

Cabinet

Tuesday 17 June 2025
11.00 am

Walworth Living Room, All Saints Hall, Surrey Square, London SE17
2JU

Appendices – Part 2

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16.	Statement of Community Involvement and Development Consultation Charter: Review and Updates Appendices 1 -8.	1 - 209

Contact

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

Date: 6 June 2025

Appendix 1: Changes to Online Validations Checklist

Table 1: Validation Checklist

Document	Current Wording	Proposed Wording (<i>new/amended text indicated in blue</i>)
Pre-Application Advice Service (Pre-application advice service Southwark Council)		
Early Engagement Strategy (Pre-Application web page)	For major and outline applications, you will also need to submit: a Design and Access Statement An Early Engagement Strategy. 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.	Early Engagement Strategy (EES) All Major applications (including major council-owned schemes): Following the confirmation 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. Applicants should publish a draft of the EES and draft plans in advance of the application being submitted. The EES should be submitted as a completed document when the planning application is submitted. This document will ensure that developers engage with residents and local stakeholders from the start of the scheme -development process. The EES 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.
Full Planning Application Validation Checklist (Planning checklists - full planning application Southwark Council)		
Development Consultation Charter – Early Engagement Strategy	You must submit an Early Engagement Strategy for all pre-applications for major applications with 10 or more proposed residential units.	You must submit an Early Engagement Strategy for all pre-applications for major applications with 10 or more proposed residential homes and 1,000 sqm or more of non-residential floorspace .

<i>(Full Planning Applications – Validation Checklist)</i>		This document must also be submitted for Council-owned schemes with 1 or more proposed residential homes, or any change in commercial floorspace.
<i>Development Consultation Charter – Engagement Summary</i> <i>(Full Planning Applications)</i>	You must submit an Engagement Summary for all major applications with 10 or more proposed residential units and for all council schemes.	You must submit an Engagement Summary for all major applications with 10 or more proposed residential homes and 1,000 sqm or more of non-residential floorspace. This document must also be submitted for Council-owned schemes with 1 or more proposed residential homes, or any change in commercial floorspace.
<i>Development Consultation Charter – Engagement Summary</i> <i>(Full Planning Applications)</i>	You must submit an Equalities Impact Assessment for all major applications with 10 or more proposed residential units. 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.	You must submit an Equalities Impact Assessment for all major applications with 10 or more proposed residential homes and 1,000sqm or more of non-residential floorspace. This document must be submitted for Council-owned schemes with 1 or more proposed residential units, or any change in commercial floorspace.
<i>EINA (validation checklist)</i> Required for some full planning applications based on the development type or location	You must submit a completed Equalities Impact and Needs Analysis form for all major applications. 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.	You must submit a completed Equalities Impact and Needs Analysis template for all major applications with 10 or more proposed residential homes and 1,000sqm or more of non-residential floorspace. This document must be submitted for Council-owned schemes with 1 or more proposed residential homes, or any change in commercial floorspace. You also must submit this template for all applications that involve the loss of community facilities in predominant use by protected characteristic communities, as defined by the Equality Act 2010.



STATEMENT OF COMMUNITY INVOLVEMENT

JUNE 2025

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 [a quarter of people who are Black, a tenth who are Asian and 7% who identify as other minority ethnicities \(Census 2021\)](#). 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 Duty¹). 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.

¹ 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 from 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	2. Once the application is submitted	3. During the determination process	4. When we make a decision
<p>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.</p> <p>We may encourage applicants to: Liaise with Tenants Resident Associations, Neighbourhood Forums, and local community groups.</p>	<p>We will: Make planning applications and supporting documents available online on the planning register.</p> <p>Consult on planning applications as set out in law and this document.</p> <p>Ensure developers carry out the requirements set out in the Developer Consultation Charter.</p> <p>Where appropriate, we will: Display a planning notice near the application site.</p> <p>Post letters to neighbours adjoining the application site.</p> <p>Publish a press notice.</p> <p>Consult with other relevant organisations.</p>	<p>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.</p> <p>Take into consideration any consultation responses as part of the officer or committee report.</p> <p>Take into account any relevant material considerations, such as impact on neighbours or design quality.</p> <p>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.</p> <p>Where appropriate, we will: Reconsult on an amended planning application for 14 days if there is a 'material' change to the original application.</p>	<p>We will: Publish the decision notice and officer or committee report on the planning register.</p> <p>Clearly outline recommended reasons for approval or refusal in the officer or committee report.</p> <p>Email the applicant with the decision notice.</p> <p>Publish any relevant appeal documents or decisions on our website. The Planning Inspectorate (PINS) website will also publish documents.</p> <p>Monitor the developer consultation process as set out in the Development Consultation Charter.</p>

