The draft local economic strategy commits to ensuring that people with disabilities and health conditions and individuals from Southwark's most disadvantaged communities will have more access to employment support designed around their circumstances and needs. Tracking progress of this will help to monitor the wider structural factors shaping food insecurity for disabled people.

<b>Gender reassignment</b> - The process of transitioning from one gender to another.	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
There are no expected impacts (positive or negative) of the strategy on Southwark residents on the basis of gender reassignment.	N/a
<b>Equality information on which above analysis is based.</b>	<b>Health data on which above analysis is based</b>
N/a	N/a
<b>Mitigating actions to be taken</b>	
N/a	

<b>Marriage and civil partnership</b> – 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. <b>(Only to be considered in respect to the need to eliminate discrimination.)</b>	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
There are no expected impacts (positive or negative) of the strategy on Southwark residents on the basis of marriage or civil partnership.	N/a
<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>

N/a	N/a
<b>Mitigating actions to be taken</b>	
N/a	

**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.

<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
<p><b>Positive:</b> The Right to Food plan proposes increasing uptake of Healthy Start vouchers. Healthy Start is the UK's main food welfare scheme which exists to improve inequalities in diet. It has been running since 2006 and its weekly vouchers entitle low-income families to vouchers for free milk, fruit, vegetables and vitamins. Pregnant women and children under 4 are eligible. It is expected that this policy should improve access to healthy food for pregnant women.</p> <p>The Right to Food plan also proposes work to scope the long-term funding for existing programmes, including Alexandra Rose vouchers. Rose vouchers help families on low incomes, including pregnant women, to buy fresh fruit and vegetables. This action should help to determine the long-term financial sustainability of the programme in Southwark.</p> <p><b>Negative:</b> There are no expected negative impacts on the basis of pregnancy and maternity.</p>	<p>There can be increased nutritional requirements during pregnancy and the post-partum periods, linked to the needs of the growing foetus and breastfeeding. Food insecurity during pregnancy is associated with increased risk of pregnancy complications such as gestational diabetes, anaemia and pregnancy-induced hypertension. Poor food access in pregnancy increases the risk of low birthweight and stunting in children, which are associated with higher risk of overweight and obesity later in life.</p>
<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>
N/a	<a href="#">McKay et al., 2022, Systematic Review of Interventions Addressing Food Insecurity in Pregnant Women and New Mothers</a>
<b>Mitigating actions to be taken</b>	

N/a	
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<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>	
<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><b>Positive:</b> Black, Asian and minority ethnic groups are identified as a target group in the Right to Food plan. Ethnic minorities are at higher risk of food insecurity. Factors influencing this include structural inequalities, including wage inequalities and overrepresentation of in zero-hours contracts. The strategy emphasises a cash first response to food insecurity, with a view to tackling the root causes. Work will take place to monitor how cash first approaches are reaching residents by ethnicity.</p> <p>The strategy's focus on affordable food retail as part of the council's planning and regeneration approach, and exploring further affordable food models, are also targeted at those on lower incomes.</p> <p>Availability of culturally appropriate food is also an issue for residents in Southwark. The Right to Food plan specifies an action to map availability of emergency food provision with culturally appropriate food in Southwark.</p> <p><b>Negative:</b> There are no expected negative impacts on the basis of race.</p>	<p>Food insecurity is often associated with overweight and obesity. Explanations include the higher cost of nutritious foods, the stress of living with food insecurity, and physiological adaptations to food restriction.</p> <p>Food insecurity can also affect mental health and isolation. The experience of being unable to access healthy, nutritious food can lead to anxiety, depression and isolation.</p> <p>Actions to tackle food insecurity and increase availability of affordable, culturally appropriate foods are expected to have a positive health impact.</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><a href="#">Southwark Annual JSNA Report 2022</a></p> <p><a href="#">Southwark Council. 2021. Tackling Household Food Insecurity. Southwark's JSNA</a></p>	<p><a href="#">Southwark Council. 2021. Tackling Household Food Insecurity. Southwark's JSNA</a></p>
<p><b>Mitigating actions to be taken</b></p>	
<p>N/a</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.	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential health impacts (positive and negative)</b>
<p><b>Positive:</b> The strategy promotes greater availability of affordable, culturally sensitive products for diverse communities, including religious diversity.</p> <p>The strategy outlines work to shape food provision in the borough, including free school meals and a longer-term procurement policy for sustainable food. Availability of healthy, nutritious food acceptable to different religious faiths will be incorporated in to relevant policies to prevent discrimination on the basis of religion.</p> <p><b>Negative:</b> There are no expected negative impacts on the basis of religion and belief.</p>	<p>Food insecurity is often associated with overweight and obesity. Explanations include the higher cost of nutritious foods, the stress of living with food insecurity, and physiological adaptations to food restriction.</p> <p>Food insecurity can also affect mental health and isolation. The experience of being unable to access healthy, nutritious food can lead to anxiety, depression and isolation.</p> <p>Actions to tackle food insecurity and increase availability of affordable, culturally appropriate foods are expected to have a positive health impact.</p>
<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>
<a href="#">Census 2021 Profile: Ethnicity, National Identity, Language and Religion</a>	<a href="#">Southwark Council. 2021. Tackling Household Food Insecurity. Southwark's JSNA</a>
<b>Mitigating actions to be taken</b>	
N/a	

<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>
There are no expected impacts (positive or negative) of the strategy on the basis of sex.	N/a
<b>Equality information on which above analysis is based</b>	<b>Health data on which above analysis is based</b>

<p><a href="#">Southwark Council. 2021. Tackling Household Food Insecurity. Southwark's JSNA</a></p> <p><a href="#">ONS (2019) Lone parent families</a></p>	N/a
<b>Mitigating actions to be taken</b>	
<p>Single men and single parents (disproportionately women) are at higher risk of being food insecure. The rising cost of living is likely to impact single parent households disproportionately, where children are already at higher risk of food insecurity. Work should take place with organisations in the borough that represent the voices of local families to understand how single parent households are impacted and how actions to tackle food insecurity are reaching this group.</p>	

<p><b>Sexual orientation</b> - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes</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>There are no expected impacts (positive or negative) of the strategy on Southwark residents on the basis of sexual orientation.</p>	N/a
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Health data on which above analysis is based</b></p>
N/a	N/a
<b>Mitigating actions to be taken</b>	
N/A	
<p><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.</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><b>Positive:</b> Food insecurity is often driven by having insufficient income to access a healthy, nutritious diet. This can be caused by low wages, rising costs of living and debt. This strategy promotes affordable, nutritious food for all.</p> <p>It also proposes championing the London Living Wage across Southwark and signposting people to income maximisation services. This directly targets</p>	<p>Actions to tackle food insecurity and affordability are expected to have a positive health impact.</p>

<p>socioeconomic disadvantage, with a view to addressing the root causes of food insecurity.</p> <p><b><u>Negative:</u></b> There are no expected negative impacts on the basis of socio-economic disadvantage.</p>	
<p><b>Equality information on which above analysis is based</b></p> <p><a href="#">Southwark Council. 2021. Tackling Household Food Insecurity. Southwark's JSNA</a></p> <p><a href="#">Southwark Annual JSNA Report 2022</a></p>	<p><b>Health data on which above analysis is based</b></p> <p><a href="#">Southwark Council. 2021. Tackling Household Food Insecurity. Southwark's JSNA</a></p>
<p><b>Mitigating actions to be taken</b></p> <p>N/a</p>	

<p><b>Human Rights</b></p> <p>There are 18 rights in the European Convention on Human Rights ('ECHR'), and these are given domestic effect in the UK by the Human Rights Act 1998 ('HRA'). Each right in the ECHR is called an Article. The Articles in the ECHR given effect in the UK by the HRA are the right to life, freedom from torture, inhuman and degrading treatment, freedom from slavery and forced labour, the right to liberty and security, the right to a fair trial, the right not to be punished outside the law, including the freedom from the imposition of retrospective penalties, the right to respect for a private and family life, the freedom of conscience, thought and religion, the right to freedom of expression, assembly and association, the right to marry, a general freedom from discrimination and the rights in the 'First Protocol' of the ECHR.</p>
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b></p> <p>This strategy promotes a nutritious, affordable, diverse food offer to meet the needs of all cultures and religions. Foods suitable for different religions and faiths should be catered for in all of the council's work around food.</p> <p>The strategy also includes targeted work for people with no recourse to public funds and asylum seekers and refugees. This includes offering no wrong door to people from these communities experiencing food insecurity. The Right to Food plan includes an action focused on campaigning for Right to Food issues such as food standards for asylum seeker accommodation centres. This is focused on championing human rights and ensuring people can access nutritious, culturally appropriate food in a way that upholds dignity.</p>
<p><b>Information on which above analysis is based</b></p> <p>N/a</p>
<p><b>Mitigating actions to be taken</b></p> <p>N/a</p>

## Section 5: Further actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating actions or the areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
1	The older adults needs assessment is being finalised. Further work is required to address the recommendations.	The equality impact assessment should be revisited once an implementation plan is developed.	October 2023
2	The strategy is focused on addressing the wider structural inequalities which shape food insecurity. These factors have a disproportionate impact on some groups.	Identify measures to track the impact of cash first approaches and employment support across protected characteristics for the action plan.	End December 2023
3	The rising cost of living will have a disproportionate impact on some groups such as single parents (disproportionately women) and disabled people.	Engage further with groups representing the voices of local residents to understand how the rising cost of living continues to impact different groups and their access to a nutritious diet.	On-going

5. Equality objectives (for business plans)					
Based on the initial analysis above, please detail any equality objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.					
Objective and measure	Lead officer	Current performance (baseline)	Targets		
			Easter	Summer	Winter
No further actions identified beyond what is outlined above.					





**Local Development Order  
Southwark District Heating Network**

**June~~December~~ 20232**

**Contents**

Statement of Reasons

Local Development Order - Southwark District Heating Network

Map showing affected Land by LDO

**London Borough of Southwark Council**  
**Southwark 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~~30 June 2028, unless there is a subsequent decision by the council 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

---

### **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 in Appendix 1.

### **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, ducts and private wires ancillary to the District Heating Network, heat exchange equipment, above ground cabinets, buildings and structures, street furniture, informational signage and ancillary engineering works, subject to conditions (Part IV).

### **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 2017;
- 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 2015 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 developer**” means the entity constructing the District Heating Network

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

“**the site**” means the site on which works authorised by this Order are being undertaken.

### *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~~30 June 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 the development ~~temporary works~~, the site of the ~~temporary works~~ shall be reinstated to the condition or improved 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 has been ~~shall be~~ undertaken by a competent arboriculturist and an Arboricultural Method Statement has been ~~shall be~~ submitted to and approved in writing by the Local Planning Authority or TfL where appropriate 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 National Joint Utility Group (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 or TfL where appropriate. 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 to be submitted to and approved in writing by the Local Planning Authority or TfL where appropriate. 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 NJUG, 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 or TfL where appropriate;
- 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 or TfL where appropriate, 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 or TfL where appropriate .
- 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.
- g-h. where the development is in close proximity to any tree and where feasible, a root protection barrier shall be installed to protect longitudinal apparatus from potential root expansion and consequent damage.

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

Reason: So that the Council or TfL where appropriate may be satisfied with 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 or TfL where appropriate, 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 or TfL where appropriate 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.~~

Before any work hereby authorised begins, the developer shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, based upon an assessment of the impact of the design scheme, the baseline data contained within the desk-based assessment and the Principles of Archaeological Investigation and Notification to the LPA (Archaeological desk based assessment and principles of investigation strategy, Southwark Local Development Order (LDO), London Borough of Southwark, RPS, 31 March 2023), which shall be submitted to and approved in writing by the Local Planning Authority.

~~The written scheme of investigation will include the following: 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.~~

- a. An assessment of the impact of the designed scheme considering the areas of significance identified in the desk-based assessment and other documents
- b. Archaeological methodologies for the approaches detailed in the Principles of Archaeological Investigation and Notification to the LPA document
- c. Agreed details of archaeological monitoring by the Local Authority of proposed works
- d. Details of public engagement proposals. This shall include:

Within one year of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide evidence of the applicant's commitment to finance and resource these works to their completion.

~~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 order that the details of the programme of works for the archaeological mitigation, reporting public engagement works and archiving are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site 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 in consultation with TfL (where appropriate), which shall include the following details:

- a. A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;
- b. A construction logistics plan prepared in accordance with TfL's Construction Logistics Plan Guidance for Developments (as amended or replace from time to time) and which identifies all efficiency and sustainability measures to be adopted during the demolition and construction of the Development;
- c. The routes which construction traffic shall be directed to use so as to minimise insofar as reasonably practicable impacts of construction traffic on the transport network and the environment;
- d. Arrangements for publicity and promotion of the scheme during construction, including information on temporary closures and diversion of any part of the public highway and private roads, footways and cycle ways;

- e. Details, including management, of Site access/egress by vehicles, cyclists and pedestrians;
- f. Details of training undertaken by the road hauliers, in particular cycle awareness;
- g. Any necessary temporary road closure orders or diversions on the highway network in the vicinity of the Site;
- h. Any necessary temporary means in the closure and diversion of any pedestrian or cycle routes through or adjacent to the Site;
- i. The proposed measures and/or hoardings (including decorative hoardings) to separate and enclose any proposed construction works;
- j. The interface between the Development and any works being carried out at the time to developments in the vicinity of the Site if affected by the Development;
- k. Details of the form, siting and installation of temporary and permanent wayfinding signage to the destinations within the vicinity of the Site;
- l. Measures necessary to ensure the continued provision of bus and taxi services within the vicinity of the Site if affected by the Development including the provision of bus stops necessary as a result of any road closures;
- m. Measures to ensure the safety of the public during the period in which works are being carried out on the Site including lighting in the streets surrounding the Site;
- n. Measures to mitigate as far as is reasonably practicable construction and Demolition traffic impacts generally;
- a-o. The proposed hours of works taking into account the proximity of potential sensitive receptors;
- b-p. 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
- e-q. Details of the methods to be employed to minimise the potential for the creation of dust from the development; and
- d-r. Details of the methods to be employed to minimise noise and vibration from the development; and
- e-s. details of the means of protecting water and waste water infrastructure; and
- f.t. Site perimeter representative sample , noise, monitoring; and
- u. 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.
- v. A commitment to adopt and implement the ICE Demolition Protocol and Considerate Contractor Scheme
- g-w. A commitment 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, including with nearby utilities and infrastructure improvements and to reduce cumulative 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.

