

## Cabinet

Tuesday 3 December 2024

11.00 am

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

## Appendices

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Item No.	Title	Page No.
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18.	<b>Report from the Environment Scrutiny Commission: Biodiversity Scrutiny Review</b> Appendix A and Appendix 1.	105 - 191

### Contact

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

Date: 25 November 2024

## APPENDIX 1

## Changes to Online Validations Checklist

Table 1: Validation Checklist

<b>Document</b>	<b>Current Wording</b>	<b>Proposed Wording (new/amended text indicated in blue)</b>
<b>Early Engagement Strategy</b> <b>(Pre-Application Page)</b> <b>Majors Only</b> <a href="#">Planning advice services - Southwark Council</a>	<p>For major and outline applications, you will also need to submit:  a Design and Access Statement  An Early Engagement Strategy.</p> <p>This document will ensure that developers engage with residents and local stakeholders from the start of the development process. The Strategy forms part of our Development Consultation Charter (DCC). Further information and an Early Engagement Strategy template are available on our Statement of Community Involvement webpage.</p>	<p>Early Engagement Strategy</p> <p>Major and outline applications <b>(including major council-owned schemes):</b>  <b>Following validation of the pre-application: Once a scheme is established as broadly policy compliant, the requirement for an EES will be discussed with the case officer as part of the pre-application process.</b></p> <p><b>The EES should be submitted as a completed document when the planning application is submitted.</b></p> <p><b>Applicants should consider publishing a draft of the EES and draft plans before the application is submitted.</b></p> <p>This document will ensure that developers engage with residents and local stakeholders from the start of the development process. The Strategy forms part of our Development Consultation Charter (DCC). Further information and an Early Engagement Strategy template are available on our Statement of Community Involvement webpage.</p>
<b>Development Consultation Charter – Early Engagement Strategy</b> <b>(Full Planning Applications – Validation Checklist)</b>	<p>You must submit an Early Engagement Strategy for all pre-applications for major applications with 10 or more proposed residential units.</p>	<p>You must submit an Early Engagement Strategy for all pre-applications for major applications with 10 or more proposed residential unit You must submit an Early Engagement Strategy for all pre-applications for major applications with 10 or more proposed residential units and <b>1000 sqm or more of non-residential floorspace.</b></p>

		<b>This document must also be submitted for all major Council-owned schemes.</b>
<b>Development Consultation Charter – Engagement Summary</b>  <b>(Full Planning Applications)</b>	<p>You must submit an Engagement Summary for all major applications with 10 or more proposed residential units and for all council schemes.</p>	<p>You must submit an Engagement Summary for all major applications with 10 or more proposed residential units <b>and 1000 sqm or more of non-residential floorspace.</b></p> <p><b>This document must also be submitted for Council-owned schemes with 1 or more proposed residential unit or any change in commercial floorspace.</b></p>
<b>Development Consultation Charter – Engagement Summary</b>  <b>(Full Planning Applications)</b>	<p>You must submit an Equalities Impact Assessment for all major applications with 10 or more proposed residential units.</p> <p>You must submit an Equalities Impact Assessment for all applications that involve the loss of community facilities in predominant use by protected characteristic communities as defined by the Equality Act 2010.</p>	<p>You must submit an Equalities Impact Assessment for all major applications with 10 or more proposed residential units <b>and 1000sqm or more of non-residential floorspace.</b></p> <p><b>This document must be submitted for Council-owned schemes with 1 or more proposed residential unit or any change in commercial floorspace.</b></p>
<b>EINA (validation checklist)</b>  <b>Required for some full planning applications based on the development type or location</b>	<p>You must submit a completed Equalities <b>Impact and Needs</b> Assessment form for all major applications.</p> <p>You also must submit this form for all applications that involve the loss of community facilities in predominant use by protected characteristic communities as defined by the Equality Act 2010.</p>	<p>You must submit a completed Equalities <b>Impact and Needs</b> Assessment form for all major applications <b>with 10 or more proposed residential units and 1000sqm or more of non-residential floorspace.</b></p> <p><b>This document must be submitted for Council-owned schemes with 1 or more proposed residential unit or any change in commercial floorspace.</b></p> <p>You also must submit this form for all applications that involve the loss of community facilities in predominant use by protected characteristic communities as defined by the Equality Act 2010.</p>





# STATEMENT OF COMMUNITY INVOLVEMENT

OCTOBER 2024

# HOW TO FIND OUT ABOUT PLANNING

## How To Find Out About Planning Applications

1. Create an account on the [Planning Register](#)
2. Select 'advanced search'
3. Under 'application' details, select the types of application or areas that you are interested in. For example: Select Ward - "Peckham Rye"; Select Type of Application - "[Prior Approval](#)".
4. Select 'search' (this will present you with all applications that fit your search criteria, present and historic)
5. Select 'save search'
6. Under 'saved search options', check the box next to 'notify me via email about new search results' and then 'save'

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

## Southwark Maps

All current and historic planning applications can be found on Southwark Maps.

1. Follow this [link](#) to Southwark Maps
2. Select 'Planning applications and appeals' layer
3. Search for the address you are interested in

## How to Find Out about Plan-Making

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

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

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

# FOREWORD

Southwark is a place of fast-paced change. In just one generation, a neighbourhood can undergo a complete transformation. This change can bring vibrancy and excitement but only when residents are part of the process.

The Statement for Community Involvement (SCI) and Development Consultation Charter (DCC) set out clear standards for consultation and engagement. Written in plain English and publicly available, residents can use these documents to find out exactly what they can expect from the Council and the developers.

- Who should be consulted?
- When should they be consulted?
- How should they be consulted?

When development is on the horizon, these are the questions that residents and community groups so often ask, and so justifiably. The Statement for Community Involvement and Development Consultation Charter provide the answers.

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## HOW TO USE THIS DOCUMENT

1. Use the Contents Page to navigate the document.
2. Click words underlined in [Blue](#) to see further information on our website.
3. You can use the 'Return to Table of Contents' button at the bottom of every page to return to this page.

# WHAT IS THE STATEMENT OF COMMUNITY INVOLVEMENT?

## What is the Statement of Community Involvement?

The Statement of Community Involvement (SCI) sets out how the Council will involve everyone in planning. If you want to be involved in the change to places in Southwark then you need to know about our planning documents and planning applications. If you engage with us then you can influence place-making and make a difference.

There are many different types of planning documents and planning applications. The Statement of Community Involvement is a simple guide to how you can find out about each one. This includes when you can contribute by being involved or providing your comments.

The best way to keep up to date is to sign up to be consulted on new [planning documents](#) and [planning applications](#).

Southwark is a young, growing and diverse inner London borough where the community speaks over 120 languages and the diversity of backgrounds includes over a quarter of people who are Black and a third who are Asian or other minority ethnicities. This means that we need to think about all of the different ways to let everyone know about the changes to Southwark that might happen when the Council is preparing planning documents and making decisions on planning applications. We set out how we do this on the next page where we talk about Southwark's approach to community engagement on planning.

Southwark's diversity gives us the opportunity to promote equalities (meeting demands on us by the Equality Act and Public Sector Equality Duty<sup>1</sup>). This will make sure that our conversations come from a wide range of perspectives and different needs to make sure that our planning actions are built on trust. We will use all of this feedback along with our research and data to consider how people will be impacted by any proposal. You can see all comments and other information that will be considered by Councillors when they are making decisions on planning documents and applications in the Equality Impact Assessment. This is part of the pack of information provided five days before the meeting making the decision.

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<sup>1</sup> The Public Sector Equality Duty (PSED) was created under the Equality Act 2010. The purpose is to integrate the consideration of equality into the decision-making of public authorities. It requires public authorities to consider:

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

# SOUTHWARK'S APPROACH TO COMMUNITY ENGAGEMENT IN PLANNING

## **Built on Trust**

We consult on plan-making and planning applications in a clear and consistent way that is easily understood by our residents.

## **Reflective**

We review the Statement of Community Involvement regularly to ensure that it responds to the needs of our communities.

## **Responsive**

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

## **Clear and Informative**

We provide consultation materials that are clear and to the point. We ensure access to consultations are clear and straightforward.

## **Evidence Based**

We only put forward policy or development proposals founded on transparent justification that will be made available on the Council's website.

## **Proportionate**

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

## **Timely**

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

## **Inclusive**

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

## **Simple and Accessible**

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

## **Collaborative**

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

# INFORMATION ABOUT PLANNING APPLICATIONS

There are many different types of planning application. Generally, we will put up a Site Notice and send a Neighbour Notification Letter, but for some smaller applications we may do one or the other.

Look on the [Planning Register](#) to find out information about planning applications.

Application Type	Site Notice	Neighbour Notification Letter	Press Notice
Applications subject to an Environmental Impact Assessment that are accompanied by an Environmental Statement	✓	✓	✓
Major Applications	✓	✓	✓
Reserved Matters (for outline permission)	✓	✓	-
Minor development	✓*		-
Minor Material Amendments	✓*		-
Householder	✓*		-
Advertisement Control	✓*		-
Prior Approval	✓*		-
Listed Building Consent	✓* (if external works)		✓
Applications for development which would affect the setting of a listed building or affect the character or appearance of a conservation area	✓*		✓

(\*Either a Site Notice or a Neighbour Notification Letter will be sent. We may use both methods of notification.)

# INFORMATION ABOUT PLANNING APPLICATIONS

Application Type	Site Notice	Neighbour Notification Letter	Press Notice
Applications that depart or do not accord with the development plan (including an application for public service infrastructure development made on or after 1st August 2021)	✓*		✓
Applications which would affect a right of way to which Part 3 of the Wildlife and Countryside Act 1981 applies (including an application for public service infrastructure development made on or after 1st August 2021)	✓*		✓
Non-Material Amendments	No statutory requirement for public consultation.		
Lawful Development Certificate	No statutory requirement for public consultation.		
Approval/Discharge of Conditions	No statutory requirement for public consultation.		

(\*Either a Site Notice or a Neighbour Notification Letter will be sent. We may use both methods of notification.)

## Who Qualifies as a 'Neighbour' for the Purposes of a Notification Letter?

- For all application types, neighbours are people who live immediately next to the application site.
- For major applications, this will also include people who live or work within approximately 100m of the application site, or further where we think it is appropriate depending on the size of development.



# HOW TO COMMENT ON PLANNING APPLICATIONS

## 1. Before the application is submitted

### We will:

Require applicants to consult with the community. For major applications, this must be in line with the requirements of the Development Consultation Charter.

### We may encourage applicants to:

Liaise with Tenants Resident Associations, Neighbourhood Forums, and local community groups.

## 2. Once the application is submitted

### We will:

Make planning applications and supporting documents available online on the planning register.

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

Ensure developers carry out the requirements set out in the Developer Consultation Charter.

### Where appropriate, we will:

Display a planning notice near the application site.

Post letters to neighbours adjoining the application site.

Publish a press notice.

Consult with other relevant organisations.

## 3. During the determination process

### We will:

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

Take into consideration any consultation responses as part of the officer or committee report.

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

We will not directly respond to individual representations received on each case. You will be notified of progress on an application if you sign up to track an application on the planning register.

### Where appropriate, we will:

Reconsult on an amended planning application for 14 days if there is a 'material' change to the original application.

## 4. When we make a decision

### We will:

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

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

Email the applicant with the decision notice.

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

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

# HOW TO SIGN UP FOR NOTIFICATIONS ON PLANNING APPLICATIONS

## Planning Register

If you want to receive alerts about planning applications:

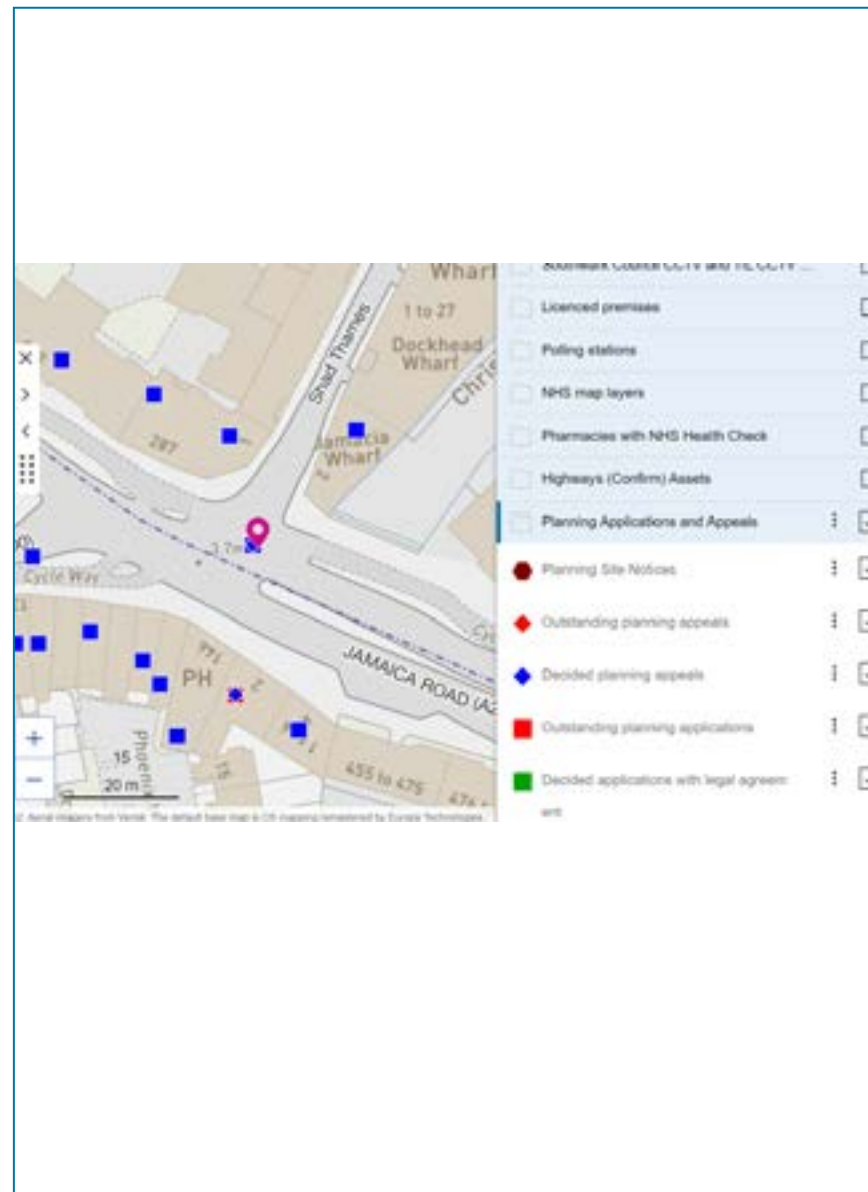
1. Create an account on the [Planning Register](#)
2. Select 'advanced search'
3. Under 'application details' select criteria that are important to you. For example, this could be a ward such as 'Peckham Rye' or the area as well as a certain type of application such as 'prior approval'.
4. Select 'search'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

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

## Southwark Maps

All current and historic planning applications can be found on Southwark Maps:

1. Follow this [link](#) to Southwark Maps
2. Select 'Planning applications and appeals' layer
3. Search for the address you are interested in



# HOW TO SUBMIT YOUR COMMENTS

## 1. On our Planning Register

The best way to submit your comments on a planning application is using the Council's [planning register](#) during the consultation period.

How to submit comments using the planning register:

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

## 2. Letters and Emails

Alternatively, you can send us your comments by email or letter.

Please email comments to the case officer or to:

[planning.applications@southwark.gov.uk](mailto:planning.applications@southwark.gov.uk)

Post letters to:

Planning Division  
Southwark Council,  
PO BOX 645529  
London SE1P 5LX

## 3. Libraries and MySouthwark Service Points

Applications can also be viewed on computers that are available at local libraries or [My Southwark Service Points](#) if you do not have internet access. Staff will be available to help you do this.

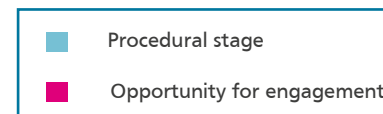
### How to submit your comments

Consultation responses can support, object or suggest amendments to the proposed development. When making a decision, the Council is only able to consider factors that are 'material planning considerations'. Here are some examples:

- Design and size of the development
- Land use
- Traffic generation and parking
- Nuisance and noise
- Whether the design fits in with the character of the area
- Amenity, daylight and privacy
- Compliance with planning policy and guidance
- Changes to the development to make sure the community has been taken into account
- Any other relevant material planning or environmental issues

Any written comment you make about an application must be placed on the planning register by law. This means that your comment will be published on our website. We will remove any personal information or inappropriate language. Anonymous and 'in confidence' comments will not usually be considered.

# CONSULTATION ON PLANNING APPLICATIONS

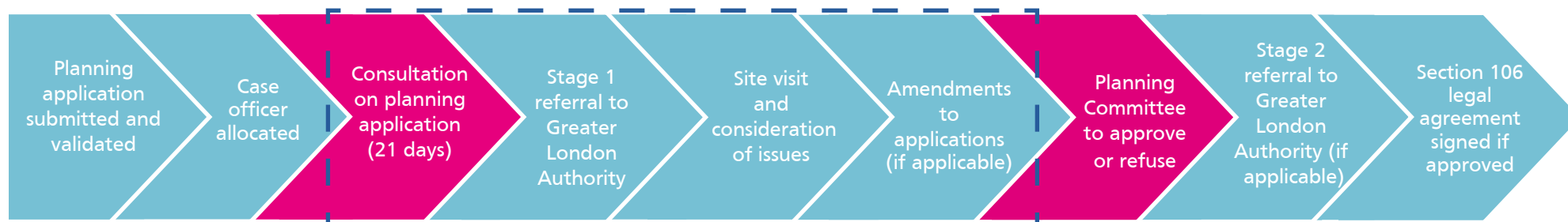


## Minor planning applications



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

## Major planning applications



There is reconsultation for 14 days if there is a 'material' change to the original application, or 30 days where an Environmental Impact Assessment is part of the application.

# PLANNING APPEALS

If a planning application is refused by the Council, the applicant can change the scheme and submit a new planning application or submit an appeal. Decisions on appeals are made by the Planning Inspectorate (PINS) who can either overturn the Council's decision or accept the Council's decision and dismiss the appeal. The Planning Inspectorate is an independent government body. Appeals can only be made by applicants.



## Getting involved

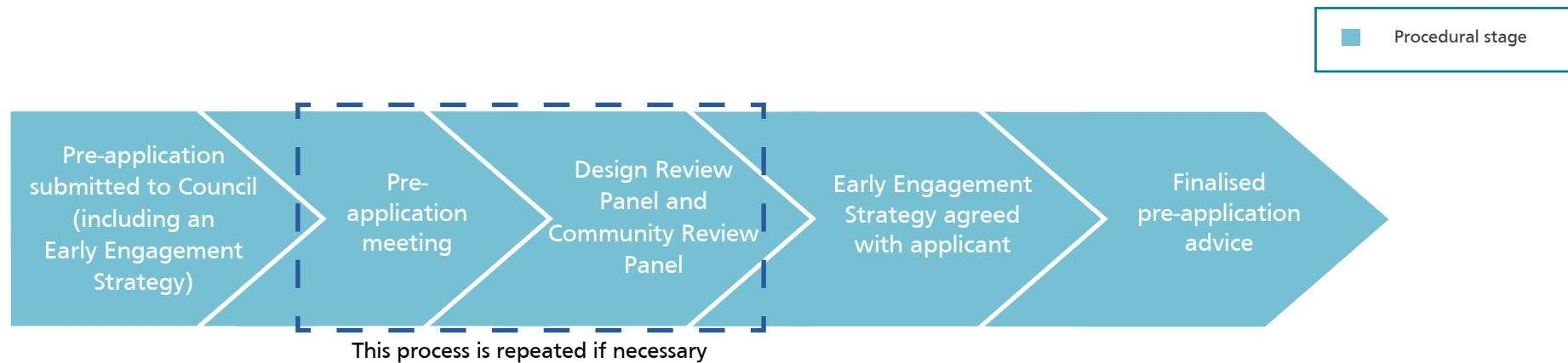
### Written Representations

Most planning appeals are decided by written representations. The Planning Inspector considers written evidence from the applicant, the Council and any member of the public who has an interest in the appeal.

If you were consulted or made comments on the planning application then you will be emailed by the Council within five days for further comments and you will then need to respond within five weeks.

If you want further information please look on the Planning Inspectorate's [website](https://www.gov.uk).

# PRE-APPLICATIONS



## Pre-application advice for planning applications

The Council provides advice for developers before they apply for planning permission. This is informal and so the conversations are not published on the planning register and the public are not consulted by the Council until a relevant application is received. Information about how we expect the developer to consult at this stage can be found in the Development Consultation Charter. This includes an Early Engagement Strategy for major developments.

# HOW TO COMMENT ON PLAN-MAKING

We want to hear what you support and how you think plans could be different. We will consult for at least six weeks on all of the documents.

1. On Our Consultation Hub	2. By email	3. By letter
It is quickest and easiest to send us your comments via our <a href="#">Consultation Hub</a>	Please email comments to: <a href="mailto:planningpolicy@southwark.gov.uk">planningpolicy@southwark.gov.uk</a>	Post letters to: Planning and Growth, Southwark Council, PO BOX 645529 London SE1P 5LX

## How to find out about plan-making

We will publicise new consultations in the following ways:

- **Press notice**

We will place a notice in Southwark News, a local newspaper.

- **Emails to our mailing list**

Further information on how to sign up to the mailing list via MySouthwark is on [page 2](#). We have over 27,000 people on our mailing list. This includes neighbouring boroughs and statutory consultees.

- **Hard copy**

A hard copy of the plan will be available at 160 Tooley Street (the Council's offices). Alternative arrangements will be made during exceptional circumstances.

- **Social media**

We will send out regular updates and reminders using the Council's social media pages when a consultation is open.

- **Council website**

The plan and all supporting documents will be available to view or download on the Council's website.

- **Consultation posters**

We will put up posters in all Southwark libraries. Assistance is available in libraries to those who need help making a comment on a plan online.

## How will we respond to your feedback?

We consider all responses and produce a Consultation Report that highlights the changes we have made to the document following consultation. We report back on consultations in a 'You Said/We Did' format.

## Where can I find a consultation report?

The report and all comments received are available on our website. We will send you a link to where you can find this report through [MySouthwark](#).

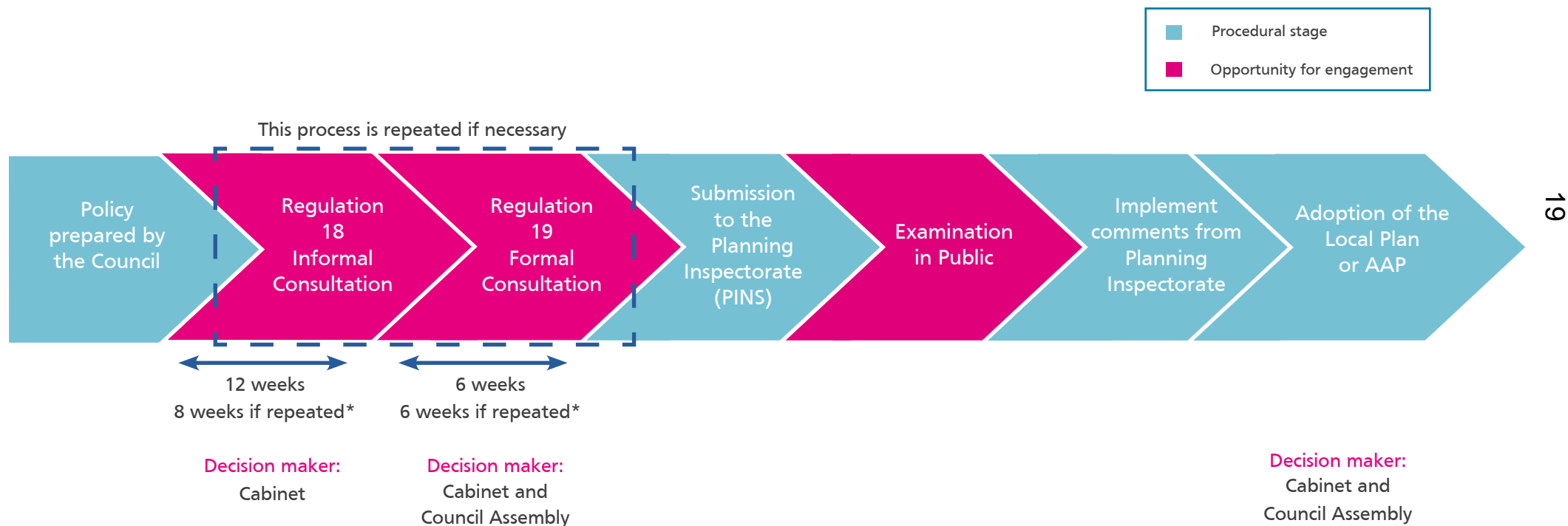
# CONSULTATION ON THE LOCAL PLAN AND AREA ACTION PLANS

## Getting involved

The Southwark Plan (2022) sets out how we want development to change Southwark. It sets out site allocations, area visions and policies that are used to determine planning applications.

## Process of Local Plan and Area Action Plan adoption

The flowchart below shows different policy documents and consultation stages.



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

## Consulting in exceptional circumstances

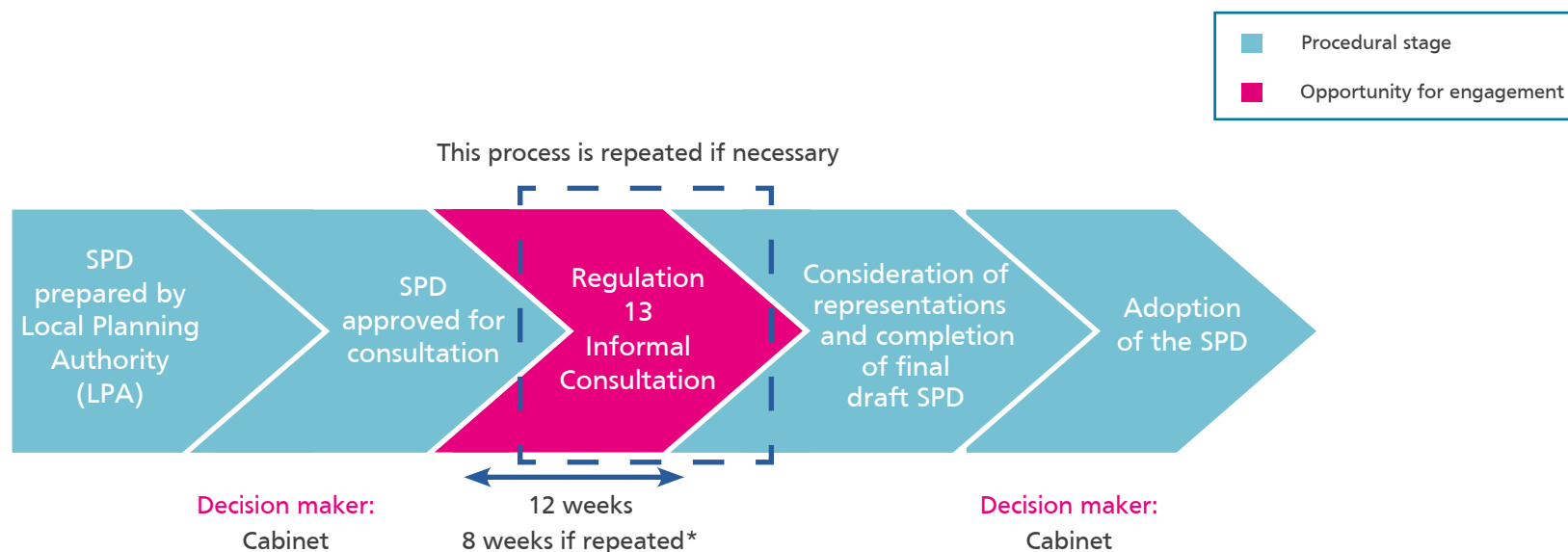
We might need to change our consultation when events prevent our procedures taking place to make sure that we continue communicating with people at all times.



# CONSULTATION ON SUPPLEMENTARY PLANNING DOCUMENTS

## What are Supplementary Planning Documents (SPDs)?

SPDs can provide guidance for development on specific sites, or on particular issues, such as design. SPDs are a material consideration in planning decisions but they are not part of the development plan. They provide additional detail to the Southwark Plan.



\*Further consultation will only take place where appropriate. We will reconsult for 8 weeks following the initial consultation if changes are proposed that require further consultation.

# CONSULTING IN EXCEPTIONAL CIRCUMSTANCES<sup>21</sup>

## Planning applications

We will:

- Be guided by central government guidance.
- Extend the formal consultation period from 21 days to 28 days to give members of the community more time to make a comment on a planning application.
- Where planning officers cannot go on site to put up a [Site Notice](#), [Neighbourhood Notification Letters](#) will be sent to those close to the site or a site notice will be put up by the applicant.
- Where a planning officer cannot carry out a site visit they may ask the applicant to carry out a virtual/video site visit and to take photos from specific areas of the site.
- Use satellite photography to assess the site.

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

## Plan-making and policy documents

We will:

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

# ENGAGING WITH US: FIND OUT MORE

## Planning Applications

[When do you need planning permission](#)  
[How the pre-application process works](#)  
[How to submit a Planning Application](#)  
[How to comment on an application](#)  
[How to use the planning register](#)  
[How we make decisions: delegated decisions and Planning Committees](#)  
[Consulting in exceptional circumstances](#)

## Planning Policy

[Development Consultation Charter \(DCC\)](#)  
[Our Local Plan and Planning Policies Map](#)  
[Planning Policy documents](#)  
[Supporting documents In local plan-making](#)  
[How to receive updates and comment on plan-making](#)  
[Decision-making in the plan-making process](#)

## Post Planning and Enforcement

[Section 106 and Community Infrastructure Levy \(CIL\)](#)  
[How to report a planning breach](#)  
[Planning Enforcement](#)

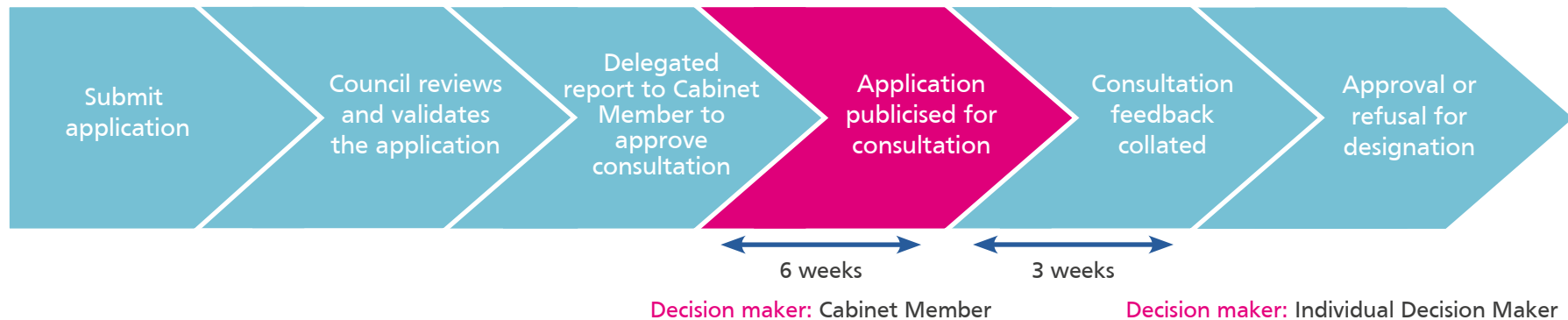
## Information on Planning

[Glossary of Planning Terms](#)  
[A Guide to Neighbourhood Planning](#)  
[Plain English Guide to the Planning System](#)  
[A Guide to Plan-Making](#)  
[A Guide to Permitted Development Rights](#)  
[Southwark Council's Movement Plan](#)  
[Planning Portal](#)  
[Equalities and Protected Characteristics](#)

# NEIGHBOURHOOD PLANNING

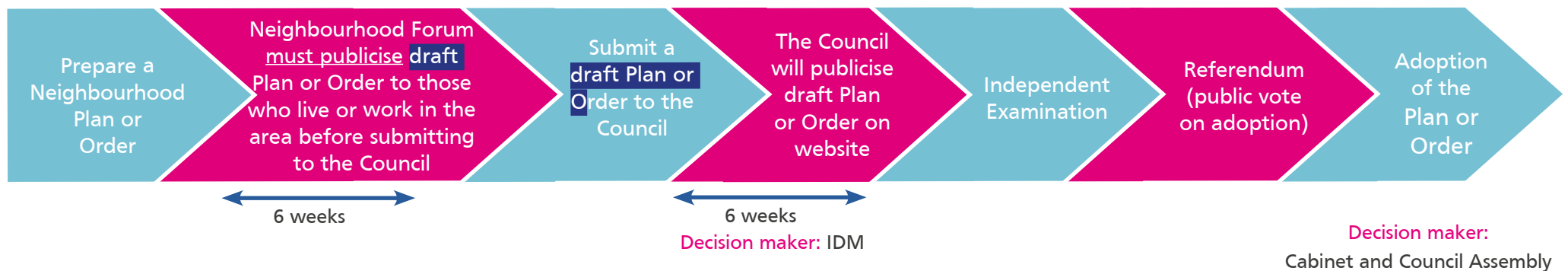
## Designating a Neighbourhood Forum and Area

To write a [Neighbourhood Plan](#) or a [Neighbourhood Development Order \(NDO\)](#), the local community must come together and apply to the Council to be formally designated as a Neighbourhood Forum and have a Neighbourhood Area designated. Only one group can represent and prepare a plan for each neighbourhood area.



## Neighbourhood Plans and Neighbourhood Development Orders

A plan for the area can be prepared by the Neighbourhood Forum. A **NDO** means that certain types of development can take place in an area without the need to apply for planning permission.



Further information on neighbourhood planning can be found [here](#).

# NEIGHBOURHOOD PLANNING PROCESS

## Process for adopting a Neighbourhood Forum or Area

1. Submit an application.
2. The Council reviews and validates the application.
3. A delegated report is sent to the Cabinet Member to approve the consultation.
4. The Council will publicise the Plan or Order on its website.
5. Consultation feedback collated.
6. Approval or refusal for designation.

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

## Required application documents

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

## Process for adopting a Neighbourhood Plan or Development Order

1. Prepare a [Neighbourhood Plan/Order](#).
2. [The](#) Neighbourhood [Forum](#) must publicise the plan/order to those who live or work in the area before submitting to the Council.
3. Submit a plan/order to the Council.
4. The Council publicise the plan/order on our website.
5. The [Plan/Order](#) will undergo an independent examination.
6. A referendum (or public vote) on the [Plan](#) will take place.
7. Adoption of the [Plan/Order](#).

## Publicising the Plan/Order to those who live or work in the area

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

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



# DEVELOPMENT CONSULTATION CHARTER

OCTOBER 2024



# Introduction

## What is the Development Consultation Charter?

The Development Consultation Charter (DCC) outlines how the Council wants developers to engage with our community when preparing planning applications and applying for planning permission. The DCC forms part of our Statement of Community Involvement (SCI). The SCI is a statutory document that sets out how Southwark Council engages with our community. The SCI outlines the role of the Council in ensuring a meaningful consultation and engagement process. The DCC outlines the role of the developer in ensuring a meaningful consultation and engagement process.

We want to put the community at the heart of shaping the changes that are taking place in their neighbourhoods, and we will ensure that engagement and consultation is carried out in the ways that are required by this Charter. We have defined three key stages of participation for the community to take part in the planning process and an objective for developers at each stage:

Stage of stakeholder participation	Developer objective
1. Engage	Engage with residents and stakeholders before submitting a planning application. This will ensure residents are included in the design of a scheme.
2. Consult	Provide opportunities for residents to feed back on the design and impact of the scheme throughout the planning process.
3. Inform	Maintain regular contact with residents throughout construction until completion and beyond.

This Development Consultation Charter sets out how we will ask the developer to prove their commitment to community engagement and show that they have taken due consideration of:

- Equalities impacts
- Social infrastructure
- Community assets
- Local demography
- Heritage and cultural assets
- Existing transport

## Who is the Development Consultation Charter for?

This document is primarily aimed at developers of major development schemes to outline the engagement required to develop in Southwark. However, this document is also useful for the two other stakeholders in the development process: the Council and the community.