### **Bakerloo Line extension**

Prior to the commencement of any works within the BLE safeguarded area relating to any part of the development included in the Local Development Order (excluding):

- a. site clearance
- b. site investigations, testing or surveys
- c. the provision of infrastructure boreholes permitted by the Town and Country Planning General Permitted Development Order 1995 or any amendment or replacement thereof
- d. excavation above -1.0m AOD, deposition, compaction, levelling of materials to new contours and works connected with infilling
- e. construction of temporary accesses and/or highway works to facilitate the carrying out of the Development including internal haul roads
- f. archaeological investigations and digs
- g. ecological surveys, investigations or assessments (including, for the avoidance of doubt, investigations or assessments relating to bats) —decontamination and remediation works
- h. site preparation

- i. the construction of boundary fencing or hoardings (including the erection of an enclosure for the purpose of site security), erection of temporary facilities for security personnel and the erection of security cameras
- j. erection of boards advertising the development and other site notices
- k. the construction of a temporary site compound and welfare facilities/buildings/enclosures, or temporary buildings moveable structures works plant or machinery and storage areas, or a temporary marketing suite that does not form a structure or part of a structure that will become part of the development after its use as temporary offices
- l. establishing temporary accommodation/facilities ahead of construction asbestos removal
- m. access works or works subject to separate agreements under s184 or s278
- n. works and operations to enable any of the foregoing to take place

A detailed design and construction method statement(s) for any and all of:

- (i) the ground floor structures,
- (ii) foundations, and
- (iii) any other works and structures below ground level, including piling and any other permanent installations relevant to the development, in each case in so far as these extend below -1.0m AOD, shall be submitted to and approved by the Local Planning Authority in consultation with Transport for London which:

1. Accommodate the proposed location of the Bakerloo Line Extension tunnels and other Bakerloo Line Extension structures in the vicinity of the site; and
2. (ii) Accommodate ground movement arising from the construction of the proposed Bakerloo Line Extension; and
3. (iii) Mitigate the effects of noise and vibration arising from the operation of the Bakerloo Line Extension within its tunnels and its other structures.

1.1 For the avoidance of doubt:

(a) the detailed design and construction method statement shall accommodate the "proposed location of the Bakerloo Line Extension tunnels and other Bakerloo Line Extension structures in the vicinity of the site" as these are designed and as this design information is in the public domain at the point of applying to discharge this condition. It shall not be necessary for the developer to wait until TfL has progressed the design to a more detailed level until this obligation can be discharged;

(b) the detailed design and construction method statement shall accommodate "ground movement arising from the construction of the proposed Bakerloo Line Extension" by reference to the construction methodology for the Bakerloo Line Extension as such information is in the public domain at the point of applying to discharge this condition. It shall

not be necessary for the developer to wait until TfL has progressed the construction methodology to a more detailed level until this condition can be discharged;

(c) the detailed design and construction method statement shall "mitigate the effects of noise and vibration arising from the operation of the Bakerloo Line Extension within its tunnels and its other structures" by reference to the operational noise and vibration effects of the Bakerloo Line Extension as such information is in the public domain at the point of applying to discharge this condition. It shall not be necessary for the developer to wait until TfL has undertaken noise and vibration assessment to a more detailed level until this condition can be discharged;

(d) it shall not be necessary for the Local Planning Authority to wait for a substantive response from TfL before discharging this condition if the period of 21 days has elapsed since the Local Planning Authority first consulted TfL in connection with the discharge of this condition and no response has been received in that period.

1.2 The development shall be carried out in all respects in accordance with the approved design and method statements. All relevant structures and works comprised within the development hereby permitted and required by this condition shall be completed prior to the occupation of the development (unless otherwise agreed by the Local Planning Authority).

1.3 No alteration to these aspects of the development shall take place without the approval of the Local Planning Authority in consultation with Transport for London. Where any alteration of these aspects of the development is sought by the developer then paragraph 1.1 shall apply.

1.4 In paragraph 1.1(d) a "substantive response" shall mean a response by TfL that it either approves or rejects (in the case of a rejection reasons must be given) the detailed design and construction method statement; or a request by TfL for further information; for the avoidance of doubt a holding response shall not be considered a "substantive response" for the purposes of this condition.

Reason: To ensure that development does not compromise the ability to build the Bakerloo Line Extension in accordance with policy IP2 Transport Infrastructure of the Southwark Plan 2022.

**Appendix 1 Area of Land covered by this Local Development Order**





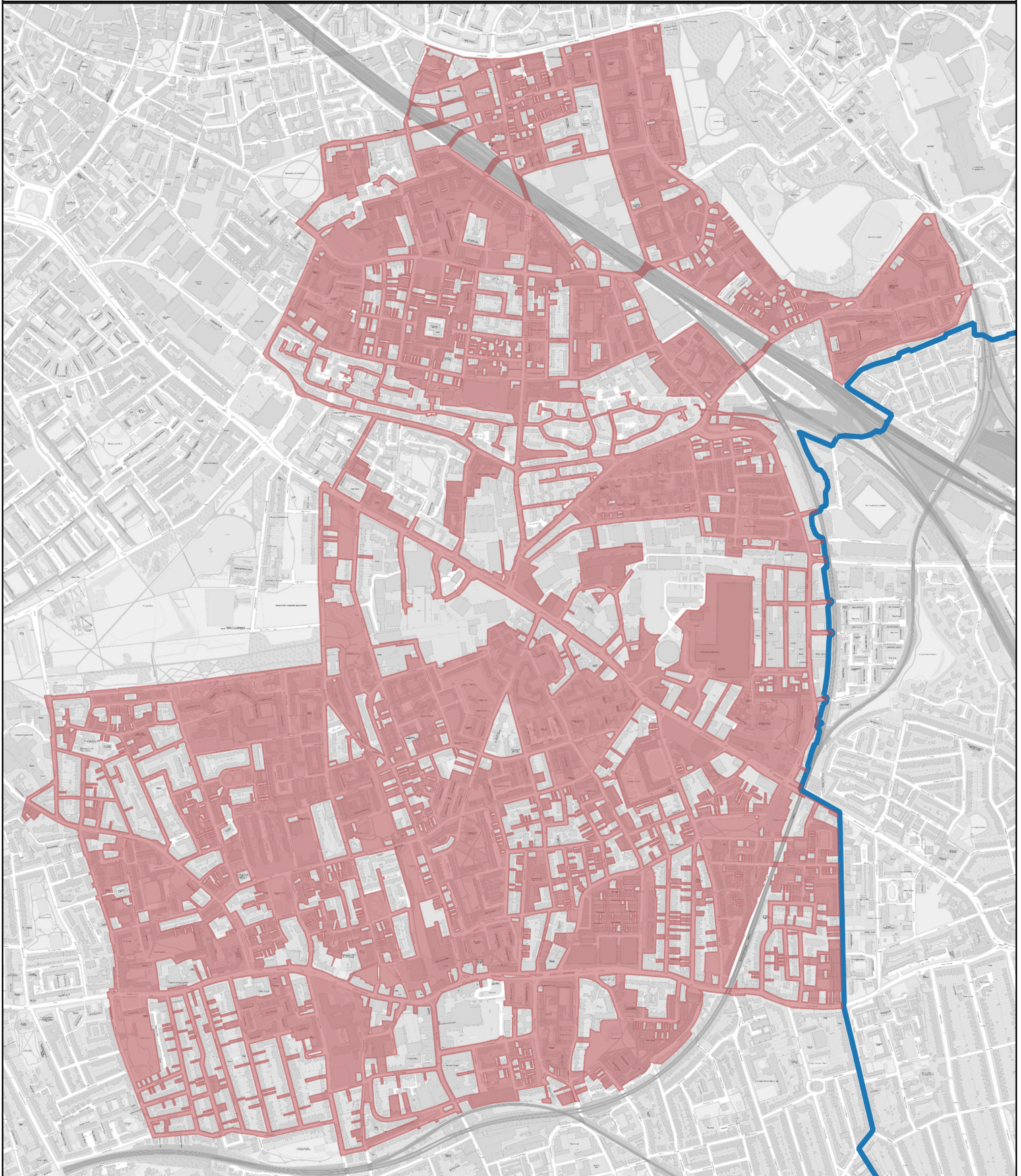
# LOCAL DEVELOPMENT ORDER – DISTRICT HEATING NETWORK

## JUNE 2023



### APPENDICES

No.	Title
Appendix A	Draft Local Development Order
Appendix B	Area covered by the Local Development Order
Appendix C	Equalities analysis
Appendix D	Consultation Report
Appendix E	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

**JUNE 2023**

### APPENDICES

No.	Title
Appendix A	Draft Local Development Order
Appendix B	Area covered by the Local Development Order
Appendix C	Equalities analysis
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Appendix E	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**

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.

**Potential health impacts (positive and negative)**

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

**JUNE 2023**

### APPENDICES

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



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

## **Consultation Report**

**May 2023**

<b>1.</b>	<b>Introduction</b>	
1.1	What is the Local Development Order?	
1.2	What is this consultation report?	
1.3	Where to get more information	
1.4	What happens next?	
<b>2</b>	<b>Local Development Order Consultation</b>	
2.1	Who was consulted and how	
<b>3</b>	<b>Consultation results</b>	
3.1	Summary of responses by theme	
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	Appendix A: Consultation questionnaire	
	Appendix B: Site notice	
	Appendix C: Subscriber email notification	
	Appendix D: Tustin Estate monthly newsletter article	
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	Appendix F: Southwark News press notice	
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	Appendix H: Representations received by email	



## 1 INTRODUCTION

### 1.1 What is a Local Development Order?

- 1.1.1 Local Development Orders (LDO) grant permission for a specified type of development, which means no planning application is needed. The LDO is made up of three main parts. The statement of reasons, the Order itself, and conditions. The statement of reasons sets out the council's justification behind the implementation of the LDO; the Order itself sets out the development which is permitted, development which is not permitted, and defines the land which the LDO applies to; and the conditions ensure that the development is acceptable in planning terms.
- 1.1.2 The proposed LDO which this report relates to will give permitted development rights for the construction of an extension to the District Heating Network (DHN) into the Old Kent Road and Peckham areas defined on the LDO map.
- 1.1.3 The District Heating Network will consist of an underground network of insulated pipes to carry steam for heating and hot water from the South East London Combined Heat and Power (SELCHP) facility to properties in Southwark. The pipes will mainly be laid underneath the public highway. The only potential structures to be permitted would be small cabinets which sit adjacent to plant rooms, and which take the pipes through the wall to connect to existing boilers.

### 1.2 What is this consultation report?

- 1.2.1 The purpose of this report is to summarise the public consultation carried out for the LDO. The consultation was carried out in accordance with section 38 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.
- 1.2.2 The legislation requires that the following persons whose interests the authority consider would be affected by the order if made:
- (a) the Mayor of London (if the local planning authority is a London borough council);
  - (b) a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;
  - (c) Natural England;
  - (d) the Environment Agency;
  - (e) Historic England;
  - (f) where the Secretary of State is the highway authority for any highway in the area of the local planning authority, the Secretary of State for Transport;
  - (g) a strategic highways company any part of whose area is in or adjoins the area of the local planning authority;
  - (h) any person—
    - (i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003 (application of the electronic communications code)(5); and
    - (ii) who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;
  - (i) any of the following persons who exercise functions in any part of the area of the local planning authority—
    - (i) a clinical commissioning group;
    - (ii) the National Health Service Commissioning Board;

- (iii) a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989 (licences authorizing supply, etc);
- (iv) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986 (licensing of gas transporters);
- (v) a sewerage undertaker;
- (vi) a water undertaker;
- (j) voluntary bodies some or all of whose activities benefit any part of the local planning authority's area;
- (k) bodies which represent the interests of persons who share a protected characteristic in the local planning authority's area;
- (l) bodies which represent the interests of persons carrying on business in the local planning authority's area.

- 1.2.3 The planning authority is required to send a copy of the draft Order and Statement of Reasons to the consultees and the consultation period is required to last a minimum of 28 days.

### **1.3 Where to get more information?**

- 1.3.1 The Local Development Order and associated documents can all be viewed on our website: <https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-guidance/evidence-base/environment-and-sustainability?chapter=2>

- 1.3.2 Copies are also available by contacting the Old Kent Road team:

Email: [info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)

### **1.4 What happens next?**

- 1.4.1 Following this consultation, amendments will be made to the December 2022 draft. There will be an internal consultation to gain approval from stakeholders. This amended version will then be submitted for Cabinet approval and adoption in June 2023.

## 2 LOCAL DEVELOPMENT ORDER CONSULTATION

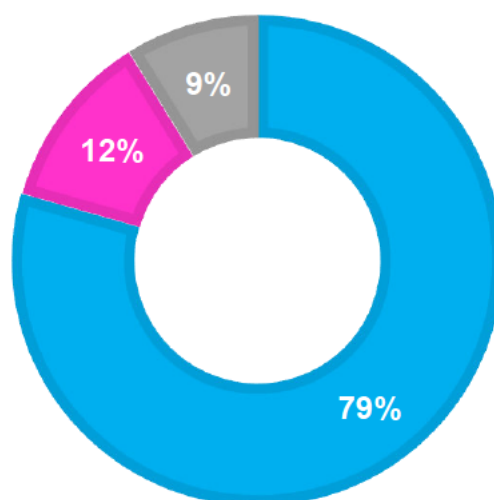
### 2.1 Who was consulted and how?

- 2.1.1 The consultation opened on 15 December 2022 and closed on 9 February 2023, lasting a total of 8 weeks. A questionnaire was published on the council's consultation hub inviting respondents to share their views and comments on the proposed LDO. Consultees could also submit their thoughts by email or post. The questionnaire can be found in Appendix A.
- 2.1.2 The consultation was publicised extensively to residents and statutory consultees. The statutory bodies notified as required by the legislation were:
- The Mayor of London
  - Transport for London - strategic highways company any part of whose area is in or adjoins the area of the local planning authority
  - Southern Gas Network - a person to whom a licence has been granted under section 7(2) of the Gas Act 1986 (licensing of gas transporters);
  - UK Power Network - a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989 (licences authorizing supply, etc)
  - Thames Water – sewerage undertaker and water undertaker
  - London Borough of Lewisham - local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;
  - Natural England
  - Environment Agency
  - Historic England.
- 2.1.3 Site notices were put up across each of the estates which will benefit from the DHN extension to notify residents of the plans and allow them to have their say. A copy of the site notice can be viewed in Appendix B.
- 2.1.4 An email notification of the consultation and links to the relevant documents was sent out to our subscribers list which has around 27,000 subscribers. A copy of this notification is included in Appendix C.
- 2.1.5 An article promoting the LDO was publicised in the Tustin and Ledbury monthly newsletters which are sent to residents on both estates, with details on how they could comment on the proposal. This can be viewed in Appendix D and E respectively.
- 2.1.6 A press notice was issued in Southwark News. This can be viewed in Appendix F.
- 2.1.7 A mail notification of the LDO and the consultation was sent to 859 leaseholders on the estates which would be connecting to the district heating network. This can be viewed in Appendix G.
- 2.1.8 Hard copies were placed in the reception of the council offices at 160 Tooley Street and the following three libraries:
- East Street Library
  - Peckham Library
  - The Blue Anchor Library, Bermondsey

### 3 CONSULTATION RESULTS

#### 3.1 Headline figures

■ Support ■ Object ■ No comment



Total	Email responses	Consultation hub responses
34	8	26

	Support	Object	No comment
Email	4	1	3
Consultation Hub	23	3	0
Total	27	4	3

#### 3.2 Summary of responses by theme

3.2.1 There were 34 responses to the consultation in total, with the majority of representation being made via the consultation hub and some were received by email. The majority of responses are supportive of the proposal with 79% giving a positive response. This is mainly due to the positive environmental benefits and the potential in reduced costs to energy bills. Of those who did object, these were mainly on the grounds that existing district heating networks in the borough are gas-powered and are unreliable. Below outlines the main themes raised by the consultation responses.

##### Concern about the cost

3.2.2 There was concern raised that the works would trigger a major works bill on leaseholders, especially in the current context of cost of living crisis.

- 3.2.3 There is also a general feeling amongst objectors that existing DHN on estates are expensive and unreliable. Objections raised that the Council is going to spend money instead of fixing what is already broken.

Environmental - objection

- 3.2.4 One objector considered that air source heat pumps are considered to be a better low-carbon energy source for homes.

Environmental – support

- 3.2.5 Those who supported the LDO were mainly in favour because of the environmental benefits. One respondent felt that it was positive to see that existing outdated boilers would be replaced with something which is better for the environment
- 3.2.6 There was positive feedback on the council for taking real practical steps to achieve net zero and that it was an innovative and sensible government plan.

Resident's amenity

- 3.2.7 One respondent felt that the LDO would benefit from more detail on how resident's amenity will be protected and arrangements for vehicular access and parking.

Archaeology

- 3.2.8 There was some concern that the archaeological investigations would delay the works.
- 3.2.9 Historic England are supportive of the proposals and would emphasize the research opportunities that the project will offer.

Other

- 3.2.10 It was raised that the areas which are affected could be made clearer.
- 3.2.11 There was interest expressed in the technical details surrounding the DHN - what the pipes will be made out of, how deep they'll be, how much heat they'll 'leak' into the surrounding ground, water temperatures.
- 3.2.12 There was also hope that the DHN would bring down energy bills.

### 3.3 Summary of email representations and council response

*Full email responses can be found in Appendix H.*

<b>Name</b>	Sport England
<b>Support</b>	N/A
<b>Comment</b>	
<ul style="list-style-type: none"> <li>No comment on the proposed development as it does not fall within Sport England's statutory or non-statutory remit.</li> </ul>	
<b>Council response</b>	
Response noted.	

<b>Name</b>	Coal Authority
<b>Support</b>	N/A
<b>Comment</b>	
<ul style="list-style-type: none"> <li>No specific comments to make on the Local Development Order as Southwark lies out the coalfield area.</li> </ul>	
<b>Council response</b>	
Response noted.	

<b>Name</b>	Individual
<b>Support</b>	No
<b>Comment</b>	
<ul style="list-style-type: none"> <li>Concern over what the proposed development will mean for leaseholders in Southwark</li> <li>Very concerned that it will trigger a major works bill and wants to know if leaseholders will be given the choice to opt out of the development as now it is an inappropriate time for another bill with the energy crisis and increases in mortgage payments</li> </ul>	
<b>Council response</b>	
<p>The Local Development Order (LDO) which is being consulted on, does not necessarily mean that any development will take place. Rather it seeks to grant statutory undertaker powers to Veolia as a heat network operator. Telecoms and utility companies like BT and UKPN are generally statutory undertakers which means that when they need to install a new telephone line or power cable they do not need to apply for planning permission first – it is deemed to be permitted development. By creating an LDO, Veolia will be able to install heat network pipes as permitted development also. They will still need permission from the landowner, and it gives them no rights to charge anyone for the pipework, but it simplifies the process of building a heat network. So the creation of an LDO does not present any direct risks or impact for leaseholders in Southwark.</p> <p>The council is indeed hoping to expand our existing SELCHP powered low carbon heat network, so that is a real possibility. Back in 2014, the council and Veolia built a heat network that connected the SELCHP facility to several housing estates in Bermondsey. That network heats 2,650 homes. The leaseholders on those estates did not have to pay any major works bills. The capital cost of the project was rolled into the heat cost over a 20 year contract period (this was fully consulted on with leaseholders). The resulting heat cost was still lower than gas and not subject to fossil fuel price fluctuations. When gas prices around the world rose by hundreds of percent, the heat cost of the SELCHP heat has remained essentially static (just rising with inflation).</p>	

<b>Name</b>	Natural England
<b>Support</b>	N/A
<b>Comment</b>	
<ul style="list-style-type: none"> <li>No comments to make on this consultation</li> </ul>	
<b>Council response</b>	
Response noted.	

<b>Name</b>	Individual
<b>Support</b>	Yes
<b>Comment</b>	
<ul style="list-style-type: none"> <li>Please do this as fast as possible. It will help residents and the planet.</li> </ul>	
<b>Council response</b>	
Support noted.	

<b>Name</b>	Avanton
<b>Support</b>	Yes
<b>Comment</b>	
<ul style="list-style-type: none"> <li>Avanton intend to connect to the SELCHP network and fully support the strategy set out by the LDO.</li> </ul>	
<b>Council response</b>	
Support noted.	

<b>Name</b>	TfL Spatial Planning
<b>Support</b>	Yes
<b>Comment</b>	
<ul style="list-style-type: none"> <li>Some of the land, particularly the A2 Old Kent Road, Queens Road and Peckham Road, forms part of the Transport for London Road Network (TLRN) for which TfL is the highway authority, therefore concerned about any proposals which could impact on the safety and/or function of the aforementioned roads.</li> <li>Any works carried out to the TLRN will need to be agreed with TfL and delivered through the appropriate mechanism and other licenses and agreements may be required from TfL for the delivery of this infrastructure on and under the TLRN.</li> <li>Noted that part of this area falls within the Bakerloo Line Extension (BLE) Secretary of State Safeguarding Area, as such it should be ensured that you have consulted the BLE team on this LDO consultation.</li> <li>It should therefore be ensured that during the detail of each phase, the applicant consults the relevant public transport infrastructure owners to ensure that there is no adverse impact to their safe and efficient operations</li> <li>Coordination between the Healthy Streets scheme and the proposed Cycle Future Route 12 should take place and a reference made to the exploration of the co-ordination should be included within the CEMP condition.</li> <li>Suggested a number of amendments to the Trees condition and the Tree &amp; Hedgerow Maintenance condition to include TfL where additional details are required to be submitted to the Local Planning Authority</li> <li>Suggested some additional wording to the CEMP condition to include measures to minimise disruption of adjoining transport, and engagement with developments/schemes to reduce the cumulative impact.</li> </ul>	

- TfL would also like to see an additional condition applied requiring the developer to submit details to the BLE team, where the proposal runs through a safeguarded area.

**Council response**

- It is understood that any works carried out to the TLRN will need to be agreed with TfL and other licenses and agreements may be required from TfL for the delivery of this infrastructure on and under the TLRN and the developer will be responsible for ensuring they have the relevant licenses.
- TfL will be consulted on any relevant documents required by the conditions on the LDO
- Where additional approval is required by the Local Planning Authority in term sof trees and the CEMP, the wording has been amended to include 'or TfL where appropriate' as suggested in the consultation response
- The additional condition requiring the developer to submit details to the BLE team has been added to the LDO as suggested

<b>Name</b>	Historic England
<b>Support</b>	Yes
<b>Comment</b>	
<ul style="list-style-type: none"> <li>• Note the proposed LDO and the archaeological requirements set out within it and consider these appropriate</li> <li>• Only comment would to emphasise the research opportunities that the project will offer – in particular the ability to better understand the Roman landscape in the area.</li> </ul>	
<b>Council response</b>	
Support noted.	



### 3.4 Consultation Hub representations and council response

Type	Support	Representation	Council response
Individual	Yes	It could be made clearer which areas of Southwark are directly affected	Support noted. The interactive map shows the land in Southwark which the LDO applies to. This can be zoomed in and out of to show more clearly than the map provided with the LDO. <a href="https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Southwark%20Planning&amp;overlays=Local%20Development%20Order&amp;zoom=9">https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Southwark%20Planning&amp;overlays=Local%20Development%20Order&amp;zoom=9</a>
Individual	Yes	No comments - it's a good initiative!	Support noted.
Individual	Yes	I live in a property that uses district heating. It is unreliable and past end of life. There was a lot of concern that the council would capitulate to replacement with gas as a result of cost. This idea is more fitting with environmental need and I wholeheartedly support it.	Support noted. Part of Southwark strategy to tackle the climate emergency is to decarbonise the council's own building stock by moving away from gas boilers to low-carbon energy sources.
Individual	No	I'm currently on one on Scovell Estate and it's expensive and unreliable. It will cost money to the council instead of fixing what's already broken.	The council's district heating networks need upgrading as they are reaching end of life. Instead of replacing with harmful gas boilers, extensive feasibility studies have shown that the implementation of a low-carbon energy source district heating network is the most cost-effective and environmental solution. The construction of the district heating network is funded by the Department for Business, Energy & Industrial Strategy.
Individual	Yes	SELCHP is an absolutely fantastic facility and should be supported developed and enhanced to continue to provide benefits to residents and businesses in the borough and neighbouring boroughs.	Support noted.
Individual	Yes		Support noted.
Individual	Yes		Support noted.
Individual	Yes	Its aims seem excellent.	Support noted.
Individual	Yes	This is a superb idea, a real and	Support noted. The council is

		practical step on the path to Net Zero. I applaud the council's vision and forward thinking on this issue. I am passionate about taking Net Zero seriously and having my council take such a lead is a source of pride. I only hope that such a scheme will be coming to Dulwich soon!	currently exploring the potential for future low-carbon heat networks across the borough.
Individual	Yes	We should make use of the heat generated	Support noted.
Individual	Yes	Please do this. I think that this initiative might be the most innovative and sensible local government plan I have ever seen.	Support noted.
Individual	Yes		Support noted.
Individual	Yes		Support noted.
Individual	Yes	Very good idea. District heating used extensively in Sweden where my wife comes from.	Support noted.
Individual	Yes	<p>I am broadly supportive of extending the district heating network and thereby contributing to reduced reliance on gas-fired boilers, particularly as the heat is available and is currently vented to the air.</p> <p>The statement of reasons could be clearer in giving actual reasons.</p> <p>The LDO would benefit from some more detail in how resident's amenity will be secured during construction.</p> <p>Some disruption is inevitable if you need to dig up the street to install the pipes - for example, will alternative arrangements be made for vehicular access and parking?</p> <p>It would be helpful (and interesting) to have a bit more technical detail on the scheme - I'm a bit geeky like that and am interested in things like what the pipes will be made out of, how deep they'll be, how much heat they'll 'leak' into the surrounding ground, water temps, and things of that nature. You might even consider having a visitor centre or something - in my experience people are interested in this</p>	<p>Support noted. Information on how residents' amenity will be protected during construction will be detailed in the Construction Environmental Management Plan. This will set out the arrangements for vehicular access and parking. This will be approved by the council's Environmental Protection team.</p> <p>More technical detail can be found in on our website:</p>

		stuff.	
Individual	Yes	On the archaeological points: is there a time limit to be imposed if the desk-based research indicates an area of interest to be investigated. Such archaeological investigations can take a long time and delay the pipe work etc to a wide surrounding area.	Support noted. There is no time limit imposed on the archaeological investigations. In order to properly protect and preserve archaeological remains by record and/or in situ.
Individual	Yes		Support noted.
Individual	Yes	Good initiative, conditional on keeping the burners up to date on the latest technology in order to minimise pollution.	Veolia will undertake some modernization works to the SELCHP facility in order to allow for an increased heat load from the expansion of the network.
Individual	Yes		Support noted.
Individual	Yes	Good for the local area. Hope it brings down energy bills.	Support noted.
Individual	Yes	The project sounds very positive and I support it	Support noted.
Individual	Yes		Support noted.
Port of London Authority	Yes	Thank you for consulting the Port of London Authority (PLA) on the proposed Local Development Order to grant permitted development rights for the construction of an underground network of insulated pipes to carry steam for heating and hot water from the SELCHP heat from waste facility to properties in Southwark. The only comment the PLA has to make is that the Construction Environmental Management Plan (CEMP) highlighted on page 18 of the Statement of Reasons, should, in line with London Plan (2021) policy T7 (deliveries, servicing and construction) consider the potential use of waterways, including the Tidal Thames through the supply chain for the movement of spoil and materials as part of these proposals, which will help reduce vehicle movements in the wider region.	Response noted.
Individual	No	What a waste money on what will be a money pit down the line	Response noted. The council will bear no cost for the construction of the district heating network as the funding for the project is coming from BEIS. Our extensive feasibility

			studies have shown that the implementation of a low-carbon energy source district heating network is the most cost-effective and environmental solution over the long term.
Individual	Yes		Support noted.
Individual	No	District heating and CHP largely uses gas to generate heating, when the Future Homes strategy sets out that in 2 years we do not put gas boilers into new properties. Air source heat pumps are a much better low carbon alternative for new build homes.	Response noted. Although other existing district heat networks in the borough use gas boilers, the LDO will give permission for a DHN which the energy source will come from SELCHP energy recovery facility. This means that waste energy from the burning of household waste will be captured and used for heating and hot water. This is considered a renewable energy source. The Council has done analysis and found the most cost effective for the most carbon savings is the district heat network.



## **Appendix A:** Consultation Hub Questionnaire

Local Development Order – District Heating Network

**March 2023**

# Local Development Order - District Heating Network

## Overview

Tell us what you think about our Local Development Order (LDO) for an extension to the District Heating Network (DHN).

This consultation was approved at Cabinet on December 6 2022 and will run from **December 15 2022 to February 9 2023**.