**Developers:** The DCC sets out guidelines for developers on how engagement should happen at each stage of the planning process. This will ensure that a development reflects the needs of the community.

**The Community:** The community includes all those who live, work, study, worship and volunteer in Southwark. The DCC shows the types of engagement the community can expect from developers throughout the planning process.

**The Council:** This Charter outlines the requirements for developers for submitting a planning application. The Council will ensure developers of major schemes in the borough meet these requirements.

## Why do we need a Development Consultation Charter?

We recognise planning and growth is not just about changes to the buildings and environment around us. It is also about improving the lives of people in the borough. It is important that everyone has a voice in the planning process and is able to influence change. The DCC is the Council’s promise to the community to deliver the objectives of [Southwark Plan Policy SP2 “Southwark Together”](#).

Working together requires the Council to provide the community with:

- Guidelines for how the Council and developers will consult and engage on planning matters.
- An empowering approach to the development process where the community are at the centre.
- Accessible, online information on how engagement and feedback has shaped discussions and proposals.

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

## Why should a developer engage with the community?

Engagement can:

- Encourage innovative ideas and design solutions inspired by local knowledge.
- Help gain support from the community as they feel valued and respected.
- Ensure the developer understands local concerns at an early stage. This helps to address issues that may arise during the application process.

## Why should the community engage with the planning process?

Engagement can:

- Allow the community to have a say on how their neighbourhood changes.
- Make sure that development responds to the needs of the community.
- Empower the community and make a difference to how development happens in the borough.



How will this Charter work?

This Charter introduces a **three-stage process** to ensure meaningful engagement on planning applications: (1) Engage; (2) Consult, and (3) Inform. Below is a table that outlines the requirements and responsibilities for developers, planning officers and the community to ensure its success.

Timeline of Processes	1: Engage			2: Consult		3: Inform
	At pre-application stage	Before submission of planning application	At submission of planning application	Consultation	Determination of planning application	During construction
Documents submitted by applicant	Begin preparing an Early Engagement Strategy (EES)		Engagement Summary (ES)  Equalities Impact Assessment (EQIA)	Updated Engagement Summary (ES) (where further engagement has been undertaken)		Construction Management Plan secured by condition or S.106
Role of developer	Arrange pre-application meetings with the Council. A Planning Performance Agreement is recommended but not compulsory. As part of the pre-application process prepare an EES and send to the Planning Officer to review.	Undertake engagement activities with the community and relevant stakeholders. Make a copy of the final version of the EES publicly available prior to the submission of the planning application.	Prepare and submit required documents with planning application.	If further engagement is undertaken post-submission, submit an updated version of the ES with evidence of further engagement.		Respond to local stakeholder concerns and feedback in a timely manner throughout construction.
Role of planning officer	Assess and provide feedback on the submitted EES.  Confirm the required DCC processes.		Review submitted documents to ensure sufficient engagement has been undertaken.  If insufficient engagement, request developer undertakes further engagement.	Comply with legal requirements for consultation.	Give a summary of engagement undertaken in officer report.  Assess whether the developer has given due regard to the needs of those with protected characteristics.	
Opportunities for residents		Engage and participate in engagement meetings.		Provide comments to developers and planning officers.	Attend or speak at Planning Committee	Contact developer to report issues.

Who should developers engage with?

This Charter aims to encourage meaningful conversations between the community and the developer. We expect developers to reach out to people in the local area who may be affected by a scheme. These people should reflect the diversity of the area where the application site is located.

Developers should research and contact the following organisations in the area of their site, including:

- Local community and faith groups
- Local heritage and amenity societies
- Tenants & Residents Associations (TRAs)
- Neighbourhood forums
- Local schools and colleges
- Multi-ward forums
- Ward councillors
- Local businesses and Business Improvement Districts (BIDs)
- Voluntary organisations. Examples include Community Southwark and the Forum for Equalities and Human Rights in Southwark (FEHRS)
- Civic societies and amenity associations

What type of applications must consult and engage?

Public consultation and engagement should be proportionate to the scale of the development. Developers of a major application must engage the community and provide evidence of having done so. Any major application must also undertake a public meeting where people can have their say on the application.

Council Schemes	1 or more home.* Any gain or loss in commercial floorspace. It will be at the Case Officer's discretion if documents are required for Council-owned schemes below this threshold.
Small Scale Major Applications	10 - 49 homes. 1,000 sqm - 3,499 sqm commercial floorspace.
Large Scale Major Applications Lower Range	50 - 99 homes. 3,500 - 10,000 sqm commercial floorspace.
Large Scale Major Applications Higher Range	100 + homes. over 10,000 sqm commercial floorspace.

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

# How should developers demonstrate a commitment to engagement?

This section outlines how we would like developers to evidence the engagement and consultation undertaken throughout the development process. We have also provided templates on our [website](#) to outline the requirements of each of the documents below.

## 1. Early Engagement Strategy

An Early Engagement Strategy (EES) **should be developed as part of the pre-application process.** The purpose of this document is to ensure that developers engage with residents and local stakeholders from the start of the development process. Early engagement is essential to ensure that residents and local stakeholders have a say in the development. It can also help to identify elements in the design of the scheme that may have a detrimental impact on certain individuals or groups.

**We recognise that schemes come to pre-application meetings at a variety of stages in the design process. There are some which will be unacceptable in principle and will progress no further. In those instances, there will be no requirement to produce an EES.**

**If a scheme is established as broadly policy compliant, the requirement for an EES will be discussed with the case officer as part of the pre-application process.**

**The EES should be submitted as a completed document when any planning application is submitted. Applicants should make the EES publicly available for residents and stakeholders to review prior to the submission of a planning application.**

**The EES should be submitted as a completed document when any planning application is submitted.**

### Fact-Based Audit

The EES should begin with a Fact-Based Audit (FBA) of the proposed development site. If the scheme is at the early stages of the design process, you should outline how you intend to undertake the FBA before finalising the design. However, if the design is at a more advanced stage, the Council expects a full **FBA. This should include:**

1. **Stakeholder analysis** - who are the owners, occupiers and users of the existing buildings and surrounding the site? What are the demographics of the existing occupiers and users of the site? This must include assessment of those with protected characteristics. **Is there a Community Plan or Neighbourhood Plan?**
2. **Local Economy and Community Infrastructure** - Are there any schools or educational facilities on or around the site? Are there any local or independent businesses? **How have you considered this impact?**
3. **Sites of Community Importance** - give a description of the existing buildings and space surrounding the site. Is the site situated within a conservation area? Is the building listed? Is the site, or any buildings within the curtilage of the site, of wider community interest?

Refer to the EES template for the full list of audit expected.

## Approach to Engagement

We want to know how you will engage with the key stakeholders that **have** been identified, what engagement activities you intend to undertake and why you have chosen these activities in particular.

Engagement activities must enable stakeholders to participate and provide their views on what they want to see from the development. You must go into engagement activities without any assumptions of what stakeholders will want or need. Examples of engagement activities can include stakeholder meetings, workshops and feedback seminars.

You should also detail how you intend to incorporate feedback received from engagement activities. We want to see evidence that stakeholders have had a meaningful impact on the design of a scheme. You must detail how you will achieve this.

## 2. Engagement Summary

You should submit an Engagement Summary (ES) with your planning application. This is a validation requirement in Southwark. The ES should provide an overview of the engagement that has taken place with local stakeholders prior to submitting the application. The Planning Officer will assess the **ES** and this should include:

- A summary of the **FBA** undertaken in the **EES**. Please include any changes that have occurred since the EES was submitted. If you have not attended a pre-application meeting with an EES, you should provide a full **FBA**.
- **A summary of engagement activities undertaken that outlines the type, date, attendees and format of each activity.**
- A summary of stakeholder views and their vision for the future use of the site. What elements of the scheme did stakeholders like? What did they dislike? What would they like to see as part of this development?
- Outline any changes that were made to the scheme because of feedback from engagement with stakeholders in a 'You Said, We Did' format. If you were not able to make changes to the design of the scheme, provide a detailed justification.
- A Social Value Statement that describes the economic, social and environmental impacts of the development. **This statement should outline** how the development will contribute to the long-term wellbeing and resilience of existing and future residents and businesses. **This should reflect the goals of the Southwark 2030 Strategy.**
- **Monitoring data that outlines the key statistics in terms of engagement and responses, e.g. the number of written comments received.**

If you decide to undertake further engagement after submitting your application, please provide an updated engagement summary with evidence of the further engagement undertaken.

3. Equalities Impact and Needs Assessment

We all have one or more protected characteristics with similar and different needs. Some groups with protected characteristics experience differential and sometimes negative impacts as a result of a development proposal or plan. Consultation and engagement can help find out about different needs and experiences of local communities to minimise these impacts. We require developers to undertake an Equalities **Impact and Needs** Assessment (**EINA**) for their development to identify potential impacts from an early stage.

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

An **EINA** should include:

- A brief description of the development proposal.
- An overview of the users of the site and the stakeholders within the decision-making process.
- An equality impact and needs analysis that considers the potential impact to groups with protected characteristics, and provides evidence upon which this assumption is made and details of any mitigating actions to be taken as a result.

Requirements for developers

The following table provides an overview of the activities we expect developers to undertake through the three stages of stakeholder participation to ensure meaningful engagement. We expect applicants to undertake each stage in turn.

Stage 1 - Engage Best practice that a developer should undertake before submitting a planning application		Minor council-owned applications*	Small scale major applications	Large scale major applications - lower range	Large scale major applications - higher range
Normal circumstances	Alternatives in exceptional circumstances				
Submit an <b>Early Engagement Strategy</b> that includes a fact-based audit of the site during the pre-application process.	Submit an <b>Early Engagement Strategy</b> that includes a fact-based audit of the site during the pre-application.	√	√	√	√
Display a notice / board at the application site, which includes images of the proposed scheme and contact details of the developer.	Display a notice / board at the application site, which includes images of the proposed scheme and contact details of the developer.	√	√	√	√
A leaflet drop with a follow-up door-knock to those within close proximity to the site (including images of the proposed scheme, contact details of the developer and how to make comments on the proposal to the developer).	Developer to send <b>Neighbourhood Notification</b> Letters to those within close proximity to the site (including images of the proposed scheme, contact details of the developer and how to make comments on the proposal to the developer).	√	√	√	√
Computer Generated Images/ 3D modelling  A video presentation of the site and the proposed scheme should be available on the developer's website where possible.	Computer Generated Images/ 3D modelling  A video presentation of the site and the proposed scheme should be available on the developer's website where possible.		√	√	√

Stage 1 - Engage Best practice that a developer should undertake <u>before</u> submitting a planning application		Minor council- owned applications*	Small scale major applications	Large scale major applications - lower range	Large scale major applications - higher range
Normal circumstances	Alternatives in exceptional circumstances				
Planning officers may advise developers who will need to be consulted.	Planning officers may advise developers who will need to be consulted.	√	√	√	√
Present the proposed scheme to the Design Review Panel <u>and/or</u> Community Review Panel (if required).	Present the proposed scheme to the Design Review Panel <u>and/or</u> Community Review Panel (if required).		√	√	√
Public engagement activities as agreed in Early Engagement Strategy. Examples include workshops, interviews and meetings.	Use online surveys and digital tools to find out the views of the community. For those who do not have access to the internet and cannot complete an online survey, the developer should complete the survey over the phone with the resident. Contact details for the developer should be provided on Neighbourhood <u>Notification</u> Letters/ leaflets.		√	√	√
Meetings with local residents, any relevant groups including community / resident groups, businesses and other stakeholders.	Meetings with relevant groups including community / resident groups, businesses, and other stakeholders via video-conference software (e.g. Zoom, Microsoft Teams).			√	√
<u>Set</u> up website providing details and images of the proposal.	<u>Set</u> up website providing details and images of the proposal.			√	√

Stage 1 - Engage Best practice that a developer should undertake <u>before</u> submitting a planning application		Minor council- owned applications*	Small scale major applications	Large scale major applications - lower range	Large scale major applications - higher range
Normal circumstances	Alternatives in exceptional circumstances				
Submit an <u>Engagement Summary</u>	Submit an <u>Engagement Summary</u>	√	√	√	√
Construction boards (hoardings) displayed	Construction boards (hoardings) displayed where relevant	√	√	√	√
Leaflet drop (and/or at pre- <u>application</u> stage)	Neighbourhood <u>Notification</u> Letters to those within close proximity of the site. This should include the contact details of the developer.	√	√	√	√
Computer Generated Images/ 3D modelling	Computer Generated Images/ 3D modelling  A video presentation of the site and the proposed scheme should be available on the developer's website where possible.	√	√	√	√
Consider the <u>C</u> ouncil's Climate Change Strategy and Movement Plan	Consider the <u>C</u> ouncil's Climate Change Strategy and Movement Plan	√	√	√	√
Present the submitted scheme to the Design Review Panel (if required).	Present the submitted scheme to the Design Review Panel via video- conference software (if required).	√	√	√	√



Stage 1 - Engage Best practice that a developer should undertake <u>before</u> submitting a planning application		Minor council-owned applications*	Small scale major applications	Large scale major applications - lower range	Large scale major applications - higher range
Normal circumstances	Alternatives in exceptional circumstances				
Public consultation workshops and  A public community meeting  Attend a <a href="#">Multi-ward Forum</a> if requested by the Council (For Strategic Applications only)	Use online surveys and digital tools to find out the views of the community.  For those who do not have access to the internet and cannot complete an online survey, the developer should complete the survey over the phone with the resident. Contact details for the developer should be provided on Neighbourhood Letters/Leaflets.		√	√	√
<a href="#">Feed back</a> to people on how they have shaped development from: <ul style="list-style-type: none"><li>Multiple public consultation workshops; and</li><li>A public community meeting</li></ul>	Provide detailed feedback <a href="#">on how</a> they have shaped the development: <ul style="list-style-type: none"><li>Update the website</li><li>Where possible, use visuals and images that demonstrate changes to the development</li></ul>		√	√	√
Equalities Impact <a href="#">and Needs</a> Assessment	Equalities Impact <a href="#">and Needs</a> Assessment	√	√	√	√
Submit a 3D model file for use in VU.CITY (FBX file, 1:1 scale and details of program modelled in)	Submit a 3D model file for use in VU.CITY (FBX file, 1:1 scale and details of program modelled in)		√	√	√

Stages 2 and 3 - Consult and Inform Best practice that a developer must undertake <u>during</u> the planning application process and <u>after</u> a planning application has been approved		Minor council-owned applications*	Small scale major applications	Large scale major applications - lower range	Large scale major applications - higher range
Normal circumstances	Alternatives in exceptional circumstances				
Provide updated engagement summary if further engagement is undertaken	Provide updated engagement summary if further engagement is undertaken	√	√	√	√
Construction boards (hoardings) displayed on site with updates on progress and contact details <a href="#">of</a> the site manager	Construction boards (hoardings) displayed on site with updates on progress and contact details for the site manager  Information is also to be updated on the website	√	√	√	√
Developers keep development web-site up-to-date	Developers keep development web-site up-to-date			√	√
Website with the progress updates by developer	Website with progress updates by developer			√	√
Where applicable, comply with any Construction Environment Management Plan that is secured through by condition on the decision notice or a S106 obligation	Where applicable, comply any with Construction Environment Management Plan that is secured through by condition on the decision notice or a S106 obligation		√	√	√

\* [Schemes generating 1 or more home\(s\) or any gain or loss in commercial floorspace](#), with the exception of Council-owned Hidden Homes schemes, as these are conversions in existing developments, and are exempt from this level of consultation. Hidden Homes could include new homes created from unused or underused space within existing estates.

## Consulting in Exceptional Circumstances

We recognise that in exceptional circumstances consultation may need to take place in different ways or use different methods so that we can continue to deliver new homes and projects within our borough.

The tables on pages 9-13 of this Charter set out best practice examples of how we expect developers to carry out consultation in Southwark, as well as alternatives to face-to-face meetings and workshops in exceptional circumstances. These alternatives should only be used when face-to-face engagement is not possible, and help us to continue working with our communities so that people can have their say and help shape their neighbourhoods.

## Old Kent Road Community Review Panel

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

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

An independent company, Frame Projects, is responsible for recruiting and managing the panel. Frame Projects will ensure the panel is independent; properly briefed and able to effectively communicate its views to the Council. This type of consultation is separate to this Charter. However, applicants are encouraged to consult this panel when preparing an application in the Old Kent Road, and this is something that can be mentioned in the Early Engagement Strategy.

## Monitoring the Development Consultation Charter

- A ~~completed~~ Engagement Summary must be [submitted](#) ~~completed~~ by the developer ~~and submitted~~ with their planning application. This is a validation requirement and The planning application will remain invalid until it has been submitted. The Engagement Summary will be made public on our Planning Register website alongside the planning application.
- All Engagement Summary documents will be placed on the Planning Register with the planning application.
- We will monitor the number of Early Engagement Strategies, [EINA](#) and Engagement Summaries that we receive.
- The submission of an ~~Early Engagement Strategy~~, Engagement Summary and Equalities [Impact and Needs](#) Assessment will be monitored at validation stage.
- ~~We will review the development consultation process~~ [We will keep the DCC requirements under review](#) including best practice guidance.



## APPENDIX 4

## Early Engagement Strategy Template



Southwark Council's Development Consultation Charter requires the submission of an Early Engagement Strategy (EES) for pre-application discussions with the council. The purpose of this document is to ensure that developers engage with residents and local stakeholders from the beginning of the development process. Early engagement is essential to ensure that residents and local stakeholders have a say in the development that is going on in their area. Early engagement can also help to identify elements in the design of the scheme that may have a detrimental impact on certain individuals or groups before a planning application is submitted.

### Part 1 - Fact-based Audit

In the Fact-based Audit, please provide the details of the local stakeholders and community infrastructure on and around the site.

'On or around the site' - refers to the area beyond the red line of the planning application, taking into account immediate neighbours of the site. Around the site is approximately a 10-minute walking radius from the red line.

For neighbourhood-level data we recommend using:

- The Southwark Council Joint Strategic Needs Assessment (JSNA)
- The Office for National Statistics Mid-Year Population Estimates
- The Office for National Statistics Census

For site-level data, we recommend:

- conducting stakeholder surveys
- recording observations through site visits
- Desk-based analysis of local infrastructure

## Stakeholder Analysis

1. Who are the owners, occupiers and users of the existing buildings on and around the site?

Consider those who live, work, play, study, shop, socialise in and/or travel through the area. Include details of any potentially vulnerable communities (such as those with protected characteristics).

2. How did you identify the stakeholders on and around the site?

3. Is there a Community Plan or Neighbourhood Plan covering the area?

## Local Economy and Community Infrastructure

### Schools and educational facilities

4. Are there any schools or educational institutions on and around the site?

5. How did you determine whether there are any schools or educational institutions on or around the site?

6. How have you considered the impact on any identified schools or educational institutions within the scheme?

Please provide information on how these organisations have been consulted on the scheme.



Local businesses	
7. Are there any local or independent businesses on and around the site?	
8. How did you determine whether there are any local or independent businesses on or around the site?	
9. How have you considered the impact on any local or independent businesses within the scheme?  Provide information on how these businesses have been consulted on the scheme.	
Sites of Community Importance	
10. Are there any sites of significance to the local community on or around the site?  This may include public art, community spaces, local landmarks or sites of local historic importance.	
11. How did you determine whether there are any sites of significance to the local community on or around the site?  We suggest consulting the <a href="#">Local List</a> and surveying local residents.	
12. How have you considered the impact on any sites of significance to the local community within the scheme?	

## Part 2 – Approach to Engagement

Based on the Fact-based Audit in Part 1 of this document, outline how you will engage with the stakeholders identified. Engagement activities should be tailored to the needs of these stakeholders.

Examples of engagement activities can include (but are not limited to):

- Stakeholder meetings
- Workshops
- Attending community group meetings
- Leaflets
- Letters
- Website

Activity and Date	Attendees	Format	Justification
Name and type of engagement activity e.g. In-person 'drop-in'.  When did the event take place? What time of day did the event take place?	Who will attend the event? Which stakeholder groups are you aiming reach? e.g. Parents and carers	How will participants feedback in the session? e.g. directly to	Why did you choose this format? Why did you choose to target this group in particular?

This section should detail how you intend to incorporate feedback received through the engagement activities that take place. We want to see evidence that stakeholders have had a meaningful impact on the design of a scheme. Please detail how you will achieve this.

How will you incorporate feedback received from engagement activities into the proposed scheme?

E.g., a tracker for feedback will be set up in Excel and we will assign the feedback to be discussed at a relevant meeting (for example, design comments will be discussed in a design meeting). Once the comment has been discussed in a meeting, we will update the tracker with a response to the comment that we will include in our Engagement Summary.

## Engagement Summary Template



Southwark Council's Development Consultation Charter requires the submission of an Engagement Summary as a validation requirement for planning applications for all major or Council-owned schemes. The completed Engagement Summary should provide an overview of the engagement that took place with local stakeholders prior to the submission of the planning application.

### Part 1 – Summary of Fact-based Audit

In the Fact-based Audit, please provide the details of the local stakeholders and community infrastructure on and around the site.

'On or around the site' – refers to the area beyond the red line of the planning application, taking into account immediate neighbours of the site. Around the site is approximately a 10-minute walking radius from the red line.

If the proposal has undergone pre-application discussions with the Council, please include any changes that have occurred since the Early Engagement Strategy was submitted.

For neighbourhood-level data we recommend using:

- The Southwark Council Joint Strategic Needs Assessment (JSNA)
- The Office for National Statistics Mid-Year Population Estimates
- The Office for National Statistics Census

For site-level data, we recommend:

- Conducting stakeholder surveys
- Recording observations through site visits
- Desk-based analysis of local infrastructure

Stakeholder Analysis	
<p>1. Who are the owners, occupiers and users of the existing buildings on and around the site?</p> <p>Consider those who live, work, play, study, shop, socialise in and/or travel through the area, including residents and groups with protected characteristics.</p>	
<p>2. How did you identify the stakeholders on and around the site?</p>	
<p>3. Is there a Community Plan or Neighbourhood Plan covering the area?</p> <p>If there is, what are the key issues and priorities for the area and how does this proposal help achieve those priorities?</p>	

Local Economy and Community Infrastructure	
Schools and educational facilities	
<p>4. Are there any schools or educational institutions on and around the site?</p>	
<p>5. How did you determine whether there are any schools or educational institutions on or around the site?</p>	

<p>6. How have you considered the impact on any identified schools or educational institutions which are within or impacted by the scheme?</p> <p>Please provide information on how these organisations have been consulted on the scheme.</p>	
Local businesses	
<p>7. Are there any local or independent businesses on and around the site?</p>	
<p>8. How did you determine whether there are any local or independent businesses on or around the site?</p>	
<p>9. How have you considered the impact on any local or independent businesses within the scheme?</p> <p>Provide information on how these businesses have been consulted on the scheme.</p>	
Sites of Community Importance	

<p>10. Are there any sites of significance to the local community on or around the site? If so, how did you determine whether there are any sites of significance to the local community on or around the site?</p> <p>This may include public art, community spaces, local landmarks or sites of local historic importance. We suggest that you consult the Council's Local List and surveying local residents.</p>	
<p>11. How have you considered the impact on any sites of significance to the local community within the scheme?</p>	

Activity and Date	Attendees	Format	Accessibility measures
<p>Name and type of engagement activity e.g. In-person 'drop-in'.</p> <p>When did the event take place? What time of day did the event take place?</p>	<p>Who attended the event? How many people attended the event?</p>	<p>How did the participants feedback in the session?</p>	<p>Were any accessibility measures put in place? e.g. Translators</p>



### Part 3 – Stakeholder Views and Vision for the Site

1.	<p>What elements of the scheme did stakeholders like?</p> <p>Be clear which stakeholders you are referring to (e.g. students at the local Secondary School liked the cycle paths)</p>	
2.	<p>What elements of the scheme did stakeholders dislike?</p> <p>Be clear which stakeholders you are referring to (e.g. the local baby and toddler group were concerned about the lack of play facilities for infants)</p>	
3.	<p>What did the different stakeholders you spoke to want to see as part of the development?</p>	

### Part 4 – You Said, We Did

Outline any changes that were made to the scheme following feedback from engagement with stakeholders. If you were not able to make changes to the design of the scheme, provide a detailed justification.

You Said		We Did
Name the stakeholder group	Provide a quote or summarised statement of comments made	Outline what changes you made as a result of this comment or provide a justification for why you couldn't make the changes suggested
E.g. attendees at the drop-in workshop	Residents of Almer Tower were concerned about a reduction in the amount of green space available because of the development	

## Part 5 – Social Value Statement

'Social Value' refers to the positive contributions that an organisation delivers which exceed its core obligations. It reflects the three principles of sustainable development:

1. Economy
2. Community
3. Environment

Social Value for public services is defined by [The Public Services \(Social Value\) Act 2012](#). It can be embedded in the lifecycle of a development in several ways, including in the supply chain, the design of buildings and places, within construction, and in how a building is eventually used and occupied.

Southwark is leading on innovative ways to secure Social Value and purpose from the way in which land is used. This is reflected in the [2023 Southwark Land Commission](#) report and the emerging work in this area.

Assessing potential Social Value gains of development helps ensure the wellbeing of existing and future residents and improve the quality of their lives. Southwark's approach to securing Social Value for our residents is centred around the six goals of our [Southwark 2030 strategy](#):

1. Decent homes for all
2. A good start in life
3. A safer Southwark
4. A strong and fair economy
5. Staying well
6. A healthy economy

Applicants should complete a Social Value Statement by responding to the questions under each of the Southwark 2030 goals. This can include measures carried out as part of the scheme's consultation and engagement strategy, or which will occur following completion of the scheme.

Please provide a summary and quantify the benefits of the scheme (e.g. 20 jobs in construction, 1 primary school, 0.25 ha open space).

Social Value of the Scheme	
Goal 1. Decent homes for all	
Does the scheme provide new affordable homes?	
Does the scheme provide a housing mix that responds to local need?	

<b>Goal 2. A good start in life</b>	
Does the proposal support the upskilling of local people?	
Does the scheme deliver and/or enhance social and community infrastructure?	
<b>Goal 3. A safer Southwark</b>	
Does the proposal include features that design out crime?	
<b>Goal 4. A strong and fair economy</b>	
Does the proposal create jobs for local people and support the local economy?	
Have local businesses been consulted and involved in the development of the scheme?	
<b>Goal 5. Staying well</b>	
Does the proposal support the long-term health and wellbeing of existing residents and neighbours?	
Does the design of the scheme (including any public realm and greening) deliver social benefits to new and existing residents and neighbours?	

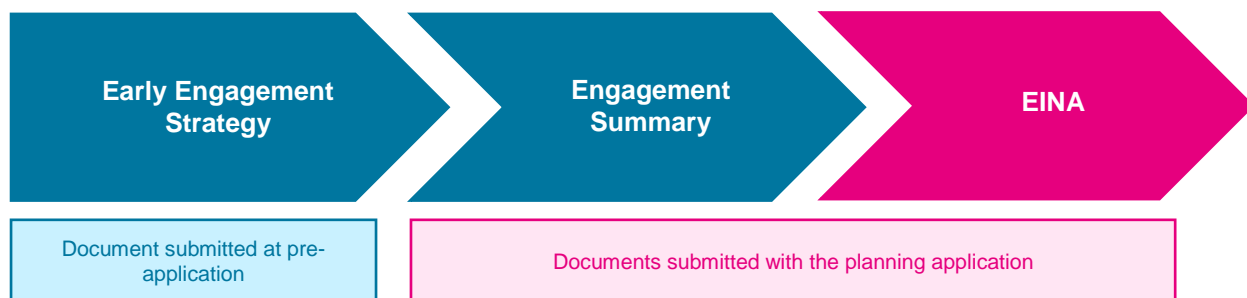
Goal 6. A healthy Environment	
<p>Does the scheme include energy infrastructure or climate mitigation measures to improve the quality of life for existing and new residents?</p> <p>This could include reducing overheating, reducing energy bills, and improvements to biodiversity.</p>	
<p>How does the proposal improve community-level resilience in the face of climate change?</p>	

## Part 6 – Monitoring Data

Monitoring Data	
How many engagement events did you hold?	
How did you advertise the engagement events?  We suggest attaching any advertising materials to your Engagement Summary.	
How many letters did you send to local residents, businesses and community groups?	
How many people attended engagement events in total?	
How many written comments did you receive?	
Where did people attending consultation events live or work?  <a href="#">Please give an area breakdown.</a>	

## APPENDIX 6

## EINA Template



## How to Fill in Your EQIA

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the duty when making decisions and setting policies. As set out in the Development Consultation Charter (DCC), the Public Sector Equalities Duty (PSED) does not apply to developers. However, to be compliant with the DCC, we require developers to support the council in meeting and discharging this important duty. For you, this means producing a proportionate Equalities Impact and Needs Assessment of the impacts of the development. It must illustrate how the proposal will remove or minimise disadvantages suffered by people due to their protected characteristics, and what steps have been taken to meet the needs of people from protected groups where these are different from the needs of other people. It should also detail positive equalities impacts.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies (and therefore, you as developers in Southwark):

- 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 is not 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.

Good evidence can include (but is not limited to):

- [Southwark Council Joint Strategic Needs Assessment \(JSNA\)](#) – produced by Southwark Council, we review a wide range of data and information, as well as views from those who live in the borough, to identify the key issues affecting the health and well-being of people in

Sources for baseline data specific to different protected characteristic groups can include (but is not limited to):

- [Age UK](#)
- [Southwark Council Local Plan EQIA](#)
- [Climate Just](#)
- [Office for Health Improvement and Disparities](#)
- [Mayor of London](#)
- [Sense UK](#)
- [Department for Work and Pensions, Family Resources Survey](#)
- [UN Women- Safe & the City](#)
- [Stonewall \(via Crisis\)](#)

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. Engagement with the community is recommended as part of the development of equality analysis.

Whilst the equality analysis is being considered, Southwark Council recommends considering socio-economic and health inequality implications, as they 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.

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

**Section 1 – Users and Stakeholders in the Decision Making Process****Brief description of development proposal****Who are the key stakeholders and users of your site?**

Please use information gathered from your stakeholder analysis submitted with your Early Engagement Strategy and Engagement Summary.

**Who are the key stakeholders involved in the decision-making process for the proposed scheme?**



## Section 2 – 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 and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve development to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

**Age** - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds)

Potential impacts (positive and negative) of proposed scheme including the impact on current users	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users
Equality information on which the above analysis is based	Socio-economic data on which above analysis is based
Mitigating actions and/or improvements to be taken	Mitigating actions and/or improvements to be taken

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

Potential impacts (positive and negative) of proposed scheme including the impact on current users	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users
Equality information on which the above analysis is based	Socio-economic data on which above analysis is based
Mitigating actions and/or improvements to be taken	Mitigating actions and/or improvements to be taken

**Gender reassignment** – The process of transitioning from one gender to another.

Potential impacts (positive and negative) of proposed scheme including the impact on current users	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users
Equality information on which the above analysis is based	Socio-economic data on which above analysis is based
Mitigating actions and/or improvements to be taken	Mitigating actions and/or improvements to be taken

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Potential impacts (positive and negative) of proposed scheme including the impact on current users	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users
Equality information on which the above analysis is based	Socio-economic data on which above analysis is based
Mitigating actions and/or improvements to be taken	Mitigating actions and/or improvements to be taken

**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 scheme including the impact on current users	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users
Equality information on which the above analysis is based	Socio-economic data on which above analysis is based
Mitigating actions and/or improvements to be taken	Mitigating actions and/or improvements to be taken

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 scheme including the impact on current users	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users
Equality information on which the above analysis is based	Socio-economic data on which above analysis is based
Mitigating actions and/or improvements to be taken	Mitigating actions and/or improvements to be taken

Sex - a man or a woman.

Potential impacts (positive and negative) of proposed scheme including the impact on current users	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users
Equality information on which the above analysis is based	Socio-economic data on which above analysis is based
Mitigating actions and/or improvements to be taken	Mitigating actions and/or improvements to be taken

**Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.**

Potential impacts (positive and negative) of proposed scheme including the impact on current users	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users
Equality information on which the above analysis is based	Socio-economic data on which above analysis is based
Mitigating actions and/or improvements to be taken	Mitigating actions and/or improvements to be taken

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 scheme including the impact on current users	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users
Equality information on which the above analysis is based	Socio-economic data on which above analysis is based
Mitigating actions and/or improvements to be taken	Mitigating actions and/or improvements to be taken



**Section 3 - Conclusions**

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

**Summarise any benefits and mitigation required**

# **Equality Impact and Needs Analysis Statement of Community Involvement and Development Consultation Charter: Annual Review and Updates November 2024**

## Guidance notes

### Things to remember:

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

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

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

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

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

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

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 implications arising from socio-economic disadvantage, 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 policy commitment to reduce socio-economic inequalities and this is reflected in its values and aims. For this reason, the council recommends considering impacts/needs arising from socio-economic disadvantage in all equality analyses, not forgetting to include identified potential mitigating actions. **The Council has adopted the Socio-Economic Duty as part of its overall equality, diversity and inclusion policy commitments in the Southwark Equality Framework.** This requires us to ensure we do not make any conditions worse for those experiencing socio-economic disadvantage through our policies and practices.

## Section 1: Equality impact and needs analysis details

<b>Proposed policy/decision/business plan to which this equality analysis relates</b>		Statement of Community Involvement and Development Consultation Charter: Annual Review and Updates			
<b>Equality analysis author</b>		Calum Chipman			
<b>Strategic Director:</b>		Stephen Platts, Planning and Growth			
<b>Department</b>		Planning Policy	<b>Division</b>	Planning	
<b>Period analysis undertaken</b>		November 2024			
<b>Date of review (if applicable)</b>					
<b>Sign-off</b>		<b>Position</b>		<b>Date</b>	

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

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

The Statement of Community Involvement (SCI) is an important planning document that defines how and when local residents, community groups and stakeholders can be involved in the planning process.

The Developer Consultation Charter (DCC) forms part of the SCI. It explains what engagement applicants and developers are expected to carry out for larger scale developments. The Charter provides the developer with guidance on how to engage effectively before, design and after the submission of a planning application.

The current version of the SCI and DCC was adopted by Cabinet on 6 December 2022.

Officers have proposed minor updates to these documents. The recommended updates to the SCI and DCC and associated templates are necessary to improve clarity for applicants and ensure alignment between the DCC requirements and current Council priorities.

The changes aim to provide clarity on the requirements of the report and emphasise the importance of delivering Social Value through developments, in line with the Southwark 2030 Strategy.

The SCI is a key element within the planning process which helps the Council deliver the goals of Southwark 2030, specifically Empowering People and Reducing Inequality. The changes also align the SCI with the work of the Southwark Land Commission, maintain high standards of community involvement and ensure compliance with the Public Sector Equalities Duty (PSED).

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

2. Service users and stakeholders	
<b>Key users of the department or service</b>	<p>Developers, Members of the public; Housing Associations/ Registered Social Landlords; Councillors.</p> <p>Environment and Leisure Department; Flood and Drainage Department; Children's and Adult's Services Department; Housing and Modernisation Department; Councillors; Finance and Governance Department; Chief Executive Department; Greater London Authority; Transport for London; Thames Water; Metropolitan Police; Chief Executive's Department.</p>
<b>Key stakeholders were/are involved in this policy/decision/business plan</b>	<p>Members of the public (after consultation); Housing Associations.</p> <p>Within Southwark Council: Environment and Leisure Department; Children's and Adult's Services Department; Housing and Modernisation Department; Councillors; Finance and Governance Department; Chief Executive Department.</p>

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

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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, including improvement actions to promote equality and tackle inequalities. 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.