Local Development Orders (LDO) grant permission for a specified type of development, which means no planning application is needed. We have the right to apply conditions on the LDO to ensure that the development is acceptable in planning terms.

The proposed LDO will give permitted development rights for the construction of an extension to the District Heating Network (DHN) into the Old Kent Road and Peckham areas defined on the [LDO map](https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Southwark%20Planning) <https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Southwark%20Planning> .

The District Heating Network will consist of an underground network of insulated pipes to carry steam for heating and hot water from the South East London Combined Heat and Power (SELCHP) facility to properties in Southwark. The pipes will mainly be laid underneath the public highway. The only potential structures to be permitted would be small cabinets which sit adjacent to plant rooms, and which take the pipes through the wall to connect to existing boilers.

This will be an extension of the existing network which currently provides heating and hot water for 2,500 properties in the Bermondsey area. More information on the existing DHN can be found [here](https://www.southwark.gov.uk/environment/south-east-london-combined-heat-and-power-selchp) <https://www.southwark.gov.uk/environment/south-east-london-combined-heat-and-power-selchp> .

The adoption of the LDO which will facilitate the extension of the DHN is a key part of [Southwark's Climate Change Strategy](https://www.southwark.gov.uk/environment/climate-emergency/reaching-net-zero/our-plan-for-net-zero) <https://www.southwark.gov.uk/environment/climate-emergency/reaching-net-zero/our-plan-for-net-zero> . Buildings account for over 75% of the carbon emissions generated in Southwark. The extension will connect 3000 additional properties to a low-carbon, renewable energy source.

The LDO will enable the council to manage the impacts of construction and ensure that there are no unacceptable outcomes through the use of planning conditions. These will ensure that heritage, archaeology, trees, and ecology are protected. It also means that impacts on neighbouring amenity from the construction will be minimised through the implementation of Construction Environmental Management Plan.

The draft LDO and supporting documents can be viewed below.

- [Draft Local Development Order and Statement of Reasons](#) <user\_uploads/statement-of-reasons---ldo-1.pdf>
- [Map](https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Southwark%20Planning) <https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Southwark%20Planning>
- [Cabinet report](https://moderngov.southwark.gov.uk/documents/s110494/Report%20Southwark%20District%20Heating%20Network%20Local%20Development%20Order.pdf) <https://moderngov.southwark.gov.uk/documents/s110494/Report%20Southwark%20District%20Heating%20Network%20Local%20Development%20Order.pdf>
- [Phasing plan](https://moderngov.southwark.gov.uk/documents/s110498/Appendix%20D%20Phasing%20plan%20for%20SELCHP%20extension.pdf) <https://moderngov.southwark.gov.uk/documents/s110498/Appendix%20D%20Phasing%20plan%20for%20SELCHP%20extension.pdf>
- [Equalities Assessment](https://moderngov.southwark.gov.uk/documents/s110497/Appendix%20C%20Equalities%20analysis.pdf) <https://moderngov.southwark.gov.uk/documents/s110497/Appendix%20C%20Equalities%20analysis.pdf>

## Privacy Statement

Southwark Council will collect and record your answers to this form. We will collect and securely store your data electronically and only give access to people who are authorised to use it. The survey information will be collated for statistical purposes to inform our decision. We will keep this data for the reasons given above and destroy it securely after four years.

If you have any questions about how we will use your personal information, please contact our Data Protection Officer by email [dpo@southwark.gov.uk](mailto:dpo@southwark.gov.uk) or telephone 0207 525 5000. More detailed information is available on our website <https://www.southwark.gov.uk/council-and-democracy/freedom-of-information-and-data-protection/corporate-data-privacy-notice> <https://www.southwark.gov.uk/council-and-democracy/freedom-of-information-and-data-protection/corporate-data-privacy-notice> and from the Information Commissioner's Office at <https://ico.org.uk/> <https://ico.org.uk/> .

1 Please confirm your consent for us to collect and use your data in the ways described above (without your consent, we are unable to use any information that you provide).

I consent for you to collect and use my data as described above. *(Required)*

## Introduction

2 What is your name?

Name

3 What is your email address?

Email

#### 4 What is your organisation (if any)?

Organisation

#### Tell us what you think

You can view the documents here:

[Statement of reasons and Local Development Order](#) <user\_uploads/statement-of-reasons---local-development-order-1.pdf>

[Local Development Order Conditions](#) <user\_uploads/local-development-order-conditions.pdf>

#### 5 Do you support the adoption of the Local Development Order to facilitate the construction of the District Heating Network?

Please select only one item

- Yes  
 No  
 Not sure

#### 6 Do you have any comments on the draft Local Development Order and Statement of reasons?

#### 7 Do you have any comments on the conditions attached to the Local Development Order?

#### About you

#### 8 If you live in Southwark, which community area do you live in?

Please select only one item

- Bermondsey  
 Borough & Bankside  
 Camberwell  
 Dulwich  
 Elephant and Castle  
 Nunhead  
 Peckham  
 Rotherhithe  
 Walworth

## 9 Equalities questions

Completing this section is optional.

To make sure we are providing fair services to all of Southwark's diverse communities, it is important that we ask you a few questions about yourself. You are under no obligation to provide the information requested, but it would help us greatly if you did. The information will be used to help us plan services that meet the needs of all users. Your responses will be kept confidential and any information published will be made anonymous. The information will be used in a statistical format only.

Age

Please select only one item

- Under 16
- 16 - 17
- 18 - 24
- 25 - 34
- 35 - 44
- 45 - 54
- 55 - 64
- 65 - 74
- 75 - 84
- 85 - 94
- 95+

What is your ethnic background?

Please select only one item

- Arab
- (Asian) Bengali
- (Asian) British
- (Asian) Chinese
- (Asian) Filipino
- (Asian) Indian
- (Asian) Pakistani
- (Asian) Vietnamese
- (Asian) Other (please specify if you wish)
- (Black) British
- (Black) Caribbean
- (Black) Ghanaian
- (Black) Nigerian
- (Black) Sierra Leonean
- (Black) Somali
- (Black) Other African
- (Black) Other (please specify if you wish)
- Gypsy, Roma or Irish Traveller
- Latin American
- Mixed White/Asian
- Mixed White Black African
- Mixed White/Black Caribbean
- Mixed Other background (please specify if you wish)
- (White) British
- (White) English
- (White) Irish
- (White) Northern Irish
- (White) Scottish
- (White) Welsh
- (White) Other European
- (White) Other (please specify if you wish)
- Other ethnic background (please specify if you wish)



Please specify further if you wish:

Are you disabled?

Please select only one item

- Yes
- No
- Prefer not to say

Please tick the box or boxes below that best describe your disability:

Please select all that apply

- Hearing / Vision (e.g. deaf, partially deaf or hard of hearing; blind or partial sight)
- Physical / Mobility (e.g. wheelchair user, arthritis, multiple sclerosis etc.)
- Mental health (lasting more than a year. e.g. severe depression, schizophrenia etc.)
- Learning disability (e.g. dyslexia, dyspraxia etc.)
- Long-term illness or health condition (e.g. Cancer, HIV, Diabetes, Chronic Heart disease, Rheumatoid Arthritis, Chronic Asthma)
- Other
- Prefer not to say

What is your sex as recorded at birth? (a question about Gender Identity will follow)

Please select only one item

- Male
- Female
- Other (please specify if you wish)
- Prefer not to say

Please specify further if you wish

Is the Gender you identify with the same as the sex you were recorded at birth?

Please select only one item

- Yes
- No
- Prefer not to say

If no, how would you define your gender identity? Please specify if you wish

Which of the following best describes your sexual orientation?

Please select only one item

- Heterosexual/straight
- Lesbian/Gay woman
- Gay man
- Bisexual
- Other (please specify if you wish)
- Prefer not to say

Please specify further if you wish

What is your religion or belief?

*Please select only one item*

- Christian
- Sikh
- Hindu
- Muslim
- Jewish
- Buddhist
- No religion
- Other (please specify if you wish)

Please specify further if you wish

**10** What is your email address?

**11** Would you be interested in being notified about future surveys and consultations in any of the following areas? (we would add your email address to a specific mailing list - you could request that your name be removed at any time by writing to [community.engagement@southwark.gov.uk](mailto:community.engagement@southwark.gov.uk))

*Please select all that apply*

- Housing and regeneration
- Health and social care
- Transport and Highways
- Culture
- Sport and Leisure
- Parks
- Crime and policing
- Communities
- Schools
- Employment
- Youth services
- Funding
- Engagement

Please make sure you have provided an email address if you wish to be added to our mailing lists.



## **Appendix B:**

### **Site notice**

Local Development Order – District Heating Network

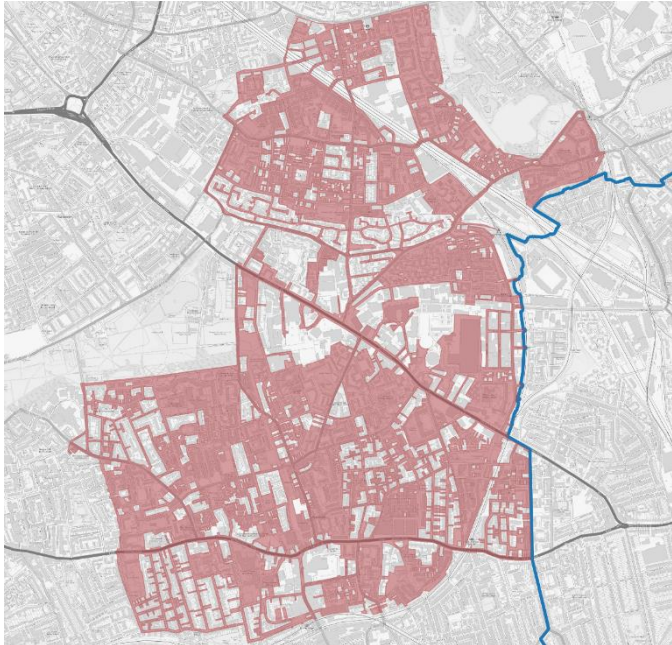
**March 2023**

## Town and Country Planning (Development Management Procedure) (England) Order 2015

### NOTICE UNDER ARTICLE 38 OF PROPOSAL FOR LOCAL DEVELOPMENT ORDER GRANTING PLANNING PERMISSION

I give notice that the London Borough of Southwark Council proposes to make a local development order for the area covered by the map granting planning permission for the:

*“Development of a district heating network, including pipes, cables and private wires ancillary to the District Heating Network, heat exchange equipment, above ground cabinets, buildings and structures, street furniture, informational signage and ancillary engineering works, subject to conditions.”*



A copy of the draft order and a statement of reasons for making the order are available for inspection at:

Council offices, 160 Tooley Street, SE1 2HZ  
Monday to Friday, 9:00am to 5:00pm (excludes bank holidays)

East Street Library, 168-170 Old Kent Road, SE1 5TY  
Monday, Tuesday and Friday, 2:00pm to 7:00pm;  
Thursday 10:00am to 3pm; Saturday 10:00am to 5:00pm

The Blue Anchor Library, Market Place, SE16 3UQ  
Monday, Tuesday, and Thursday 9:00am to 7:00pm;  
Friday 10:00am to 6:00pm; Saturday 9:00am to 5:00pm

Peckham Temporary Library, 17-23 Bournemouth Road, SE15 4UJ  
Monday to Thursday 10:00am to 7:00pm; Saturday  
10:00am to 5:00pm; Sunday 12:00pm to 4:00pm

They are published on the Council's website at: <https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/evidence-base/environment-and-sustainability?chapter=2>

Anyone who wishes to make representations about this proposed local development order should do so by:

- Visiting our consultation hub and filling in our online questionnaire: <https://consultations.southwark.gov.uk/corporate-strategy/local-development-order-district-heating-network>
- E-mail to [info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)
- Post your response to:  
LDO Consultation  
Old Kent Road Team  
Southwark Council  
FREEPOST SE1919/14  
London SE1P 5EX

All comments must be received by **23:59 on Thursday 9 February 2023**.

Signed.....

On behalf of the London Borough of Southwark Council

Date

#### Statement of owner's rights

*The grant of planning permission does not affect owners' rights to retail or dispose of their property, unless there is some provision to the contrary in an agreement or in a lease.*



## **Appendix C:** Email notification

Local Development Order – District Heating Network

**March 2023**

**From:** [Southwark Council](#)  
**To:**  
**Subject:** Tell us your thoughts on the proposed Local Development Order

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**Southwark Council is consulting on a draft of the Local Development Order – District Heating Network**

Consultation is open until **Thursday 9 February 23:59**.

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED), SECTION 61A**  
**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)**  
**(ENGLAND) ORDER 2015, SECTION 38**

**What is the Local Development Order?**

The proposed Local Development Order (LDO) will grant permitted development rights for the construction of an underground network of insulated pipes to carry steam for heating and hot water from the SELCHP heat from waste facility (<https://www.selchp.com/>) to properties in Southwark. The district heating network is a low-carbon alternative to the gas-fired boilers which are currently used as the main heating source in Southwark's homes and businesses.

In 2013 Southwark Council connected 2,500 homes in Bermondsey to SELCHP via a district heating network. This has saved around 7,700 tonnes of CO2 per year. The proposed LDO will grant planning permission for an extension of the network to areas around Old Kent Road and Peckham. A decision to build the network will require a separate approval from Southwark Council to vary its existing Heat Network Contract with Veolia, the operators of SELCHP. If the extension is built, it will connect around 3000 existing homes and new development\* to a low-carbon, renewable energy source.

The use of the LDO will enable the Council to manage the impacts and ensure that there are no unacceptable outcome through the use of planning conditions. These will ensure that heritage, archaeology, trees, and ecology are protected. It also means that impacts on neighbouring amenity from the construction will be minimised through the implementation of Construction Environmental Management Plan.

*\*Statement of owner's rights*

*The grant of planning permission does not affect owners' rights to retail or dispose of their property, unless there is some provision to the contrary in an agreement or in a lease.*

The draft Local Development Order (December 2022) is available to view [here](#).

For more information and the supporting documents please visit [our website](#).