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



<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><b><i>Statement of Community Involvement (SCI)</i></b></p> <p>The proposed changes to the SCI are minor and relate to the correction of grammatical errors, formatting changes and clarifications in the description of DCC requirements.</p> <p>These updates are anticipated to make the document more accessible, by improving clarity and readability of the documents. This will have a positive impact for all, including those with protected characteristics.</p> <p><b><i>Development Consultation Charter (DCC)</i></b></p> <p>The proposed changes to the DCC are anticipated to have positive benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The work on Social Value is likely to have positive impacts, as it is delivering added value for the different pillars of Social Value in new development.</p> <p>The addition of questions relating to the Social Value of schemes will bring positive benefits by identifying and clarifying potential Social Value gains of development.</p> <p>The amendment of questions relating to Heritage and Site Layout, Accessibility and Movement, and Climate Change and Sustainability is anticipated to have a neutral effect. This is because this data is still provided in other validation documents (Design and Access Statement, Heritage Statement, Transport Assessment, and Energy Statement), and the assessment is made under the relevant Local Plan policies.</p> <p>The amendment of the DCC requirements for all council owned schemes and amending the requirement to being for 1 dwelling and above is expected to have neutral benefits on those with protected characteristics. This is because it will be at planning officers' discretion as to whether these documents are submitted (i.e. Engagement Summary and EINA) for council schemes for less than 1 dwelling.</p> <p>Officers must have a consideration of potential Equalities Impacts in their assessment of all planning applications. Furthermore, EINAs are required for all applications proposing a loss of community uses</p>	<p><b><i>Statement of Community Involvement (SCI)</i></b></p> <p>There are no positive or negative socio-economic impacts identified for the above protected characteristic and the SCI.</p> <p><b><i>Development Consultation Charter (DCC)</i></b></p> <p>There are no socio-economic impacts identified for the above protected characteristic and the Developer Consultation Charter.</p>

which would take into account the impact on those with the above protected characteristic. It is therefore anticipated the change will have a neutral impact overall.	
<b>Equality information on which above analysis is based</b>	<b>Socio-Economic data on which above analysis is based</b>
<p>The median age in Southwark is 33, which is below that of London as a whole (35). (Census 2021)</p> <p>Southwark has an ageing population. Between 2011 and 2021, the proportion of Southwark residents aged 0-9 fell from 12.6% to 10.5%, while the proportion aged 50 and over rose from 20.4% to 24.7%. (Census 2021)</p> <p>A 79% increase in the population of Southwark aged 65 or more is forecast by 2039. This incorporates a 92% increase in those over 75 and 87% growth in those over 85. (Strategic Housing Market Assessment Update 2019)</p> <p>The areas with the highest proportions of elderly residents are in the south of the borough. Areas with the highest proportion of children are in the centre and south of the borough. (Census 2021)</p>	<p>In 2021/22 approximately 23,000 children aged 0-15 in Southwark were living in poverty, after housing costs were factored in, equating to 36% of children in the borough. This is higher than the London average of 33%. (JSNA Annual Report 2023).</p>
<b>Mitigating and/or improvement actions to be taken</b>	
As there are no negative impacts, no mitigating actions are required.	As there are no negative impacts, no mitigating actions are required.

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

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.**

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

<p><b>Statement of Community Involvement</b></p> <p>The proposed changes to the SCl are minor and relate to the correction of grammatical errors, formatting changes and clarifications in the description of DCC requirements.</p> <p>These updates are anticipated to make the document more accessible and would have a positive social impact for all, including those with protected characteristics. Older and younger people may benefit from more accessible engagement processes that come from the requirements set out in the SCl.</p> <p><b>Development Consultation Charter</b></p> <p>The proposed changes to the DCC are anticipated to have neutral benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The work on Social Value is likely to have positive impacts, as it is delivering added value for the different pillars of Social Value in new development.</p> <p>The addition of questions relating to the Social Value of schemes will bring positive benefits by identifying and clarifying potential Social Value gains of development.</p> <p>The amendment of questions relating to Heritage and Site Layout, Accessibility and Movement, and Climate Change and Sustainability is anticipated to have a neutral effect. This is because this data is still provided in other validation documents (Design and Access Statement, Heritage Statement, Transport Assessment, and Energy Statement), and the assessment is made under the relevant Local Plan policies.</p> <p>Improved DCC Templates will aid in identifying accessibility needs early in the planning process.</p> <p>The amendment of the DCC requirements for all council owned schemes and amending the requirement to being for 1 dwelling and above is expected to have neutral benefits on those with protected characteristics. This is because it will be at planning officers' discretion as to whether these documents are submitted (i.e. Engagement Summary and EINA) for council schemes for less than 1 dwelling.</p> <p>Furthermore, EINAs are required for all applications proposing a loss of community uses which would take into account the impact on those with the above protected characteristic. It is therefore anticipated the change will have a neutral impact overall.</p>	<p><b>Statement of Community Involvement</b></p> <p>There are no positive or negative socio-economic impacts identified for the above protected characteristic.</p> <p><b>Development Consultation Charter</b></p> <p>There are no socio-economic impacts identified for the above protected characteristic.</p>
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Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p>In 2021, 8.2% of Southwark residents identified as being disabled and limited a lot. This was a decrease from 11.1% in 2011. Almost a quarter of households (33,000) had at least one resident with a disability. (Census 2021)</p> <p>The neighbourhoods with higher proportions of disability are Old Kent Road, South Bermondsey and Nunhead &amp; Queen's Road. (Census 2021, quoted in JSNA Annual Report 2023)</p> <p>In 2019 there were 613 households in Southwark with unmet wheelchair accessible accommodation needs. (Strategic Housing Market Assessment Update 2019)</p> <p>Research conducted by the charity Sense has found that 61% of disabled people are chronically lonely. This figure rises to 70% for young disabled people. (<a href="https://www.sense.org.uk/media/latest-press-releases/loneliness-rises-dramatically-among-disabled-people/">https://www.sense.org.uk/media/latest-press-releases/loneliness-rises-dramatically-among-disabled-people/</a>)</p>	<p>The Joseph Rowntree Foundation has found that poverty rates for households with a disabled person or informal carer are much higher than average. (Joseph Rowntree Foundation, 'UK Poverty 2023' (available at: <a href="https://www.jrf.org.uk/report/uk-poverty-2023">https://www.jrf.org.uk/report/uk-poverty-2023</a>))</p>
Mitigating and/or improvement actions to be taken	
<p>As there are no negative impacts, no mitigating actions are required.</p>	<p>As there are no negative impacts, no mitigating actions are required.</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 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.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
<p><b>Statement of Community Involvement</b></p> <p>The proposed changes to the SCI are minor and relate to the correction of grammatical errors, formatting changes and clarifications in the description of DCC requirements.</p>	<p><b>Statement of Community Involvement</b></p> <p>There are no positive or negative socio-economic impacts identified for the above protected characteristic and the SCI.</p> <p><b>Development Consultation Charter</b></p>

<p>These updates are anticipated to make the document more accessible and would have a positive social impact for all, including those with protected characteristics.</p> <p><b><i>Development Consultation Charter</i></b></p> <p>The proposed changes to the DCC are anticipated to have neutral benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The work on Social Value is likely to have positive impacts, as it is delivering added value for the different pillars of Social Value in new development.</p> <p>The addition of questions relating to the Social Value of schemes will bring positive benefits by identifying and clarifying potential Social Value gains of development.</p> <p>The amendment of questions relating to Heritage and Site Layout, Accessibility and Movement, and Climate Change and Sustainability is anticipated to have a neutral effect. This is because this data is still provided in other validation documents submitted as part of a planning application (for example Design and Access Statement, Heritage Statement, Transport Assessment, and Energy Statement), and the assessment is made under the relevant Local Plan policies.</p> <p>The amendment of the DCC requirement for all council owned schemes to the requirement being for 1 dwelling and above is expected to have neutral benefits on those with protected characteristics. This is because it will be at planning officers' discretion as to whether these documents are submitted (i.e. Engagement Summary and EINA) for council schemes for less than 1 dwelling.</p> <p>Officers must have a consideration of potential Equalities Impacts in their assessment of all planning applications. Furthermore, EINAs are required for all applications proposing a loss of community uses. This would take into account the impact on those with the above protected characteristic. It is therefore anticipated the change will have a neutral impact overall.</p>	<p>There are no socio-economic impacts identified for the above protected characteristic.</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>1.23% of people aged 16 years and over in Southwark have a gender identity different from their sex registered at birth. (Census 2021)</p> <p>8.1% of people in the Burgess Park area have reported a gender identity different from their sex registered at birth. This is the highest figure of any area (medium super output area) in England and Wales. (Census 2021)</p> <p>Nationwide, 41% of trans people and 31% of non-binary people have experienced a hate crime or incident because of their gender identity in the last 12 months. (Stonewall, 'LGBT in Britain: Trans Report 2018 (available at: <a href="https://www.stonewall.org.uk/system/files/lgbt_in_britain_-_trans_report_final.pdf">https://www.stonewall.org.uk/system/files/lgbt_in_britain_-_trans_report_final.pdf</a>))</p>	<p>One in four trans people have experienced homelessness at some point in their lives. (Stonewall, 'LGBT in Britain: Trans Report 2018 (available at: <a href="https://www.stonewall.org.uk/system/files/lgbt_in_britain_-_trans_report_final.pdf">https://www.stonewall.org.uk/system/files/lgbt_in_britain_-_trans_report_final.pdf</a>))</p>
<b>Mitigating and/or improvement actions to be taken</b>	
As there are no negative impacts, no mitigating actions are required.	As there are no negative impacts, no mitigating actions are required.

<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>	
<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><b>Statement of Community Involvement</b></p> <p>The proposed changes to the SCI are minor and relate to the correction of grammatical errors, formatting changes and clarifications in the description of DCC requirements.</p> <p>These updates are anticipated to make the document more accessible and would have a positive social impact for all, including those with protected characteristics. Older and younger people may benefit from more accessible engagement processes that come from the requirements set out in the SCI.</p>	<p><b>Statement of Community Involvement</b></p> <p>There are no positive or negative socio-economic impacts identified for persons who are married or in a civil partnership.</p> <p><b>Development Consultation Charter</b></p> <p>There are no socio-economic impacts identified for the persons who are married or in a civil partnership.</p>

<p><b>Development Consultation Charter</b></p> <p>The proposed changes to the DCC are anticipated to have neutral benefits for all people living and working in Southwark and those who want to get involved in the planning system.</p> <p>The addition of Social Value in the DCC is likely to have positive impacts, as it is delivering added value for the different pillars of Social Value in new development.</p> <p>The addition of questions relating to the Social Value of schemes will bring positive benefits by identifying and clarifying potential Social Value gains of development.</p> <p>The amendment of questions relating to Site Layout, Accessibility and Movement is anticipated to have a neutral effect. This is because this data is still provided in other validation documents (Design and Access Statement, Heritage Statement, Transport Assessment, and Energy Statement) and the assessment is made under the relevant Local Plan policies.</p> <p>The amendment of the DCC requirements for all council owned schemes to being for 1 dwelling and above is expected to have neutral benefits on those with protected characteristics. This is because it will be at planning officers' discretion as to whether these documents are submitted (i.e. Engagement Summary and EINA) for council schemes for less than 1 dwelling.</p> <p>Furthermore, EINAs are required for all applications proposing a loss of community uses which would take into account the impact on those with the above protected characteristic. It is therefore anticipated the change will have a neutral impact overall.</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 latest census found that 26.9% of Southwark residents were married or in a civil partnership. This was a fall from 29.4% in 2011. Southwark had the fourth-highest percentage of adults who had never been married or in a civil partnership of all English local authorities. The proportion of residents who are married or in a civil partnership is significantly higher in the south of the borough than the north. (Census 2021)</p>	<p>None</p>
<p><b>Mitigating or improvement actions to be taken</b></p>	
<p>As there are no negative impacts, no mitigating actions are required.</p>	<p>As there are no negative impacts, no mitigating actions are required.</p>

**Pregnancy and maternity** - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

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)
<p><b>Statement of Community Involvement</b></p> <p>The proposed changes to the SCI are minor and relate to the correction of grammatical errors, formatting changes and clarifications in the description of DCC requirements.</p> <p>These updates are anticipated to make the document more accessible and would have a positive social impact for all, including those with protected characteristics.</p> <p><b>Development Consultation Charter</b></p> <p>The proposed changes to the DCC are anticipated to have neutral benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The work on Social Value is likely to have positive impacts, as it is delivering added value for the different pillars of Social Value in new development.</p> <p>The addition of questions relating to the Social Value of schemes will bring positive benefits by identifying and clarifying the potential Social Value gains of development.</p> <p>The amendment of questions relating to Site Layout, Accessibility and Movement is anticipated to have a neutral effect. This is because this data is still provided in other validation documents (Design and Access Statement, Heritage Statement, Transport Assessment, and Energy Statement) and the assessment is made under the relevant Local Plan policies.</p> <p>The amendment of the DCC requirements for all council owned schemes to being for 1 dwelling and above is expected to have neutral benefits on those with protected characteristics. This is because it will be at planning officers' discretion as to whether these documents are submitted (i.e. Engagement Summary and EINA) for council schemes of less than 1 dwelling.</p> <p>Furthermore, EINAs are required for all applications proposing a loss of community uses which would take</p>	<p><b>Statement of Community Involvement</b></p> <p>There are no positive or negative socio-economic impacts identified for persons who are pregnant.</p> <p><b>Development Consultation Charter</b></p> <p>There are no socio-economic impacts identified for the persons who are pregnant.</p>



into account the impact on those with the above protected characteristic. It is therefore anticipated the change will have a neutral impact overall.	
<b>Equality information on which above analysis is based</b>	<b>Socio-economic data on which above analysis is based</b>
The total number of babies born in Southwark has been decreasing year on year over the past 10 years. The decline in the fertility rate in Southwark is seen across all age groups, but particularly among younger women. The average age of mothers giving birth in Southwark in 2022 was around 33 years. Across the borough there is substantial variation in the number of births each year, with rates highest in Dulwich and Peckham Rye. The general fertility rate is lowest in Nunhead & Queen's Road, at 27 births per 1,000. This ward has also seen the greatest decline over the decade (59%). (JSNA Annual Report 2023; JSNA Multi-ward Profiles 2023: East Central Southwark)	MBRRACE-UK's 2022 report found that women living in the most deprived areas have the highest maternal mortality rates and are two and a half times more likely to die than their counterparts living in the least deprived areas. (M-BRRACE-UK, 2022, 'Saving Lives, Improving Mothers' Care: Lessons learned to inform maternity care from the UK and Ireland Confidential Enquiries into Maternal Deaths and Morbidity 2018–20' (available at: <a href="https://www.npeu.ox.ac.uk/mbrance-uk/reports">https://www.npeu.ox.ac.uk/mbrance-uk/reports</a> )
<b>Mitigating and/or improvement actions to be taken</b>	
As there are no negative impacts, no mitigating actions are required.	As there are no negative impacts. No mitigating actions are required.

<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	
<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><b>Statement of Community Involvement</b></p> <p>The proposed changes to the SCI are minor and relate to the correction of grammatical errors, formatting changes and clarifications in the description of DCC requirements.</p> <p>These updates are anticipated to make the document more accessible and would have a positive social impact for all, including those with protected characteristics.</p> <p>Non-native English speakers may find it hard to understand the SCI and the DCC.</p> <p><b>Development Consultation Charter</b></p>	<p><b>Statement of Community Involvement</b></p> <p>There are no positive or negative socio-economic impacts identified relating to race.</p> <p><b>Development Consultation Charter</b></p> <p>There are no socio-economic impacts identified, relating to race.</p>

<p>The proposed changes to the DCC are anticipated to have neutral benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The addition of questions on Social Value is likely to have positive impacts, as it is delivering added value for the different aspects of Social Value in new development.</p> <p>The amendment of questions relating to Site Layout, Accessibility and Movement is anticipated to have a neutral effect, because this data is still provided in other validation documents (Design and Access Statement, Heritage Statement, Transport Assessment, and Energy Statement), and the assessment is made under the relevant Local Plan policies.</p> <p>The amendment of the DCC requirement for all council owned schemes and amending the requirement to being for 1 dwelling and above is expected to have neutral benefits on those with protected characteristics. This is because it will be at planning officers' discretion as to whether these documents are submitted (i.e. Engagement Summary and EINA) for council schemes for less than 1 dwelling.</p> <p>Furthermore, EINAs are required for all applications proposing a loss of community uses which would take into account the impact on those with the above protected characteristic. It is therefore anticipated the change will have a neutral impact overall.</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>Southwark is a very ethnically diverse borough. In 2021, 51.4% of residents identified as white (a decrease from 54.2% in 2011). 25.1% identified as 'Black, Black British, Black Welsh, Caribbean or African'. 9.9% identified as 'Asian, Asian British or Asian Welsh'. 6.3% identified as 'Arab of any other ethnic group'. (Census 2021)</p> <p>Areas with the highest concentrations of white residents are mostly in the south of the borough and the Rotherhithe peninsula. Areas with the highest proportions of Black residents are mostly in the centre of the borough. The areas with the highest proportion of Asian residents are Borough and Elephant and Castle. (Census 2021)</p> <p>National research by UCL has found that Black and Asian adults over the age of 65 years are almost twice as likely to report having no close friends (9% and 7%</p>	<p>29% of Black residents live in the borough's most deprived neighbourhoods, while only 17% of the borough's white residents live in these neighbourhoods. (JSNA Annual Report 2023)</p> <p>Areas (medium super output areas) in Southwark with the highest proportions of Black residents include Peckham Park Road (48.8%), Burgess Park (38.7%) and South Bermondsey West (31.7%). In addition, the area with the highest proportion of residents identifying as 'other ethnic group' is Burgess Park (15.6%). These areas overlap with the Old Kent Road Opportunity Area. The Areas with the highest proportions of Asian residents are Elephant and Castle (21%) and</p>

respectively) compared to White and mixed or 'other' ethnicity adults of the same age (both 4%). ( <a href="https://www.ucl.ac.uk/ioe/news/2020/jan/older-ethnic-minority-adults-have-fewer-close-friends">https://www.ucl.ac.uk/ioe/news/2020/jan/older-ethnic-minority-adults-have-fewer-close-friends</a> )	Borough and Southwark Street (19%). These areas overlap with the Elephant and Castle and London Bridge/Bankside Opportunity Areas. (Census 2021)
<b>Mitigating and/or improvement actions to be taken</b>	
Second-language English speakers may find it hard to understand the SCI and DCC. Upon request the Council can translate the documents into other languages. The document also adheres to Hemmingway plain English guidelines.	As there are no negative impacts. No mitigating actions are required.

<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><b>Statement of Community Involvement</b></p> <p>The proposed changes to the SCI are minor and relate to the correction of grammatical errors, formatting changes and clarifications in the description of DCC requirements.</p> <p>These updates are anticipated to make the document more accessible and would have a positive social impact for all, including those with protected characteristics.</p> <p><b>Development Consultation Charter</b></p> <p>The proposed changes to the DCC are anticipated to have neutral benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The work on Social Value is likely to have positive impacts, as it is delivering added value for the different pillars of Social Value in new development.</p> <p>The addition of questions relating to the Social Value of schemes will bring positive benefits by identifying and clarifying potential Social Value gains of development.</p>	<p><b>Statement of Community Involvement</b></p> <p>There are no positive or negative socio-economic impacts identified, relating to religion and belief.</p> <p><b>Development Consultation Charter</b></p> <p>There are no socio-economic impacts identified, relating to religion and belief.</p>

<p>The additional questions may also aid applicants in considering the impacts on local places of worship around the site.</p> <p>The amendment of the questions relating to Site Layout, Accessibility and Movement is anticipated to have a neutral effect, because this data is still provided in other validation documents (Design and Access Statement, Heritage Statement, Transport Assessment, and Energy Statement), and the assessment is made under the relevant Local Plan policies.</p> <p>The amendment of the DCC requirements for all council owned schemes and amending the requirement to being for 1 dwelling and above is expected to have neutral benefits on those with protected characteristics. This is because it will be at planning officers' discretion as to whether these documents are submitted (i.e. Engagement Summary and EINA) for council schemes for less than 1 dwelling.</p> <p>Furthermore, EINAs are required for all applications proposing a loss of community uses which would take into account the impact on those with the above protected characteristic. It is therefore anticipated the change will have a neutral impact overall.</p>	
<b>Equality information on which above analysis is based</b>	<b>Socio-economic data on which above analysis is based</b>
<p>The latest census found that 43.3% of Southwark residents identify as Christian and 9.6% identify as Muslim. 36.4% identify as having no religion. (Census 2021)</p>	<p>None</p>
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required.</p>	<p>As there are no negative impacts, no mitigating actions are required.</p>

<b>Sex</b> - A man or a woman.	
<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><b>Statement of Community Involvement</b> The proposed changes to the SCI are minor and relate to the correction of grammatical errors, formatting changes and clarifications in the description of DCC requirements.</p>	<p><b>Statement of Community Involvement</b> There are no positive or negative socio-economic impacts identified, relating to religion and belief.</p>

<p>These updates are anticipated to make the document more accessible and would have a positive social impact for all, including those with protected characteristics.</p> <p><b>Development Consultation Charter</b></p> <p>The proposed changes to the DCC are anticipated to have neutral benefits for all people living and working in Southwark and who want to get involved in the planning system.</p> <p>The work on Social Value is likely to have positive impacts, as it is delivering added value for the different pillars of Social Value in new development.</p> <p>The addition of questions relating to the Social Value of schemes will bring positive benefits by identifying and clarifying potential Social Value gains of development.</p> <p>The amendment of the questions relating to Site Layout, Accessibility and Movement is anticipated to have a neutral effect, because this data is still provided in other validation documents (Design and Access Statement, Heritage Statement, Transport Assessment, and Energy Statement), and the assessment is made under the relevant Local Plan policies.</p> <p>The amendment of the DCC requirements for all council owned schemes and amending the requirement to being for 1 dwelling and above is expected to have neutral benefits on those with protected characteristics. This is because it will be at planning officers' discretion as to whether these documents are submitted (i.e. Engagement Summary and EINA) for council schemes for less than 1 dwelling.</p> <p>Furthermore, EINAs are required for all applications proposing a loss of community uses which would take into account the impact on those with the above protected characteristic. It is therefore anticipated the change will have a neutral impact overall.</p>	<p><b>Development Consultation Charter</b></p> <p>There are no socio-economic impacts identified, relating to religion and belief.</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 Census 2021 found that 51.6% of Southwark's residents are women and 48.4% are men. (Census 2021)</p> <p>According to Plan International UK, 66% of girls in the UK have experienced sexual attention or</p>	<p>The GLA reports that women earning the women's median wage need to spend 63% of their earnings to afford the median private rent in London. Men only need to spend 49% of their earnings on average. (London Assembly, 'Women and housing: a gap in the market',</p>

<p>sexual or physical contact in a public place. (Plan International, 'Street Harassment: It's Not OK', 2018 (available at: <a href="https://plan-uk.org/street-harassment/its-not-ok">https://plan-uk.org/street-harassment/its-not-ok</a>))</p> <p>71% of women of all ages in the UK have experienced some form of sexual harassment in a public space. This number rises to 86% among 18-24-year-olds. (APPG for UN Women, 'Prevalence and reporting of sexual harassment in UK public spaces', 2021 (available at: <a href="https://www.unwomenuk.org/site/wp-content/uploads/2021/03/APPG-UN-Women-Sexual-Harassment-Report_Updated.pdf">https://www.unwomenuk.org/site/wp-content/uploads/2021/03/APPG-UN-Women-Sexual-Harassment-Report_Updated.pdf</a>))</p>	<p>2023 (available at: <a href="https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-press-releases/gender-pay-gap-continues-impact-women-housing#:~:text=Women%20earning%20the%20women%27s%20median,spend%2049%25%20of%20their%20earnings">https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-press-releases/gender-pay-gap-continues-impact-women-housing#:~:text=Women%20earning%20the%20women%27s%20median,spend%2049%25%20of%20their%20earnings</a>))</p>
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required.</p>	<p>As there are no negative impacts, no mitigating actions are required.</p>

<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><b>Statement of Community Involvement</b></p> <p>The proposed changes to the SCI are minor and relate to the correction of grammatical errors, formatting changes and clarifications in the description of DCC requirements.</p> <p>These updates are anticipated to make the document more accessible and would have a positive social impact for all, including those with protected characteristics.</p> <p><b>Development Consultation Charter</b></p> <p>The proposed changes to the DCC are anticipated to have neutral benefits for all people living and working in Southwark</p>	<p><b>Statement of Community Involvement</b></p> <p>There are no positive or negative socio-economic impacts identified, relating to religion and belief.</p> <p><b>Development Consultation Charter</b></p> <p>There are no socio-economic impacts identified, relating to religion and belief.</p>

<p>and who want to get involved in the planning system.</p> <p>The work on Social Value is likely to have positive impacts, as it is delivering added value for the different pillars of Social Value in new development.</p> <p>The addition of questions relating to the Social Value of schemes will bring positive benefits by identifying and clarifying potential Social Value gains of development.</p> <p>The amendment of questions relating to Site Layout, Accessibility and Movement is anticipated to have a neutral effect, because this data is still provided in other validation documents (Design and Access Statement, Heritage Statement, Transport Assessment, and Energy Statement), and the assessment is made under the relevant Local Plan policies.</p> <p>The amendment of the DCC requirements for all council owned schemes and amending the requirement to being for 1 dwelling and above is expected to have neutral benefits on those with protected characteristics. This is because it will be at planning officers' discretion as to whether these documents are submitted (i.e. Engagement Summary and EINA) for council schemes for less than 1 dwelling.</p> <p>Furthermore, EINAs are required for all applications proposing a loss of community uses which would take into account the impact on those with the above protected characteristic. It is therefore anticipated the change will have a neutral impact overall.</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>In the latest census 8.08% of Southwark's residents identified as LGB+. This is the fourth highest figure of any local authority district in England and Wales. The areas with the highest proportion of LGB+ residents are in the north-west of the borough. (Census 2021)</p> <p>According to research by Yougov, over a third of LGBT people say they don't feel comfortable walking down the street holding their partner's hand. This rises to</p>	<p>One in six LGB people have experienced homelessness at some point in their lives. (Stonewall and Yougov, 'LGBT in Britain: Home and Communities', 2018 (available at: <a href="https://www.stonewall.org.uk/sites/default/files/lgbt_in_britain_home_and_communities.pdf">https://www.stonewall.org.uk/sites/default/files/lgbt_in_britain_home_and_communities.pdf</a>))</p>

<p>three in five for gay men. One in five LGBT people have experienced a hate crime or incident due to their sexual orientation and/or gender identity in the last 12 months. (Stonewall and Yougov, 'LGBT in Britain: Hate Crime and Discrimination', 2017 (available at: <a href="https://www.stonewall.org.uk/system/files/gbt_in_britain_hate_crime.pdf">https://www.stonewall.org.uk/system/files/gbt_in_britain_hate_crime.pdf</a>))</p>	
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	

<b>Human Rights</b> <p>There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol</p>
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>
<p>The Statement of Community Involvement and Developer Consultation Charter aligns with the council's Approach to Community Engagement document used throughout the council that is considerate of the Human Rights Act.</p>
<b>Information on which above analysis is based</b>
<p>None</p>
<b>Mitigating and/or improvement actions to be taken</b>
<p>We will continue to monitor and review the implementation and use of Statement of Community Involvement and Developer Consultation Charters to ensure that the likelihood of negative impacts arising is minimal. The Council will mitigate against any unforeseen issues that arise.</p>




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## APPENDIX 8

# Consultation Plan – SCI / DCC

## 1. Introduction

### What is the Statement of Community Involvement (SCI)?

1. The SCI gives details about the opportunities residents have to help make plans, policies and decisions that can affect their community. The document outlines the Council's commitments and sets out the values in the Approach to Community Engagement.
2. The Development Consultation Charter (DCC) forms part of the SCI. It explains how developers are expected to carry out successful engagement for large-scale developments (development is considered large-scale if it involves over 10 homes). The charter provides the developer with guidance on how to engage effectively with the public, before any application has been submitted.
3. The DCC means applicants need to submit three documents at different stages. These are an Early Engagement Strategy (EES), an Engagement Summary (ES) and an Equalities Impact Assessment (EQIA). The Council tells developers what information to put in these documents and provides templates to make sure they provide all the information needed.

### Why are we consulting on the SCI?

4. The current SCI is from December 2022. The SCI and DCC are intended to be live documents that would respond to the changing needs of residents.
5. Officers have reviewed the SCI and DCC and the implementation of these requirements over the past 2 years, and in response have made some minor changes to both documents to make the process clearer for both residents and applicants.
6. In addition, in response to the Council's 2030 Pledge and focus on Social Value, additional questions are proposed to understand the value added by new development.
7. Minor changes have been made to the templates for developers to support in compiling the EES, ES and EQIA.

8. There is no requirement in the Southwark Constitution for these changes to be consulted on. This public consultation on the SCI is an opportunity for Southwark residents to have their say on the proposed changes. The responses received by the council during this process will help to shape and improve the SCI and DCC for the benefit of the community.

#### What is a consultation plan?

9. A consultation plan sets out how residents can expect to be consulted about the proposed changes to the SCI. It details how to find out about the consultation and how to make comments on this document.
10. Anyone with further questions about the consultation or the SCI can contact the planning policy team at [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk).

#### Summary of consultation to date

11. The current SCI and DCC were adopted in December 2022. This was only after two rounds of consultation (January 2020 – March 2022 and December 2021 – March 2022).

#### The purpose of this consultation

12. The purpose of this consultation is to receive feedback from the community of our proposed changes to the SCI and DCC. The Council wish to know residents' on:
  - The rewording of sections to be clearer and correct some grammatical mistakes.
  - Encouraging applicants to publish their plans before submitting an application.
  - Refining what type of Council-owned applications are needed to submit certain documents.
  - Changing some of the questions in our EES and ES templates.
  - Expanding the Social Value Statement section of the ES.
  - Changing the Equalities Impact Assessment (EQIA) to an Equalities Impact and Needs Assessment (EINA) (this will help emphasise potential socio-economic impacts of developments).

## **2. How are we Consulting**

#### How are we consulting?

13. This consultation plan sets out the consultation we are planning to carry out on the proposed changes to the SCI and DCC. There is no statutory requirement to consult the community on the SCI. However, in order to produce a document that reflects the needs of the community, we will consult on the proposed changes to the SCI. This also makes sure the process is as transparent as possible.
14. We invite members of the public or any other stakeholders to share their views on our proposed changes to the SCI, DCC, or any of the three templates (ES, EES, and EQIA).

### 3. The timetable and methods of consultation

#### Consultation timeframe

15. We will consult on our proposed changes for a minimum of six weeks. Additional time will also be added to the consultation to account for the Christmas period.
16. The consultation will run from 16<sup>th</sup> December 2024 until 10<sup>th</sup> February 2025.

#### Consultation methods

17. The documents will be put on the Council's website and will also be available to view at the Council's Tooley Street offices (160 Tooley Street).
18. An advert publicising the consultation will be put in Southwark News and we will also send an email to around 30,000 contacts who have signed up for our Planning Policy mailing list.
19. The table below shows the ways we will consult.

<b>METHOD OF CONSULTATION</b>	<b>CONSULTEE</b>	<b>DATE</b>	<b>COMMENTS</b>
Send a mail out to all statutory consultees informing them of the consultation and inviting comments	All on planning policy consultee database	Consultation launch	
Display consultation documents at our offices	All	Consultation launch	
Upload the documents onto the	All	Consultation launch	Our website will continually be updated

Council website for the public to view			
Advertise the consultation in the local press	All	Consultation launch	This will be in the Southwark News
Make a copy of the SCI / DCC available for an individual if requested	Individuals if requested	On request	

## 4. How to Comment

20. The Council welcomes comments on the SCI and DCC and any comments on the proposed changes to the documents

21. Feedback can be given:

- On the Consultation Hub
- By email to [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk)
- By phone to 020 7525 2990
- By letter / post to:

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

22. For any queries or assistance, please contact:  
[planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk).

## 5. What happens next?

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

24. Once this consultation is over, responses will be compiled, and the SCI will be amended where necessary to take on board the comments received. This new

SCI will then be formally adopted. The SCI will be implemented, and monitoring will be ongoing.

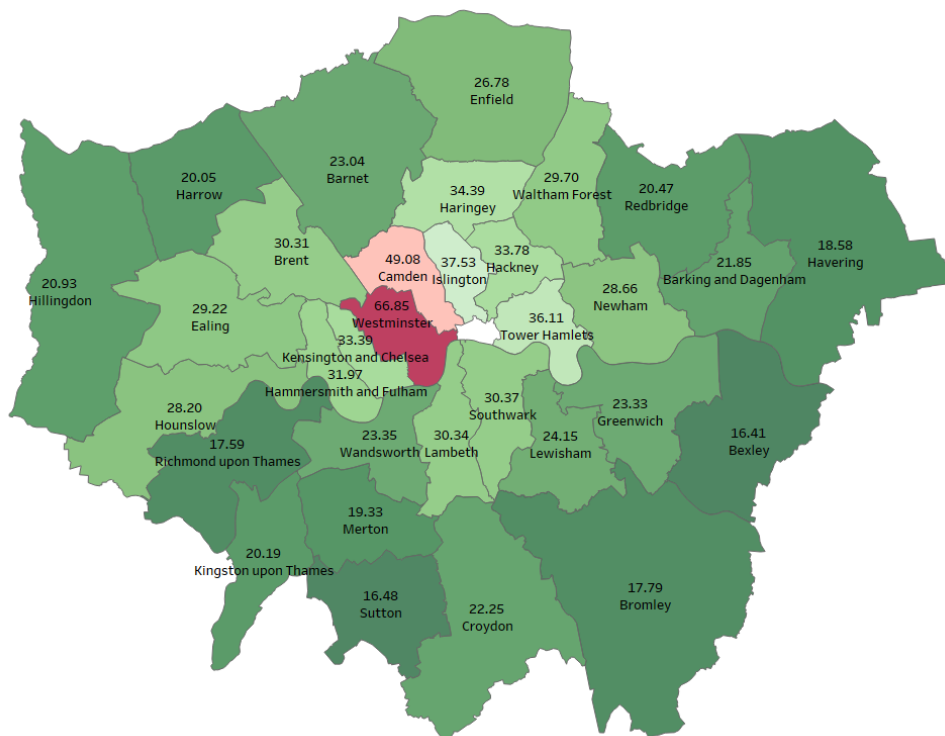
25. Feedback from this consultation will be made available on the website and a link to this feedback will be sent to MySouthwark users.

## APPENDIX 1

### Southwark Antisocial behaviour data and comparisons

1. Comparable London Borough police data on ASB, (between Feb 23-Jan 24) shows central London boroughs see higher rates of ASB calls, especially Westminster, (66.85) and Camden, (49.8). However, Southwark has below average call rates for ASB (30.37).
2. The rates for the 12 inner London boroughs are as follows:

Local Authority	ASB Call Rates per 1,000 population
Westminster	66.85
Camden	49.08
Islington	37.53
Tower Hamlets	36.11
<b>Inner London Average</b>	<b>35.27</b>
Hackney	33.78
Kensington & Chelsea	33.39
Hammersmith & Fulham	31.97
<b>Southwark</b>	<b>30.37</b>
Lambeth	30.34
Wandsworth	26.35
Lewisham	24.15
Greenwich	23.33



*ASB Call Rates to Police*

3. Antisocial behaviour continues to blight communities. The police recorded one million incidents of antisocial behaviour in the year ending December 2023. Estimates from the Crime Survey for England and Wales for the year ending December 2023 showed that 35 per cent of people had experienced or witnessed some type of antisocial behaviour. In London, ASB calls to police are most often about rowdy or inconsiderate behaviour.
4. We know that ASB is under-reported. Research demonstrates that more than half of ASB incidents go unreported. More work needs to be done to understand why this is and to ensure that everyone is aware of what ASB is and how and who to report it to.
5. National data shows a clear link between deprivation and people's concerns of ASB and safety in London along with a significant correlation to confidence in the police. It also demonstrates that ASB is often directed at victims who are vulnerable or have wider support needs and leaves a long-lasting impact on individuals, families and the local communities that suffer it.
6. An updated Crime and ASB survey has been undertaken for Southwark collating all of the reported incidents of ASB to both the council and the police during 2023/24 and the findings are shown below;



ASB Reports by Ward	Police		Council		Combined	
	2023/24	Ranking	2023/24	Ranking	2023/24	Ranking
North Walworth	841	1	1095	1	1936	1
Old Kent Road	700	4	819	2	1519	2
London Bridge & West Bermondsey	795	2	703	7	1498	3
Borough & Bankside	703	3	606	10	1309	4
Rye Lane	640	6	667	8	1307	5
Chaucer	562	8	722	5	1284	6
North Bermondsey	685	5	584	13	1269	7
South Bermondsey	510	9	742	4	1252	8
Nunhead & Queen's Road	499	10	750	3	1249	9
Camberwell Green	577	7	607	9	1184	10
Rotherhithe	474	11	576	14	1050	11
Newington	341	16	706	6	1047	12
Peckham	423	13	598	11	1021	13
Faraday	474	11	490	15	964	14
St Giles	357	15	588	12	945	15
Goose Green	281	17	457	16	738	16
St George's	380	14	332	18	712	17
Surrey Docks	235	18	235	21	470	18
Champion Hill	95	22	338	17	433	19
Dulwich Wood	149	19	277	19	426	20
Peckham Rye	88	23	240	20	328	21
Dulwich Village	137	20	173	22	310	22
Dulwich Hill	103	21	163	23	266	23
Unknown	74		502		576	
<b>Total</b>	<b>10123</b>		<b>12970</b>		<b>23093</b>	

7. The top 5 areas for reported ASB related matters to both the police and council for 2023/24 differs from the current areas of Community warden focus as identified in 2022. The combined top five wards for ASB for 2023/24 reported by volume were:
8.
  - North Walworth
  - Old Kent Road
  - London Bridge & West Bermondsey
  - Borough & Bankside
  - Rye Lane
9. In the short term the town centre priority areas that are patrolled by the Community Wardens have been expanded to include SE1 and the London Bridge area and Old Kent Road. As a consequence, the frequency of patrolling in the original 5 priority areas has been reduced to accommodate these additional hotspots.
10. Looking in more detail at the data for Southwark Police ASB increased by 11% on the last quarter and 6% on Q2 last year. However Council reported ASB

decreased by 3% compared with Q1, and by 0.5% compared with Q2 last year.  
The latest data is in the following table@

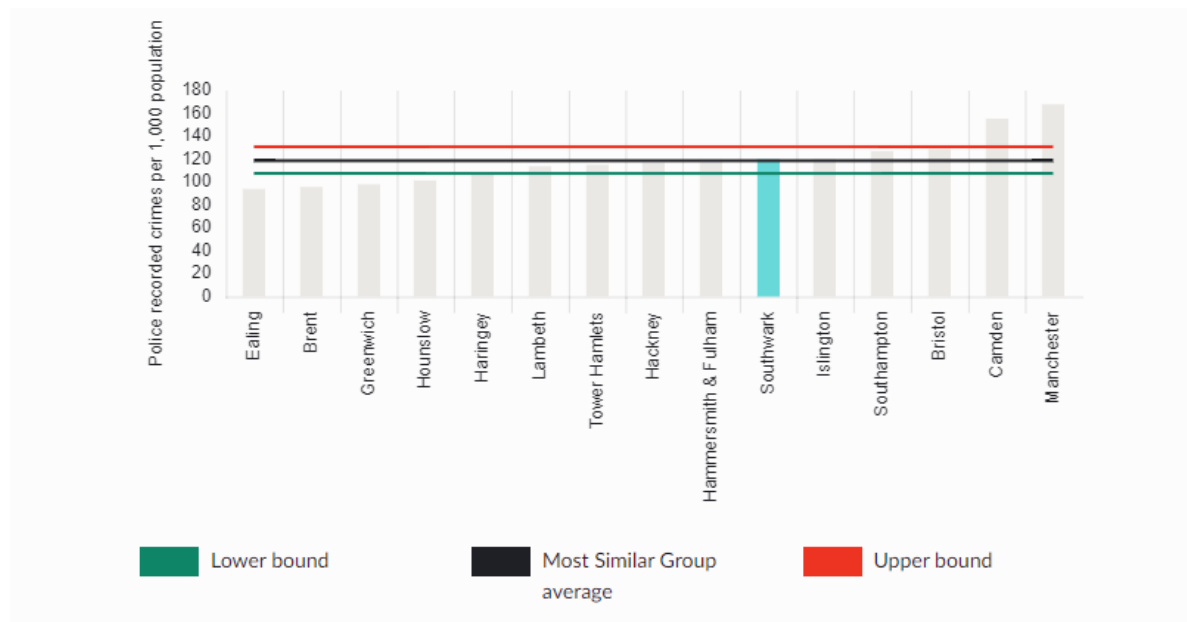
11.

ASB Incidents		Q1 2024/25	Q2 2024/25	% change Qtr	Q2 2023/24	% change FY
Calls to Police	1. Rowdy Or Inconsiderate Behaviour	1,290	1,454	12.7%	1,335	8.9%
	2. Noise	220	314	42.7%	253	24.1%
	3. Rowdy / Nuisance Neighbours	318	291	-8.5%	325	-10.5%
	All Other (see reference guide)	573	606	5.8%	609	-0.5%
	<b>Total</b>	<b>2,401</b>	<b>2,665</b>	<b>11.0%</b>	<b>2,522</b>	<b>5.7%</b>
Calls to Council	1. Presence of users or dealers	79	102	29.1%	88	15.9%
	2. Multiple Issues	61	66	8.2%	41	61.0%
	3. Threatening Behaviour	46	64	39.1%	50	28.0%
	All Other (see reference guide)	591	526	-11.0%	579	-9.2%
	<b>Total</b>	<b>777</b>	<b>758</b>	<b>-2.4%</b>	<b>758</b>	<b>0.0%</b>
SASBU - No of cases opened		207	235	13.5%		
Noise Complaints to Council	Rapid Response	1,742	1,816	4.2%	1,842	-1.4%
	3 day response	1,089	971	-10.8%	1,211	-19.8%
	<b>Total</b>	<b>2,831</b>	<b>2,787</b>	<b>-1.6%</b>	<b>3,053</b>	<b>-8.7%</b>
Repeat Callers*		56	61	8.9%	70	-12.9%
Community Trigger / ASB Review		11	6	-45.5%		
<b>Council Enforcement Actions:**</b>						
FPN's issued		0	0	N/A		
CSAS Interventions		20	17	-15.0%		
Council By-laws		83	81	-2.4%		
Warning letters /Cease & Desist notices		70	69	-1.4%		
Acceptable Behaviour Contracts		8	3	-62.5%		
Community Protection Notices/ Warnings (CPN/CPW)		14	3	-78.6%		
Tenancy action		37	52	40.5%		
Injunctions / Court		31	0	-100.0%		
Criminal Behaviour Orders		0	0	N/A		
Proactive CCTV reports to MetControl		38	28	-26.3%		
Evidence packages prepared (CCTV & Wardens)		17	14	-17.6%		
Noise Abatement notices		35	35	0.0%		
* callers who made 3 or more calls to the council or to the police regarding ASB during each 4-week PTG period						
** Performance was not recorded in the same way in 2023/24						
^ SafeStats is currently missing 2024/25 data following a hacking incident. To be updated in due course.						
<b>Other ASB reporting:</b>						
BTP ASB reports^				N/A	117	N/A
LFB ASB reports^				N/A	13	N/A
Cleansing	Fly-tipping reports	1786	2187	22.5%	1809	20.9%
	Littering	224	264	17.9%	275	-4.0%
	Dog fouling	90	128	42.2%	141	-9.2%

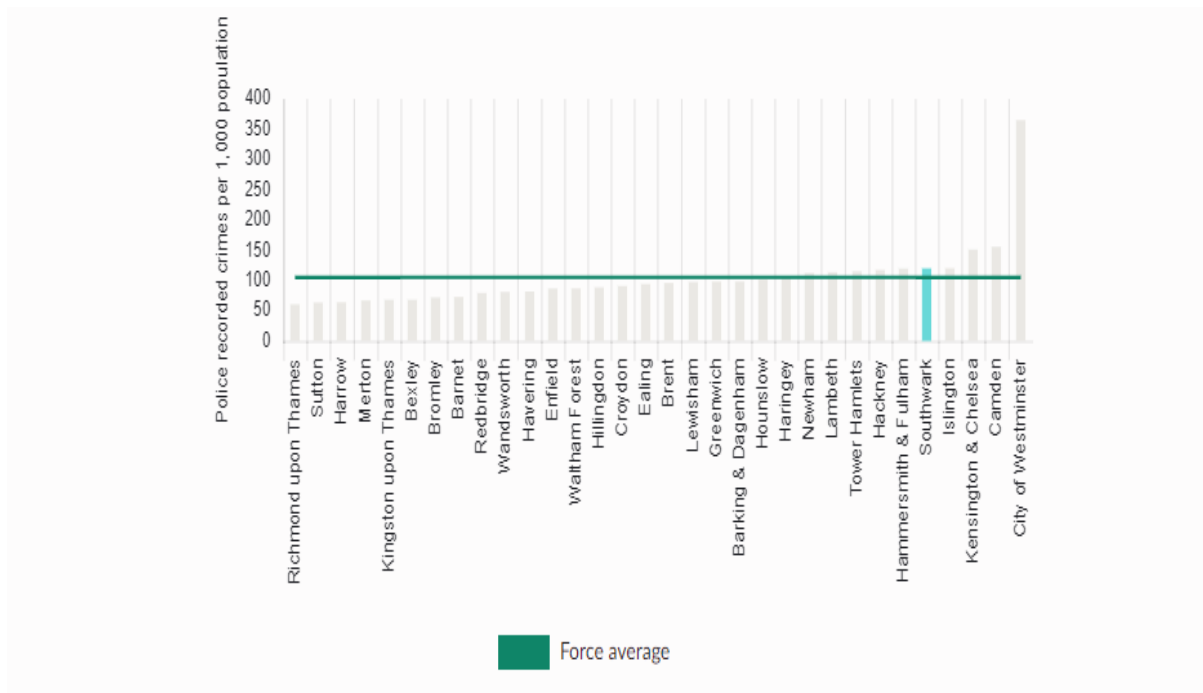
## APPENDIX 2

### Southwark Crime Data

1. Areas which have similar demographic, social and economic characteristics will generally have reasonably comparable levels of crime. Most Similar Groups were designed by the Home Office to help make fairer and more meaningful comparisons between areas that share similar social and economic characteristics.
2. In the year ending June 2024, the crime rate in Southwark was about the same as the average crime rate across these similar areas further analysis of crime and ASB rates as is shown in the table below:

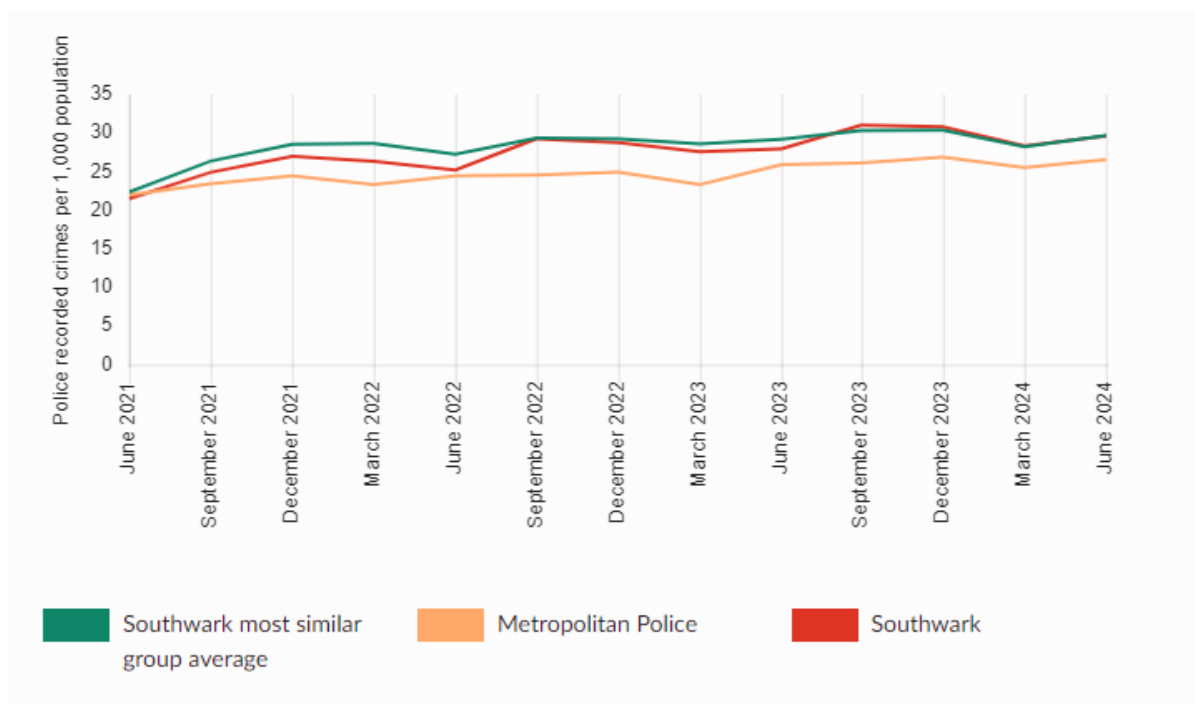


3. Southwark is around or below average for most crime types except for robbery and theft from the person where the rates in Southwark are higher than average. The MSG gives us some key authorities to benchmark our work against.
4. By contrast in comparison with other London boroughs in the year ending June 2024, the crime rate in Southwark was higher than average for the Metropolitan Police area as shown in the chart below:



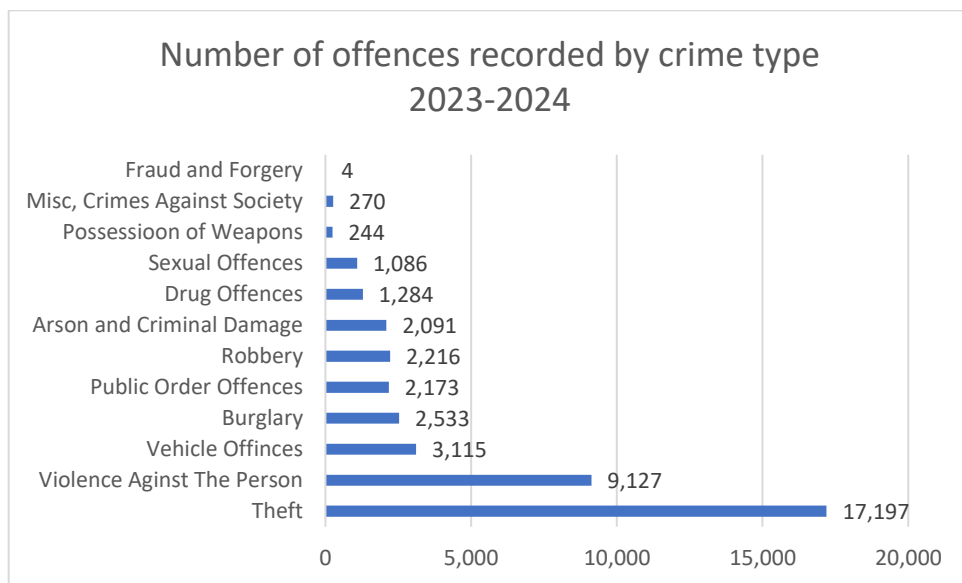
5. In the quarter ending June 2024, the crime rates were:

- up in Southwark
- up in the Metropolitan Police force area
- compared with the corresponding quarter in 2023.



6. The chart shows the quarterly crimes per thousand residents over a three-year period.

7. For 2023-2024 a total of 41,340 offences were recorded in Southwark the breakdown by crime type is as follows:



8. Theft is the most common crime type in Southwark by a significant margin and we know from engagement with residents the impact this has on people's perception of safety and trust and confidence in community safety partners and police.
9. While the long-term trend has been crime reducing overall, over the last two years by comparison with rates across London Southwark has seen small increases that are comparable with London as a whole. The table below compares police recorded crime data with the other Inner London Boroughs and London as a whole:

	November 2022 - October 2023			November 2023 - October 2024		
	Total Notifiable Offences	Offences per 1,000 population	% Change on previous 12 months	Total Notifiable Offences	Offences per 1,000 population	% Change on previous 12 months
Westminster						
Camden	38,795	156.4	15.3%	42,029	183.2	8.3%
Kensington & Chelsea	22,365	141.8	7.7%	23,112	146.5	3.3%
<b>Southwark</b>	<b>38,987</b>	<b>120.9</b>	<b>6.3%</b>	<b>41,929</b>	<b>128.2</b>	<b>3.0%</b>
Islington	28,407	119.3	5.1%	29,829	125.2	5.0%
Hackney	31,175	120.5	-0.2%	33,432	118.7	7.2%
Tower Hamlets	34,910	110.0	8.9%	36,999	116.6	6.0%
Hammersmith & Fulham	21,224	102.4	6.7%	21,432	116.5	0.9%
Lambeth	34,673	103.7	5.9%	38,221	114.3	10.2%
Greenwich	27,416	95.8	3.9%	27,663	96.6	0.9%
Lewisham	29,370	94.7	6.3%	29,971	96.6	2.0%
Wandsworth	26,059	80.3	7.0%	25,959	80.0	-0.4%
<b>LONDON</b>	<b>982,766</b>		<b>8.1%</b>	<b>946,345</b>		<b>3.0%</b>

10. A ward by ward breakdown is shown below:

	November 2022 - October 2023			November 2023 - October 2024		
Ward	Total Notifiable Offences	Offences per 1,000 population	% Change on previous 12 months	Total Notifiable Offences	Offences per 1,000 populatio	% Change on previous 12 months
Borough & Bankside	3,978	375.6	36.0%	3,955	373.5	-0.6%
London Bridge & West Bermondsey	4,187	257.3	24.1%	4,195	257.8	-9.5%
North Walworth	2,641	178.6	11.6%	3,650	227.3	27.2%
St Georges	1,599	209.2	23.2%	1,763	230.7	0.5%
Rye Lane	1,966	127.7	-11.0%	2,107	136.8	7.2%
Chaucer	1,996	134.0	31.3%	1,885	126.5	-5.6%
Faraday	1,317	106.1	9.5%	1,452	117.0	10.3%
Camberwell Green	1,737	114.0	3.8%	1,693	111.2	-2.5%
Old Kent Road	2,070	114.1	1.9%	1,989	109.6	-3.9%
Peckham	1,239	85.7	2.6%	1,419	104.1	14.5%
St Giles	1,401	88.2	-8.7%	1,502	94.6	7.2%
Rotherhithe	1,933	110.8	12.3%	1,625	93.2	-15.9%
South Bermondsey	1,540	90.1	6.4%	1,647	85.8	-4.1%
North Bermondsey	1,717	88.8	19.3%	1,467	85.8	-4.7%
Goose Green	993	69.8	-11.9%	1,048	73.6	5.5%
Nunhead & Queens Road	1,202	74.2	-10.0%	1,161	71.7	-3.4%
Dulwich Village	660	60.0	-9.5%	741	67.4	12.3%
Newington	937	67.8	2.6%	901	65.1	-3.8%
Surrey Docks	1,042	76.8	8.8%	824	60.7	-20.9%
Dulwich Wood	648	62.5	11.7%	622	60.0	-4.0%
Dulwich Hill	475	48.2	-13.8%	543	55.1	14.3%
Champion Hill	600	55.7	2.0%	590	54.8	-1.7%
Peckham Rye	639	60.3	-7.3%	505	47.6	-11.7%

## APPENDIX 3

### Summary of current Community Safety Partnership statutory duties

CSP current statutory duties include:

- Working together with partners to share information to reduce crime and disorder and antisocial behaviour.
- Work together to undertake a strategic assessment of crime and drug misuse in the area.
- Produce annual rolling three-year Community Safety Plans.
- Local authorities to scrutinise crime and disorder issues and functions including the functioning of the local Community Safety Partnership.
- Producing a reducing reoffending strategy.
- A range of powers given to Community Safety Partnerships regarding tackling of local antisocial behaviour, including oversight of ASB Case reviews.
- Duties to have due regard to preventing people being drawn into violent extremism (The Prevent Duty).
- Work together to prevent and tackle serious violence and have a strategy and action plan for dealing with serious violence (The Serious Violence Duty).

The current priorities of the Southwark Community Safety Partnership are:

- Violence Against Women and Girls.
- Tackling Drug related Harm.
- Tackling Violence and Vulnerability.
- Trust and Confidence.
- Safe and Social Estates and Neighbourhoods.

## APPENDIX 4

### Place Based Problem Solving

1. As part of an effective response to place-based problem solving in key locations, the Community Safety Team have undertaken a number of activities. Peckham Square is one of the most recent examples of this work.
2. In April 2024, we were alerted to rising concerns about crime and ASB in Peckham Square. Behaviours displayed include sex working, drug dealing, and drug taking. However, public reporting of ASB and crime in this area remains low. Continued engagement with residents and addressing barriers to public reporting are crucial for the success of the long-term efforts to sustain the progress made. Delivery of action has included,
  - **Joint Patrols:** Daily patrols by wardens, SASBU, and police to engage with vulnerable individuals in the square these have included St Mungos and Change, Grow, Live, (substance misuse support provider).
  - **Positive Engagement:** Engaging and signposting individuals to housing and mental health support services.
  - **Operational Day:** A coordinated operation involving multiple agencies to target key areas.
  - **CCTV Monitoring:** Enhanced CCTV coverage through targeted patrols to assist police, community wardens and improve community safety.
  - **Housing Support:** Offering support for high-risk individuals.
  - **Multi agency** meetings to share intelligence, have oversight of individual cases and agree appropriate interventions and taskings across the partnership to disrupt and where needed enforce and take action.
3. Outcomes so far include:

Activity	Notes
5 arrests	Enforcement against including individuals involved in serious organized criminality, weapons, knives, drugs, cuckooing and prostitution.
8 community protection warnings and 1 community protection notice have been served.	Should these be breached this becomes an arrestable offence
A Section 35 Dispersal Order for 48 hours	This prevented 73 people from, entering the square with 7 receiving written warnings.
One tenancy recovered	Recovery of a council property from an individual involved in criminal activity
20 Change Grow Live drug outreach patrols jointly with wardens, Police, Street	Engagement with 38 clients has taken place, 15 of whom have been offered drug treatment (others connected and referred to other boroughs and some refusing to



Population outreach and the Health Improvement Team.	engage who have been offered harm minimization support including Naloxone).
--	---

4. Ongoing work includes a lighting audit, improvements to visibility around Peckham Square, Environmental Visual Audits: addressing overgrown greenery and addressing potential risks along the Surrey Canal Path and an ongoing Police Partnership response to the area to ensure sustainability of improvements.

## APPENDIX 5

### Ongoing Service Improvements

1. A number of improvements have been made or are ongoing to how the warden service operates, and these include:
  - The operational and tactical tasking process has been aligned with the Crime and ASB survey, so the approach is evidence based. This ensures that resources are deployed where they are most needed.
  - Body Worn Cameras have been issued to all Community Wardens. Any footage captured are high quality resolution images of a sound evidential quality so can be used in both council and police investigations, prosecutions, and criminal proceedings.
  - The four cars used by the Wardens; have recently all been branded with a 'Tacking Anti-Social Behaviour Together' design. This supported by a wider suite of marketing materials which the team can use through the critical work engaging with the community.
  - The Community Wardens shift pattern has been reviewed and adjusted to align working patterns to the peak times that crime and ASB is reported to be happening. This data informed approach maximises the deployment of resources to the right place at the right time and ensures cover from 7am to 9pm. We will consider how this aligns to the common times when ASB is reported and what the appropriate response is to this.
  - We are building a new data platform for the Community Wardens service and work has commenced on this with an estimated completion date of early 2025. Handheld devices will form part of the new system, so the Community Wardens are able to capture their patrols in real time, reducing administrative tasks and increasing time out on patrols. An updated data system will also enable regular data insight products and performance reports. The intention is to have a single system that allows better sharing of information across council teams.
  - A crime and ASB dashboard has been developed which demonstrates levels of reported ASB against deployment of resources on a month-by-month basis and supports an evidence-based approach and enables a more agile response as and when ASB priority areas fluctuate.
  - There has been a particular focus on actively promoting and communicating to residents the engagement work focusing on ASB and crime prevention. Resident newsletters have included promoting crime-prevention advice, in addition, there has been targeting messaging in hotspot crime areas, as well as encouraging the reporting of crime through Crimestoppers. There has been an increase in community engagement events on tackling ASB in key locations providing high visibility, engagement and reassurance to residents and stakeholders. This has assisted in elevating and amplifying the positive

community safety-related work the council is doing with its partners.

2. To provide an independent assessment of the Community Wardens service, we are part way through a light touch service review of the town centre wardens team.
3. A light touch service review evaluates a service using ten key criteria, including but not limited to, structure and HR, finance, procurement, performance management, and systems, processes, and data. Using this methodology gives a horizontal, broad perspective of a service, but relatively surface level. It effectively pinpoints any areas of best practice and identifies opportunities to deliver, for example, more positive outcomes for residents, improve the customer experience, and work more efficiently to meet future demand without injecting further resources.
4. The output of the review, a report to be considered and recommendations to be implemented, will also form a body of evidence to plan and develop the more wholesale review of the council's Community Safety function.
5. The Southwark Antisocial Behaviour Unit (SASBU) identifies and addresses serious and complex cases of anti-social behaviour (ASB) from residents living in Council housing stock. Resident Service Officers (RSOs) deal with the lower level ASB.
6. During 22/24 SASBU undertook the following enforcement activity,
  - Number of Possession Orders applied for: 17
  - Possession Orders – 100% approval rates
  - Number of ASB applications made: 11
  - Number of ASB injunctions granted: 11
  - Number of Closure applications made: 60
  - Number of Closure orders granted: 60
7. A very high proportion of active casework held by the SASBU team relates to complex factors such as dual diagnosis, including substance misuse and/or mental health issues.
8. The SASBU team are funded through the Housing Revenue Account and deal with 10-12% of all ASB calls reported to the council. The remainder are dealt with by the noise team, Environmental enforcement officers and housing officers.
9. SASBU puts victims and witnesses at the heart of case management and works in partnership with internal and external agencies, including the voluntary sector to secure the best outcomes. SASBU use a range of enforcement powers and will take legal action to protect Southwark's communities.

10. SASBU also use the Community Trigger, sometimes referred to as ASB case reviews where there are repeat incidents of antisocial behaviour or hate crime and consists of a multiagency review to look at all aspects of a case and how it can be resolved collectively.
11. Response times for antisocial behaviour reports are categorised according to severity and are as follows:
  - Next working day for reports of offensive and hate-related graffiti, racial, homophobic, or any hate-related harassment, threats, or use of physical violence
  - Within 3 working days for rowdy behaviour, vandalism and damage to property, large groups congregating.
  - Within 5 working days for noisy neighbours, street drinking and begging, litter, rubbish, fly tipping, the misuse of motorised vehicles, neighbour disputes.
12. We will undertake further benchmarking of the response times, but they are currently shorter than Lambeth council and consistent with those in Lewisham.
13. SASBU Service Improvements include:
  - Recent data analysis has identified that a significant proportion of reported ASB relates to complex factors including substance misuse and/or mental health. On this basis, external funding was secured for two new fixed term posts, both of which commenced in June 2024. These are a Dual Diagnosis, Advanced Practitioner Social Worker and an ASB Management Officer, to engage, support and refer residents into treatment where there is alcohol or substance misuse issues and Mental Health issues.
  - The establishment of a Complex Case Review Panel to add to the oversight of cases and ensure the right services are dealing with the right things and feedback is provided to victims and witnesses.
14. CCTV Service Improvements include:
  - An increase in CCTV operatives were included as part of the council's investment into a Town Centre ASB Taskforce. The increase of 20%, (2 operatives) went live in 2022 and aligned CCTV ASB taskings in Town Centre with warden shift patterns. The operational focus of this arrangements supports effective deployment of staff and increases the patrolling coverage in key areas. Current examples of this includes

Peckham Square highlighted elsewhere in this report as a case study of effective multiagency working.

- Since the introduction of these new arrangements and a dedicated operative lead for Town Centre's this has allowed further improvements to the wider CCTV deployment to detect ASB, ensuring that we are focusing on targeted CCTV patrols in the right areas and the right times.

## APPENDIX A

# Biodiversity scrutiny review report

November 2024

Environment Scrutiny  
Commission

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Loss of biodiversity globally means the earth is now undergoing a sixth mass extinction event, largely driven by loss of habitat and further compounded by climate change. The UK is classified at one of the world's most nature-depleted countries, with nearly one in six of species at risk of extinction<sup>1</sup> and lower tree cover than the majority of European nations.

A primary driver of loss of biodiversity in the UK has been the early industrialisation of our food system, although there are other pressures to do with consumption, population and development.

Given the urban character of Southwark, the pressures that the borough's nature and biodiversity face arise primarily from competing demands for land for housing and infrastructure. (The countryside faces additional pressures from intensive farming.) These development pressures are more likely to increase rather than decrease. Recent examples of the pressures are the loss of valuable brownfield habitats due to development, and the paving over of front gardens to provide personalised parking space, especially now to charge EVs

The new additional mandatory targets for housing in the draft National Planning Policy Framework will increase these pressures on land further. It is therefore particularly important that land for nature and resident recreation is preserved, as far as possible.

There are, however, opportunities to make more of our existing green and blue spaces and to work with stakeholders and residents to increase habitat for wildlife. The recent Southwark Land Commission report 'Land for Good' provides a framework for managing more land for the benefit of people and the planet and provides synergy through relationships and a well aligned and coherent framework for many of the review's recommendations.

This is a pivotal moment for the council to enhance its approach to biodiversity. There is an expanding array of duties for Local Authorities in respect of improving biodiversity, including delivering Biodiversity Net Gain (BNG) in Planning and enhanced Biodiversity Duty and reporting requirements.

## **Adopting 30 x30 and the Global Biodiversity Framework**

The loss of natural habitats in the wider countryside reinforces the need to ensure that opportunities to enrich our natural environment are embraced, wherever they arise. Nature conservation in cities is, therefore, increasingly important in the context of the global trend of biodiversity decline. London is almost 50% green and blue space and qualitative enhancement of biodiversity in these areas can make a significant contribution. It is also particularly important, as the inevitable competition for land resources in an urban environment will always limit expansion of green and blue space to some degree.

Biodiversity has a UN convened process similar to that relating to Climate Change. The 15th Conference of the Parties (COP15) was held in Montreal in 2022, and led to the international vision of living in harmony with nature by 2050, the global

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<sup>1</sup> Page 2 & 3 State of Nature, 2023



agreement to protect 30% of land and oceans by 2030, and the adoption of the Kunming-Montreal Global Biodiversity Framework (GBF).

It is increasingly appreciated that the loss of biodiversity ought to be treated as an emergency, alongside reducing carbon emissions, and this is recognised in Southwark's Climate Emergency Strategy and Action Plan. The Commission recommends that 30 X 30 and the Global Biodiversity Framework be adopted to align local and global ambition. This requires a radical new approach that will improve Southwark's resilience to the Climate and Biodiversity Emergencies, delivering more land for habitats and, over the longer term, benefit residents by bringing them closer to nature.

## **Ecological Networks: 'More, Bigger, Better and Joined up', Making Spaces for Nature**

National policy in the UK has been driven by the overarching vision in the Making Space for Nature report, 2010, chaired by Professor John Lawton. This influential report for government called for a step change in provision for nature, setting out a vision for landscape -scale Ecological Networks to deliver habitat restoration and re-creation through 'More, Bigger, Better and Joined up' spaces for nature. The focus is on conserving wild plants and animals at the landscape, regional and ecosystem level, by improving connectivity, better protecting existing sites, and increasing the amount of habitat through expanding existing sites and creating new sites. This is a key theme of our review.

The Making Spaces for Nature report has influenced many of the policies and plans including the National Biodiversity Strategy 2020 and development of 48 regional Local Nature Recover Strategies (LNRS), one of which will cover London, to deliver a regional Ecological Network.

Ecological Networks are closely aligned with Green Infrastructure Strategies, as these map out provision of green spaces that benefit both wildlife and people. Natural England provided guidance on producing Green Infrastructure Strategies in 2023 and the GLA is conducting a piece of work mapping Green Infrastructure to support the delivery of the London LNRS.

Ecological Networks are already recognised in the majority of Southwark's strategies and plans. Furthermore, both planning policy and the Climate Emergency Strategy and Action Plan recommend that green or wildlife corridors be used to guide habitat protection and restoration, however, there is still no formally agreed map setting these out.

Southwark Nature Action Plan (SNAP) 2020 said that further work will be delivered to develop Ecological Networks, and this is anticipated to feed into the Local Nature Recovery Strategy. While other councils, such as Lambeth, have produced Green Infrastructure Strategies, and used them to map out Ecological Networks, Southwark has not produced a strategy yet.

A key recommendation is that the council undertakes its own mapping exercise to develop Green Infrastructure Strategy for the borough, to strategically plan out Ecological Networks. These will enable the joining up and better protection of our many existing wildlife habitats (designated as SINCs) along wildlife corridors, and

plan where to prioritise improving and increasing wildlife habitats. Southwark Nature Action Volunteers have developed a map of nature corridors , in consultation with local groups, and there is research, commissioned in 2015 as part of a review of SINCs, that can also be used as a foundation for this essential task of mapping Ecological Networks for the borough.

There will potentially also be an early opportunity to bring forward an Ecological Network through the Climate Change and Environment SPD, currently being consulted upon.

## **More and Bigger habitat**

A key message of both the COP 15 and the UK's 2010 Making Space for Nature report was that we need *more* habitat, covering a *bigger* area. Size matters, as many sites are too small to sustain a population of species, and this is particularly true of many urban sites.

The amount of ongoing urban development in Southwark and the pressures on land for other needs including housing and infrastructure, mean that increasing the size of existing habitat areas in the borough, and creating more habitat areas will not be easy. However, there are many incremental steps that, taken together, can make a big difference. Two of the most significant are managing existing non-habitat green and blue spaces better so they become wildlife habitat, and systematic and strategic de-paving.

### **Depaved as default , wherever possible**

There is a huge amount of wasted land in Southwark, where potentially life-supporting soil is trapped beneath little-used hard surfaces. Depaving hard surfaces increases both space for more habitat and improves flood attenuation, particularly when combined with rain gardens or other types of Sustainable Drainage Systems (SuDS),.

Southwark Nature Action Volunteers conducted a sample survey of pockets of paved land in Camberwell. Extrapolating this exercise across the borough demonstrated that there could be around 3 hectares (30,000m<sup>2</sup>) of largely unused and unnecessarily paved land in Southwark that could easily be made available for planting. If land dedicated to parked vehicles is also included, then this greatly increases the area under consideration. There is growing potential here as car dominance decreases and active travel increases, which is the aim of the Streets for People Strategy.

The Commission would like to see both an increase in soft planting provided in new streetscapes schemes and a programme of strategic depaving. This ought to be linked to Southwark's ambitious tree planting programme, so that we move towards a future where trees are located in a wider habitat, with ideally at least two trees in each pit surrounded by herbaceous planting to support greater wildlife. Octopus Gardens in Bermondsey is a good example of an area being improved by removing hard standing and adding more soft planting and demonstrates the potential to recover paved land to make space for biodiversity:

*Octopus Garden, Dunton and Lynton Roads, 2022 / The garden view from Lynton Road, 2023*



Indisputably, any moves to restore the natural water attenuation capacity of land across our borough reduces the demand placed on increasingly overloaded sewer and drainage infrastructure, and helps address the elevated flood risk associated with climate change.

### **Reducing the paving over of front gardens**

Wholesale paving of front gardens began in 1995, when the government relaxed planning regulations. National Park City estimates that today 75% of all front gardens in London, an area estimated as more than 40 times the size of Hyde Park, have been covered with impermeable hard surface. The estimated area of green lost is more than 40 times the size of Hyde Park. This trend is set to increase as demand for home charging of electric vehicles (EVs) increases.

The damage done by the loss of these formerly green spaces is huge, leading to a significant increase in flooding and loss of biodiversity. In response to extensive flooding in several English cities in 2007, regulations were introduced specifying that paved areas in front gardens larger than 5m<sup>2</sup> should be permeable or include soakaways within the property boundary, however, these regulations have been frequently disregarded and enforcement is poor. Furthermore, historically created parking spots in front gardens are frequently too small to accommodate modern cars which, accordingly, frequently overhang and obstruct the public footway. The council's own design standard has not been updated to reflect increased vehicle size so even new hardstandings can leave cars protruding across the pavement from the outset.

The review considers what powers the council has to reduce or mitigate this loss including through its somewhat limited powers to restrict the associated installation of dropped kerbs. This may be possible where there is high parking stress and a CPZ. There is also an opportunity to provide residents with advice on how to reduce the impact of hard standing and retain as much greenery and permeability as possible. Pavement Channels to facilitate domestic charging of EVs parked at the kerbside offer a potential solution, and government guidance is anticipated following a number of pilots.