Hard copies of the document can be viewed at:

- Council offices, 160 Tooley Street, SE1 2HZ  
Monday to Friday, 9:00am to 5:00pm (excludes bank holidays)
- East Street Library, 168-170 Old Kent Road, SE1 5TY  
Monday, Tuesday and Friday, 2:00pm to 7:00pm; Thursday 10:00am to 3pm; Saturday 10:00am to 5:00pm
- The Blue Anchor Library, Market Place, SE16 3UQ  
Monday, Tuesday, and Thursday 9:00am to 7:00pm; Friday 10:00am to 6:00pm; Saturday 9:00am to 5:00pm
- Peckham Temporary Library, 17-23 Bournemouth Road, SE15 4UJ  
Monday to Thursday 10:00am to 7:00pm; Saturday 10:00am to 5:00pm; Sunday 12:00pm to 4:00pm

## How can I comment?

- Visit our [Consultation Hub](#) to fill out an online questionnaire
- Email your comments to [info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)
- You can also write to: LDO Consultation, Old Kent Road Team, Southwark Council FREEPOST SE1919/14 London SE1P 5EX

The consultation will be open until **23:59 on Thursday 9 February 2023**.

Southwark Council

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[Unsubscribe](#) from any further emails from Southwark Council.

You may also choose to [modify your subscriber preferences](#).

[www.southwark.gov.uk](http://www.southwark.gov.uk)

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This email was sent to Email Address using GovDelivery Communications Cloud on behalf of: Southwark Council PO BOX 64529 London SE1P 5LX





## **Appendix D:** Tustin Estate monthly newsletter

Local Development Order – District Heating Network

**March 2023**





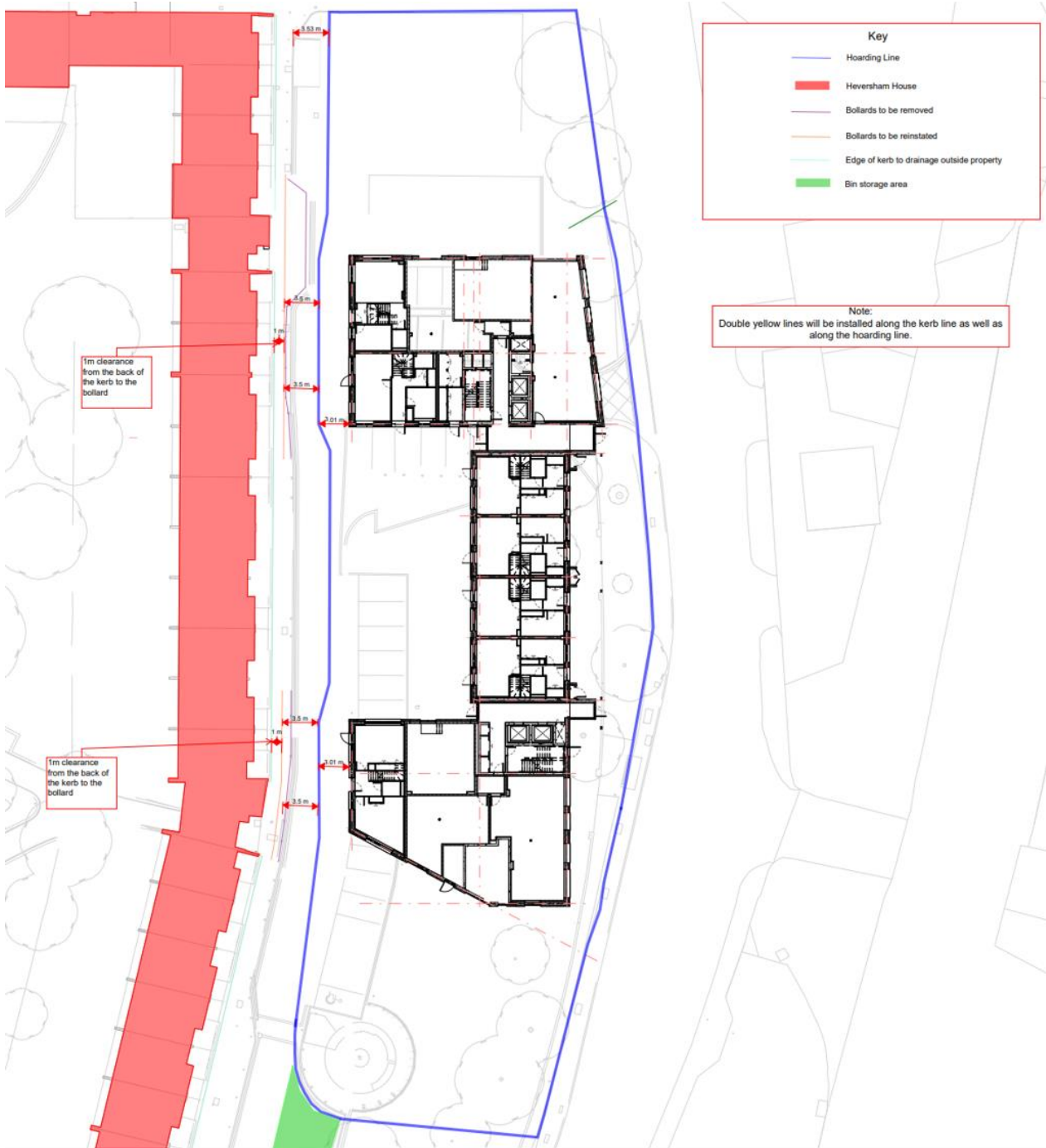
# Tustin Estate newsletter

## January 2023

Welcome to the latest edition of the Tustin Estate monthly newsletter from Southwark Council.

The residents of the Tustin Estate have voted for the demolition and rebuild of Bowness House, Heversham House, Hillbeck Close and Kentmere House, and the refurbishment of the council houses on Manor Grove. The first phase of new homes are now being built and will be ready in 2025.

The design of the new homes at Hillbeck Close is pictured above.



## Public Meeting

**Thursday  
26 January 2023**

**Tustin Community Hall  
Windermere Point**

**6pm to 7.30pm**

**The Tustin Community  
Association is holding a  
general meeting about the  
new build works.**

## New homes progress

Ullswater House demolition is in progress. New asbestos was found that was not discovered during earlier surveys as we are now reaching places we couldn't before. This means it is a stop-start process.

A similar situation exists on the site of the new homes in front of Heversham House where some materials were found that could contain asbestos. Any asbestos found is always removed safely.

## Amended Hoarding Plan

There has been a change to the hoarding plan at Heversham House and Ilderton Road (Plot G1). The revised plan is on page two of the newsletter. These works began on 3 January, 2023 and are expected to be complete by 13

January, 2023. The revised road lining will be carried out at a later date.

This has resulted in a change to Heversham House residents' bin collection. Please leave your rubbish out on collection day at the collection point shown.

The hoarding at Manor Grove will also be amended soon, bins will be moved by the estate team on collection day to Manor Grove Road.

## Changes to parking

The bollards and posts reverting parking at the south end of Heversham House will be removed, if they have not already been done so.

The date for the new temporary parking bays behind Bowness House and at Manor Grove will be confirmed soon. Contractors are currently pricing the works.

## Standard construction hours

Noisy building work is only carried out between the following hours:

- Monday to Friday 8am to 6pm
- Saturdays 9am to 2pm
- No works on Sundays and Bank Holidays

Please note that you may see Openreach staff around the hoarding by Heversham House quietly working on 14 and 15 January 2023, re-routing fibre cables that are currently passing through the proposed location of Block G1, in

front of Heversham House and Ilderton Road.

## Construction video

Don't forget Bouygues has created a video to show how the construction of the new homes will be managed – you can watch it online using this QR code:



## Environmental monitoring

Bouygues monitor noise, dust, and vibrations to ensure they're operating safely and within the limits set by Southwark. Monitors are installed around the construction site.

## Drop in sessions

The next drop-in session will be on Thursday 26 January 2023. If you want to speak to the team before then, do not forget we are available 24 hours a day, 7 days a week at the Ledbury TRA Hall, Pencraig way (next to Kwik Fit on the

Old Kent Road), London SE15 1SH. You can telephone on **020 7732 2886** or email **tustin@southwark.gov.uk**

## District Heating Network consultation

The council is consulting on a proposed Local Development Order for an extension to the District Heating Network. The consultation will run until midnight on February 9 2023.

Local Development Orders grant permission for a specified type of development, which means no planning application is needed. The council has the right to apply conditions on the Local Development Order to ensure that the development is acceptable in planning terms.

The proposed Local Development Order will give permitted development rights for the construction of an extension to the District Heating Network into the Old Kent Road and Peckham areas, which includes Tustin.

If the extension is built, it will connect around 3,000 existing homes and new developments to a low-carbon, renewable energy source. The District Heating Network will be made up of an underground network of insulated pipes to carry steam for heating and hot water from the South East London Combined Heat and Power (SELCHP) facility to properties in Southwark. The pipes will mainly be laid underneath the public highway. The only potential structures to

be permitted would be small cabinets which sit next to to plant rooms, and take the pipes through the wall to connect to existing boilers.

More information can be found on our website at:

**[www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/evidence-base/environment-and-sustainability?chapter=2](http://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/evidence-base/environment-and-sustainability?chapter=2)**

Let us know what you think by visiting our consultation hub:

**[consultations.southwark.gov.uk/corporate-strategy/local-development-order-district-heating-network](http://consultations.southwark.gov.uk/corporate-strategy/local-development-order-district-heating-network)** or email **[info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)**

## Getting ready to go on the Housing Register

In preparation for tenants in Kentmere House, Heversham House and Bowness House to be rehoused in the new homes that will be built on the Tustin Estate, we are working with them to get registered on the housing list. Thank you to everyone who has come in to see us for help to get registered.

Early in 2023, tenants and resident leaseholders will choose the home they would like to move into. A booklet will show the layout and the size of the property and state the rent and council tax. If you do not contact us to get registered, you may miss out on a chance of choosing your new home.

If you need help or have any worries, just contact the team on **020 7732 2886** or email **[tustin@southwark.gov.uk](mailto:tustin@southwark.gov.uk)**, we are here 24 hours a day, 7 days a week.

## Local police sessions

The local Old Kent Road Ward Police team have requested that any crime be reported, if it is an emergency, to **999** and for non-emergencies to **101**.

The team can also be contacted by telephone on **020 8721 2436**, emailing **[oldkentroad.snt@met.police.uk](mailto:oldkentroad.snt@met.police.uk)** or they can be tweeted at **[@MPSOldkentRoad](https://twitter.com/MPSOldkentRoad)**.

## Repairs

The blocks that are due for demolition are still maintained by the council. All repairs for all the blocks on the Tustin Estate should be reported by calling **0800 952 4444**.

## Damp and mould

If you are a Southwark Council tenant with damp or mould in your home, you can get in contact with us by emailing **[dampandmould@southwark.gov.uk](mailto:dampandmould@southwark.gov.uk)** or calling us on **020 7525 2600** and choosing option one and then option five.

## Tustin Community Association

The Tenants and Residents' group for the Tustin Estate is called the Tustin Community Association (TCA). It has been established for many years and works on behalf of residents on many

issues. The group meet on the third Thursday of each month at 6pm by Zoom.

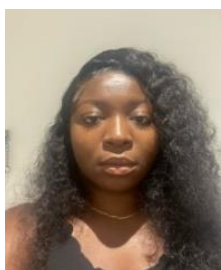
Andrew Eke is Chair of the Tustin Community Association. The contact details for the TCA are:

- Telephone: **07464 867736**
- Email: **tustintca02@hotmail.com**
- Address: Residents Hall, Windermere Point, London SE15 1DY

## The Tustin Resident Project Group

The Tustin Resident Project Group meets monthly and oversees the project from a resident perspective working with Southwark Council. We are keen for more people to get involved. If you are interested in joining the group, please contact Jen Pepper on Freephone **0800 073 1051** or at **jen.pepper@opencommunities.org**

## Contacting Bouygues



If you want to contact Bouygues UK their Resident Liaison Officer is Mariam Ayoola.

**Mariam's** email address is:

**mariam.ayoola@bouygues-uk.com.**

Their out of hours number is 0800 0837268.

## Resident Services Officer

Andrew Johnson is the Resident Services Officer for the Tustin Estate. You can contact Andrew on **07535**

**541329** and his email address is **andrew.johnson@southwark.gov.uk**

## Contacting Southwark about this project

The Tustin team working with the community on the plans for the low rise homes on the estate can be contacted on **020 7732 2886** or email **tustin@southwark.gov.uk**.

## Strep A and scarlet fever: what to look out for

More children have developed scarlet fever recently. This is above what we would expect for winter. Scarlet fever is caused by the bacteria Group A streptococcus (Strep A), which on very rare occasions can cause more serious disease if it gets into the bloodstream or lungs.

Find out about the symptoms of scarlet fever and what to do if your child has scarlet fever at

**[www.nhs.uk/conditions/scarlet-fever/](http://www.nhs.uk/conditions/scarlet-fever/)**

## Flu and COVID-19 cases are rising rapidly: book your vaccine today

More people are going into hospital because they are ill with flu or COVID-19. Being vaccinated is the best way to protect yourself and others from flu and COVID-19. Book your COVID-19 and flu jabs today at

**[www.nhs.uk/conditions/vaccinations/flu-influenza-vaccine/](http://www.nhs.uk/conditions/vaccinations/flu-influenza-vaccine/)**

## Help to prevent spread of winter bugs and protect yourself

The best way to protect yourself and your loved ones is to:

- Get vaccinated against flu and COVID-19
- Let fresh air in if meeting indoors
- If you feel unwell, try to stay at home and avoid contact with other people where possible
- Wear a face covering, in crowded and enclosed spaces
- Wash your hands or use sanitiser



**Murselin Islam**  
**[murselinislam@hotmail.com](mailto:murselinislam@hotmail.com)**

## The Independent Tenant and Homeowner Advisor

The Open Communities staff who will work on Tustin, providing individual advice to tenants, leaseholders and freeholders, and organising, chairing and taking minutes at the estate-wide and Resident Project Group Meetings, are Jen Pepper and Murselin Islam.

You can contact Jen on **[jen.pepper@opencommunities.org](mailto:jen.pepper@opencommunities.org)** and Murselin at **[murselinislam@hotmail.com](mailto:murselinislam@hotmail.com)** and Freephone **0800 073 1051**.



**Jen Pepper**  
**[jen.pepper@opencommunities.org](mailto:jen.pepper@opencommunities.org)**

## Tustin Diary Dates for the next few months

Diary Date	What's the event	Where is it?
Thursday 19 Jan 2023 starting at 6pm	Tustin Community Association Meeting	Held on Zoom, details are available from the Chair, Andrew Eke at: <a href="mailto:tustintca02@hotmail.com">tustintca02@hotmail.com</a> .
Thursday 26 Jan 2023 5pm to 7pm	Tustin Drop-in	This will be held at Tustin Community Hall Windermere Point , between 3pm and 5.30pm.
Thursday 26 Jan 2023 6pm to 7.30pm	Tustin Community Association Public Meeting	This will be held at Tustin Community Hall Windermere Point at 6pm to 7.30pm.
Thursday 2 Feb 2023 3pm to 7pm	Tustin Drop-in	This will be held at Tustin Community Hall Windermere Point, between 3pm and 7pm.
Thursday 9 Feb Jan 2023 starting at 6pm	Tustin Resident Project Group	This will be held on Zoom and details are available from Jen Pepper the Independent Tenant and Homeowner Advisor at <a href="mailto:jen.pepper@opencommunities.org">jen.pepper@opencommunities.org</a> .
Thursday 16 Feb 2023 starting at 6pm	Tustin Community Association Meeting	Held on Zoom, details are available from the Chair, Andrew Eke at: <a href="mailto:tustintca02@hotmail.com">tustintca02@hotmail.com</a> .
Thursday 23 Feb 2023 3pm to 7pm	Tustin Drop-in	This will be held at 801 Old Kent Road, between 3pm and 7pm.
Thursday 2 March 2023 3pm to 7pm	Tustin Drop-in	This will be held at Tustin Community Hall Windermere Point, between 3pm and 7pm.
Thursday 9 March 2023 starting at 6pm	Tustin Resident Project Group	This will be held on Zoom and details are available from Jen Pepper the Independent Tenant and Homeowner Advisor at <a href="mailto:jen.pepper@opencommunities.org">jen.pepper@opencommunities.org</a> .
Thursday 16 March 2023 starting at 6pm	Tustin Community Association Meeting	Held on Zoom, details are available from the Chair, Andrew Eke at: <a href="mailto:tustintca02@hotmail.com">tustintca02@hotmail.com</a> .
Thursday 23 March 2023 3pm to 7pm	Tustin Drop-in	This will be held at Tustin Community Hall Windermere Point, between 3pm and 7pm.
Thursday 6 April 2023 3pm to 7pm	Tustin Drop-in	This will be held at Tustin Community Hall Windermere Point, between 3pm and 7pm.





## **Appendix E:** Ledbury Estate monthly newsletter

Local Development Order – District Heating Network

**March 2023**



# Ledbury Estate newsletter

27 January 2023

### **Warning about bottled gas**

*It remains vitally important residents do not bring any bottled gas or gas appliances into the tower blocks as the buildings will not withstand the force of a gas explosion.*

*Fire wardens will also be monitoring to check that no gas canisters are brought into the buildings.*

### **Rubbish thrown from windows**

The cleaners for the estate have a hard enough job to keep the estate clean, let alone clearing up after residents who think it is ok to dispose of their rubbish by simply throwing it out of their windows.

Recently, as well as throwing out cigarette ends could cause a fire, we have found sanitary towels and soiled nappies. Please keep our estate tidy.

Any resident found disposing of their rubbish in this way will have action taken against them, as it contravenes the tenancy agreement.

### **District Heating Network consultation**

The council is consulting on a proposed Local Development Order for an extension to the District Heating

Network. The consultation will run until midnight on February 9 2023.

Local Development Orders grant permission for a specified type of development, which means no planning application is needed. The council has the right to apply conditions on the Local Development Order to ensure that the development is acceptable in planning terms.

The proposed Local Development Order will give permitted development rights for the construction of an extension to the District Heating Network into the Old Kent Road and Peckham areas, which includes Tustin.

If the extension is built, it will connect around 3,000 existing homes and new developments to a low-carbon, renewable energy source. The District Heating Network will be made up of an underground network of insulated pipes to carry steam for heating and hot water from the South East London Combined Heat and Power (SELCHP) facility to properties in Southwark. The pipes will mainly be laid underneath the public highway. The only potential structures to be permitted would be small cabinets which sit next to plant rooms, and take the pipes through the wall to connect to existing boilers.

More information can be found on our website at:

[www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/evidence-base/environment-and-sustainability?chapter=2](http://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/evidence-base/environment-and-sustainability?chapter=2)

Let us know what you think by visiting our consultation hub:

[consultations.southwark.gov.uk/corporate-strategy/local-development-order-district-heating-network](http://consultations.southwark.gov.uk/corporate-strategy/local-development-order-district-heating-network) or email [info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)

## Southwark 2030

Southwark 2030 is your chance to help shape the future of our borough. We want to bring people together, from all parts of our community, to talk about and help decide the place we all want Southwark to be by 2030. There are lots of ways to get involved in Southwark 2030. Please join in by visiting the website:

[www.southwark.gov.uk/southwark2030](http://www.southwark.gov.uk/southwark2030)

**SOUTHWARK**  
**2030**

## Cost of Living support

We know money is tight for lots of residents at the moment. If you need help or support through the cost of living crisis, we are here to help. Please visit [www.southwark.gov.uk/here-to-help](http://www.southwark.gov.uk/here-to-help)



## Housing update

All residents in the tower blocks will have to leave their homes while their blocks are demolished and the new homes are built. All permanent tenants have the right to return to the estate.

Please note that properties are not allocated according to the time you bid. They are allocated by our colleagues in the allocations team according to

Southwark Council's lettings policies. Ledbury Towers' permanent tenants are in Band One, and the properties are allocated by how many stars each applicant has, then by application date and finally by your tenancy date.

If you need help with bidding or you think your application can attract stars because you or someone else in your household is working or carrying out voluntary work for more than 16 hours a week, do not forget to come in and see the Ledbury Team for help.

Right now we have 189 permanent empty homes, as many tenanted households have moved into new homes and 19 leaseholders sold their properties

back to the council. Of course those tenants who have moved retain the right to return.

209 properties were initially refused by tenants who had viewings. However many of these have already received further offers and many residents have already moved into their new homes. No permanent tenant from the Ledbury Towers will be suspended from bidding if they choose to refuse a property.

## Damp and mould

If you are a Southwark Council tenant with damp or mould in your home, you can get in contact with us by emailing [dampandmould@southwark.gov.uk](mailto:dampandmould@southwark.gov.uk) or calling us on **020 7525 2600** and choosing option one and then option five.

## Ledbury Towers repairs

All repairs for the Ledbury Towers should be reported by calling **0800 952 4444**. Repairs can also be reported by email at [repairs@southwark.gov.uk](mailto:repairs@southwark.gov.uk) in the usual way and you will be advised by the call handler of the day and time of the appointments for access so that you can arrange the most convenient appointment for you.

In relation to any repairs, which you believe to be more complex or long standing, please email with your name,

address and contact details to [disrepairmailbox@southwark.gov.uk](mailto:disrepairmailbox@southwark.gov.uk).

## Reminder on oxygen cylinders

It is not safe to use oxygen cylinders in the blocks. This means visitors to the blocks can't come in if they need an oxygen cylinder.

From the home visits we have carried out we know that, at present, no current resident needs to use an oxygen cylinder.

However no one knows what their health will be in the future. If an issue arises with your health that means that you will need to use an oxygen cylinder, please speak to your doctor and then let your Resident Service Officer (whose contact details are in this newsletter) know immediately so we can work with you to ensure your health needs are catered for.

Non-resident leaseholders are being asked to make sure their tenants in the block are also aware of this issue.

## Local police sessions

The local Old Kent Road Ward Police team has requested that any crime be reported, if it is an emergency, to **999** and for non-emergencies to **101**. The

team can also be contacted by telephone on **020 8721 2436**, emailing **oldkentroad.snt@met.police.uk** or they can be tweeted at **@MPSOldkentRoad**

## Resident Services Officer for the Ledbury temporary accommodation properties

You can contact the Temporary Accommodation team at: **tahousingteam@southwark.gov.uk**

All repairs should be reported by calling **0800 952 4444**. Repairs can also be reported by email at **repairs@southwark.gov.uk**

## Resident Services Officer for the Ledbury low-rise properties

Nmah Kamara is the Resident Services Officer for the Ledbury Estate (not including the towers). You can contact Nmah on **07547 664161** or email **nmah.kamara@southwark.gov.uk**

All repairs should be reported by calling **0800 952 4444**. Repairs can also be reported by email at **repairs@southwark.gov.uk**.

## Resident Service Officer for Sylvan Grove

Obie Ebanks is the Resident Services Officer for Sylvan Grove. You can

contact Obie on **07711 910754** or at **obie.ebanks@southwark.gov.uk**

All repairs for Sylvan Grove should be reported by calling **0800 952 4444**.

Repairs can also be reported by email at **repairs@southwark.gov.uk**.

## Resident Services Officer for Churchyard Row

Debbie Ming is the Resident Services Officer for Churchyard Row. You can contact Debbie on **07932 333199** or at **debbie.ming@southwark.gov.uk**.

As a reminder all repairs for Churchyard Row should be reported by calling 0800 952 4444. Repairs can also be reported by email at **repairs@southwark.gov.uk**

## Flu and COVID-19 cases are rising rapidly: book your vaccine today

More people are going into hospital because they are ill with flu or COVID-19. Being vaccinated is the best way to protect yourself and others from flu and COVID-19. Book your COVID-19 and flu jabs today at **www.nhs.uk/conditions/vaccinations/flu-influenza-vaccine/**

## Help to prevent spread of winter bugs and protect yourself

The best way to protect yourself and your loved ones is to:

- Get vaccinated against flu and COVID-19
- Let fresh air in if meeting indoors
- If you feel unwell, try to stay at home and avoid contact with other people where possible
- Wear a face covering, in crowded and enclosed spaces
- Wash your hands or use sanitiser

## Strep A and scarlet fever: what to look out for

More children have developed scarlet fever recently. This is above what we would expect for winter. Scarlet fever is caused by the bacteria Group A streptococcus (Strep A), which on very rare occasions can cause more serious disease if it gets into the bloodstream or lungs.

Find out about the symptoms of scarlet fever and what to do if your child has scarlet fever at

**[www.nhs.uk/conditions/scarlet-fever/](http://www.nhs.uk/conditions/scarlet-fever/)**

## The Independent Tenant and Homeowner Advisor

John Gargan and Alison Gaskin from Open Communities are the Independent Tenant and Homeowner Advisors. If you have any questions you can contact them on **0800 073 1051** and John at **[john@johngargan.com](mailto:john@johngargan.com)** and Alison at **[alisongaskin@yahoo.co.uk](mailto:alisongaskin@yahoo.co.uk)**.



**John Gargan**

**[john@johngargan.com](mailto:john@johngargan.com)**



**Alison Gaskin**

**[alisongaskin@yahoo.co.uk](mailto:alisongaskin@yahoo.co.uk)**

## The Ledbury Team

You can contact the Ledbury team at the Ledbury TRA Hall by calling **020 7732 2757** or **020 7732 2886**. Please e-mail the team at **[Ledburyhousingteam@southwark.gov.uk](mailto:Ledburyhousingteam@southwark.gov.uk)**.



**Mike Tyrrell – Director  
of Ledbury Estate**

**Tel: 020 7732 2757**  
**[mike.tyrrell@southwark.gov.uk](mailto:mike.tyrrell@southwark.gov.uk)**



**Olive Green –  
Resident Services  
Manager**

**Tel: 020 7732 2757**  
**[olive.green@southwark.gov.uk](mailto:olive.green@southwark.gov.uk)**



**Hema Vashi –  
Resident Services  
Officer for Bromyard  
House**

**Tel: 07852 766058**  
**[hema.vashi@southwark.gov.uk](mailto:hema.vashi@southwark.gov.uk)**



**Modupe Somoye –  
Resident Services  
Officer for  
Peterchurch House**

**Tel: 07903 281390**  
**[modupe.somoye@southwark.gov.uk](mailto:modupe.somoye@southwark.gov.uk)**



**Sharon Burrell –  
Resident Services  
Officer for Sarnsfield  
House**

**Tel: 07432 738774**  
**[sharon.burrell@southwark.gov.uk](mailto:sharon.burrell@southwark.gov.uk)**



**Sabdat (Sabi) Ibn-  
Ibrahim – Resident  
Services Officer for  
Skenfrith House**

**Tel: 07984 144224**  
**[sabdat.ibn-ibrahim@southwark.gov.uk](mailto:sabdat.ibn-ibrahim@southwark.gov.uk)**



# Top tips to improve your mental wellbeing

There are little things we can all do to take care of our mental wellbeing.



Just like our physical health, it is important to look after our mental health. This can help us to learn new ways to cope with life's challenges and lead happier, healthier lives.

Simple changes can make a big difference – here are six areas that can help you look after your mental wellbeing:



## 1. Being aware of unhelpful thoughts

Learn to ask yourself whether your thoughts are helpful or not? Is there a different way to see the situation? What would you say to a friend?

## 2. Focus on now

Spend time focusing on the present instead of getting stuck on the past or worrying too much about the future. You could try relaxation techniques and mindfulness.

## 3. Getting enough rest

Make sure you have enough down time before bed and a good sleep routine with a regular bedtime and wake up time.

## 4. Connecting with others

Make time for socialising with friends and family or online communities where you are able to talk about the way you feel.

## 5. Living a healthy lifestyle

Eating well and getting enough exercise for your physical health can help to boost your mental wellbeing too.

## 6. Do something for yourself

Have some 'me time' by spending regular time on the things that make you happy, whether that's a hobby, trying something new or relaxing.



**Better Health** every mind matters

If you or someone you trust has a smart phone or computer and can access the internet, do visit [www.nhs.uk/every-mind-matters/](http://www.nhs.uk/every-mind-matters/) for more tips and information on caring for your mental health, and find what works for you. You can also get access to the internet at most local libraries.



## **Appendix F:** Press notice

Local Development Order – District Heating Network

**March 2023**

TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND)  
ORDER 2015, SECTION 38

NOTICE OF CONSULTATION FOR:

**LOCAL DEVELOPMENT ORDER DISTRICT HEATING NETWORK (2022)**

Southwark Council is consulting on the draft Local Development Order District Heating Network 2022 from **December 15 2022 to February 9 2023.**

The Local Development Order (LDO) will grant permitted development rights for the construction of an underground network of insulated pipes to carry steam for heating and hot water from the SELCHP facility to properties in Southwark. This will be an extension of the existing network which currently provides heating and hot water for 2,500 properties in the Bermondsey area. The adoption of the LDO which will facilitate the extension of the DHN is a key part of Southwark Council's strategy to tackle climate change. If built, the extension will connect 3000 additional properties to a low carbon, renewable energy source. The use of the LDO will enable the Council to manage the impacts of construction and ensure that there are no unacceptable outcomes through the use of planning conditions. These will ensure that heritage, archaeology, trees, and ecology are protected. It also means that impacts on neighbouring amenity from the construction will be minimised through the implementation of Construction Environmental Management Plan.