## Better

A lot of habitat is required to support a diverse range of insects, small mammals and birds. We can also create a more hospitable habitat for nature by eliminating the use of pesticides as far as possible and adopting other wildlife friendly practices in our existing green and blue spaces.

### Creating more habitat in our existing green and blue spaces

The way we manage parks, verges, housing land, and gardens impacts either positively or negatively on nature and biodiversity. Small changes such as “no mow May”, leaving deadwood, using more native plants, harvesting rainwater, and planting for the whole life cycle of insects can make a huge difference.

The commission heard from *Insectinside*: a local resident, Penny Metal, has documented over 600 species of invertebrates in a small park in Peckham which has a strategic connection to a large railway corridor SINC. This was facilitated by encouraging more wildlife friendly park maintenance. The wildlife charity Butterfly Conservation told us that most parks in Southwark could support 20-25 species of butterfly.

The UK has half a million hectares of garden, which cover a larger area than all of our nature reserves and offer significant potential to improve habitats for wildlife. More and more groups and residents are becoming engaged in wildlife-friendly gardening. The London Centre for Wildlife Gardening is based in Peckham and is well placed to assist with this .

### SINCs

Southwark is doing very well to have 89% of SINCs in active management. Active management of SINCs is one of the most important steps we can take and Southwark Biodiversity officers have paid close attention to this task. There is, however, work to be done on improving the implementation of SINCs management plans, which can be variable.

The Commission also recommends the council pays more attention to buffering sites by reducing artificial light and noise and preventing further development around the margins of SINCs. Many urban SINCs are small and suffer from pronounced *edge effects*, where the margins are inhospitable to wildlife, thus reducing the overall habitat area.

### Pesticide Free

The review also considers how Southwark can minimise, or even eliminate the use of glyphosate and other pesticides (including herbicides), given their proven harms to biodiversity and human health.

Parks ceased the scheduled use of pesticides prior to 2018; from a policy perspective, glyphosate could be still be used in controlled spot applications against invasive species such as Japanese knotweed, although no cases have been

reported in recent years. Meanwhile, pesticides are still used on some estates and streets.

The Commission heard from Lambeth Council on the subject of its Community Weeding Scheme, which was introduced to encourage residents to take on the task of manually weeding their own streets instead of the council spraying them. Over time the more Lambeth residents joined the scheme, volunteering to hand weed. Lambeth Council no longer sprays streets with pesticides, There has been a surge in rare species of wild plants and growing numbers of residents appreciating and welcoming wild plants on their streets. Officers have been involved in ensuring that residents understand which species can be left and which ones need to be removed (e.g. buddleia, which is invasive and can cause structural problems).

There are other approaches that the Commission recommends the council explore: for example, Glastonbury Council found that using a foam system to control weeds was cheaper than either hand weeding or pesticide use. Pesticide Action Network (PAN) reported that going pesticide free can be cost neutral or even cost negative after the initial investment stage.

## **Joined up**

Southwark Nature Action Volunteers (SNAV) co-optees' evidence particularly focused on this theme, and the creation of two different sorts of wildlife corridors: one for wildlife only and one for nature and people. SNAV's map identifies areas in Peckham Rye, Canada Water and the Old Kent Road where there are needs and opportunities to restore missing links. Our existing protected habitats (SINCs) would form the core area, and these would be joined up through the existing linear network, such as green paths, railway cuttings and rivers. This work ought to feed into the development of Ecological Networks.

## **Bolder**

The Commission would urge ambition here to expand the number of green routes through the city and explore the vision shown by other cities who have daylighted covered rivers to provide arteries through the city for recreation and restoration of marginal river habitat.

## **More animated**

There is growing evidence that community participation in the management of natural habitats in a sustainable way, is good for people, wildlife and the economy. Increasingly, conservation efforts are switching to engaging local communities and institutions in the management of habitats.

The Council's devolved Cleaner Greener Safer fund has empowered local parents and schools across the borough to apply for funding to build green walls, and

resident groups to reclaim spaces for nature, with public gardens and mini forests being established and tended throughout the borough.

The encouragement, definition, and development of Public-Common Partnerships, as suggested in the Southwark Land Commission Report, has great potential to increase community engagement while potentially lightening some of Southwark Council's burden of management.

In the course of the review the Commission dealt largely with officers who understood the value of biodiversity and were making important changes to benefit wildlife. However, it is clear that not all council employees, contractors and sub-contractors are necessarily aware of the council's ambitions to improve biodiversity, or how this might shape the work that they do. A training programme for officers is required. This must build and renew, on an ongoing basis, the knowledge and commitment needed to ensure that spaces are managed to maximise biodiversity.

## **Food and Biodiversity**

The consumption and production of food in cities can play a significant role in supporting more biodiverse friendly farming.

Whilst intensive monocultural farming is often almost completely devoid of wildlife, the opposite is true of many allotments and community growing spaces, which are often rich sources of biodiversity. These spaces can be very productive and help build connections to nature; both the food produced and activity involved can contribute significantly to our residents' health and well-being. The council created the role of a Community Gardening Coordinator in 2020, which is currently job shared. The coordinators are supporting local people to grow food and are seeking to expand the plots of land available for growing. Even more can be done here by mapping out more plots and enabling more residents to access growing space. The Commission also recommends that Council Assembly declares a Right to Grow, which will complement our existing Right to Food.

The council can also do more to support the wider production and sale of Agroecological food which is aligned to natural processes, equitably produced, and local controlled. The UN has, since at least 2010, identified Agroecology as the most highly endorsed solution to climate, biodiversity and food crises. The Global Biodiversity Framework also endorses this approach. The UN calls for transformative change to towards modes of agricultural development that are 'highly productive, highly sustainable and that contribute to the progressive realization of the human right to food'. This is in the context of identifying unsustainable agriculture and food systems as a primary cause of biodiversity loss as well as of the water and climate crises.

Agroecology is closely aligned to Food Sovereignty, which is an international concept used by small scale farmers (rural and urban) and encompasses localising the food system, including training and support for local markets. There are projects the council already supports, such as the [Walworth Neighbourhood Food Model](#), that we could replicate and scale up to deliver a range of benefits for people and planet.

## **In conclusion**

Southwark has many beautiful parks, well protected habitats, and a long tradition of investing in improving the borough's biodiversity, including recognising the need for the expertise of Ecology Officers and now Community Gardening Coordinators. We have many enthusiastic gardeners and food growers in our communities and an active voluntary sector, supporting the delivery and development of the Southwark Nature Action Plan.

Southwark Biodiversity Partnership is comprised of committed local groups and stakeholders who play an important role in improving local biodiversity. This group nominally oversees the delivery of the SNAP, and this has been enhanced with the appointment of an independent chair. More could be done to enhance their role as local stakeholders in the delivery of the SNAP and to play a leadership role across the borough.

The borough is in a good place to make a step change in increasing biodiversity. Working with local stakeholders, the community, the voluntary sector, developers and residents to increase the amount and the quality of habitat in a planned and strategic way will be instrumental in achieving this goal.

## Introduction

This review is mainly aimed at the council but is also seeking to increase collaboration by the council with the community, voluntary sector and, where appropriate, businesses.

The Commission considered the following themes :

- i. The biodiversity requirements of the Environment Act (2021) have significantly increased the duties of local authorities and regional government to improve biodiversity, which makes the review particularly timely. New requirements include enhanced Biodiversity Duty and reporting requirements, mandatory

Biodiversity Net Gain (BNG) in planning and the requirement for regional Local Nature Recovery Strategies (LNRS). The council will be contributing to London's Local Nature Recovery Strategy, which will be fed into by all 32 London boroughs and the City of London as 'supporting authorities'.

- ii. The overarching vision in the Making Space for Nature report, 2010, chaired by Professor John Lawton, was a key theme of the review. This influential report for government called for a step change in provision for nature by setting out a vision for large-scale habitat restoration and re-creation through **more, bigger, better and joined up** spaces for nature. Southwark Nature Action Volunteers co-optee evidence particularly focused on this theme, and the creation of biodiversity networks, improving habitat management and finding ways to increase space for nature by depaving and other measures were a particular focus.
- iii. Southwark has recently invested in community food growing. The potential for urban agriculture and local food production to deliver improvements to biodiversity, as well as improve well-being was considered and contrasted with the impacts of intensive farming. In particular the review considered:
  - How to increase urban food production as an affordable path to greater food security
  - Reducing scope 3 emissions and ecological degradation caused by consumption of food produced from mono-cultures and non-carbon sequestering land use, across the UK and beyond
  - Increasing the proportion of food consumed that is produced through agroecology
- iv. Accelerating the phasing out of pesticides
- v. Stemming or mitigating the loss of planting and permeability in front gardens as residents with cars increasingly prioritise hard standings for private parking, especially to accommodate the switch to Electric Vehicles
- vi. Southwark plans and strategies including:
  - Southwark Nature Action Plan (SNAP)
  - Southwark Climate Change Strategy and Action Plan
  - Southwark's Land Commission
  - Southwark's Streets for People strategy, and the associated EV, walking and cycling plans
  - Southwark Plan
  - Local Flood Risk Management Strategy 2024
  - Air Quality Strategy and Action Plan 2017
  - Tree Management Policy 2020
  - Southwark Food Security Action Plan 2019

## Biodiversity context



## Assessment of biodiversity

The collective impact of humans on the environment is now increasingly referred to as ushering in a new geological epoch: the Anthropocene. The combination of systemic pressures (including but not limited to climate change) means we are now undergoing a sixth mass extinction event as the globe faces a loss of biodiversity and accelerating falls in the abundance of species, both of which are impacting on the viability of ecosystems.

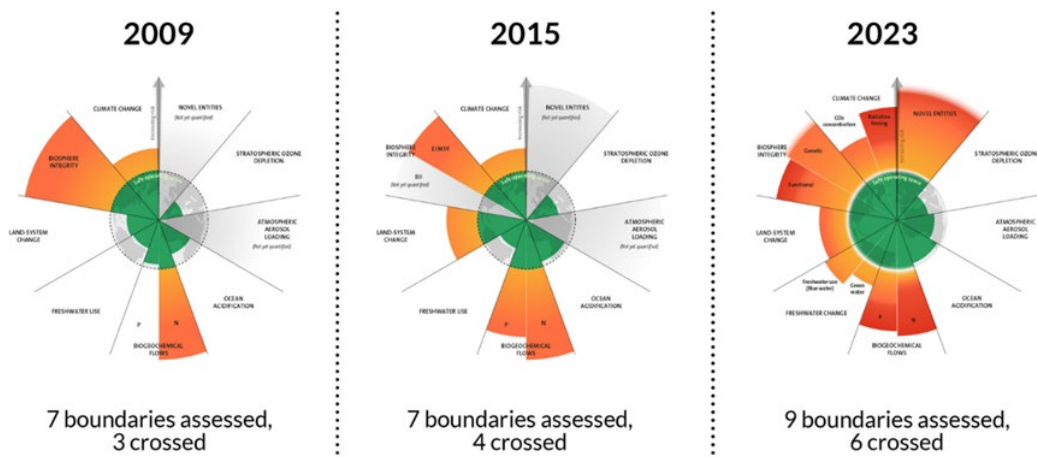
## International

### United Nations assessment

The 2019 Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) report finds that: *'Nature across most of the globe has now been significantly altered by multiple human drivers, with the great majority of indicators of ecosystems and biodiversity showing rapid decline. Around one million species already face extinction, many within decades, unless action is taken to reduce the intensity of drivers of biodiversity loss. Without such action, there will be a further acceleration in the global rate of species extinction, which is already at least tens to hundreds of times higher than it has averaged over the past 10 million years'.<sup>2</sup>*

### Planetary Boundaries

The most recent (2023) report on Planetary Boundaries finds that the Biosphere Integrity boundary has been crossed – both for loss of genetic diversity and planetary functionality.



According to the report, the boundary for planetary function of biosphere integrity was transgressed in late 19<sup>th</sup> Century, a time of large scale land transformation. It highlights that loss and degradation of habitat is the main driver for the depletion of

<sup>2</sup> SUMMARY FOR POLICYMAKERS OF THE IPBES GLOBAL ASSESSMENT REPORT ON BIODIVERSITY AND ECOSYSTEM SERVICES

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ecosystems and that this is a historical process that has been underway for over a hundred years.

The work on planetary boundaries allows us to see the human impacts on the Earth system across different domains and consider how they interact. It is now well established that climate change impacts negatively on biosphere integrity and, conversely, that biosphere integrity provides resilience against climate change.

There are other interrelationships which are as important – particularly the boundaries that have been crossed for Nitrogen and Potassium, Novel Entities, and freshwater flows. The breaching of Nitrogen and Potassium boundaries is associated with the use of fertilisers, as are some of the Novel Entities, all of which are impacting on biodiversity. The pressure on freshwater flows is also highly relevant to the UK and Southwark.

## UK

In comparison with the rest of the world, the UK is not faring well. The 2023 State of Nature report found that the UK, like most other countries worldwide, has experienced a significant loss of biodiversity. The trends in nature examined in the report cover, at most, 50 years, but these follow on from major changes to the UK's nature over previous centuries. As a result, the UK is now one of the most nature-depleted countries on Earth.

Two main drivers of change<sup>3</sup> are summarised by the 2010 Space for Nature report as

- Habitat loss,
- Habitat deterioration.

The report goes on to identify 6 main causes<sup>4</sup> which can be summarised as:

- Increased intensification of farming – facilitated by new technologies and agricultural policy
- Demographic changes, including population growth and increased single occupancy leading to more land being utilised for housing and infrastructure
- Consumption, societal preferences, political and regulatory environment and desire for economic growth driving land use change
- Climate change

The State of Nature 2023 report identifies agricultural intensification as the major driver of biodiversity decline on land in the UK<sup>5</sup>. The report says that a combination of technological advances, use of agro-chemicals and changing agricultural policy has reduced the capacity of farmed landscapes to support wildlife, resulting in widespread biodiversity loss. 71% of the UK's land is managed by farmers and other land managers.

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<sup>3</sup> Page 7 Space for Nature

<sup>4</sup> Page 21 of the Space for Nature report in section 3.1

'Foresight Land Use Futures: Making the most of land in the 21st century' summarises the Foresight Land Use Futures 2010 report, which was a comprehensive review of the pressures on land-use in the UK.

<sup>5</sup> Page 56 State of Nature 2023

The report finds that while many farmers are now adopting nature friendly practices, which will help specific species and stem losses, these are generally insufficient and overall the trajectory is still towards further decline of species' abundance and loss of genetic biodiversity.

## London

While London has also experienced a relative decline in wildlife over the last hundred years, London – even inner London – can be good for wildlife<sup>6</sup>.

It has a warm and sheltered climate, accentuated by a significant **urban heat island** effect. About 47% of the area is classified as green space. Unlike in the countryside, the green spaces in London are (generally) not being intensively farmed or built upon, as they are mainly parks, cemeteries and other managed areas.

Gardens are another important habitat, although, as the report will discuss later, front gardens are under threat. However, overall, gardens still make an important contribution to habitat, and this may be increasing as people understand the value of wild life gardening.

## Policy Context

### Global

Biodiversity has a UN convened process similar to that relating to Climate Change. The 15<sup>th</sup> Conference of the Parties (COP15) was held in Montreal in 2022, and led to the international agreement to protect 30% of land and oceans by 2030, and to the adoption of the Kunming-Montreal Global Biodiversity Framework (GBF). This Framework supports the achievement of the Sustainable Development Goals and builds on the Convention's previous Strategic Plans, setting out an ambitious pathway to reach the global vision of a world living in harmony with nature by 2050. Among the Framework's key elements are 4 goals for 2050 and 23 targets for 2030.

### European

The EU has conservation regulations that protect species and habitat, some of which remain in force in the UK post Brexit.

Formerly, the UK was part of the Natura 2000 ecological network. This was superseded by 2019 regulations, which created a national site network on land and at sea, including both the onshore and offshore marine areas of the UK. The national site network includes existing and new Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

The Urban Waste Water Treatment Directive (1991) and The Water Environment (Water Framework Directive) Regulations (2017) provide a framework for managing the water environment in England and Wales, and require that a river basin management plan is prepared for each river basin district.

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<sup>6</sup> Page 171 The Disappearance of Butterflies <https://www.atroposbooks.co.uk/the-disappearance-of-butterflies>

## UK

**In 2010 the government commissioned an influential report ‘Making Space for Nature: A review of England’s Wildlife Sites and Ecological Network 2010’ chaired by Professor Sir John Lawton CBE FRS.** Lawton’s overarching vision is a key theme of the review. This influential report for government called for a step change in provision for nature by setting out a vision for large-scale habitat restoration and re-creation through ‘More, Bigger, Better and Joined up’ spaces for nature.

The review set out to establish whether or not the UK had a coherent and resilient Ecological Network and explained why in the summary:

*Ecological networks have become widely recognised as an effective response to conserve wildlife in environments that have become fragmented by human activities. An ecological network comprises a suite of high quality sites which collectively contain the diversity and area of habitat that are needed to support species and which have ecological connections between them that enable species, or at least their genes, to move.*

The review concluded that there are serious short-comings in the English network: wildlife sites are too small, and losses of certain habitats have been so great that the area remaining is no longer enough to halt additional biodiversity losses without concerted efforts. The report also found that, with the exception of Natura 2000 sites and SSSIs, most of England’s semi-natural habitats important for wildlife are generally insufficiently protected and under-managed. In addition, many of the natural connections between sites have been degraded or lost, leading to isolation of sites. Furthermore, too few people have easy access to wildlife.

The report called for a step-change in nature conservation, where we embrace a new, restorative approach which rebuilds nature and creates a more resilient natural environment for the benefit of wildlife and ourselves. It highlighted that this will require strong leadership from government, but that it is not a job for government alone, setting out the necessity for effective and positive engagement with landowners and land managers, as well as improved collaboration between local authorities, local communities, statutory agencies, the voluntary and private sectors, farmers, other land-managers and individual citizens.

The overall vision was defined in four words: **more, bigger, better and joined-up**. The report said that it would not be possible to halt and reverse the collapse of England’s wildlife documented without a larger network comprising more areas rich in wildlife, bigger sites, better managed sites, and more inter-connected sites.

This vision has been taken up and amplified by Southwark Nature Action Volunteers and has been used to frame much of the findings of the Commission’s review. Lawton’s 2010 report also laid the conceptual framework for many of the following government strategies and statutory duties:

**A green future ‘25 Year Environmental Plan’ 2018** set out the Government’s ambition to leave our environment in a better state than we found it. The 25 Year Environment Plan outlines the steps government proposes to take to achieve this ambition. It contains key targets for biodiversity including creating a nature recovery network.

**The National Biodiversity Strategy 2020** for England, Wales and Scotland shifted focus from the habitat and species based approach, where action plans focused on United Kingdom priority habitats and species, to a landscape-scale conservation strategy, with an overall target of halting net loss of biodiversity by 2020. The vision set out to: 'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'.

**The Environment Act (2021)** new biodiversity requirements include enhanced Biodiversity Duty and reporting requirements, mandatory Biodiversity Net Gain (BNG) in planning and regional Local Nature Recovery Strategies.

- **Biodiversity Net Gain (BNG)**  
Biodiversity Net Gain is a mandatory component of the Environment Act (2021) and the Council's Biodiversity Duty. It is a way of creating and improving natural habitats by ensuring that development has a measurably positive impact ('net gain') on biodiversity.  
As of 12 February 2024, BNG is mandatory for major developments (classified as developments of over 10 dwellings), with some exceptions. Developers must deliver a minimum BNG of 10% over the baseline biodiversity value of the site. Small sites are required to meet 10% BNG as of 2 April 2024
- **Enhanced Biodiversity Duty and reporting requirements**  
The Environment Act states that the Council must first consider what action it intends to take to conserve and enhance biodiversity, by early 2024. This consideration should include the measures to be taken by the Council to conserve and enhance biodiversity and the specific objectives to deliver these outcomes. The first subsequent Biodiversity Report setting out progress against the agreed priorities, interventions and objectives must be published no later than 1st January 2026.
- **Duty to Consult on the felling of street trees.** This is a new duty under the requirements arising from the Environment Act.
- **Local Nature Recovery Strategy (LNRS)**  
The LNRS is a new system of spatial biodiversity strategies in England, required by law under the Environment Act 2021. There is a requirement for 48 responsible authorities across England to produce Local Nature Recovery Strategies. All the regions will work together to restore, create, and connect habitat. Southwark Council will be contributing to London's LNRS, delivered by the Greater London Authority (GLA).

**In January 2023, Natural England launched the new Green Infrastructure Framework.** The Green Infrastructure Framework is a commitment in the Government's 25 Year Environment Plan. It supports the greening of our towns and cities and connections with the surrounding landscape as part of the Nature Recovery Network. Networks of green and blue spaces and other natural features can bring big benefits for nature, climate, health and prosperity.

## London

In July 2019, the National Park City Foundation confirmed London as the world's first National Park City. Our city is almost 50% green and blue – with thousands of parks, private gardens, allotments, orchards, street trees, green roofs, wetlands, rivers, canals, and ponds.

## **GLA**

The London Environment Strategy sets out how the Mayor will work with others to make sure that London's biodiversity is enhanced and that more Londoners can experience nature.

The London Plan 2021 contains the following policies linked to conservation of natural habitats and ecological management and enhancement:

- ☐ London Plan policy Green infrastructure
- ☐ London Plan policy Geodiversity
- ☐ London Plan policy Urban greening factor
- ☐ London Plan policy Sustainable drainage
- ☐ London Plan policy Local green and open space
- ☐ London Plan policy Biodiversity and access to nature
- ☐ London Plan policy Trees and woodlands
- ☐ London Plan policy Food growing
- ☐ London Plan policy Waterways

## **London Local Nature Recovery Strategy**

The Greater London Authority (GLA) is the designated responsible authority for producing the statutory LNRS for London.

The GLA is working with Southwark as well as all 31 other London Boroughs, the City of London, and the six neighbouring counties (Hertfordshire, Kent, Essex, Buckinghamshire, Surrey, and Berkshire) to produce the London LNRS.

The GLA is using the Space for Nature report theme i.e. that London's ecological network will be 'bigger, better, and more joined up'.

## **London Green Infrastructure Framework (LGIF)**

The GLA is producing a new vision and new spatial framework to target and prioritise green and blue infrastructure across London so that nature and green space can flourish and is accessible to all Londoners. The London Green Infrastructure Framework (LGIF) will be developed alongside the London Local Nature Recovery Strategy (LNRS), with the latter as the biodiversity/nature digital map layer of the LGIF. It will inform any updates to the London Plan and will be completed by Summer 2025

## **Thames River**

In 2006, the European Commission issued a 'reasoned opinion' stating that the UK was failing to comply with the water Directive's requirements for London. In 2010, the Commission started legal proceedings with the Court of Justice of the European Union, which in 2012 found the UK to be in breach owing to the frequency of spills from Combined Sewer Overflows along the River Thames. The near-complete, £10B Thames Tideway project, which includes major work in Southwark, was intended to bring London into compliance with the 1991 Directive.

## **Southwark Policy and Implementation**

This section outlines and reviews the following Southwark plans and strategies:

- i. Climate Change Strategy and Action Plan, including the Climate Resilience and Adaptation Strategy and Trees Management Plan
- ii. Southwark Plan and delivery of planning policy
- iii. Streets for People, and the associated EV, walking and cycling plans
- iv. Land for Good - Southwark's Land Commission
- v. Enhanced Biodiversity Duty and reporting requirements
- vi. Southwark Nature Action Plan (SNAP)

## **Climate Change strategy and action plan**

Southwark Climate Change strategy identifies biodiversity as a key theme, and both the Climate Change action plan and the SNAP are integrated to ensure coherence in the setting and assessing of targets.

### Trees

One of the major outcomes of the declaration of the Climate Emergency in 2019 was a commitment to increase tree coverage across the borough, and this is backed by a budget of £5,000,000. The aims of the programme are:

- Maintain and increase tree coverage, with tree planting encouraged amongst residents;
- Make Southwark the first inner London borough to have over 100,000 trees (and endeavour to increase tree canopy to cover 24% of public land);
- Work with local people, schools and community groups to find locations for and plant a further 20,000 trees.

The commission heard that this ambitious programme is well underway, but encountered problems with drought in the summer of 2022. The service set out a number of steps being taken with contractors and parks teams to improve survival rates. This is supported by the Council's Tree Management Plan (2020), which aims to maintain a healthy, protected and sustainably managed treescape, for the environment, biodiversity and wellbeing of Southwark residents through a set of strategic objectives.

SNAV welcomed the tree planting programme, however they urged the council to ensure that this was integrated with other planting to improve biodiversity and that adoption by the community was encouraged. In particular, they recommended that

tree pits are made larger, to accommodate more plants and, ideally, two trees. Officers advised the Commission that where possible the space afforded for tree pits is maximised, however this is often influenced by the width of footways and ensuring there is ample space for pedestrians.

SNAV recommended that at least 50% of trees planted are native species, with a preference for trees that feed pollinators, other invertebrates, and birds.

Officers highlighted the importance of species diversity to ensure current and future resilience against climate change; however, they cautioned that there are only 32 species of native tree, many of which are unsuitable for planting in urban areas, so a 50% native target would not align with current recognized best practice.

Officers said that Ecosystem services provided by urban trees improve resilience and the quality of life in cities in addition to providing social and ecological benefits. Officers added that it is important that Southwark's tree population remains diverse and is not over reliant on small number of species to provide these ecosystem services benefits as it increases susceptibility to pests, pathogens and climate change.

Officers reported that urban trees are selected according to the criteria set out below, and advised that it would, therefore, not be possible to attribute a percentage figure to provide focus on planting towards either native species or pollinators without deviating from this:

- Tree suitability: Tree characteristics, tree growth, site constraints, soil type.
- Ecosystem services delivery: amenity value, shading, supporting wildlife carbon sequestration.
- Disservices: the unintended problems of some species including high pollen production, proliferation of fruit, raised roots or a degradation in air quality)
- Climate change resilience: for example tolerance to drought, frost hardiness, temporary water logging, response to elevated air temperatures and shortened winter dormancy, and pests and diseases.

The Commission notes that while the above criteria indicate that 'supporting wildlife' is a factor, the biodiversity weighting would benefit from being strengthened, as currently it is subsumed within other considerations including amenity value and carbon sequestration. In particular more a explicit emphasis on choosing trees that that feed pollinators, other invertebrates, and birds , where possible, would be welcomed. This will be particularly important along wildlife corridors, SINCS and in buffer zones, and therefore a reference to Ecological Networks in the criteria would be beneficial. In addition the Commission would like to see the advantages of choosing native trees to be made explicit in the criteria, while acknowledging that importance of diversity, planning for resilience, suitability, and choosing trees that deliver a variety of benefits.

### Climate Change Resilience and Adaptation Strategy

The Climate Resilience and Adaptation Strategy sets out the co-benefits of urban greening for reducing heat risk and flood risk whilst enhancing biodiversity opportunities, which is welcome. The Commission noted that the Thriving Nature



section of the Climate Change Resilience and Adaptation Strategy referred to work in the Climate Change Strategy and Action Plan to increase habitat and biodiversity. However, beyond some high level objectives in the strategy, it does not discuss habitat protection, habitat creation or de-paving, other than by reference to the creation of green corridors, which as discussed elsewhere has not yet been taken forward.

## **Southwark Plan and planning policy**

The following policies in the Southwark Plan aim to retain and enhance biodiversity:

- P57 Open Space
- P58 Open water space,
- 59 Green Infrastructure,
- P60 Biodiversity,
- P61 Trees.

A review of these policies will be carried out as part of the Southwark Plan review in 2027.

### **Green Infrastructure Strategy**

The London Plan G1 Green infrastructure plan states that *'London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.'*

In addition to the commitment at a Londonwide level, the London Plan also says that: *'Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with [the London Plan].'*

There is a Green Infrastructure policy in the Southwark Plan 2022 (P59, page 196) which says, amongst other stipulations, that developments ought to 'integrate with the wider green infrastructure network', however, as yet there is no coherent green infrastructure network identified, which is a significant gap. Other London councils, including Lambeth, have made more progress.

Green Infrastructure Strategies are designed to be used as a tool in Planning to ensure green space in development is coherent across the borough to maximise benefit to nature and people, and to protect existing natural spaces .

The Space for Nature report recommends that local authorities ensure that Ecological Networks, including areas for restoration, are identified and protected through local planning. In addition, they recommend that: 'before disposal of any public land, the impact on the ecological network should be fully evaluated. Where such land is identified as having high wildlife value (existing or potential) it should not be disposed of unless its wildlife value is secured for the future' . Green Infrastructure Strategies are the appropriate tool to deliver this protection.

Natural England guidance on Green Infrastructure describes this as "the network of green spaces and natural elements that intersperse and connect our cities, towns and villages. It is the open spaces, waterways, gardens, woodlands, green corridors,

wildlife habitats, street trees, natural heritage and open countryside. Green infrastructure provides multiple benefits for the economy, the environment and people.”<sup>7</sup>

The guide goes on to say this definition encompasses the concept of multifunctional areas of land, which is a key feature of green infrastructure. Individual spaces may have many functions such as:

- providing recreational space for healthy exercise
- providing a relatively tranquil environment;
- providing a place for wildlife to live;
- contributing an attractive green element to the image of an area;
- raising the quality of everyday living and working environments;
- providing flood storage space in times of flood;
- providing a transport corridor for walkers and cyclists;
- helping areas cope with the impacts of climate change;
- providing areas for local food production.

Officers said that the scoping for the Green Infrastructure Strategy, as required by the London Plan, will take place in late 2024, as part of the review of the Southwark Plan. Officers advised that this is best carried out in a joined up way working across various council departments, and in line with a range of parallel work streams which overlap with green space and open space need, including the planned review of SINCs, Open Space Needs Assessments, the SNAP, and the Climate Change Strategy and Action Plan.

Furthermore officers advised that the strategy will need to be considered alongside competing spatial requirements such as for housing and employment. Officers advised that this analysis will be carried out as part of the Southwark Plan review on how to accommodate the borough’s ambitious housing targets of appropriate density through allocated sites, and opportunity areas, whilst delivering a cohesive and comprehensive Green Infrastructure Strategy.

For reference, officers provided the existing (adopted) targets as laid out in the Southwark Plan:

- 40,035 homes between 2019 and 2036 (2,355 new homes per annum).
- 58,000 total jobs between 2019 and 2036

In addition there are new, higher draft housing target for Southwark of 2,710 homes per annum (arising from the Government’s reform of the planning system and higher housing allocation for London). If this housing target is to be met, associated infrastructure and employment opportunities will be required, as well as open space and greening. Undesignated sites will face several competing demands, particularly from housing.

The Commission agrees that developing a Green Infrastructure Strategy is a significant cross-departmental undertaking, that must take into account many other policies and priorities, as well as engagement with the Southwark Biodiversity Partnership. Nevertheless the Commission’s view is that this ought to be

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<sup>7</sup> Page 4 Green infrastructure strategies An introduction for local authorities and their partners, Natural England.

commenced and delivered as soon as possible, especially as many existing policies rely upon delivery according to a mapped Ecological Network, which is not yet in place.

The increasing pressures on land for housing, in particular, make it more important than ever that the council manages competing priorities and as far as possible finds creative solutions, including repurposing grey land, wherever possible.

The Commission therefore looks forward to seeing the development of the anticipated Green Infrastructure Strategy, together with the forthcoming London LNRS map, and to this being actively implemented and referenced by Planning.

### **Biodiversity Net Gain (BNG) and Urban Greening Factor (UGF)**

#### **Urban Greening Factor (UGF)**

Officers confirmed to the Commission that the council has already integrated calculation of the Urban Greening Factor (UGF) into planning applications. 100% of major developments in Q3 2023/24 achieved the required London Plan UGF target of 0.4 for predominantly residential and 0.3 for predominantly commercial sites.

The Commission asserted that UGF target scores must be considered the **minimum benchmark**, and not the maximum required. Moreover, the Commission considered that the 0.4 UGF target should be applied across the board for all Major Developments, both commercial and residential, and that scope for UGF to be applied to smaller projects should also be examined.

#### **Biodiversity Net Gain**

As outlined earlier, from April 2024 it is now broadly mandatory for developers to deliver a minimum BNG of 10% over the baseline biodiversity value of all sites under development

Officers reported that in-depth preparation has been undertaken to deliver this including:

- The appointment of an Ecologist in the Planning team to lead on the assessment of BNG
- A free GIS mapping trial with data partner Gigl (Greenspace information for Greater London) to map existing ecological data across the borough in a way which is compliant with the statutory Biodiversity Net Gain assessment tool.
- The inclusion of a monitoring fee for significant BNG in the draft S106 and CIL SPD to cover the cost of the Council executing its duty to check that biodiversity gains on major developments are delivered over a thirty year period.

Officers said that the pre-adoption analysis of applications which have included BNG data before it became a mandatory requirement has shown that the achievement of BNG on a limited number of applications generally exceeds the minimum 10%

requirement. This is due to the generally low biodiversity baseline value of many urban sites. However, it should be noted that the metric submitted on these applications were not the Government's final statutory metric and have not been scrutinised by an Ecologist.

Analysis by a Commission co-optee identified that developers of the Bagshot block of the Aylesbury estate have stated in their planning application documents that they will not meet the requirement for 10% BNG. Overall, there is a net loss of green space, although improved habitat quality in the proposed new green areas (e.g. types of proposed planting) brought BNG to nearly 10%. In addition there was no UGF calculation in the documents examined and a concern that the development would not make the minimum 0.4 residential UGF target.

As the Aylesbury development is both within the buffer zone of two SINC's (Burgess Park and Surrey Square) and on a green corridor (East Walworth Green Links), in the Commission's view the development ought to be subject to more stringent greening requirements.

Analysis by officers and a Commission co-optee demonstrate that, given the low biodiversity baseline value of most sites, the absolute increase in biodiversity units in Southwark through the application of BNG has been extremely small. As currently applied, it is not proving to be an effective way to increase biodiversity in Southwark.

The fact that the minimum requirement has tended generally to be achieved onsite suggests that there is scope for developers to achieve a target higher than 10%, effectively signposting developers towards the borough's aspirations.

Officers cautioned that Paragraph 6 of the [Biodiversity Net Gain PPG](#) states that:

*Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified.*

Officers advised that the potential to increase the minimum BNG percentage will be investigated as part of the Southwark Plan full review when biodiversity policy P60 is updated. This will enable the interrelationship between policies and the Council's differing priorities to be investigated and consulted upon as part of the Southwark Plan review. Officers said that, for example, on urban sites, achieving low carbon development is often reliant on the provision of PV solar panels on roofs, which reduces the amount of space available for biodiverse green roofs. There are, however, solutions that allow green roofs to [successfully coexist with solar panels, although they may be more expensive.](#)

In the meantime, officers said that the emphasis will be on encouraging BNG which is multi-functional, suitable to the site context and joined up with surrounding green space and ecological corridors. As noted above, there is no current map of Ecological Networks, including wildlife corridors, available to inform this work.

Officers were asked about the scope for requiring developers to deliver offsite Biodiversity Net Gain on Council-owned land (rather than to external entities which might be based out of the borough or even the UK). To do so would require the Council to establish a Habitat Bank Vehicle (HBV), a legal entity. Officers said that even if the Council decided to do so, the Council would not be able to stipulate that

Biodiversity Units are delivered through a Council HBV as the provision of Biodiversity Units operates in a free market. In addition, officers' said that, given that developers appear to be able to deliver 10% BNG onsite, the cost to the Council of establishing a HBV may not be warranted. This is supported by the Making Space for Nature report which states that on-site delivery of BNG is preferred to off-site delivery.

The Commission noted some of the problems with non-site based [carbon offsetting](#) and was concerned that these could be replicated in off-site BNG. The Commission strongly favours onsite delivery of BNG as the default position

### BNG and UGF

The Commission considered that increasing and combining BNG and UGF together would be the best approach: although, when operating from a low baseline, meeting BNG requirements delivers only a small increase in biodiversity of the value of the BNG metric is that it emphasises habitats and connectivity to wider Ecological Networks. UGF, meanwhile, places less emphasis on habitats and connectivity per se, but is focused on an absolute outcome in terms of area of green and blue space. Taken together, UGF and BNG can be mutually supportive approaches.

## **Enhanced Biodiversity Duty and reporting requirements**

As set out above the Environment Act states that the Council must first consider what action it intends to take to conserve and enhance biodiversity, by early 2024.

Southwark's First Consideration paper was considered internally on 25th July 2024, and the First Consideration report went to the Cabinet for the [16 September 2024 meeting](#).

Publication of a Biodiversity Report will follow, evidencing the policies, actions and progress Southwark has made towards its biodiversity objectives to improve the environment in the 24 months since the First Consideration, by 1 January 2026.

## **Streets for People**

The Streets for People strategy sets out the council's commitment to improve residents' quality of life and take action on climate change by changing how we travel and use streets in our borough. The Streets for People Strategy is themed around 4 areas:

- Streets for Communities
- Streets for Journeys
- Streets for the Economy
- Streets for Nature.

and designed to support:

- cleaner air
- safer and quieter streets with less traffic and fewer accidents
- healthy travel options like walking, cycling or wheeling

- greener and more pleasant spaces for our communities to connect and socialise
- a better place for all who live, work, study and visit

The Streets for People Strategy has three subsidiary plans that the council consulted upon at the beginning of 2024. These cover:

- Electric Vehicles (EV)
- Cycling
- Walking

Streets for People is an excellent framework that is well placed to dovetail with the ecological networks for people and nature that the Space for Nature report recommends under its 'more joined up' vision. Similarly, the strategy is well placed to cohere with the Green Infrastructure Strategy, recommended by Natural England and required by the London Plan .

However, Streets for People suggests only a minimum of 10% of the area of each new streetscaping scheme should be planted. The Commission felt that this is less than would be possible or appropriate in many schemes. While investing in street remodelling for pedestrianisation, it is important to incorporate the maximum area of planting possible, to enhance biodiversity and protect against increasing flood risk. The Commission suggests that consideration should be given to establishing an appropriate UGF to be applied across streetscape designs.

## **Land for Good : Southwark Land Commission report 2023**

The Southwark Land Commission set out to examine how land could be used for the good of people and planet. There were seven recommendations, all of which could be considered relevant to the review in some way:

- 1: Put social purpose at the heart of land use
- 2: Map what's there and what isn't
- 3: Take control of our land and assets
- 4: Defend and extend affordable accommodation for all
- 5: Cherish our natural capital and decarbonise our land
- 6: Give the community real power and voice
- 7: Disrupt the status quo to unlock bigger changes

There are also detailed priority actions that emerge from the report recommendations which include, under Recommendation 5 (Cherish our natural capital and decarbonise our land) calls for a plan to 'Join up existing green spaces to create a network of Biodiversity Corridors'. As part of this the report draws attention to B-Lines, which are *'a series of 'insect pathways' running through our countryside and towns, along which a series of wildflower-rich habitat stepping stones are being*

*created and restored. They link existing wildlife areas together, creating a network, like a railway, that will weave across the UK landscape’.*

The report notes that in a time of an intense cost-of living crisis, there is a clear need and opportunity for environmentally focussed land use and management decisions to help meet social and ecological objectives. The report notes the value of local growing projects such as Walworth Neighbourhood Food Model and says this ought to be resourced and replicated to enhance food security for Southwark’s diverse communities.

## **Southwark Nature Action Plan**

The Council agreed the Southwark Nature Action Plan in 2020, which followed on from two previous Biodiversity Action Plans. This is a detailed document that takes stock of the borough’s biodiversity and lays plans for its improvement, many of which have been acted upon.

### Key highlights of strengths :

- Good Management of SINCS is a key recommendation in the Space for Nature Report, Lawton 2010. A high percentage of Southwark SINCs are in active management. In 2015 the council conducted a review of present and potential SINCS and produced an action plan for improvement: the ‘SINC Review and Borough Ecological Survey of the London Borough of Southwark: Southwark Surveys 2014-2015’ to support the SNAP. This was produced by The Ecological Consultancy and finalised in 2016. Recent reports to the Commission indicated 89% are in positive environmental management . Southwark is ranked as the 3rd best council in England for SINCs in positive conservation management.
- Parks have taken concrete steps to increase biodiversity through improvements to habitat management and reduced pesticide use to best practice (i.e. for use only if necessary to control invasive species such as Japanese Knotweed); the council is reviewing its use of such chemicals on streets
- There has been a huge investment of £5 million to plant 20,000 in trees to increase the canopy cover to 24% led by a dedicated Tree officer (as outlined above)
- Rain gardens have been installed in various locations across the borough
- There is an ecological partnership overseeing the SNAP with good engagement and partners delivering important work across the borough
- Biodiversity Net Gain and the Urban Green Factor are embedded in Planning

### Mapping out Ecological Networks

The SNAP report of 2020 referred to further work that will be undertaken to develop Ecological Networks, and this is anticipated to feed into the Local Nature Recovery Strategy. Initial mapping of Ecological Networks was undertaken as part of the 2015 SINC review, but this remains under developed. It may be this has been delayed because it was initially anticipated that the Nature Recovery Strategies would be required sooner and at a more local level by government ( rather than at a regional London level) , and DEFRA guidance was anticipated imminently.

Once again, as referenced elsewhere in this review, the absence of a Green Infrastructure Strategy and mapped ecological networks is a key gap and weakness.

### Community oversight of the SNAP

The governance and oversight of the SNAP could be improved to ensure that the Southwark Biodiversity Partnership has a clearer terms of reference, and delivery of the SNAP is reviewed annually, as envisaged at the outset. The Commission welcomes the recent appointment of an independent chair of the Southwark Biodiversity Partnership. Southwark has a very engaged voluntary sector and committed stakeholders and more can be made of this strength by giving the group a clearer remit.

## **More, Bigger, Better, and Joined Up, Bolder and more Animated**

In their evidence to the Commission, Southwark Nature Action Volunteers (SNAV) outlined how the central recommendation of the Making Space for Nature report “more, bigger, better and joined-up” applies to urban areas as much as rural areas.

SNAV proposed actions for Southwark Council under each theme, with an added theme of “more exciting” to reflect the importance of engaging urban society in nature and wildlife. The review expands ‘exciting’ to consider how bold urban schemes revitalise the city, and take account of the benefits to people and nature of engaging local residents in biodiversity and food growing projects, bringing them to life.

SNAV articulated a vision for Southwark as follows:

*A person, living anywhere in the borough, should be able to walk or wheel safely to anywhere else in the borough amid a chorus of birdsong increasing through the winter and spring, past fluttering butterflies and buzzing grasshoppers in the summer, and picking edible fruits along the way in the autumn.*

And for some of Southwark’s many non-human residents:

- *A dragonfly, damselfly, frog or toad should be able to safely and easily travel from one healthy pond to another, with grassy verges and safe hiding places along the way.*
- *A sparrow, dunnock, or blue tit should be able to find plentiful insect, fruit, and seed forage to feed her family within an easy 50m radius of her family nest.*
- *Southwark’s more specialised invertebrates should be able to find their native partner plants, survive and thrive. A brimstone butterfly should be able to find a healthy buckthorn shrub on which to lay her eggs, and a common blue should be able to find birdsfoot trefoil, etc.*
- *Bats (of all nine different species known to be living in Southwark) should be able to navigate treelines and waterways easily, forage on plentiful insects, and have safe, undisturbed summer and winter roosting places.*

This vision brings to life the central theme of the Lawton’s 2010 Making Space for Nature report, which is the delivery of an Ecological Network, which ‘comprises a

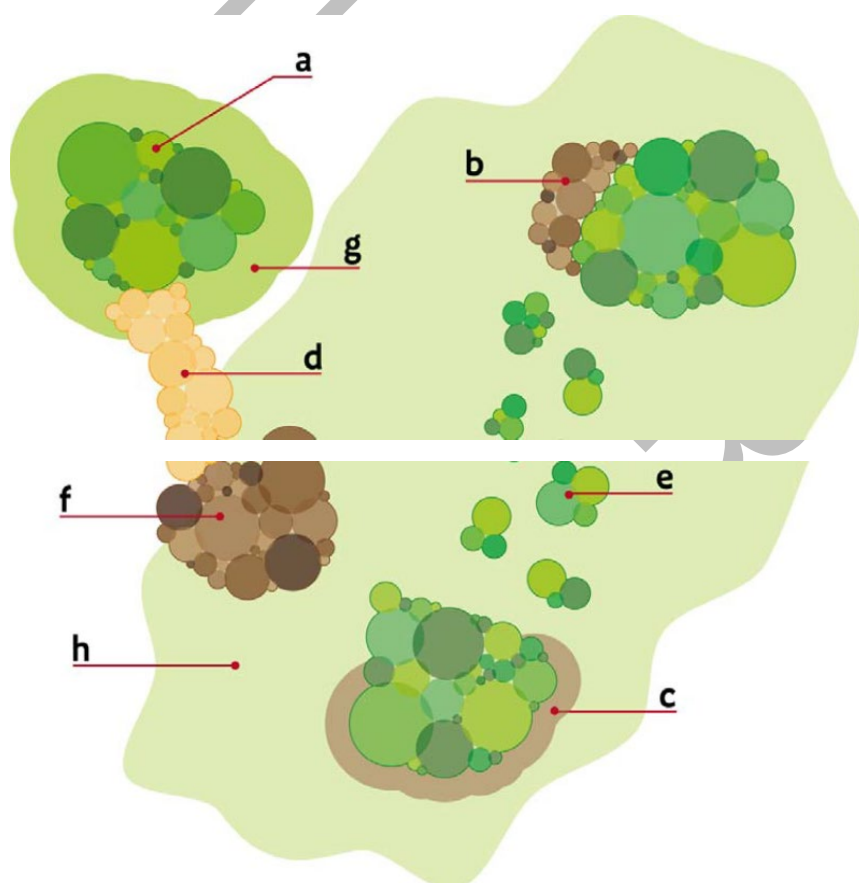


*suite of high quality sites which collectively contain the diversity and area of habitat that are needed to support species and which have ecological connections between them that enable species, or at least their genes, to move'<sup>8</sup>.*

The report sets out five key approaches to rebuild nature :

- (i) Improve the quality of current sites by better habitat management.
- (ii) Increase the size of current wildlife sites.
- (iii) Enhance connections between, or join up, sites, either through physical corridors, or through 'stepping stones'.
- (iv) Create new sites.
- (v) Reduce the pressures on wildlife by improving the wider environment, including through buffering wildlife sites

These are illustrated below in the report:



*Figure X. Enhancing ecological networks*

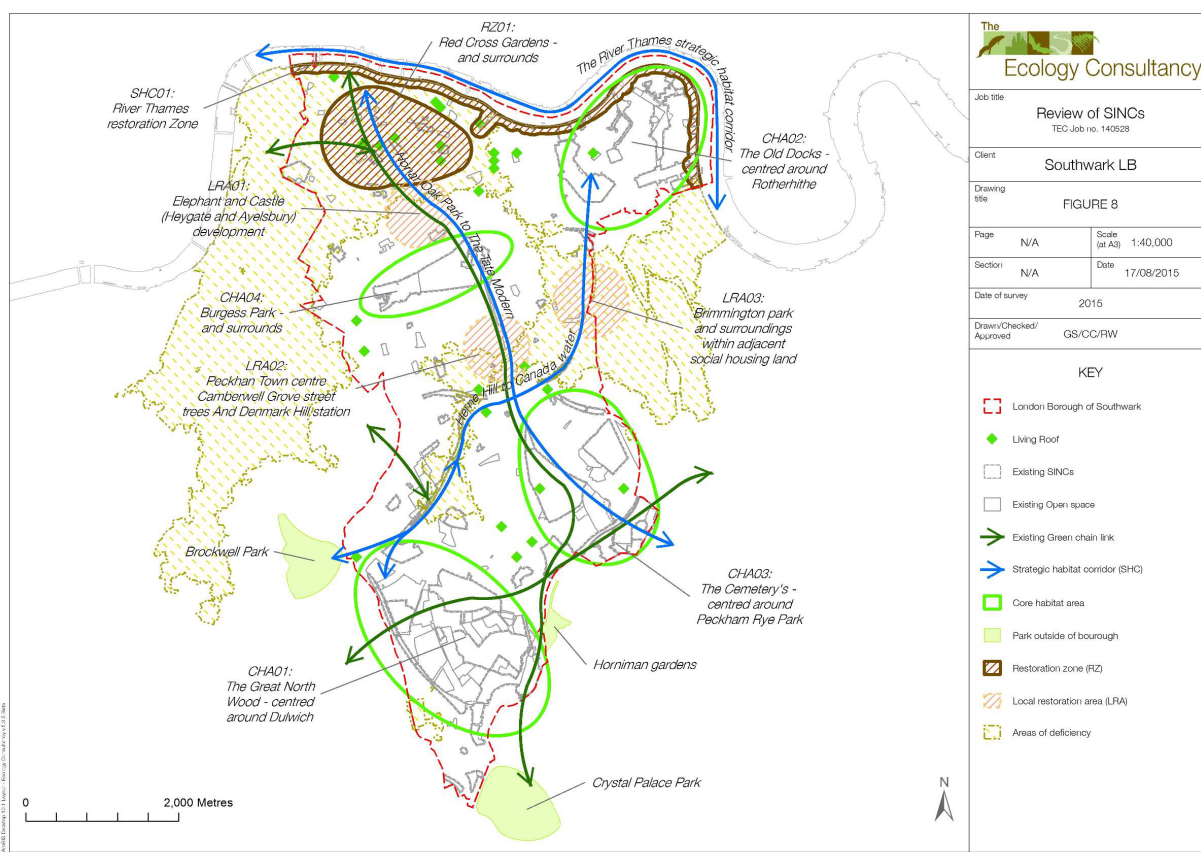
*Approaches include: improving the quality of habitat patches (a); making existing sites bigger (b), which can include creating ecotones (enhancing connectivity through a continuous corridor (d) or a stepping stone corridor (e); creating new sites (f); and reducing pressures on sites either by establishing buffer zones (g) or enhancing the wider environment (h).*

<sup>8</sup> Page iv Space for Nature, Lawton 2010

## The council's existing work on Ecological Networks

The council has taken some foundational steps to deliver Ecological Networks: there is a commitment to develop these in the existing SNAP and references to Ecological Networks are threaded through the Southwark Plan.

The council commissioned a '*SINC Review and Borough Ecological Survey of the London Borough of Southwark: Southwark Surveys 2014-2015*' to support the 2020 SNAP. This was produced by The Ecology Consultancy and finalised in 2016. This included research on developing Ecological Networks. This project identified a number of biodiversity hotspots where clusters of SINC's could be referred to as Core Habitat Areas. The figure below was produced as part of the report and illustrates these and the other components that form the borough's primary ecological network, including three strategic habitat corridors.



The Space for Nature, Lawton, 2010 report sets out good practice in developing Ecological Networks derived from the global and European experience<sup>9</sup>:

- The network must have clear aims and a vision, including quantified performance targets where appropriate. Without these, it is hard to properly design the network, engage stakeholders or assess success.

<sup>9</sup> See Making Space for Nature Page 16 section 2.2.3 Components of an ecological network referencing Jones-Walters et al. 2009; IEEP & Alterra 2010.

- Local stakeholder engagement, including landowners, is critical and they should be involved from the outset.
- Where appropriate, it is beneficial to establish multi-functional use of the network and its component sites, so that local people are not excluded from the benefits it provides.
- There is a need for local flexibility in delivery to reflect local differences in implementation options and aspirations.
- A sound evidence base is essential. This is important at the design stage to ensure the right sites are included to adequately support species and habitats and other ecological assets; for management of the network; and to assess whether it is achieving its objectives.
- There is a need for effective protection of all the network components (not just core areas).
- Proper funding is critical, and this need not be just, or even primarily, from government sources.

## More and Bigger

A key message of both the COP Biodiversity Action plan and the UK's Space for Nature report was that we need more habitat, covering a bigger area.

The COP 15 commitment, known as 30x30, calls for the effective protection and management of 30% of the world's land, fresh waters and oceans by the year 2030. Given London is nearly 50% green and blue space, the Commission recommends that Southwark embrace this objective locally.

Officers advise that, while there is an opportunity to expand the SINC selection in the next SINC review, to 'protect' 30% of Southwark ecologically would require a very radical new system, especially given that it is an inner London borough. The commission welcomes this alongside identifying other ways to increase and protect habitat by working with all sections of the council, communities, landowners, householders and other stakeholders.

While recognising the challenge the Commission nevertheless recommends this as an overarching ambition in preparation for the Biodiversity Report, required by January 2026, and the associated work involved in establishing Ecological Networks.

*Size matters and the Making Space for Nature report noted that, whilst important, simply protecting remaining semi-natural habitats, corridors and stepping stones will not be enough: 'the amount of habitat that remains and the small sizes of many of the fragments, mean that the current series of protected sites is insufficient to prevent further loss of species. Nor is it generally appreciated that loss of species from surviving habitat fragments can take a long time; some manage to cling on even though their populations are no longer viable in the long term – an effect called an extinction debt (Tilman et al. 2002). This is both bad and good news. Bad because in the longer term the situation is worse than we think. But good because we may be able to avoid paying much of our current extinction debt by both*

*improving the quality of the habitats that remain and by restoring or re-creating habitats that we have lost' (page 45).*

The amount of existing urban development in Southwark and the pressures on land for other uses, including housing and infrastructure, mean that neither increasing the size of present habitat areas in the borough, nor creating more habitats will be easy.

However, there are many incremental steps that, taken together, can make a big difference. Two of the most significant are managing existing non-habitat green and blue spaces better so they become wildlife habitat ( see Better section ) and reducing paving by:

- I. preventing the further paving over and loss of front gardens (see Spotlight Strategy - below)
- II. systematic and strategic de-paving (see "Spotlight Strategy" - below), and increasing green roof coverage.

## **Spotlight strategy: Preventing further loss of front gardens as valuable natural resources**

Wholesale paving of front gardens began in 1995, when the government relaxed planning regulations to allow vehicle owners to cross the pavement and park on their front gardens, if they had one. Vehicle Footway Crossovers (VFCs) in most cases became permitted development and fed an insatiable desire amongst car owners to have their vehicle stored within sight of their front door. VFCs ultimately rendered whole stretches of public highway unavailable for parking for anyone other than the occupier of the adjacent dwelling, stimulating further demand for offstreet parking and more VFCs, and so on in a vicious circle. The repetitive undulation in the pavement caused by multiple VFCs can be hazardous to some disabled pedestrians and wheelchair users which is at odds with Transport for All's Equal Pavements Pledge adopted by the council. With the growth in EVs, there is now an additional catalyst driving applications for VFCs.

The Commission considered reports including from the Royal Horticultural Society, National Park City Foundation and Ealing Front Gardens Project which highlight how, in the intervening period, London's front gardens have been paved over at an alarming rate. By 2010 approximately 12 square miles of London's front gardens – equivalent to 22 Hyde Parks - had been paved over. By 2015, 50% of all of London's front gardens had been paved over – a 36% increase through the decade.

National Park City estimates that today 75% of all front gardens in London have been covered with impermeable hard surface and the damage done by the loss of these formerly green spaces is huge:

*Thirty years ago, London's green front gardens were part of its lungs and sponge – oxygenating the air and soaking up rainwater. Now they're adding to surface water flooding and sewage discharges [into rivers and bathing water], overheating, biodiversity and habitat loss, subsidence and pollution – and leaving local authorities, water companies and transport infrastructure to pick up the pieces.*

The considerable environmental damage associated with loss of front gardens has been highlighted by the UK Climate Change Committee, National Infrastructure Commission and Ofwat.

In response to extensive flooding in several English cities in 2007, regulations were introduced specifying that any paving exceeding 5m<sup>2</sup> in area should be permeable or or require installation of soakaways within the boundary of the property. However, regulations have been frequently disregarded and enforcement is poor.

### **Planning powers to reduce the installation of Vehicle Footway Crossovers and associated loss of front gardens**

Highways and planning officers were asked to explore what can be done to prevent further losses of front gardens, or failing that, to mitigate the effects of their loss. Highways officers advised that there is a general presumption to grant requests for VFCs due to the 1995 legislation which effectively confers a common law right of vehicular access to residential properties from the public highway. There are some restrictions on granting VFCs, including safety considerations if the proposed location is too near a bus stop or a junction, or where the associated front garden is too small. However, historic VFCs often offer access to gardens that were paved to accommodate much smaller vehicles, and overhang onto the pavement by much larger modern cars is common.

Under Southwark Council's existing design standard, VFCs are granted for properties with front gardens of a minimum depth of 4.8m from the front of the property to the back of the pavement "to allow vehicles to be parked without overhanging the pavement. However, this minimum depth has not been updated to reflect the considerable expansion in vehicle size. Many modern cars exceed 4.8m in depth and it is common for them to overhang the public footway, obstructing pedestrians.

Officers informed the Commission that there is some leverage in Conservation areas to follow the RHS advice regarding materials and planting, however in a situation where there is no demolition in a Conservation area, or under 5 square metres of hard standing is laid down, options are limited due to permitted development rights.

More advice could be provided to residents explaining the environmental impact of hard standings and how this may be mitigated, in line with the RHS best practice, if they still choose to go ahead.

The council could also increase charges for dropped kerbs. Currently, there is a non-refundable fee of £165 for a feasibility investigation that must be submitted with an application for to Highways. The Commission considered the range of fees that other London Boroughs charge and officers advised there is room to increase these. Some councils charge considerably more. The construction costs vary but are typically between £1000-2000.

CPZs are used as a condition for refusal of dropped kerbs in the London Boroughs of Haringey and Camden on the basis that dropped kerbs reduce access to parking on the highway. The council may be able to amend the existing departmental

standard for crossovers to seek to limit new crossovers in areas with high parking stress/in a CPZ if the crossover would reduce the availability of on-street parking. Meanwhile, the law requires councils to have regard to several factors (primarily safety) when determining crossover applications and the loss of on street parking would be just one factor under consideration. Currently these constraints must be considered on a case-by-case basis

Given the increasing evidence of damage caused by front garden loss, the Commission felt that a unified move to discourage VFCs should be adopted across London.

Anecdotal evidence suggests that parking pressure and the desire to park within view combine as a major driver towards front garden conversions. As CPZs reduce parking pressure, and of themselves can be used as a reason to reject applications for VFCs, they could be an effective tool to stem further front garden loss.

The council may be able to issue an Article IV Direction under planning legislation to restrict the conversion of gardens to hard standing for vehicles. This would mean that every application within the area specified in the order would require planning permission. Officers advised that the council could be liable for any reduction in the property value arising from the loss of the right to install a hard standing/crossover, although the Commission felt that the move would be more likely to enhance property value due to the improved amenity value and reduced flood risk associated with planted and permeable space.

Officers reported that blanket Article IVs are not generally considered appropriate and that the Secretary of State has the power to intervene. Officers believed therefore that there is a consequent risk of appeal with residents seeking redress based in loss of value of parking. Thus using an Article IV is untested and may be a high risk approach.

### **Installation of Pavement Channels**

In addition, the Commission heard from CEOs of 2 companies – Charge Gully and Pavecross – that are pioneering pavement channel mechanisms that enable home charging of EVs parked on the kerbside. If workable, pavement channels could offer the benefits of home EV charging (which is currently significantly cheaper than other options) thus negating the desire to convert front gardens for parking.

Both channel options utilise a similar approach, embedding a channel in the pavement to house an electrical charging cable running from residents homes to a vehicle parked on the adjacent section of kerbside. In both cases the cable is securely enclosed and the channel is finished flush with the pavement.

This is emergent technology and there are currently hurdles to be overcome in managing permissions under Highway and Planning law. Concerns have been voiced by officers around health and safety, and systems that would need to be implemented to safeguard the public purse when installing, maintaining and removing the channels. Companies sought to provide a range of robust assurances and suggested solutions to all these issues; nevertheless they acknowledged that leadership by central government would provide the best framework to enable local authorities to facilitate installation.



There are ongoing pavement channel trials in East Lothian, Bath and with other local authorities. The government paper 'Plan for Drivers' is consulting on measures to increase charge point solutions, supporting pavement channel pilots and developing planning guidance for local authorities.

The Commission considered that pavement channels do provide a potential solution open up home EV charging without the need for a front garden. Residents would be obliged to cover the costs of installation, just as they do with a dropped kerb and could be charged up front for future maintenance costs. Meanwhile, there are bureaucratic obstacles to their implementation and concerns over health and safety to be overcome.

### **Spotlight Strategy: Systematic De-paving and defaulting to providing a green public realm and provision of Sustainable Drainage Systems (SuDS), wherever possible.**

Systematic de-paving is a powerful strategy for releasing new land for planting, providing better conditions for biodiversity, and releasing more space for food growing. The associated increase in green space can also improve citizens' physical and mental health and wellbeing and increase community pride and engagement. There are significant areas of grey land covered by paving which could provide a perfect opportunity for increasing wildlife habitats in our borough.

Southwark Council's Climate Change Resilience and Adaptation Strategy, recognises the need to reduce the heat island effect and flood risk. Sustainable Drainage Systems (SuDS or rain gardens) can effectively assist in flood attenuation, cooling and improving biodiversity. Favouring soft planting over hard standing can also contribute significantly to carbon reduction as the production of cement, a vital ingredient in concrete and other types of paving, accounts for 8% of carbon emissions worldwide.

There have been a number of small volunteer-led schemes in Southwark which show the potential. The Octopus Garden project led by the community group Trees for Bermondsey beautifully illustrates the possibilities:



*De-paving for the Octopus Garden, Dunton and Lynton Roads, 2022*



*The garden view from Lynton Road, 2023*

The Commission believes that we need a baseline shift so depaved is the default, wherever possible to enhance our Ecological Network. This can be achieved through systematic depaving, and by amending our current approach to streetscape schemes, including our tree planting programme and delivery of SuDs.

### **Releasing grey land: repurposing more of the public realm, kerbside and car parks for greenery by depaving**

There is a huge amount of wasted land in Southwark, where potentially life-supporting soil is trapped beneath little-used hard surfaces.

#### Public Realm

SNAV have created [this map](#) identifying several sites with unnecessary paving, within a small sample area of Camberwell - 1,255m<sup>2</sup> within 1.25 square kilometres. Extrapolating this number to the borough as a whole, there may be approximately 28,965m<sup>2</sup> (nearly 3 hectares) of little-used, unnecessary hard surface readily available for depaving in Southwark (this is without including any car parks).

#### Kerbside

Including land dedicated to parked vehicles greatly increases the area under consideration. Lambeth's kerbside strategy calculated that its kerbside area alone, currently 94% of which is used for parking, is equal to 194 football pitches, or 1,158,000m<sup>2</sup> (116 hectares) or over twice the area of Burgess Park.

#### Streets for People

The Streets for People Strategy has suggested that at least 10% of every Highways scheme footprint should be dedicated to planting and nature-based solutions. SNAV asserted that 10% for biodiversity is much less than would be appropriate in many schemes (see Liverpool Grove).





*Liverpool Grove pedestrianisation - a missed opportunity for SuDS and biodiversity. This mostly impermeably paved project is directly adjacent to a large churchyard green space and park. The small amount of planting provided is non-native.*



*Almost entirely paved forecourt outside a new development on Thurlow Street. To the right there is concrete seating but no sign of any shade.*

## **Sustainable Drainage Systems SuDS: making better use of water and integrating tree planting and habitat creation with flood resilience.**

Water is essential for plants and wildlife; our existing infrastructure diverts most of it straight into sewers. Harvesting rainwater to irrigate planted community spaces and rain gardens would benefit wildlife and help to support viable and permeable green spaces. Areas of Southwark are already prone to surface water flooding and flash floods, and these events can only be expected to become more common with the acceleration of climate change. Increasing the area of vegetated permeable land,

which attenuates and allows infiltration of rainwater, is key to adapting our urban environment to these changes. Evaporation is also increased on vegetated land, reducing temperatures and the urban heat island effect.

Rain gardens, also known as Sustainable Drainage Systems (SuDS).

Meristem Design shared information on schemes they have worked on in Southwark and beyond. These modify surface waterflow to more natural rates, allowing vegetation and plants to absorb the majority of the rainwater. Rain gardens also filter water, preventing toxins from entering the sewage system.



Forest Road,  
Meristem Design,  
Rain Gardens/ SUDs

A SuDS study in northeast England found that the installation of only six trees, including only two structural tree pits designed for maximum rooting capacity, reduced peakflow between upstream and downstream manholes by 25-30%.

Improving the flood attenuation of pedestrianised projects

The Commission heard that highways pedestrianisation projects are being built with insufficient consideration for run-off reduction.<sup>10</sup>

Tree planting, de-paving SuDS, and underground utilities.

<sup>10</sup> Whilst Southwark's Developer's Guide for Surface Water Management calls for post-development site discharge rates to be equal to greenfield rates, the same standards do not seem to be applied to streetscape pedestrianisation projects. Southwark Streetscape Design Manual (2020) states that "SuDS design must be integrated into new schemes with careful consideration of the maintenance and management responsibilities". However, it does not give a runoff or peak flow reduction requirement or any engineering parameters. Susdrain recommends a goal of 50% reduction of peak runoff for each redeveloped site and provides information on different land area and storage requirements needed to meet this goal for the most frequent to less frequent rainfall events. See SNAV Depaving report to February 2024 meeting of the Commission.

De-paving land creates space for larger-canopied trees to be planted, giving them a healthy environment to establish and mature, so that cooling benefits provided through evapo-transpiration and shade are maximised over time.

The Southwark Streetscape Design Manual (2020) states that “SuDS design must be integrated into new schemes with careful consideration of the maintenance and management responsibilities” and that “tree pits should be constructed as large as possible given the constraints of the site”.

Integrating Tree planting with other planting and SuDS is likely to provide a much better habitat and survival rates for trees. Sealing the soil with hard surfaces stops plant growth from sequestering carbon. Stressed trees, without enough rooting volume to be drought resilient, cease photosynthesizing and become carbon sources rather than sinks.

Southwark’s Tree Section is diligently working to plant more trees, and there is a Tree Policy 2020 to guide this, however SNAV commented that sometimes these trees are being placed awkwardly or inappropriately, in tiny tree pits which do not allow sufficient mature rooting volume or provide significant wildlife benefit. Some of these plantings would offer much greater benefit and long-term survival rates if coordinated with well-designed de-paving and SuDS and located in bigger planting schemes that supported greater biodiversity.

Officers agreed that larger pits are preferred, however they advised underground utilities, pedestrian access, and other amenity consideration all come into play. The Commission acknowledges these constraints, however, there are opportunities to synchronise depaving with other work (as discussed under ‘Dig Once’, below). The Commission notes some areas which have been used as highway for decades will have a high concentration of utilities cables/pipes etc. embedded beneath them, and that areas with utilities lines running close to the surface are not suitable for planting of woody species. However, shallow rooted herbaceous species may still be considered for overplanting, depending on the type and location of utilities lines. Some lines are actually better accessible for service when set in easily replaced herbaceous planting than if buried in concrete; other lines may require hard surface protection. Investigation for de-paving is an occasion for more accurate mapping of underground lines.

### Planting for biodiversity

Not all local greening is equal from a biodiversity standpoint. It is important to include site-appropriate wildlife-friendly species, catering for the whole lifecycle of insects, and incorporate more native species.

Planting should also ideally be in a mosaic, consisting of several “layers”, comprising a variety of native wildlife friendly plants, including groundcover, native grasses or herbaceous plants, and a woody / structural layer that will provide architecture and cover for larger animals such as birds. For this reason, the Commission would like to see much larger tree pits, ideally with more than one tree, and for these trees to be incorporated into bigger habitat creation schemes.

Meanwhile, not every de-paved area needs to be expensively planted and maintained. With proper initial design, it is possible to create green spaces with very high biodiversity value, and acceptable aesthetic value, through initial seeding of

wildflowers, tolerance of volunteer plants, annual mowing, and ongoing litter picking. Public awareness and increased tolerance of “weeds” simply as wild plants is already underway as part of the reduction in spraying of glyphosate throughout the borough. This can be enhanced by adopting a Community Weeding scheme, discussed elsewhere. Any de-paved areas engineered as SuDS will have minimal additional maintenance requirements such as periodic unblocking of drains, similar to conventional drainage systems.

### Soil

The microorganisms that live in the soil perform essential and often underestimated roles in our biomes and wider ecosystem. Healthy soil biota relies on aerobic reactions and carbon and nutrient cycling, which are severely impeded by soil sealing and compaction under paving.

As part of developing an Ecological Network, soil sampling is advised. This will mean that places with healthy soil can be prioritised and valued. If heavy contamination beneath existing paving is detected, measures must be taken so that toxic materials do not become loose in the environment. However, it is important to note that even if the earth cannot be directly planted there is still the option of planters, including SuDS, and food growing in raised beds.

## **Opportunities and resources to depave**

### Depaving Front Gardens

Gardens are an important source of greenery and can provide a rich habitat for wildlife. The UK has half a million hectares of garden, which is a bigger area than all of our nature reserves<sup>11</sup>. Unfortunately, front gardens are being increasingly paved over to park cars and EV charging is further catalysing this trend. Measures to prevent further paving over of front gardens are considered essential and are explored in a separate section of this review.

Several councils have put forward successful programmes to encourage residents to depave their front gardens, which Southwark Council could replicate:

- Lambeth Council worked with residents in Kennington, supplying skips and labour to [help residents remove unwanted hard surfaces](#) from private space, including front gardens and driveways. Lambeth has provided an open invitation (council phone number and email address) for other interested residents to get in touch.
- Hammersmith and Fulham Council have produced a [Flood Mitigation Report](#) which proposes an annual public de-paving programme similar to Lambeth's program in Kennington.
- The city of Amsterdam in the Netherlands has a [de-paving programme](#) where the city supports any resident wishing to de-pave outside their unit.

### Dig once.

The London borough of Enfield has established [a “dig-once” programme](#), leveraging the Mayor of London's Infrastructure Coordination Service to incorporate de-paving,

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<sup>11</sup> <https://www.sciencefocus.com/nature/a-scientists-guide-to-life-how-to-garden-for-wildlife>



SuDS, and streetscape improvements with already-scheduled necessary subgrade utilities improvements, thereby reducing cost and disruption.

### Thames water and Insurance bodies

Indisputably, any moves to restore the natural water attenuation capacity of land across our borough reduces the demand placed on increasingly overloaded sewer and drainage infrastructure. As such, over and above the positive environmental impacts of depaving described, depaving offers potential cost savings to Thames Water; furthermore, the reduced flood risk could also be positive for commercial entities insuring against the risk of flooding. It is possible that, with the right approach, there could be funding streams available from these companies to support depaving.

### Resources, cost and value

Southwark's Flood Risk Management Strategy aims to promote the use of SuDS (draft for consultation June 2023), but identifies that funding is an issue. However, it is important to note that there is a difference between de-paving and SuDS and their respective associated costs. Depaving simply means that the top hard surfaces are removed, and soil which allows plants to grow is exposed or added. In contrast, SuDS may include engineered substrates, storage and piping systems, in addition to simpler run-off reduction measures. Schemes incorporating less paving do not necessarily add costs if site works are already being undertaken.

There are also currently many outside funding streams available for de-paving and climate resilience-related improvement schemes, for example flood management funding from the [Environment Agency](#) and the [Mayor of London](#) funding for rewilding, gardens and food growing.

It is much more cost-effective to de-pave and plant larger, more joined-up areas. In addition, with a larger root zone, the trees have a greater chance of survival, good growth and long life.

The value per square metre of depaved land, as calculated through natural capital accounting methods, is potentially significant considering the land's improved value in terms of contributions to biodiversity, urban cooling, flood resilience, and improved air and water quality. This potential value should be taken into account alongside the inherent and unquantifiable benefits of biodiverse greenspace.

### Examples of successful systemic de-paving strategies employed by local authorities.

In Portland, Oregon, USA, local government has partnered with community organisation De-pave to successfully carry out community de-paving projects for over ten years, so far removing over 22,000m<sup>2</sup> of hard surface and reducing Portland stormwater sewer loading by over 60,000,000 litres.

In the small town of Douai, France, systemic implementation of SuDS strategies has reportedly led to the saving of 1 million euros per year, or the equivalent of 30-40% of budget compared to a regular rainwater management system for a town that size. (Herin et Dennin, 2016)

## **Balancing depaving with amenity, vehicular and pedestrian access requirements**

Not everywhere can or should be de-paved. It is essential that de-paving and pedestrianisation projects are thoughtfully and professionally designed, with pedestrian accessibility in mind, including ensuring that disabled parking is available nearby and prioritised over other vehicle parking, and that the mix of surfaces in redesigned areas is appropriate to support access for those with limited mobility. Where hard surfaces are essential for vehicles, the council ought to consider the use of Grasscrete or similar products, which allow both specified vehicle loading and vegetative growth.