Where to view the documents

The documents can be viewed on the council website: [https://www.southwark.gov.uk/planning\\_and\\_building\\_control/planning\\_policy\\_and\\_transport\\_policy/development\\_plan/evidence\\_base/environment\\_and\\_sustainability?chapter=2](https://www.southwark.gov.uk/planning_and_building_control/planning_policy_and_transport_policy/development_plan/evidence_base/environment_and_sustainability?chapter=2)

Hard copies of the documents can be viewed at:

- Council offices, 160 Tooley Street, SE1 2HZ  
Monday to Friday, 9am to 5pm (excluding bank holidays)
- East Street Library, 168 170 Old Kent Road, SE1 5TY  
Monday, Tuesday and Friday 2pm to 7pm; Thursday 10am to 3pm; Saturday 10am to 5pm
- The Blue Anchor Library, Market Place, SE16 3UQ  
Monday, Tuesday, and Thursday 9am to 7pm; Friday 10am to 6pm; Saturday 9am to 5pm
- Peckham Temporary Library, 17 23 Bournemouth Road, SE15 4UJ  
Monday to Thursday 10am to 7pm; Saturday 10am to 5pm; Sunday 12pm to 4pm

**How to comment:**

Visiting our consultation hub and filling in our online questionnaire:

[https://consultations.southwark.gov.uk/corporate\\_strategy/local\\_development\\_order\\_district\\_heating\\_network](https://consultations.southwark.gov.uk/corporate_strategy/local_development_order_district_heating_network)

E mail to [info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)

Post your response to:  
LDO Consultation  
Old Kent Road Team  
Southwark Council  
FREEPOST SE1919/14  
London SE1P 5EX

All comments must be received by **23:59 on Thursday 9 February 2023.**

Register for a MySouthwark account and opt in to our email updates on your profile at <https://www.southwark.gov.uk/mysouthwark>



## **Appendix G:** Mail notification to leaseholders

Local Development Order – District Heating Network

**March 2023**

Southwark Council is consulting on a draft of the **Local Development Order – District Heating Network**

Consultation is open until **Thursday 9 February 23:59**.

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED), SECTION 61A**

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015, SECTION 38**

**What is the Local Development Order?**

The proposed Local Development Order (LDO) will grant permitted development rights for the construction of an underground network of insulated pipes to carry steam for heating and hot water from the SELCHP heat from waste facility (<https://www.selchp.com/>) to properties in Southwark. The district heating network is a low-carbon alternative to the gas-fired boilers which are currently used as the main heating source in Southwark's homes and businesses.

In 2013 Southwark Council connected 2,500 homes in Bermondsey to SELCHP via a district heating network. This has saved around 7,700 tonnes of CO2 per year. The proposed LDO will grant planning permission for an extension of the network to areas around Old Kent Road and Peckham. A decision to build the network will require a separate approval from Southwark Council to vary its existing Heat Network Contract with Veolia, the operators of SELCHP. If the extension is built, it will connect around 3000 existing homes and new development\* to a low-carbon, renewable energy source.

The use of the LDO will enable the Council to manage the impacts and ensure that there are no unacceptable outcome through the use of planning conditions. These will ensure that heritage, archaeology, trees, and ecology are protected. It also means that impacts on neighbouring amenity from the construction will be minimised through the implementation of Construction Environmental Management Plan.

*\*Statement of owner's rights*

*The grant of planning permission does not affect owners' rights to retail or dispose of their property, unless there is some provision to the contrary in an agreement or in a lease.*

The draft Local Development Order (December 2022) is available to view on our website:

<https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/evidence-base/environment-and-sustainability?chapter=2> .

Hard copies of the documents can be viewed at:

- Council offices, 160 Tooley Street, SE1 2HZ  
Monday to Friday, 9:00am to 5:00pm (excludes bank holidays)
- East Street Library, 168-170 Old Kent Road, SE1 5TY  
Monday, Tuesday and Friday, 2:00pm to 7:00pm; Thursday 10:00am to 3pm;  
Saturday 10:00am to 5:00pm

- The Blue Anchor Library, Market Place, SE16 3UQ  
Monday, Tuesday, and Thursday 9:00am to 7:00pm; Friday 10:00am to 6:00pm; Saturday 9:00am to 5:00pm
- Peckham Temporary Library, 17-23 Bournemouth Road, SE15 4UJ  
Monday to Thursday 10:00am to 7:00pm; Saturday 10:00am to 5:00pm;  
Sunday 12:00pm to 4:00pm

### **How can I comment?**

Visit our Consultation Hub to fill out an online questionnaire:

<https://consultations.southwark.gov.uk/corporate-strategy/local-development-order-district-heating-network/>

Email your comments to [info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)

You can also write to:

LDO Consultation, Old Kent Road Team, Southwark Council FREEPOST  
SE1919/14 London SE1P 5EXT.

The consultation will be open until **23:59 on Thursday 9 February 2023**.

Southwark Council



## **Appendix H:** Representations received by email

Local Development Order – District Heating Network

**March 2023**

9<sup>h</sup> February 2023  
Our ref. 21.5174

24 Southwark Bridge Road  
London  
SE1 9HF

T 0203 268 2018

LDO Consultation  
Old Kent Road Team  
Southwark Council  
FREEPOST SE1919/14  
London  
SE1P 5EXT

By email

Dear Sir/Madam,

## Re: Draft Local Development Order – District Heating Network

We write on behalf of our client Avanton OKR3 in support of the above referenced draft Local Development Order (LDO). The LDO proposes to grant permitted development rights to enable connections to the SELCHP facility, which would benefit a number of sites and existing housing estates in the Old Kent Road Opportunity Area.

Our client is promoting the development of the Old Kent Road Gas Works site for a large scale residential development comprising approximately 700 new homes, including commercial space and extensive public realm works. The proposals seek to accord with Policy P70 of the Southwark Plan and Policy SI 2 of the London Plan.

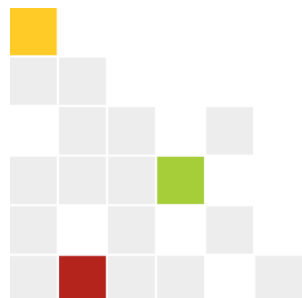
We understand it is the intention of the LDO to encourage the uptake and implementation of a district heat network (DHN) in accordance with Southwark Local Plan Policy P70 Energy. The aims of the LDO are as follows:

- To maximise emission 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

As set out in the Southwark Plan, decentralised energy networks provide opportunities to reduce carbon emissions and introduce a cleaner energy supply with the potential to reduce fuel poverty. Policy P70 of the Southwark Plan, requires a reduction in operational greenhouse gas emissions and energy demand in new developments.

The Greater London Authority (GLA) provide a 'Heating Hierarchy' within their 'Energy Strategy Guidance'. This is a list of methods to provide heat to a development that the GLA expect design teams to consider, prioritising the methods at the top of the hierarchy. A DHN connection is first in the hierarchy which confirms that the GLA expect this to be implemented where feasible, above any other method.

The carbon emissions associated with a single kWh of energy from the SELCHP DHN is 0.015kgCO<sub>2</sub>. This is 66% less carbon intensive when compared to what is







**From:** [Old Kent Road Southwark](#)  
**To:** [REDACTED]  
**Date:** 22 December 2022 14:28:53  
**Attachments:** [image001.png](#)  
[image002.jpg](#)  
[image003.jpg](#)

---

----- Forwarded message -----

**From:** **The Coal Authority-Planning** <[TheCoalAuthority-Planning@coal.gov.uk](mailto:TheCoalAuthority-Planning@coal.gov.uk)>  
**Date:** Wed, Dec 21, 2022 at 3:19 PM  
**Subject:** FW: [External] Tell us your thoughts on the proposed Local Development Order  
**To:** [info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk) <[info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)>

Further to your email below I can confirm that as Southwark Council lies outside the coalfield area, the Coal Authority have no specific comments to make on the Local Development Order – District Heating Network.

Kind regards

[REDACTED]



[REDACTED] *M Sc MRTPI*  
**Planning & Development Manager**

**T:** [REDACTED]

**M:** [REDACTED]

**E:** [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)

**W:** [gov.uk/government/organisations/the-coal-authority](http://gov.uk/government/organisations/the-coal-authority)

My pronouns are: she / her

How to pronounce my name (phonetic spelling): Deb Roh-berts

---

**From:** Southwark Council <[Southwark-Council@public.govdelivery.com](mailto:Southwark-Council@public.govdelivery.com)>  
**Sent:** 16 December 2022 12:56  
**To:** The Coal Authority-Planning <[TheCoalAuthority-Planning@coal.gov.uk](mailto:TheCoalAuthority-Planning@coal.gov.uk)>  
**Subject:** [External] Tell us your thoughts on the proposed Local Development Order

You don't often get email from [southwark-council@public.govdelivery.com](mailto:southwark-council@public.govdelivery.com). [Learn why this is important](#)

**WARNING:** This email originated outside of the Coal Authority. **DO NOT CLICK** any links or open any file attachments unless you recognise the sender and know the content is safe. Check the spelling of any email addresses carefully for anything unusual. If you are unsure please contact the ICT Service Desk for guidance.

Southwark Council is consulting on a draft of the **Local Development Order – District Heating Network**

Consultation is open until **Thursday 9 February 23:59**.

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED), SECTION 61A**  
**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)**  
**(ENGLAND) ORDER 2015, SECTION 38**

**What is the Local Development Order?**

The proposed Local Development Order (LDO) will grant permitted development rights for the construction of an underground network of insulated pipes to carry steam for heating and hot water from the SELCHP heat from waste facility (<https://www.selchp.com/>) to properties in Southwark. The district heating network is a low-carbon alternative to the gas-fired boilers which are currently used as the main heating source in Southwark's homes and businesses.

In 2013 Southwark Council connected 2,500 homes in Bermondsey to SELCHP via a district heating network. This has saved around 7,700 tonnes of CO2 per year. The proposed LDO will grant planning permission for an extension of the network to areas around Old Kent Road and Peckham. A decision to build the network will require a separate approval from Southwark Council to vary its existing Heat Network Contract with Veolia, the operators of SELCHP. If the extension is built, it will connect around 3000 existing homes and new development\* to a low-carbon, renewable energy source.

The use of the LDO will enable the Council to manage the impacts and ensure that there are no unacceptable outcome through the use of planning conditions. These will ensure that heritage, archaeology, trees, and ecology are protected. It also means that impacts on neighbouring amenity from the construction will be minimised through the implementation of Construction Environmental Management Plan.

*\*Statement of owner's rights*

*The grant of planning permission does not affect owners' rights to retail or dispose of their property, unless there is some provision to the contrary in an agreement or in a lease.*

The draft Local Development Order (December 2022) is available to view [here](#).

For more information and the supporting documents please visit [our website](#).

Hard copies of the document can be viewed at:

- Council offices, 160 Tooley Street, SE1 2HZ  
Monday to Friday, 9:00am to 5:00pm (excludes bank holidays)
- East Street Library, 168-170 Old Kent Road, SE1 5TY  
Monday, Tuesday and Friday, 2:00pm to 7:00pm; Thursday 10:00am to 3pm; Saturday 10:00am to 5:00pm
- The Blue Anchor Library, Market Place, SE16 3UQ  
Monday, Tuesday, and Thursday 9:00am to 7:00pm; Friday 10:00am to 6:00pm; Saturday 9:00am to 5:00pm
- Peckham Temporary Library, 17-23 Bournemouth Road, SE15 4UJ  
Monday to Thursday 10:00am to 7:00pm; Saturday 10:00am to 5:00pm; Sunday 12:00pm to 4:00pm

**How can I comment?**

- Visit our [Consultation Hub](#) to fill out an online questionnaire

- Email your comments to [info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)
- You can also write to: LDO Consultation, Old Kent Road Team, Southwark Council FREEPOST SE1919/14 London SE1P 5EX

The consultation will be open until **23:59 on Thursday 9 February 2023**.

Southwark Council

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You may also choose to [modify your subscriber preferences](#).

[www.southwark.gov.uk](http://www.southwark.gov.uk)

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This email was sent to [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk) using GovDelivery Communications Cloud on behalf of: Southwark Council PO BOX 64529 London SE1P 5LX



|  
Resolving the impacts of mining. Like us on [Facebook](#) or follow us on [Twitter](#) and [LinkedIn](#).



Our ref: PL00792016

LDO Consultation  
Old Kent Road Team  
FREEPOST SE1919/14  
London SE1P 5LX

By email: [info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)

13 February 2023

Dear Old Kent Road Team

### London Borough of Southwark: LDO Consultation

Thank you for consulting Historic England on draft local list of heritage assets within the borough, and apologies for the lateness of this response. As the Government's statutory adviser, Historic England is keen to ensure that conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the planning process.

We note the proposed LDO, and the archaeological requirements set out within it. We consider these appropriate, and therefore our only comment would be to emphasise the research opportunities that the project will offer – in particular the ability to better understand the Roman landscape in the area.

Please note that this opinion is based on the information provided by you and does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SA/SEA, have adverse effects on the environment.

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 Facsimile 020 7973 3001  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.





Historic England

[REDACTED]

Historic Environment Planning Adviser

E-mail: [REDACTED]

DD: [REDACTED]



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 Facsimile 020 7973 3001  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



**From:** [Old Kent Road Southwark](#)  
**To:** [REDACTED]  
**Subject:** Fwd: Local Development Order Comments  
**Date:** 22 December 2022 14:32:08

---

----- Forwarded message -----

**From:** [REDACTED] <[REDACTED]>  
**Date:** Fri, Dec 16, 2022 at 1:09 PM  
**Subject:** Local Development Order Comments  
**To:** <[info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)>

Yes please do this as fast as possible. It will help residents and the planet.



**From:** [Old Kent Road Southwark](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Date:** Fwd: Local Development Order – District Heating Network  
22 December 2022 14:31:49

---

----- Forwarded message -----

**From:** [REDACTED]  
**Date:** Fri, Dec 16, 2022 at 1:28 PM  
**Subject:** Local Development Order – District Heating Network  
**To:** <[info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)>

Hello,

Can you tell me what this proposed development will mean for leaseholders in Southwark?

[REDACTED]

I'm very concerned that this will trigger a major works bill if it goes ahead.

May I know whether leaseholders will be given the choice to opt out of the development or will it be mandatory?