Convenience and amenity must be balanced with finding creative ways to maximise biodiversity, habitats and greenery given the myriad of benefits they offer to all.

## **BETTER**

The council can improve biodiversity and better manage existing green space by:

- extending the habitat for wildlife in our many green spaces,
- improving management of our existing SINCS,
- introducing buffer zones around SINCS,
- measuring biodiversity more accurately using AI and bio-acoustics
- improving the wider environment by reducing light pollution,
- eliminating the use of harmful pesticides.

(Eliminating Pesticides is covered at the end of the section in a Spotlight Strategy, as one of the most important interventions the council can make.)

## **Extending wildlife friendly planting and management in green spaces**

A lot of habitat is required to support a diverse range of insects, small mammals and birds. The existing green areas in the city can be improved by increasing the volume, diversity, and variety of plants. Parks, housing estates, gardens, verges, pathways and pockets of land all offer opportunities. Southwark has many large and small parks where habitats could be improved. The UK has half a million hectares of garden, which cover a larger area than all of our nature reserves and offer significant potential to improve habitats for wildlife.

### **Build it and they will come**

Many of our existing green spaces can be managed better for wildlife by reducing cutting, retaining leaf litter and collecting rain water. With relatively small changes to habitats, most parks could support 20-25 species of butterfly.

Over 600 species of insects were identified in Warwick Gardens, a small park in Peckham, located next to a railway cutting SINC. This documentation of insect life was carried out by Southwark Resident Penny Metal from [Insectinside](#) and demonstrates that small changes to habitat, such as retaining deadwood, leaving areas undisturbed, and varying mowing and thus grass and plant height can greatly enhance biodiversity.

### A layered mosaic

The 2006 report from the Government's Commission for Architecture and the Built Environment, explains that to better support biodiversity, green space must be designed and managed as a more complex "layered mosaic" consisting of:

1. Long grass with seeds and flowers (herbaceous layer)
2. Hedgerows and dense native shrubbery of varying heights, providing cover
3. Understory trees
4. Large canopy trees
5. Leaf litter allowed to remain, providing cover for insects
6. Significant amounts of deadwood (chips, sticks, logs, stumps) – very important for insects at different stages of life cycle.
7. Aquatic zones (with sloping natural banks and equal areas of open water vs associated vegetation)

### Insects – the base of the food chain

Many insects and other invertebrates in London are limited by the availability of food and water. In creating or improving green spaces, it is important to cater for the whole life cycle, not just adult insects. Pollinator plants (flowers) provide food for adult insects, but other plants are needed to support their immature stages (caterpillars), too, as well as places to shelter overnight and through the winter e.g. ivy.

One of the best habitats for insects is flower rich grassy areas, which thrive on low fertility soil. These have the added benefit of requiring little maintenance.

Many butterfly and moth larvae rely on a single plant species for food. For example, the Brimstone butterfly relies on buckthorn bushes. A thick hedge of native species will provide food, shelter, and nesting sites for a wide range of wildlife.

### Water

Community gardens and food growing plots all need sources of easily available water to be sustainable. Officers reported that they do provide stand pipes using water from the Thames, and mobile sources of water, however there is a cost, supporting the view that the installation of waterbutts should be prioritised where possible. For significant annual food growing sites there needs to be a reliable water source in the hot months of summer. Rainwater capture is important but may not suffice.

SNAV highlighted that Southwark could benefit from increasing the number and distribution of ponds. Even very small ponds, if well designed and well managed, can support wildlife such as toads, frogs and dragonflies, and provide a place to grow our incredibly beautiful native wetland plants. Southwark has many mainly hidden rivers: The Peck, Earls Sluice & Neckinger run underground apart from the pond in Ruskin Park and lake in Peckham Rye park. Stretches of water in Dulwich Park and Belair Park are linked to the otherwise hidden Efra. These hidden water bodies present an opportunity to create temporary ponds or “scrapes”. Being temporary, they do not support fish, so other species are able to thrive without being eaten. SNAV suggested that Peckham Rye Park would be a good location for this.

Southwark’s few existing waterbodies could all benefit from increases in their associated marginal and emergent vegetation, to improve water quality and provide more and better habitat. Along the banks of the Thames, there may be opportunities to work with PLA and Thames 21<sup>12</sup> to explore possibilities for improvements to biodiversity. Officers said a wall set back in Surrey Docks Farm that may be a good location. In addition, there may be an opportunity to create sandbanks to encourage birds that feed on mudflats, e.g. sand martins, black-tailed godwits, or to create reedbeds which support a multitude of invertebrates as well as birds such as reed warblers.

The Making Space for Nature report recommended that public bodies<sup>13</sup>:

- make space for water and wildlife along rivers and around wetlands;
- restore natural processes in river catchments, including in ways that support climate change adaptation and mitigation; and
- accelerate the programme to reduce nutrient overload, particularly from diffuse pollution.

There is increasing public concern with pollution in our rivers. As discussed above the Water Framework Directive Regulations apply to management of the waterways in Southwark and sewerage undertakers should be monitored to ensure ongoing compliance. Southwark should consider targeting the Water Framework Directive “Good Ecological Potential” for its one remaining above ground waterway, the Peck. Improving the biodiversity management through better practice

The Commission heard evidence from members and through field visits that the practice of council employees, contractors and sub-contractors can be variable. The Commission saw examples of Southwark staff pioneering wildlife friendly land management with reductions in pesticide use, but also heard of poor practice where community gardens had experienced street cleaners pulling up plants they viewed as weeds.

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<sup>12</sup> Thames21.org.uk “...working with communities to improve rivers and canals for people and wildlife.”

<sup>13</sup> See recommendation 4 Making Space for Nature report



Councillors reported receiving complaints from constituents about mowing verges. A recent members' enquiry about mowing alongside the Surrey canal path revealed that it is managed under a grounds maintenance contract which reads as follows:

*"Throughout the year grass will be no longer than 40mm or less than 25mm immediately after cutting and will not be allowed to grow longer than 65mm between cuts".*

Officers advised that this is one example from a huge variety of grass cutting specifications in place across the Council and thus not representative of grounds maintenance practices in general. However, the Commission believes that perhaps there are areas that are currently managed under higher maintenance regimes where mowing could be scaled back. Meanwhile, it is recognised that different mowing schedules need to apply to areas such as sports pitches and picnic areas, and that our public spaces must be managed according to their intended use.

Council staff and contractors are often not familiar with methods and techniques of land management for biodiversity. Good management is reliant upon having well written contracts and ensure that managers and workers are communicating and delivering ecology-oriented goals at the ground level. Even once good practice is embedded, this can be vulnerable to changes in personnel in the absence of good training or poorly devised contracts. Best practice needs to be regularly reinforced through proper staff training and contract management.

#### Promoting wildlife gardening

People are increasingly gardening for biodiversity, and this can be promoted further: more and more, shifting social norms encourage a less ordered approach. Southwark hosts the Peckham centre for Wildlife Gardening and as such has a great local resource.

## **Management of SINC**s

While Southwark is doing very well to have 89% of SINC

s in active management, there is work to be done on improving the implementation of SINCs management plans, which can be variable.

In March 2019, one co-ptee wrote a [blog](#) for the Friends of Burgess Park noting that 16 species of butterfly had been recorded in the Park. Over the next few years, the active management was continued, and the number of butterfly species increased to 23. This is in comparison to around 16 butterfly species in Dulwich Park, where the management plan is less focused on wildlife-friendly interventions.

This example in Burgess Park shows the beneficial effect that implementing a management plan can have on the wildlife in our parks and green spaces: "build it and they will come".



Ensuring that management plans are in place, and continue to be implemented, should be a priority for the Council. There is evidence that, where management is discontinued - or the plan is not followed - wildlife numbers tend to decrease.

#### Tackling Anti-Social Behaviour (ASB)

The Southwark Biodiversity Partnership is currently exploring work by the [Scottish Forestry Commission on ASB](#), which emphasises it is a complex problem requiring nuanced and sensitive response, involving various stakeholders and approaches. SINC management plans would benefit from attention to this.

## Buffering SINCS

Buffering SINCS is important, particularly in urban areas where sites are often small and, therefore, have more 'edge effects'.

The edges of sites, such as woodland often have a markedly different characteristics from the whole, making them much less hospitable for many species, thus reduce the working size of a wildlife site (Making Space for Nature, Lawton 2010<sup>14</sup>)

There are two main ways to buffer sites: firstly, by making the surrounding environment more wildlife friendly by, for example, reducing or eliminating harmful pesticide use across the borough, becoming a dark sky borough, and reducing traffic.

The second is by buffering the edges, which creates a more wildlife friendly zone around SINCS. This is particularly important for small sites (Lawton 2010). Buffering involves managing the area surrounding a wildlife site in ways which reduce adverse effects on the site itself and sustain positive landscape interactions (Jongman & Pungetti 2004).

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<sup>14</sup> See page 72

Buffering ought to be integrated into the Ecological Networks planning that is taking place in the development of the LNRS and as part of the Green Infrastructure Strategy. The Space for Nature report assumes a 500-metre buffer around urban wildlife sites.

## **Measuring biodiversity through Bioacoustics**

It is difficult to objectively measure the health of wildlife, including the amount and diversity of species present. Bio-acoustic monitoring is an exciting new method to better establish the health and diversity of life in our green spaces. Bio-acoustic monitoring records mammal and invertebrate sounds. This enables species identification, and the measuring of abundance and behaviour in the survey area.

Much of Southwark's current biodiversity survives not only in SINCS, but also in some of the borough's few remaining unmarked marginal habitat areas, as well as parks and gardens. Currently, recording of existing wildlife populations in Southwark is sporadic and haphazard, and little is known of our wildlife populations' numbers, movements or trends.

One of the commission co-optees heard from Professor Kate Jones, head of Ecology and Data Science at UCL, along with the council's Ecology Officer. She recommended that a more complete and systematic monitoring could be accomplished with AI-based bio-acoustic monitoring devices in targeted trial applications. Through the use of this technology, scientists based at the Norwegian Institute for Nature Research (NINA) and the University of Cambridge are reliably tracking 56 species' distributions and dynamics in real time across Norway,<sup>15</sup> enabling better and more targeted biodiversity policy.

## **Improving the wider environment**

The Making Space for Nature report, Lawton, 2010 notes that the more we improve the wider environment within which wildlife sites sit, the less work we will have to do in other ways to establish a coherent and resilient ecological network<sup>16</sup>, although it is not a central theme of the report.

### Light pollution and Southwark becoming a dark borough

Artificial light is disruptive to wildlife. The Ecology Officer said that developers are expected to consider light pollution, especially near parks, and there is also generally a curfew applied to the use of floodlights in parks and other open spaces.

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<sup>15</sup> <https://thesoundofnorway.com/>

<sup>16</sup> Page 60, Lawton 2010.

SNAV advised that wildlife-friendly lighting includes positioning lights lower and closer together, using motion sensors and the minimum wattage or lumen output necessary, using longer wavelengths (eg red or amber LEDs) that are less disruptive to wildlife, and shielding, with no light above the 90-degree plane from the fixture. Modern technologies can enable motion sensors to shift lumen output or wavelength according to time of night or if pedestrians are detected.

Reducing artificial light in and around SINCS ought to be explored. Bats are particularly sensitive to light pollution. A rare type of bat has been found in local woods, marking an increase its known range. Officers reported that there is a dialogue underway about creating dark bat corridors.

There is a movement to create make [London a dark sky city](#) and rewild the night. Canada Water is considered dark.

## **Spotlight Strategy – Going Pesticide Free**

### **One the biggest changes Southwark Council can make to improve biodiversity is to go pesticide free.**

It is now nearly ten years since the WHO published its findings that glyphosate is a “probable human carcinogen”, kick starting a growing international movement to end the use of pesticides in towns and cities. The Commission heard from the Pesticide Action Network (PAN), which campaigns to eliminate pesticide use due to compelling evidence of the multiple harms they cause to humans, pets, wildlife and biodiversity.

Children are most vulnerable to the negative health impacts of pesticides, as are workers exposed to the chemicals during application. Domestic animals who walk where the chemicals have been applied and then lick their paws can ingest the chemicals directly. It is also now well-known that the serious decline of bees and other pollinators, birds and mammals have all been linked to pesticide use<sup>17</sup>.

“Pesticides” includes herbicides, insecticides and fungicides. Hundred of tonnes are used in cities every year to control wild plants (particularly on pavements), to prevent insect damage to ornamental plants and to control invasive species.

Many cities are now going pesticide free, driven by growing Public Health concerns, in particular with Glyphosate. Paris has been completely pesticide free for 20 years. According to PAN, all towns and cities of both Belgium and France are now pesticide-free, along with hundreds of other towns and cities across the world

In the UK, Glastonbury was the first council to go pesticide free in 2015. Hammersmith and Fulham was the first London borough to go pesticide free in 2016 Lambeth Council went the final step and stopped using pesticides on streets during the pandemic.

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<sup>17</sup> See page 4 Going Pesticide Free- A guide for Local Authorities ([Information for local authorities - Pesticide Action Network UK \(pan-uk.org\)](#))

A growing number of councils now only use pesticides to control invasive species such as Japanese Knotweed. PAN emphasised that if pesticides are to be used to control invasive species, it should be injected into the stem rather than sprayed, to limit the potential harms. There are also 'electronic control systems' which kill plant root systems that can be used to exclude even this use.

Southwark Council ended the routine application of pesticides in parks several years ago (before 2018) but continues their use on streets and some estates.

The Commission found that the approach to pesticide use across Southwark's streets and estates varies. An officer managing an estate in Bermondsey informed the Commission during a visit that he had long shunned use of pesticides in his management area, whereas other areas continued to use pesticides.

Anecdotally, in the south of the borough, residents have noticed that spraying has taken place. Meanwhile, on one street residents have complained that flowers they planted in tree pits had been hoed out by over-zealous street care employees. Whilst removal of flowers was an annoyance, it indicates that manual weeding is taking place.

#### Lambeth Council Community Weeding Scheme: a case study in staged community engagement approach to reducing pesticide use

PAN recommended a staged approach that engages the public, similar to the approach taken by Lambeth Council.

In 2019 Lambeth Council was approached by urban food growing charity Incredible Edible to end their pavement pesticide spraying and find alternatives to control wild plants. At the time, the council was in a three year contract, which would have been expensive to exit so, as a compromise, the council agreed that streets and communities could opt out if residents would be prepared to do hand weeding. The council promoted this and was pleasantly surprised that 30 streets joined. Then, during the pandemic, the council increased this to 100 streets as residents welcomed the neighbourhood activity. After a further push the council reached 130 streets.

Following this success Lambeth Council stopped spraying and now streets can opt into the Community Weeding Scheme and leave the wild plants to grow throughout the spring and summer. Residents remove the species that can become trip hazards or harm pavements (e.g Buddleia and Tree of Heaven ).

The scheme has been a big success and a botanist recently counted over 70 species on a single street including rare and endangered plants. The Commission was impressed by the Community Weeding Scheme's achievements: both the reduction in pesticide use and the associated community engagement benefits.

Lambeth Council reported that the change process has been largely supported by officers and residents, with 700 champions. The council received far fewer complaints than expected. The Lambeth lead officer told the Commission that the change process has been in part about reframing plants on the pavements as being

a benefit to the environment rather than thinking of them as messy plants out of place.

### Challenges and costs

Approaches to ending the use of pesticides have varied across the country and come with different costs. Councils such as Lambeth have adopted manual weeding, assisted by community participation. Lambeth Council said that one challenge when they recommissioned the service was that there were not many contractors who were willing to hand weed.

Glastonbury Council conducted a pilot and audit of costs and found that the most cost effective method to control wild plants was through the use of a foam system, which was cheaper than either hand weeding or pesticide use, once the investment in equipment were made.

PAN reported that going pesticide free can be cost neutral or even cost negative after the initial investment stage. PAN has carried out numerous case studies of councils that have gone pesticide free, which could help to guide Southwark Council towards finding the most cost effective way to eliminate use of these harmful chemicals.

## **Joined up**

The Making Space for Nature report emphasises the importance of joining up wild spaces to maintain or strengthen ecological coherence, primarily by increasing connectivity with corridors and 'stepping stones'.

### **Southwark Nature Action Volunteers Nature corridors**

SNAV have proposed two types of nature corridors, set out in a map – see below.

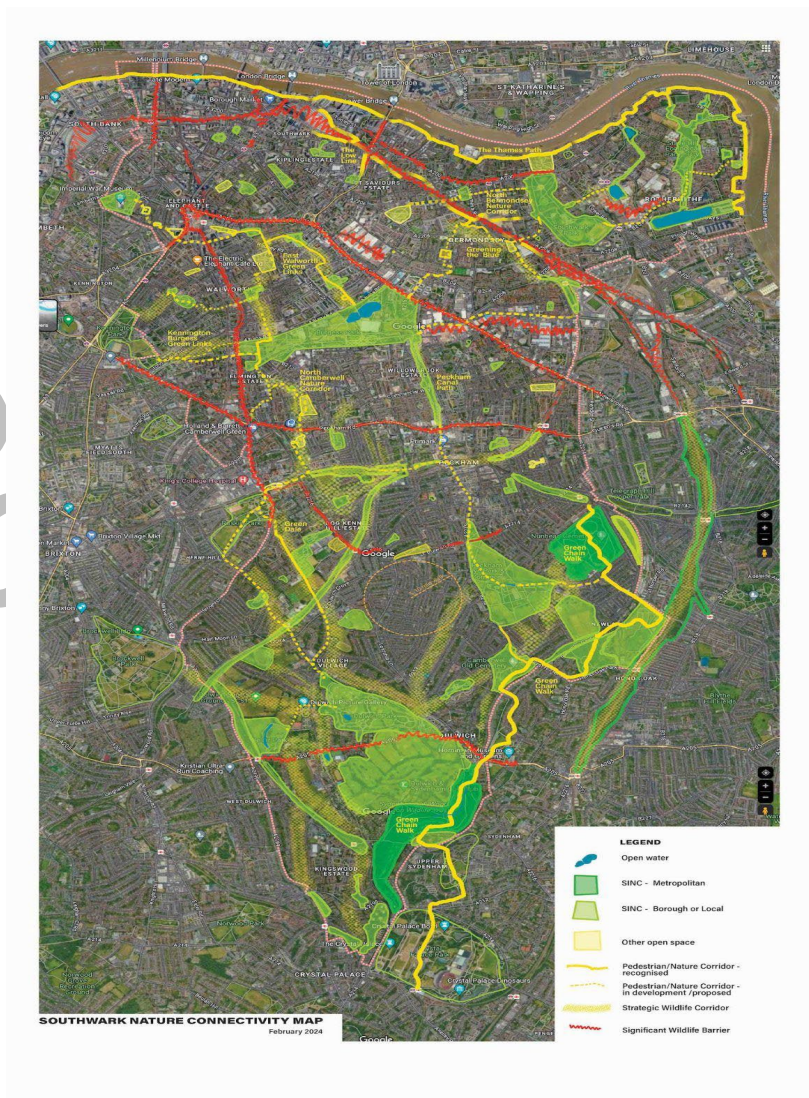
1. One for people and nature: 'Pedestrian/Nature Corridors' which connect green spaces. These are continuous, or have very frequent "biodiversity stepping stones".
2. One for nature only: 'Strategic Nature Highways' which are inaccessible areas that are critical for wildlife survival and nature recovery.

This is in line with Making Space for Nature's recommendation that 'Public bodies and other authorities responsible for canals, railways, roads, cycle ways and other linear features in the landscape, should ensure that they better achieve their potential to be wildlife corridors, thereby enhancing the connectivity of ecological networks, and improving opportunities for people to enjoy wildlife'<sup>18</sup>.

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<sup>18</sup> See Recommendation 21 Space for Nature





When presenting this map to the Commission, SNAV highlighted specific points to be noted:

- Peckham's Rye Lane is a major missing link, as nature corridors go there and then get lost;
- Canada Water is an opportunity to connect the Borough SINC's of Southwark Park and Russia Dock Woodland / Stave Hill Ecology Park, Albion Channel and Lavender Pond;
- Old Kent Road is a barrier that ought to be made permeable to nature.

SNAV and Butterfly Conservation evidence said that the long term vision is for complete nature connectivity throughout the borough, however the strategic starting point is to focus on connecting SINC's. This echoes the identification of Core Habitat Area in the Ecological Consultancy 2016 report for the SNAP, discussed above.

SNAV advised mapping to enhance existing and new potential green routes/corridors that can connect parks and link up with SINC's to maximise the land available.

When creating wildlife corridors it is important to choose plants that provide a habitat for insects, the base of the food chain. In the meantime Southwark ought to avoid adding any new barriers for wildlife populations such as large expanses of paved areas, and ensure multi-level planting including adequate provision of ground-level planting (that is more accessible to terrestrial species). In addition, the council ought to continue and strengthen efforts to reduce motor traffic that contributes to wildlife mortality and impedes movement due to noise and pollution.

The research conducted by The Ecological Consultancy for the council back in 2016 and SNAV's more recent mapping exercise and ongoing community research are both excellent resources for the council to build upon in developing wildlife corridors, as part of mapping Ecological Networks.

## **A bolder, more animated, vision**

There is an established body of evidence that connecting with nature is good for human health, and that good quality stewardship by humans increases ecological health.

Close proximity to nature increases physical activity, particularly in pre-school children, who prefer to play in natural or wild spaces. The benefits to mental health are even more pronounced with stress and depression alleviated, and attention levels increased in children with ADHD<sup>19</sup>.

## **Bolder**

The Making Space for Nature report recommended the establishment of Ecological Restoration Zones (ERZs) that operate over large, discrete areas within which significant enhancements of ecological networks are achieved, by enhancing existing wildlife sites, improving ecological connections and restoring habitats. The report said that ERZs should be proposed and implemented by consortia of local authorities, local communities and landowners, the private sector and voluntary

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<sup>19</sup> The Space for Nature report cited the following

'The Royal Commission on Environmental Pollution 2007); many of the benefits are a result of people being more physically active if they have access to natural environments, and overall levels of physical activity across age groups are positively associated with the proximity and accessibility of green spaces to residential areas (Jones et al. 2009), particularly in pre-school children (Baranowski et al. 1993).

Evidence on mental health benefits from contact with nature is even more compelling. Stress and symptoms of depression are reduced (Wells & Evans 2003); concentration and self-discipline are enhanced (Faber Taylor et al. 2002) and levels of admissions for mental illness decrease (Bowler et al. 2010). Attention levels in children with attention deficit disorder increase when they have access to natural spaces (Faber Taylor et al. 2001). Children also often prefer to play in natural or wild places, helping them develop cognitive, physical and social skills (Muñoz 2009).



conservation organisations, and supported by national agencies. The London LNRS offers an excellent opportunity to take this forward.

SNAV highlighted the potential for ambitious, large scale projects to excite residents to engage with nature, as well as multiplying the positive impacts for biodiversity by acting at scale.

An existing example of such a project is the recently opened Green Link Walk, which was launched in March 2024. This new 15-mile walking route, the Green Link Walk, has been launched by Transport for London (TfL), the City of London, Southwark, Islington, Hackney and Waltham Forest, and conceived in partnership with a range of different walking and wheeling groups, including Ramblers, London Living Streets, Sustrans and CPRE.

This is the eighth route in the Walk London Network and runs from Epping Forest to Peckham town. It links almost 40 areas of green space. TfL says: *'The new route has been created to increase leisure walking in London, improve Londoners' health and wellbeing, and enhance community access to green space and nature. The Walk London Network is one of the largest walking and wheeling networks of any city in the world and includes the Capital Ring, Green Chain, Jubilee Greenway, Jubilee Walkway, Lea Valley, London Outer Orbital Path, and the Thames Path'.*

Rivers also offer an exciting opportunity providing some of the most important natural connections. The Space for Nature report says that<sup>20</sup>: *'Rivers provide ecological connections across England. They supply a number of critical ecosystem services, not least water for drinking, crop irrigation and industry, as well as being important places for recreation. They provide a range of wildlife habitats and support species dispersal and migration. As such, their quality and function is very important for ecological networks.'*

A number of cities across the globe have daylighted rivers to provide space for nature and recreation for people, including projects in Seoul, Los Angeles, and Portland, Oregon.

### ***Daylighting the Cheong Gye Cheon River in Seoul, South Korea***

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<sup>20</sup> Page 49 Space for Nature



***Before daylighting the Gyeong Gye Cheon River pre-2005.***

The river is buried underneath an elevated highway. Photo is part of a historic photo tile mosaic along the now daylighted river. Source

<https://www.harvestingrainwater.com/gallery/daylighting-buried-waterways-show-the-flow-image-gallery/>



***After daylighting river.***

Gyeong Gye Cheon River Festival in 2008.

On average, the river park attracts 60,000 people per day. Its become a major draw for tourists as well as residents. Source:

<https://www.harvestingrainwater.com/gallery/daylighting-buried-waterways-show-the-flow-image-gallery/>

Like many London rivers, sadly the Effra, the Peck, Earl's Sluice & Neckinger run mostly underground apart from the pond in Ruskin Park and lakes in Peckham Rye park, Dulwich Park and Belair Park . The mouth of the River Neckinger forms St Saviour's Dock, a sheltered inlet of the Thames. All of these river segments are within Sites of Interest for Nature Conservation, providing key habitat for freshwater wildlife such as amphibians, fish, water birds, and insects. Officers advised that the council is due to begin ecological improvement works in Peckham Rye Park and Belair Park to expand and enhance wetland habitats whilst reducing the risk of flooding for residents.

The Commission is keen for the council to explore opportunities to expose more of Southwark's rivers as part of more ambitious London wide schemes, noting this would be a logistically challenging in built up areas.

In addition, as discussed above, the River Thames and the recent completion of the Super Sewer may also present an opportunity to engage with the Thames as a natural asset and improve foreshore habitats, for example creating a sand martin bank.

## **More animated**

There is increasing evidence that community management of natural habitats in a sustainable way, is good for people, wildlife and the economy. Increasingly, conservation efforts are switching to engaging local communities and institutions in the management of habitats. Conservation is seeking to integrate economic activities such as food growing in ecologically sustainable ways. Expanding agroecology has potential to significantly enhance biodiversity.

Other examples of fostering small scale connections with nature include the adoption of trees. A structured example of this is the Portland Urban Forest Project which provides resources for the local community to adopt and look after trees. In Southwark, Herne Hill Treewatch encourages residents to adopt and care for trees on the road where they live. Trees for Bermondsey offers similar opportunities.

Many young trees across the borough did not survive the drought of 2022 and encouraging more local community groups to look after young trees could enhance their survival rates. Officers reported that they have started to engage with schools (6 over the summer of 2023) to encourage more planting both within and beyond the school boundary. . Officers reported that the Peckham Rye Park Tiny Forest initiative engaged over a hundred volunteers and they are seeking to replicate this as a model of good practice.

Nature audits are another way of encouraging connection with nature as well as providing valuable information on biodiversity, and can be carried out by community groups.

Penny Metal of Insectinside, shared her photographs documenting life in the bushes of a small Peckham park, Warwick Gardens ( as discussed above in Better).She has

photographed and documented over 672 different types of insects. Penny's beautiful photographs have been published and she has presented in a couple of schools. She would like to do more community engagement to engage children and others in appreciating insects, and how small changes to habitat can enable insects to flourish. Members suggested an exhibition in the atrium.

Southwark also encourages community participation through the Cleaner Greener Safer fund process, the Community Garden scheme and hosts the centre for Wildlife Gardening in Peckham .

Southwark also encourages community participation through the Cleaner Greener Safer fund process, the Community Garden scheme and hosts the centre for Wildlife Gardening in Peckham .

The encouragement, definition, and development of Public-Common Partnerships, as suggested in the Southwark Land Commission Report, where local community organisations share responsibility for land management with Southwark as the landowner, has great potential to increase community engagement while potentially lightening some of Southwark's burden of management.

## **Food and Biodiversity**

As discussed above the UK's industrialised food system is key driver of loss of habitat, with agricultural intensification identified as the major driver of biodiversity decline on land in the UK .

Adopting and encouraging nature friendly food growing is an important way of reversing this trend, and Southwark is leading the way with our Community Gardening scheme. Local food production is a significant opportunity to increase biodiversity, promote healthy food and encourage a connection with nature.

### **Food policy**

#### **INTERNATIONAL**

The right to food is recognised under international human rights and humanitarian law in article 25 of the Universal Declaration on Human Rights.

The United Nations has called for transformative change to towards modes of agricultural development that are 'highly productive, highly sustainable and that contribute to the progressive realization of the human right to food'. This is in the context of identifying unsustainable agriculture and food systems as a primary cause of biodiversity loss as well as the water and climate crises.

The UN has, since at least 2010, identified Agroecology as the most highly endorsed solution to climate, biodiversity and food crises. Reports by the [Special Rapporteur on the right to Food](#) and the 2019 report by United Nations Committee on World



Food Security (CFS) [Agroecological and other innovative approaches for sustainable agriculture and food systems that enhance food security and nutrition](#) set out the reasons in detail.

*The following have been given as a reasons for supporting Agroecology in the 2010 report:*

- *The contribution of agroecology to the right to food*
- *Availability: agroecology raises productivity at field level*
- *Accessibility: agroecology reduces rural poverty*
- *Adequacy: agroecology contributes to improving nutrition*
- *Sustainability: agroecology contributes to adapting to climate change*
- *Farmer's participation: an asset for the dissemination of best practices*

Agroecology is not clearly defined and exists on a continuum. In practice this comes down to the extent to which food systems<sup>21</sup>:

- (i) rely on ecological processes as opposed to purchased inputs;
- (ii) are equitable, environmentally friendly, locally adapted and controlled
- (iii) adopt a systems approach embracing management of interactions among components, rather than focusing only on specific technologies

## NATIONAL

The UK has no overriding policy on food production. It has responded to an independent review: the [National Food Strategy](#) and it has an [Agricultural Transition Plan 2021 to 2024](#). The latter has a section which sets out an ambition to link to the 25 year environment plan, Local Nature Recovery Networks and the UN Biodiversity COP 15 vision to protect 30% of England's land for biodiversity by 2030. This paper also outlines initiatives linked to payments for farmers to increase biodiversity.

## LONDON

The GLA has a London Food Programme which covers areas including:

- facilitating and supporting the London Food Board;
- implementing the new London Food Strategy; and
- supporting the delivery of projects, programmes and initiatives to help deliver good food for London.

The GLA endorses [Capital Growth Network](#), London's most extensive network dedicated to food cultivation. The network includes voluntary sector groups that the Commission has heard from directly, such as Incredible Edible.

Policy G8 on Food Growing in the London Plan states that boroughs' development plans should:

- Protect existing allotments and encourage provision of space for urban agriculture, including community gardening, and food growing within new developments and as a meanwhile use on vacant or under-utilised sites

<sup>21</sup> Page 3

[https://www.fao.org/fileadmin/user\\_upload/hlpe/hlpe\\_documents/HLPE\\_S\\_and\\_R/HLPE\\_2019\\_Agroecological-and-Other-Innovative-Approaches\\_S-R\\_EN.pdf](https://www.fao.org/fileadmin/user_upload/hlpe/hlpe_documents/HLPE_S_and_R/HLPE_2019_Agroecological-and-Other-Innovative-Approaches_S-R_EN.pdf)

- Identify potential sites that could be used for food production.

## **SOUTHWARK**

Southwark is leading the way in food growing and food security in London. The council employs two community gardeners, is committed to expanding allotments provision, and is a Right to Food borough, with a community plan to increase food security.

Growing food on allotments can be productive and, if managed well, can deliver more than four times the yields of arable farms<sup>22</sup>. Home growing does, however, require a competent level of skills and is labour intensive, which is why both more land and community support are crucial to its success .

### **Community Gardening Service**

The Community Gardening service was created in June 2020 with the establishment of 2 fixed-term part-time Community Gardening Coordinator (CGC) posts with a mission to:

- ☐ Be the main point of contact within the council for community gardening and food growing enquiries
- ☐ Increase opportunities for residents to access community gardening
- ☐ Support a Southwark community gardening network
- ☐ Champion community gardening across the council

Incredible Edible of Lambeth, who are active throughout London within the Capital Growth network welcomed this as best practice that they would like to see replicated by other boroughs. Having two gardening coordinators directly employed by the council was considered a vital asset to food growing. In their role championing urban agriculture the gardening coordinators combine technical expertise in growing with a focus on working with local communities.

Incredible Edible supports local food growing groups, including fostering good relationships between residents, with non-violent communication workshops ( a communication style that aims to improve understanding and connection through empathy) and other types of support. They emphasized that investing in people and community is very important for projects to thrive. This is often done through voluntary work, and hard to sustain, so having additional capacity from officers is an important asset.

The Capital Growth network event on the 27 April heard from black and marginalised groups such as [Coco Collective](#) and [Black Farmers Market](#) and both spoke of the difficulties faced by black growers in having sufficient volunteer capacity

<sup>22</sup> <https://ourworld.unu.edu/en/home-growing-produces-ten-times-the-food-of-arable-farms>

to remediate sites and access funding, particularly in the context of and a lack of paid work, racism and multiple forms of deprivation.

### **The co-benefits of food growing for biodiversity**

The Community Garden Coordinators highlighted the many co- benefits that food growing has for both for local gardeners and the wider ecological habitat. They provided the below key learning points and benefits associated with local participative food growing projects, drawing on their experience and academic research<sup>23</sup>.

- Community gardens should be seen as key green infrastructure in a Climate Action Plan as they mix social and ecological systems as community-based adaptation
- Risks: Can be transitory and more complex to support. Cities may prefer more low management green infrastructure such as bioswales, green roofs etc. Southwark is well-placed as it has 2 part-time Community Gardening Coordinator roles to support residents
- Food policies recognise community gardening as key to community engagement, but should also be seen as encouraging informal management and stewardship of green spaces, resulting in more resilient cities (Biggs et al, 2012)
- Community gardens generate ecosystem services like food production, pollination, environmental education, social cohesion which spills into the wider landscape
- Provision of critical lifecycle habitat for species, corridors between different habitats, range of habitats
- Privatisation of land restricts people's ability to practically engage with urban ecosystems
- Increasing people's awareness of how their actions affect the biosphere is not just about proximity to green spaces, stewardship is about getting involved
- Participatory management approaches are critical for harnessing the diversity found in cities

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<sup>23</sup> The underutilized role of community gardens in improving cities' adaptation to climate change: A review - People, Place and Policy (ppp-online.org)

In defence of urban community gardens - Egerer - 2024 - People and Nature - Wiley Online Library  
 Andersson, E., Barthel, S., Borgström, S., Colding, J., Elmqvist, T., Folke, C. and Gren, Å. (2014) Reconnecting cities to the biosphere: Stewardship of green infrastructure and urban ecosystem services. *Ambio*, 43, 4, 445–453. CrossRef link

Archer, D., Almansi, F., DiGregorio, M., Roberts, D., Sharma, D. and Syam, D. (2014) Moving towards inclusive urban adaptation: Approaches to integrating community-based adaptation to climate change at city and national scale. *Climate and Development*, 6, 4, 345-356. CrossRef link

- Adaption actions by local communities can complement actions by local government

### **Allotment Expansion Guarantee (AEG)**

Access to land is a key challenge to expanding food growing in an urban context. In April 2021, following the appointment of the Community Gardener, the council launched the Allotment Expansion Guarantee.

The Community Gardening Coordinators support residents to set up new community gardens and food growing plots (raised beds) on housing land through the AEG. The service has created an AEG Commonplace link that gives information about the process for residents to create new community allotments and maps proposals. The team commissioned a Southwark portal on the national Good to Grow map identifying community gardens across the borough with links to the AEG page. This allows community gardens to advertise plots available and call out for volunteers, as well as advertising events and being a search engine for those looking for nearby growing spaces and community gardens. The team developed the AEG process including site checks, governance agreements, maintenance agreements and plot holder agreements for gardening groups to run these new spaces.

### **Right to Food**

Southwark Council declared itself as a Right to Food Borough, and is working with local businesses, community groups and schools to ensure everyone in Southwark has access to healthy, affordable food within a short walk of their home. A borough-wide action plan to increase household food security has been created, which came out of working with over 60 organisations locally over a year. It has three aims:

- Improved access for food insecure people to pathways of support.
- Improved education and learning about sustainable food.
- Improved access to healthy and affordable food for all.

*What more could Southwark do*

### **Biodiversity, urban agriculture , agroecology, and Food Sovereignty**

Urban agriculture, particularly in allotments and community gardens, tends to be agroecological, and thus better for biodiversity than either untended land or land use for intensive farming, which, as discussed above, is often deleterious to biodiversity .

Incredible Edible advocates for Agroecology as the most adaptive practice, which is in tune with their core value of kindness, and that growing food in tune with nature supports both biodiversity and production of nutritious food.

The Commission considered a short film by Carolyn Steel which outlines the ideas expressed in her book *Sitopia – How food can save the world*. Carolyn Steel is also on the board of a volunteer-led organic, regenerative urban farm of the same name In Greenwich. *Sitopia* is a portmanteau of the Greek words 'sitos,' meaning food, and



‘topos,’ meaning place or site. In essence, sitopia refers to the idea of ‘food place’ or ‘food site.’

Steel uses food as a metaphor to explore life and death and how we steward our environment. She draws attention to the soullessness of much of our current food production and how low food prices of supermarkets mask the true costs and consequences industrial farming such as pollution, ecological destruction and the production of poor quality food that prices more sustainable producers out of the market leading to poor diets and health conditions such as obesity. . She calls for us to value food and create a “virtuous cycle” in which “the market would favour foods that nurtured nature, animals and people”. Sitopia reimagines food as sacred, highlighting the cultural importance of our culinary heritage and the social and spiritual significance and sacrifice involved in food production and consumption .

Leanne Werner’s report on Urban Agriculture in North America particularly focused on biodiversity. Her report states that: *If done in the right way, urban farming can lead to an increase in biodiversity. Plant diversity in urban agricultural sites is consistently higher than other forms of green space (Lin & Fuller, 2013; Taylor & Lovell, 2013).*

She provides examples of spaces that people have used for farming, which are as diverse as the communities farming them:

#### FoodShare’s Burmhampton High School

Burmhampton High School has a three-acre site divided into three areas: one acre for food, one acre for pollinators and the rest an orchard. Most of the plants and vegetables are grown from seeds or plug plants. There are 65–75 different crops and the type of crop grown is decided by the community. Each vegetable patch is divided by pollinators. It is a fully organic farm, and they use landscape fabric over cabbages to deter pests instead of using harmful pesticides.

#### Toronto Metropolitan University

The roof is divided into various sections including a sacred medicine wheel-shaped planting area where they grow sage, tobacco and sweet grass to name just a few. They often get gate crashers on roof spaces – self-seeded plants that just appear. These plants are not removed as they thrive in this rooftop environment. The roof-top farm produces around 2,500kg of food per year from its market garden section, with around 100 different types of fruit and vegetables from April to October. The farm is fully organic, and uses crop rotation and a drip irrigation system.

#### City Beet Farm

City Beet Farm follows organic and sustainable farming practices, focusing on soil health, biodiversity and community engagement. The farm has installed a garden, which it maintains, and there are workshops to help residents convert their yards into productive food gardens. Through its efforts, City Beet Farm not only contributes to local food production but also promotes urban greening, biodiversity and neighbourhood resilience

Many North American urban farmers, particularly from black communities, have adopted Food Sovereignty, a framework that overlaps with Agroecology and arose from the La Via Campesina, the international alliance of peasant farmers. It is, therefore, rooted in the global south and advocates for culturally sensitive practices.

Scrutiny Report

### **The seven pillars of food sovereignty**

- **Focuses on food for people:** The primary purpose of food production and distribution should be to meet the nutritional needs and ensure the food security of people, rather than prioritising profits or export markets.
- **Values food providers:** Food sovereignty values and supports the rights and livelihoods of small-scale food producers, including family farmers, peasants, pastoralists, fisherfolk and indigenous peoples. It recognises their knowledge, skills, and contributions to food production.
- **Localises food systems:** Food sovereignty promotes decentralised food systems that prioritise local production, distribution, and consumption. It encourages communities to rely on locally adapted agricultural practices and traditional knowledge.
- **Puts control locally:** It advocates for democratic control over food systems, allowing communities and individuals to make decisions about food production and consumption that align with their needs, preferences, and cultural traditions.
- **Builds knowledge and skills:** Food sovereignty emphasises the importance of agroecological farming practices and traditional knowledge in building resilient and sustainable food systems. It promotes education and capacity-building to empower communities to produce their own food.
- **Works with nature:** It promotes environmentally sustainable agricultural practices that respect the ecological limits of the planet, conserve biodiversity, and mitigate climate change. Agroecology is a central component of food sovereignty, emphasising the integration of ecological principles into farming systems.
- **Values food as culture and tradition:** Food sovereignty recognises the cultural significance of food and the importance of preserving traditional foodways and culinary traditions. It seeks to protect food diversity and promote culturally appropriate diets.

### ***Right to Grow Bill***

Incredible Edible and Capital Growth Network are championing a Right to Grow Bill for councils to take forward. Hull has adopted this already. This is aimed at giving people and groups a positive right to grow food and encouraging councils to commit to this aim and develop the right mechanisms to support food growing in underused land.

Incredible Edible told the Commission that : *“The biggest obstacle to more local food growing is the lack of available land close to people’s homes. However, the land is there across our public realm.”*

The Commission would encourage this repurposing of land for food growing, particularly grey land now used for car parking and paving.

Southwark Council’s Community Gardening Coordinators are already undertaking many of the actions set out in the Right to Grow Bill but a positive endorsement by the whole council of the overall aim, and commitment to undertake all the steps laid out in the Bill, will strengthen the borough’s food growing capacity and associated benefits .

Moreover, the bill synchronises with the aims and delivery framework of the Land for Good report by the Land Commission to work with anchor institutions and civil society to deliver the recommendations. The Right to Grow bill is very much about collaboration and Incredible Edible says : *“this new right would create opportunities for communities and the public sector to come together, play to each other’s strengths, build trust and make the very best use of public sector land”*.

### **‘The Right to Grow’**

This council notes that the cost-of-living crisis and the continued efforts to recover from the pandemic brings a new focus on ensuring that residents have access to enough fresh food for day to day living.

This council notes:

- The increasing need to put the health and well-being of residents at the heart of our corporate strategies.
- The powerful evidence which demonstrates the link between people’s health and wellbeing and the availability of fresh locally produced food.
- That the cost-of-living crisis is creating real hunger reinforcing the need for healthy fresh food at an affordable price.
- That communities coming together to grow food can radically reduce costs to NHS and social care budgets by reducing loneliness and providing healthy food.
- That there is plenty of under used publicly owned land which could be used for community food growing while also improving the public realm.

This council agrees (or to the extent that the below concern executive functions, recommends to the executive) to adopt a right to grow on council owned land which is suitable or cultivation.

As a result, this council will:

- Identify and produce a map of all council owned land suitable for community cultivation.
- Make this land available for cultivation by a simple license to community organisations at no cost.
- Consider community food growing on sites awaiting development for other uses on a fixed term basis.
- Write to MPs who represent the council area and ask them to support the Incredible Edible campaign or national right to grow.

*In addition the Council will work with partners through the Land for Good delivery process and encourage anchor institutions and civil society to join the council in the above endeavour .*

## Acknowledgements

### **The Environment Scrutiny Commission members 2023/24:**

#### Elected members

Councillor Margy Newens (Chair)

Councillor Graham Neale (Vice-Chair)

Councillor Youcef Hassaine

Councillor Cassandra Brown

Councillor Reginald Popoola

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Councillor James McAsh, Cabinet Member for Climate Emergency, Clean Air and Streets / vice chair of the Southwark Land Commission

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### **Special thanks**

The Commission would like to thank all the contributors to the report, listed above, but particularly both the co-optees , Anna Colligan and Simon Saville, nominated by Southwark Nature Action Volunteers, who provided considerable expertise and time.

## APPENDIX ONE

### Biodiversity scrutiny review report recommendations

No	Recommendation	Priority Actions
	<b>Vision: Adopt 30x30 and the Kunming-Montreal Global Biodiversity Framework (GBF).</b>	
1	<b>Adopt the Biodiversity COP 15 commitment known as 30x30, which calls for the effective protection and management of 30% of the world's land, fresh waters and oceans by the year 2030, as a strategic local aim. Adopt also, the <a href="#">Kunming-Montreal Global Biodiversity Framework (GBF)</a> which aims to “catalyse, enable and galvanize urgent and transformative action”. This calls for action at an international, national and local level and, as such, will align local ambition and pride to national and global ambition. This is a proven way to increase commitment to pro-</b>	<p>Develop the updated Southwark Nature Action Plan (SNAP) with the Global Biodiversity Framework (GBF) and 30x30 aims.</p> <p>Build the 30x30 aim into the development of Ecological Networks and the Green Infrastructure Strategy.</p> <p>Include a commitment to 30x30 and the Global Biodiversity Framework (GBF) in the Climate Strategy and Action Plan.</p> <p>Update the Thriving Nature theme referred to in the Climate Change Resilience and Adaptation Strategy and Climate Change Strategy, to ensure the Climate Change Action Plan includes sufficient provision for biodiversity, including a delivery plan for Ecological Networks, measurable objectives for habitat protection, habitat creation, and de-paving as default, wherever possible.</p> <p>Incorporate a commitment for the Council to see all areas of council policy not only through the prism of a Climate Emergency but also through the prism of a Biodiversity Emergency.</p> <p>Communicate the 30x30 and GBD as a global and local ambition to stakeholders</p>



	<b>environmental behaviour changes<sup>1</sup>.</b>	<p>and residents, and encourage civil society to adopt the GDF and 30x30 alongside Net Zero by 2030.</p> <p>Review Southwark SINC's with view to increasing size and number.</p> <p>Identify other ways to protect habitat by working with communities, landowners, householders and other stakeholders.</p>
	<b>Strategy: Ecological Networks</b>	
2	<p><b>Prioritise development of a Green Infrastructure Strategy to map out a coherent Ecological Network for Southwark</b>, which</p> <ul style="list-style-type: none"> <li>(i) Maps current SINC's and green and blue spaces</li> <li>(ii) Identifies opportunities to increase the size of current SINC's.</li> <li>(iii) Joins up or enhances connections between wildlife SINC's, either through physical corridors, or through 'stepping stones'.</li> <li>(iv) Aids the creation of new wildlife SINC's</li> <li>(v) Reduces the pressures on</li> </ul>	<p>Account must be taken of the full range of semi-natural habitats needed by wildlife. Gaps must be identified (e.g. ponds, absent in many areas of Southwark) and plans developed to address these gaps.</p> <p>Consider designing nature-friendly crossings of major barriers to nature, such as Jamaica Road at Southwark Park/King's Stairs and Old Kent Road. Consideration should be given to reducing traffic, noise and artificial light, and to increasing vegetation at key locations, including overhead "canopy bridges".</p> <p>Several of Southwark's existing major wildlife corridors end just short of Peckham's Rye Lane area. Consider designating Peckham as a Missing Link / Biodiversity Connectivity Zone, and implementing special measures to encourage the development of wildlife affordances in this area.</p> <p>The Ecological Network, and Green Infrastructure Strategy, should be co-</p>

<sup>1</sup> See section 5

<https://www.frontiersin.org/articles/10.3389/fenvs.2023.1103635/full#:~:text=In%20particular%2C%20the%20present%20study,national%20pride%20have%20higher%20PET>

	<p>wildlife by improving the wider environment, including through buffer-zones around wildlife SINCs (amended from Lawton, 2010)</p>	<p>designed and monitored in conjunction with the Southwark Biodiversity Partnership (the Southwark Nature Action Plan (SNAP) reference group), and other local groups/stakeholders, recognizing and building on existing greening efforts by community groups and landowners.</p> <p>The Green Infrastructure Strategy should be led by the council's Planning department, as part of a cross departmental initiative that recognises the interrelationships between Planning, Climate Change, Parks, Housing, Flood Management, Highways, Air Quality and other departments, while maintaining a co-design approach with the Southwark Biodiversity Partnership.</p> <p>Link the development of Southwark's Green Infrastructure Strategy and local Ecological Network with the development of the citywide LGIF and LNRS, working with the GLA as an active and informed partner.</p> <p>The Green Infrastructure Strategy should:</p> <ol style="list-style-type: none"> <li>I. identify geographically specific opportunities for cross-borough collaboration, ensure existing green infrastructure is optimised and existing barriers to wildlife movement are reduced, and consider green infrastructure in an integrated way as part of a wider network connecting to neighbouring boroughs.</li> <li>II. recognize a buffer zone around SINC boundaries, with attention to reducing artificial lighting, noise, height limits for tall buildings (overshadowing) and traffic and increasing habitat for wildlife through de-paving, and installation of green roofs.</li> <li>III. Look to use development and redevelopment opportunities to provide new green spaces and extend and link existing greenspaces and parks.</li> </ol>
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		IV. Integrate Food Growing
3	<p>Improve the engagement, governance and oversight of the SNAP by putting forward a Terms of Reference document, for the Southwark Biodiversity Partnership to consider and adopt, as it sees fit. Ensure , as far as possible, that the Southwark Biodiversity Partnership has a clear remit to report on delivery of the SNAP through the agreed Terms of Reference, including providing the SNAP annual report to Cabinet as part of a wider report on Biodiversity performance.</p>	
	<b>Planning and Construction</b>	
4	<p>Explore methods of delivering biodiversity improvements through the Planning process, beyond the minimum 10% BNG specified in the Environment Act 2021 when undertaking the 2027 review of the Southwark Plan and through Special Planning Documents (SPD). This should be combined with more</p>	<p>Having adopted the London Plan guidance on UGF of 0.3 for predominantly commercial and 0.4 for predominantly residential developments, the council must ensure that, in accordance with the guidance, these targets are treated as the minimum benchmark rather than the maximum required.</p> <p>Ensure the UGF is adopted into the current SPD on Climate and Environment , currently being consulted upon.</p> <p>Monitor BNG and UGF for compliance, with a view to achieving at least the required 10% BNG on-site as well as the UGF floor targets.</p>

	<b>ambitious Urban Greening Factor (UGF) targets. Improvements to both, taken together, are most likely to deliver better outcomes for biodiversity.</b>	<p>Ensure continued monitoring and spot auditing of BNG delivery throughout the 30 year period.</p> <p>Explore the following in the review of the Southwark Plan;</p> <ul style="list-style-type: none"> <li>• Increasing the BNG to above the present 10% improvement on baseline;</li> <li>• Applying a minimum 0.4 UGF to all major commercial as well as residential projects;</li> <li>• Applying UGF targets to smaller projects as well as major sites;</li> <li>• Adopting higher targets for BNG and UGF at strategic locations, as defined by the Green Infrastructure Strategy/ Ecological Network, such as SINC buffer zones or in areas with poor existing wildlife connections.</li> </ul>
5	<b>Wherever possible new major residential developments should be conditioned to include grey water recycling and rainwater harvesting, including providing for storage of rainwater in water butts or similar to support community gardening and food growing.</b>	
6	<b>Explore how domestic planning applications could be conditioned or,</b>	The council should develop and make available on its website a mini-guide for homeowners and developers applying for planning permission for minor

	<p><b>at least, applicants could be encouraged to include wildlife friendly features such as green roofs, flow-through planters, rain gardens, swift bricks, insect houses (for example in cases of loft conversions) and water butts, and to minimise impermeable hard surfacing</b></p>	<p>developments or home improvements, with information on the benefits of these nature-friendly features.</p> <p>The council's climate change team should engage with Thames Water to explore how more residents can be encouraged to install water butts at their homes, for example, by Thames Water managing the subsidised delivery of water butts to residents. (This could be modelled on the existing composting scheme, where residents can buy compost bins at a subsidised rate and community groups, places of worship and schools are able to claim 2 free bins each.)</p> <p>Update the New Homes Design Guide to take account of the recommendation on the right</p> <p>Update the draft Householder SPD to take account of the recommendations outlined on the left</p>
7	<p><b>Update the draft Climate and Environment Supplementary Planning Document (SPD) and Householder SPD to incorporate the review recommendations .</b></p> <p><b>Where this is not possible bring forward a Biodiversity (SPD) and update versions of the Southwark Plan</b></p>	<p>Consider this report in part as a response to the consultation on the Climate and Environment SPD and Householder SPD</p>
8	<p><b>Adopt the full dark sky recommendations from APPG Dark</b></p>	<p>Encourage adoption in the new London Plan.</p>

	<p><b>Skies Policy Plan</b> (<a href="http://appgdarksies.co.uk">appgdarksies.co.uk</a>) including standards on the setting, brightness, colour temperature and density of lighting.</p>	
	<b>More and Bigger</b>	
9	<p><b>Conduct an ecological audit of our parks, estates, verges, schools, sports fields, and pockets of land in order to increase habitat for wildlife, and adopt wildlife friendly practices.</b></p> <p><b>Conduct this in conjunction with the development of Ecological Networks.</b></p>	
10	<p><b>Undertake a mapping exercise with ward councillors and community stakeholders (as recommended by Southwark Land Commission) to identify further land that is currently or can potentially be enhanced for biodiversity. Consider how undesignated open space, such as land currently used for parked vehicles, estate lands, schools, sports field borders, and rooftops, could be transformed and/or managed as places for nature as well</b></p>	

	as people.	
11	<b>When allocating funding for Council projects – i.e. CGS, DHB and others,, ensure that the budget covers the costs of the appropriate number of council officers, including experienced project managers and others who are trained in biodiversity improvements (see recommendation 22).</b>	
12	<p><b>Depaving has the potential to be a powerful tool against the biodiversity and climate crises and in support of the Climate Change Mitigation and Adaptation Strategy, particularly with regard to flood risk management. In recognition of this, the Commission recommends the following:</b></p> <p><b>a) Adopt de-paved as default, wherever possible, in all new Streetscape or housing schemes.</b></p> <p><b>b) Increase our greenspace by de-paving the many unused areas of existing hardstanding to make room for ‘pocket parks’, new street trees, hedgerows, rain gardens, food growing spaces and other forms of</b></p>	<p>Integrate de-paved as default with the BNG and UGF approach</p> <p>Employ an internal design review process to ensure that any new streetscape or housing projects incorporate:</p> <ul style="list-style-type: none"> <li>• green wildlife habitat</li> <li>• SuDS and other permeable spaces to facilitate water attenuation to the maximum extent possible;</li> </ul> <p>All projects to redesign our Streetscape and other public realm must be treated as opportunities to improve the borough’s biodiversity and flood risk management, rather than purely as functional and/or traffic engineering solutions. Proposals should be flagged as a matter of course with the Southwark Biodiversity Partnership, to ensure that they benefit at the design phase from a wide range of input from landscape architects, horticulturalists, ecologists, urban food growers and community leaders</p> <p>As part of this, ensure that the Streetscape design, Climate Emergency Action plan, SNAP, Streets for People strategy, Local Flood Risk Management Strategy, Southwark Plan and the Tree Management Policy 2020 are updated to provide a</p>

	<p><b>new planting.</b></p>	<p>coherent approach to adopting de-paving as the default, wherever possible. Ensure that teams engaged in design and execution of the above, as well as the teams handling the design and execution of Cleaner Greener Safer projects across the borough, are updated and working in accordance with the ambition to de-pave.</p> <p>Highways department should routinely consider applications from utility companies involving excavation of public space in the light of possible green infrastructure projects. Where possible, any scheduled infrastructure projects which involve digging or de-paving to access underground utilities should be coordinated with permanent improvements to improve permeability, increase public green space and improve bio. Where possible, de-paving should be designed to be integrated with stormwater management at area drains, to “slow the flow.”</p> <p>The council should explore all possible sources of funding for the various depaving initiatives described, including DEFRA, Thames Water, GLA, insurance companies and environmental NGOs like the London Wildlife Trust.</p> <p>Establish a strategic approach to de-paving linked to the Ecological Networks and Green Infrastructure Strategy recommended above.</p> <p>Aim for 30% minimum planting for streetscape schemes.</p> <p>Encourage and enable interested local residents to adopt de-paved sites and contribute to management and maintenance. Work closely with local community to sensibly design de-paved areas in keeping with local needs, and form maintenance agreements for planted areas.</p> <p>Make a program of technical guidance and support available to any residents wishing to de-pave their own private land.</p>
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		<p>Where the budget is limited, deliver green spaces with high biodiversity value, and acceptable aesthetic value, by providing an initial seeding of wildflowers, encouraging tolerance of volunteer plants, delivering annual mowing, and ongoing litter picking.</p> <p>The Council must mandate (or strongly advise where powers are limited) the use of permeable materials for ground cover wherever possible. Non-permeable materials should be accepted only if there is a technical justification given for permeable materials not being suitable</p>
13	<p><b>The Council should adopt a default position that recognises installation of Vehicle Footway Crossovers (VFCs) and associated hard standings as an environmental and social ill which stands at odds with council policies including the Climate Emergency Action Plan, the Climate Emergency Resilience and Adaptation Plan, the Streets for People strategy and the Equal Pavements Pledge (as the repetitive undulation of pavements due to installation of VFCs can be an obstacle to disabled pedestrians and wheelchair users). For these reasons, the council should actively discourage and take steps to reduce the rate and extent of this loss of front gardens and installation of new VFCs wherever possible, publicise</b></p>	<p>Highways and Planning work together to bring forward a new policy on VFCs, including greater enforcement, and that this incorporates the below points:</p> <ol style="list-style-type: none"> <li>There should be a presumption against the installation of VFCs where there is a CPZ in place and/or high parking stress.</li> <li>The minimum depth of front garden required for a property to be granted a VFC should be immediately increased to 6m, to ensure that it is large enough to accommodate a modern vehicle without obstruction to the public footway.</li> <li>Council tenancy agreements should specifically prohibit tenants from paving over front gardens and there should be a presumption against the granting of a VFC. This could be reviewed in exceptional individual circumstances.</li> <li>In an effort to inform the public and discourage further loss of front gardens, details of the adverse environmental impacts of loss of planting and permeability from front gardens should be posted on the council's website under the section where residents apply for a VFC and sent to residents in response to their application. (This could be done by setting up a dedicated email address for applications with an automatic response.) Residents should</li> </ol>

	<p><b>its reasons for doing so and ensure that legal obligations relating to hard standings are enforced.</b></p>	<p>be asked to confirm that they read and understood the information provided before confirming that they wish to go ahead with their application.</p> <ul style="list-style-type: none"> <li>e. In the event that an application for a VFCs is granted, applicants should be routinely provided with guidance on minimising the adverse environmental impact of the associated front garden conversion, including advice on paving the minimum area required and maximising permeability and planting based on best practice as described by organisations such as the RHS and National Park City Foundation. Applicants should also be informed of their legal obligations in respect of the Town and Country Planning (General Permitted Development) (Amendment) (No. 2) (England) Order 2008 which requires front garden hard surfacing of more than five square metres in area “to either be made of porous material or, if an impermeable surface, to direct runoff to a soakaway area or rainwater storage within the property’s boundary”</li> <li>f. Increase the application fee and installation charge for VFCs. The increased charge for installation of the VFC will include all existing costs associated with planning, maintenance and implementation, as well as the cost of 2 mandatory checks – 6 months and 1 year after installation – to determine that any associated hard standing conforms as a minimum with the Town and Country Planning (General Permitted Development) (Amendment) (No. 2) (England) Order 2008. The upfront charge should also include a deposit sufficient to cover the costs of remedial action should this be necessary to render any installed hard standings compliant.</li> <li>g. The council should enforce against vehicles crossing the public footway where a VFC has been refused.</li> <li>h. The council should speed up the process for delivering disabled bays outside homes of disabled residents to respond to the need for adjacent parking.</li> <li>i. Explore becoming an early adopter of Pavement Channels to facilitate home charging of EVs parked on the kerbside and join a pilot if there is an</li> </ul>
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		<p>opportunity to do so or if the government provides the appropriate assurances and planning guidance.</p> <p>j. Do everything possible in current and future legislation to prevent further loss of planting and permeability in front gardens and encourage depaving</p>
	<b>Better</b>	
14	<b>Make Southwark a pesticide free borough, to protect biodiversity and to protect our residents from the inherent harms of pesticides. Take a staged approach to eliminating pesticide use from our streets and estates, following on from the elimination of pesticide use from our parks several years ago.</b>	<p>I. Draw upon the Pesticide Action Network's (PAN) Toolkit for Local Authorities to smooth this transition and, in particular, to understand the alternatives to pesticide use, the relative costs and the challenges;</p> <p>II. Consider replicating Lambeth Council's Community Weeding Scheme .</p> <p>III. To best understand and manage the challenges involved in this change of practice, including obtaining value for money and stakeholder buy in the Cabinet Member and officers should actively engage with counterparts in Lambeth and other councils that have already undertaken this change and gone pesticide free</p> <p>IV. Publicise to residents and landowners the reasons that Southwark is taking this approach, explaining the harms associated with the spraying of pesticides, and use this position to discourage residents and landowners from private use of pesticides.</p>
15	<b>Proactively encourage and enable the installation (including retrofitting) of well-designed, wildlife-friendly</b>	Recognize the significant biodiversity benefits of well designed green roofs can deliver, and particularly encourage their use through Planning in priority locations identified through the Green Infrastructure Strategy.

	<b>green roof systems on buildings and structures. Projects vary, but on average green roof systems have many of the ecological benefits of de-paving, at approximately half the cost per m2, sometimes less.</b>	Promote the use of green roofs for agroecological urban farming.
16	<b>New trees should be considered as part of a larger habitat design and more priority given to their contribution to local ecology and the wider Ecological Network. Where possible, trees should be co-located with other trees and planting, in larger pits or schemes, and in conjunction with SuDs, wherever possible.</b>	<p>Amend the existing criteria for choosing trees to include the following :</p> <ul style="list-style-type: none"> <li>a) benefit to the wider ecology, with a preference for trees that feed pollinators, other invertebrates, and birds, and which takes account of the advantages of native trees to the ecosystem</li> <li>b) placement within the wider Ecological Network, including wildlife corridors and proximity to SINC's ( to be set out in the forthcoming Ecological Network/ Green Infrastructure Strategy and London LNRS)</li> </ul> <p>Planting should be in as large tree pits as possible within the constraints of the site, preferably with at least two trees to support a mosaic habitat designed to sustain the whole life cycle of insects. Where as possible, trees should be integrated with in SuDS,</p> <p>Encourage and support community trees groups such as Herne Hill Tree Watch and Trees for Bermondsey.</p>
17	<b>Mandate biodiverse-friendly planting and maintenance in all new schemes including pocket parks, larger park planting schemes and SuDS.</b> <p><b>All new contracts approved through Trees, Housing, Parks, Planning or Highways should be chosen to</b></p>	<p>All planting must be managed to ensure:</p> <ul style="list-style-type: none"> <li>• That herbaceous planting is with wildlife-friendly species, with due consideration given to all phases of invertebrate lifecycles, and majority UK native,</li> <li>• that Trees are selected according to the amended biodiversity focused criteria (above)</li> <li>• resilience in case of drought and excess rainfall and the extremes of UK</li> </ul>

	<b>explicitly enhance and maintain biodiversity.</b>	<p>temperatures.</p> <p>Council officers including those managing Cleaning Greener Safer and Devolved Highway Budget projects should be made aware of these criteria.</p> <p>Where contractors/sub-contractors are responsible for the choice of plant species, these criteria should specified in contracts.</p> <p>This is a useful resource  <a href="https://www.lbp.org.uk/downloads/Publications/Management/making-contracts-work-for-wildlife.pdf">https://www.lbp.org.uk/downloads/Publications/Management/making-contracts-work-for-wildlife.pdf</a></p>
18	<b>Improve the active management of SINC.</b>	<p>Ensure the SINC and management plan for each habitat type is in place and well-communicated to all relevant staff.</p> <p>Explicitly include sections for biodiversity-appropriate first response to Anti Social Behaviour (such as community policing, community engagement in activities such as litter picking, CCTV, fencing off sensitive habitat).</p>
19	<b>Conduct systematic and periodic ecological audits of our parks, estates, verges pockets of land and SINCS, using targeted trial applications of AI-based bioacoustic monitoring devices. Use the information collected to develop more targeted biodiversity protection and support practices and policies.</b>	

20	<p><b>Increase blue habitat, especially in areas where there are gaps by:</b></p> <ul style="list-style-type: none"> <li>i. <b>expanding the areas of marginal habitat around the borough's rivers and ponds;</b></li> <li>ii. <b>increasing the number of ponds and wetlands, including temporary ponds.</b></li> </ul>	<p>Explore whether and how existing underground rivers could be used in some areas of the borough to achieve this ambition.</p> <p>Create River Basin Management Plans for the catchments of the Rivers Peck and Neckinger, including Earl's Sluice.</p>
21	<p><b>Southwark should pursue the Water Framework Directive "Good Ecological Status" for all remaining above ground waterways, such as the Peck.</b></p>	
	<b>Joined Up</b>	
22	<p><b>Provide, recognise, and protect routes for use by wildlife only, as well as for use for active travel, with reference to the work SNAV have done on wildlife corridors for nature and people, as part of the broader piece of work on Ecological Networks.</b></p>	
23	<b>Southwark should work with the GLA</b>	<p>Consultation must first take place with Planning and Ecology Officers and the</p>

	to adopt clearer definitions and requirements for nature-friendly “green” corridors, for example including guidelines for minimum widths, sizes, spacing, target species, and types of soil and planting.	Southwark Biodiversity Partnership.
	<b>More animated</b>	
24	<b>Encourage, enable and support community and volunteer management of nature, wherever there is interest. As well as reducing costs, this will increase social benefit, educate and enhance the sustainability of wildlife friendly habitat.</b>	Encourage, define and develop Public-Common Partnerships, as suggested in the Southwark Land Commission Report, where local community organisations share responsibility for land management with Southwark as the landowner
25	<b>Develop a training programme on biodiversity and wildlife friendly management of green and blue space, targeted at officers and contractors across all relevant roles and grades, suited to their job roles. This should be an integral part of the staff training already required to ensure that all areas of council policy are seen through the prism of the Climate Emergency and extended to include the Biodiversity</b>	<p>Ensure that all teams, including Planning, Climate Change, Sustainable Growth, Parks, Housing, Flood Management, Highways, Air Quality and other departments are aware of our ambitions to address the Biodiversity Emergency.</p> <p>Ecology officers to support / collaborate in developing cross council positive biodiversity training</p> <p>The training ought to be developed for:</p> <ol style="list-style-type: none"> <li>1. Managers and leaders</li> <li>Staff managing delivery of projects under the Cleaner Greener Safer and Devolved Highways Budget funding streams,</li> <li>2. Operational staff including</li> </ol>

	<b>Emergency.</b>	<p>Grounds maintenance team Cleaning team Supervisory staff</p> <p>The training must ensure proper management and that wildlife friendly practices are embedded into operations.</p> <p>Training should be repeated at regular intervals for existing staff and embedded in any induction training for new staff.</p> <p>Contractors and sub-contractors should be obliged to adopt the same commitments to biodiversity across their areas of responsibility, including in respect of training their staff.</p>
26	<p><b>Proactively promote Southwark's ambition to address the biodiversity emergency and explain steps that the council is taking and plans to take to achieve that end. This will include information explaining decisions taken in response to the recommendations contained in this document, such going pesticide free and other changes in management of green and blue spaces across the borough.</b></p> <p><b>Develop a programme to engage residents in the appreciation of and connection to nature.</b></p>	<p>Use social media and publications such as Southwark Life to explain highlight our ambitions and paths to achieving them. These should include recommendations as to how residents, schools, places of worship and other stakeholders can help to protect and improve biodiversity in their own gardens and local green spaces.</p> <p>Facilitate an exhibition in the Tooley Street Atrium of Insectinside.me and encourage links to Southwark schools.</p> <p>Consider developing livestream wildlife webcams to increase resident involvement in and awareness of Southwark's wildlife.</p>
27	<b>Actively promote wildlife gardening</b>	<p>Promote water butts to households including as recommended above.</p>



	to residents.	Deliver this in partnership with the Centre for Wild Life Gardening and other members of Southwark Biodiversity Partnership
	<b>Bolder</b>	
28	<b>Develop ambitious cross borough Ecological Networks , and particularly consider the ecological and social potential of daylighting more of Southwark's Rivers (eg. the River Peck in Peckham Rye Park and River Effra in the south of the borough) and increasing marginal habitat.</b>	
	<b>Food and biodiversity</b>	
29	Make Southwark a "Right to Grow" borough, taking a motion to Southwark Council Assembly adopting 'The Right to Grow'.	<p>A 'The Right to Grow' motion along the lines below would be appropriate:</p> <p><i>This Council notes:</i></p> <ul style="list-style-type: none"> <li>• <i>that the cost-of-living crisis and the continued efforts to recover from the pandemic bring a new focus on ensuring that residents have access to enough fresh food for day to day living;</i></li> <li>• <i>The increasing need to put the health and well-being of residents at the heart of our corporate strategies;</i></li> <li>• <i>The powerful evidence which demonstrates the link between people's health and wellbeing and the availability of fresh locally produced food.</i></li> <li>• <i>That the cost-of-living crisis is creating real hunger, reinforcing the need for healthy fresh food at an affordable price.</i></li> <li>• <i>That communities coming together to grow food can radically reduce costs to NHS and social care budgets by reducing loneliness and providing</i></li> </ul>

		<p><i>healthy food.</i></p> <ul style="list-style-type: none"> <li>• <i>That there is plenty of under used publicly owned land which could be used for community food growing while also improving the public realm.</i></li> </ul> <p><i>This Council agrees (or to the extent that the below concern executive functions, recommends to the executive) to adopt a Right to Grow on council owned land which is suitable for cultivation.</i></p> <p><i>As a result, this Council will:</i></p> <ul style="list-style-type: none"> <li>• <i>Identify and produce a map of all council owned land suitable for community cultivation.</i></li> <li>• <i>Make this land available for cultivation by a simple licence to community organisations at no cost.</i></li> <li>• <i>Consider community food growing on sites awaiting development for other uses on a fixed term basis.</i></li> <li>• <i>Write to Southwark's MPs and ask them to support the Incredible Edible campaign and national right to grow.</i></li> </ul> <p><i>In addition the Council will work with partners through the Land for Good delivery process and encourage anchor institutions and civil society to join the council in the above endeavor .</i></p>
30	<b>Map food growing plots</b>	<p>Undertake this mapping as part of a larger piece of engagement work with community stakeholders to release more land for community good ( see recommendation 10).</p> <p>If there is insufficient capacity within the council to carry out this task, mapping</p>

		<p>will need to be commissioned externally.</p> <p>Include as a minimum a public facing element that helps residents to discover ownership of land that could be used to grow food, and also invites local landowners to submit potential food growing plots for community use under license, preferably for a minimum period of 5 years (although consideration could be given to shorter terms in some circumstances).</p>
31	<p><b>Update the SNAP to include a community garden plan, which includes the right for residents to have a garden, orchard, or food growing plots on their estate. Include details on how Southwark can support urban agriculture to increase biodiversity.</b></p>	
32	<p><b>Develop a Community Gardening / urban food growing policy, and include links to creating local markets and the planning system.</b></p>	<p>Create a cross service working group to bring this forward consisting of Community Gardening Coordinators, Planning Policy, Regeneration, Public Health , Climate Change and Ecology teams.</p> <p>As part of this :</p> <p>Create new urban farming and community food growing zones alongside new developments (roof tops, schools and new parks and green land). Old Kent Road would be a good test site for an integrated and inclusive food growing system.</p> <p>Include a Food Growing Policy in the next update of the Southwark Plan ( and /or Environment &amp; Climate SPD) that requires developers to include spaces for urban agriculture, allotments and community gardening.</p>

		<p>Support local market initiatives, such as cooperative grocery stores, farmers' markets and other community hubs, in collaboration with food growing projects in the area and initiatives such as the Walworth Neighbourhood Food Model.</p> <p>Undertake to support Agroecology through all urban agriculture initiatives</p>
33	<b>Undertake to support Agroecology through food procurement.</b>	
34	<b>Work with the Capital Growth network to monitor and measure how food growing projects in Southwark are improving biodiversity and helping to tackle the ecological emergency.</b>	

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