Now is not the time to burden us with another bill, not on top of the energy crisis & the looming increase in Mortgages (in my case £400 per month)

It would be completely tone deaf & unacceptable for Southwark to do this at this time if it means a major works bill.

I would like my questions answered & added as a comment to the proposal's consultation document.

Many thanks

[REDACTED]

[Sent from Yahoo Mail for iPhone](#)





Date: 16 January 2023  
Our ref: 415931  
Your ref: Local Development Order – District Heating Network



LDO Consultation  
Old Kent Road Team  
Southwark Council  
FREEPOST SE1919/14  
London SE1P 5EX

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY** - [info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)

Dear Sir or Madam

### **Planning Consultation: Local Development Order – District Heating Network**


Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 16<sup>th</sup> December 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have **no comments** to make on this consultation.

For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

Yours faithfully

  
Operations Delivery  
Consultations Team  
Natural England

**From:** [Old Kent Road Southwark](#)  
**To:** [REDACTED]  
**Date:** Fwd: Local Development Order – District Heating Network  
 22 December 2022 15:37:27  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)

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----- Forwarded message -----

**From:** **Planning South** <[Planning.South@sportengland.org](mailto:Planning.South@sportengland.org)>  
**Date:** Thu, Dec 22, 2022 at 2:50 PM  
**Subject:** Local Development Order – District Heating Network  
**To:** [info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk) <[info@oldkentroad.org.uk](mailto:info@oldkentroad.org.uk)>

Thank you for consulting Sport England on the above application.

The proposed development does not fall within either our statutory remit (Statutory Instrument 2015/595), or non-statutory remit (National Planning Policy Guidance (PPG) Par. 003 Ref. ID: 37-003-20140306), therefore Sport England has not provided a detailed response in this case, but would wish to give the following advice to aid the assessment of this application.

General guidance and advice can however be found on our website:

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\\_applications](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications)

If the proposal involves the **loss of any sports facility** then full consideration should be given to whether the proposal meets Par. 99 of National Planning Policy Framework (NPPF), link below, is in accordance with local policies to protect social infrastructure and any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.

If the proposal involves the provision of a **new sports facility**, then consideration should be given to the recommendations and priorities set out in any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority may have in place. In addition, to ensure they are fit for purpose, such facilities should be designed in accordance with Sport England, or the relevant National Governing Body, design guidance notes:

<http://sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

If the proposal involves the provision of additional **housing** ( then it will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then new and/or improved sports facilities should be secured and delivered in accordance with any approved local policy for social infrastructure, and priorities set out in any Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.

In line with the Government’s NPPF (including Section 8) and PPG (Health and wellbeing section), consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing or assessing a proposal. Active Design provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England’s Active Design Guidance: <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

*Please note: this response relates to Sport England’s planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.*

Yours sincerely,

Planning Administration Team

[Planning.South@sportengland.org](mailto:Planning.South@sportengland.org)

Sport England 

This Girl Can 

Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/>. If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing [DPO@sportengland.org](mailto:DPO@sportengland.org)





Date: 8<sup>th</sup> February 2023

**Transport for London**  
City Planning

5 Endeavour Square  
Westfield Avenue  
Stratford  
London E20 1JN

Phone 020 7222 5600  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

To whom it may concern,

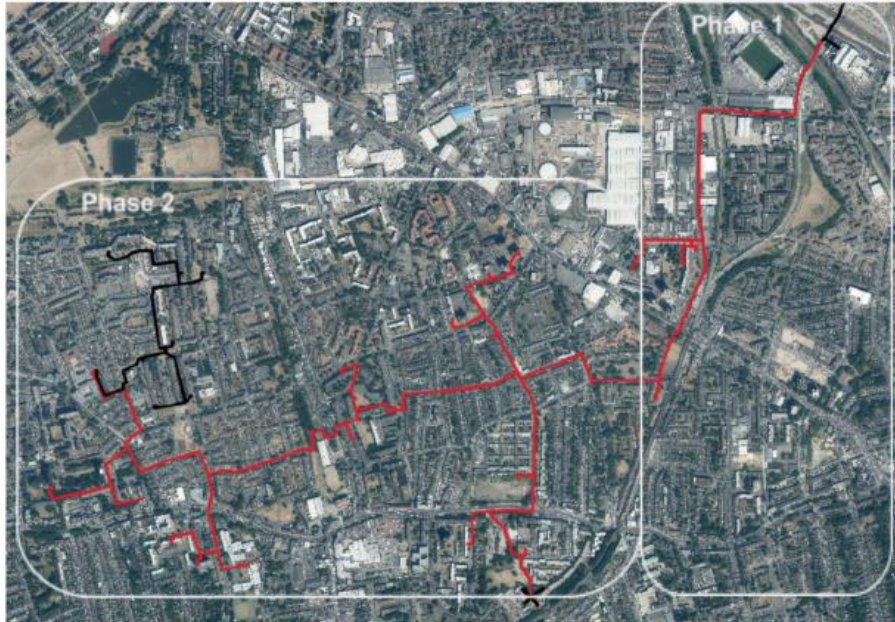
## **TfL's response to Local Development Order – Southwark District Heat Network**

Thank you for consulting TfL Spatial Planning on the proposed Local Development Order ('LDO') for the development of a District Heating Network (DHN). Please see the below comments made on behalf of TfL Spatial Planning. Our role is to look at growth and development in the statutory context of the London Plan on behalf of the Mayor of London. Please note that these comments are additional also to any response you may have received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest.

It is understood that this Development Order seeks to grant permission for the installation of district heating network, including pipes, cables and wires, heat exchange equipment, street furniture, informational signage and ancillary engineering works, subject to conditions. The LDO also identified a range of development which is not permitted by this order.

The land in which the Local Development Order applies has been identified within Appendix 1, with the phasing plan detailed in Appendix D (copied below for ease of reference). Some of the land, particularly the A2 Old Kent Road, Queens Road and Peckham Road, forms part of the Transport for London Road Network (TLRN) for which TfL is the highway authority. TfL is the highway authority for the TLRN and are therefore concerned about any proposals which could impact on the safety and/or function of the aforementioned roads. It is useful to note that the A2 Old Kent Road is a strategic corridor for freight movement. Any works carried out to the TLRN will need to be agreed with TfL and delivered through the appropriate mechanism. Other licences and agreements may be required from TfL for the delivery of this infrastructure on and under the TLRN.

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



It is also useful to note that part of this area falls within the Bakerloo Line Extension (BLE) Secretary of State Safeguarding Area, as such it should be ensured that you have consulted the BLE team on this LDO consultation.

The provided phasing plan is difficult to read, as such it is not clear whether this route will pass in proximity to public transport infrastructure. It should therefore be ensured that during the detail of each phase, the applicant consults the relevant public transport infrastructure owners to ensure that there is no adverse impact to their safe and efficient operations, which would be contrary to Policy T3.

For the A2 Old Kent Road, there is a 'Healthy Streets' scheme currently under design development for the Old Kent Road. The scheme will provide improved pedestrian, cycle and public transport facilities along the corridor to support the initial 9,500 homes capacity prior to the Bakerloo Line Extension (BLE), and sustainable travel for the future. Part of the proposed network also runs along roads/footpaths which form part of the proposed Cycle Future Route 12 (CFR12), which will provide a connection between Rotherhithe and Peckham. The design of this scheme is being led by Southwark, but funded by TfL. As such, it should be ensured that the Southwark design team for CFR12 has been made aware and provided with the opportunity to comment on this consultation. In order to avoid abortive work, and where timeframe allows, co-ordination between the two mentioned schemes should take place. A reference to the exploration of the co-ordination should be included within the CEMP condition.

### Conditions

It is noted that the LDO includes a number of conditions. TfL have the following comments/recommended changes on these conditions:

### Trees

TfL has a number of green assets located along the Old Kent Road, Queens Road/Peckham Road. As such, TfL will need to be consulted on any proposals which impact on our assets. The following amendments to the two conditions relating to trees is therefore advised:

### **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, or TfL (where appropriate) 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 or TfL (where appropriate). 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 or TfL (where appropriate);

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 or TfL (where appropriate), 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 or TfL (where appropriate).

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 or TfL (where appropriate) 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 or TfL (where appropriate) 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 or TfL (as appropriate), 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 or TfL (as appropriate), 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.

### **Construction Management Details**

It is understood that the LDO requires a Construction Environmental Management Plan (CEMP) to be submitted for each phase, with the draft Local Development Order containing the proposed condition wording. As highlighted above, part of the land identified within the LDO forms part of the Transport for London Road Network. There are also roads in which TfL bus routes operate along. Any impact to bus operations will need to be mitigated, in line with Policy T3, with the applicant expected to pay all costs associated with the implementation of the necessary mitigation.

Furthermore, as highlighted above there are a number of TfL projects which overlap with the area that is to be covered by the LDO. As such, to minimise the cumulative impact as part of the CEMP should provide an overview of the engagement undertaken with adjoining development sites and/or projects, how they are seeking to co-ordinate and detail the measures that are to be implemented to reduce the cumulative impact of the schemes.

TfL Spatial Planning have the following comments to make on the proposed condition wording:

### **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, **in consultation with TfL (where appropriate)** 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. detail of the measures that will be implemented to ensure that disruption to the adjoining transport, including (where applicable) bus services, freight and active travel, will be minimised during construction through the provision of traffic management plans.
- e. detail of traffic routing of in-bound and outbound construction traffic, holding, loading and unloading arrangements and location of lay off away from the site area;
- f. overview of the engagement had with developments, schemes and/or projects in proximity, and details of measures explored, and committed to, reduce the cumulative impact
- eg. details of the methods to be employed to minimise noise and vibration from the development; and
- eh. details of the means of protecting water and waste water infrastructure and street apparatus; 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.

#### Bakerloo Line Extension (BLE)

As highlighted above, part of the proposed network will run through the Bakerloo Line Extension (BLE) Secretary of State Safeguarding Area. With this in mind, the below condition should be applied which requires the developer to submit details to the BLE team, where the proposal runs through the safeguarded area.

Prior to the commencement of any works within the BLE safeguarded area relating to any part of the development included in the Local Development Order (excluding):

- a. site clearance
- b. site investigations, testing or surveys
- c. the provision of infrastructure boreholes permitted by the Town and Country Planning General Permitted Development Order 1995 or any amendment or replacement thereof
- d. excavation above -1.0m AOD, deposition, compaction, levelling of materials to new contours and works connected with infilling
- e. construction of temporary accesses and/or highway works to facilitate the carrying out of the Development including internal haul roads
- f. archaeological investigations and digs
- g. ecological surveys, investigations or assessments (including, for the avoidance of doubt, investigations or assessments relating to bats)
- h. decontamination and remediation works

- i. site preparation
- j. the construction of boundary fencing or hoardings (including the erection of an enclosure for the purpose of site security), erection of temporary facilities for security personnel and the erection of security cameras
- k. erection of boards advertising the development and other site notices
- l. the construction of a temporary site compound and welfare facilities/buildings/enclosures, or temporary buildings moveable structures works plant or machinery and storage areas, or a temporary marketing suite that does not form a structure or part of a structure that will become part of the development after its use as temporary offices
- m. establishing temporary accommodation/facilities ahead of construction asbestos removal
- n. access works or works subject to separate agreements under s184 or s278
- o. works and operations to enable any of the foregoing to take place

A detailed design and construction method statement(s) for any and all of:

(i) the ground floor structures,

(ii) foundations,

and

(iii) any other works and structures below ground level, including piling and any other permanent installations relevant to the development, in each case in so far as these extend below -1.0m AOD, shall be submitted to and approved by the Local Planning Authority in consultation with Transport for London which:

1. Accommodate the proposed location of the Bakerloo Line Extension tunnels and other Bakerloo Line Extension structures in the vicinity of the site; and
2. (ii) Accommodate ground movement arising from the construction of the proposed Bakerloo Line Extension; and
3. (iii) Mitigate the effects of noise and vibration arising from the operation of the Bakerloo Line Extension within its tunnels and its other structures.

1.1 For the avoidance of doubt:

(a) the detailed design and construction method statement shall accommodate the "proposed location of the Bakerloo Line Extension tunnels and other

Bakerloo Line Extension structures in the vicinity of the site" as these are designed and as this design information is in the public domain at the point of applying to discharge this condition. It shall not be necessary for the developer to wait until TfL has progressed the design to a more detailed level until this obligation can be discharged;

(b) the detailed design and construction method statement shall accommodate "ground movement arising from the construction of the proposed Bakerloo Line Extension" by reference to the construction methodology for the Bakerloo Line Extension as such information is in the public domain at the point of applying to discharge this condition. It shall not be necessary for the developer to wait until TfL has progressed the construction methodology to a more detailed level until this condition can be discharged;

(c) the detailed design and construction method statement shall "mitigate the effects of noise and vibration arising from the operation of the Bakerloo Line Extension within its tunnels and its other structures" by reference to the operational noise and vibration effects of the Bakerloo Line Extension as such information is in the public domain at the point of applying to discharge this condition. It shall not be necessary for the developer to wait until TfL has undertaken noise and vibration assessment to a more detailed level until this condition can be discharged;

(d) it shall not be necessary for the Local Planning Authority to wait for a substantive response from TfL before discharging this condition if the period of 21 days has elapsed since the Local Planning Authority first consulted TfL in connection with the discharge of this condition and no response has been received in that period.

1.2 The development shall be carried out in all respects in accordance with the approved design and method statements. All relevant structures and works comprised within the development hereby permitted and required by this condition shall be completed prior to the occupation of the development (unless otherwise agreed by the Local Planning Authority).

1.3 No alteration to these aspects of the development shall take place without the approval of the Local Planning Authority in consultation with Transport for London. Where any alteration of these aspects of the development is sought by the developer then paragraph 1.1 shall apply.

1.4 In paragraph 1.1(d) a "substantive response" shall mean a response by TfL that it either approves or rejects (in the case of a rejection reasons must be given) the detailed design and construction method statement; or a request by TfL for further information; for the avoidance of doubt a holding response shall not be considered a "substantive response" for the purposes of this condition

Please can it be confirmed that the above condition wording is accepted by the Council, and will be added to the LDO.

Details submitted can be checked against the BLE Information Pack for Developments ensuring that the projects do not conflict, which would be contrary to Policy T3.

Please do not hesitate to contact me if you wish to discuss any of the above matters further.

Yours sincerely,

██████████

TfL Spatial Planning



## LOCAL DEVELOPMENT ORDER – DISTRICT HEATING NETWORK

**JUNE 2023**

### APPENDICES

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

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





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