HOW TO SIGN UP FOR NOTIFICATIONS ON PLANNING APPLICATIONS

Planning Register

If you want to receive alerts about planning applications:

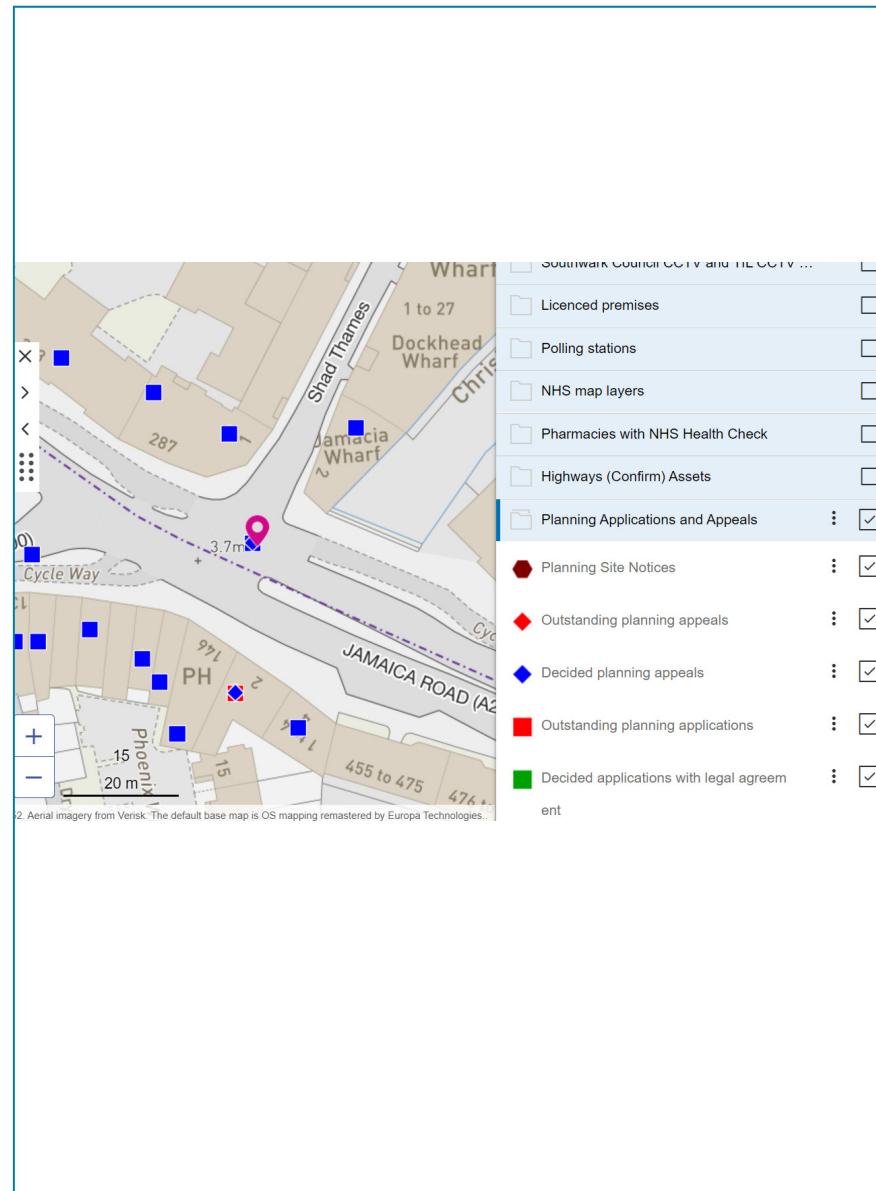
1. Create an account on the [Planning Register](#)
2. Select 'advanced search'
3. Under 'application details' select criteria that are important to you. For example, this could be a ward such as 'Peckham Rye' or the area as well as a certain type of application such as 'prior approval'.
4. Select 'search' (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	2. Letters and Emails	3. Libraries and MySouthwark Service Points
<p>The best way to submit your comments on a planning application is using the council's planning register during the consultation period.</p> <p>How to submit comments using the planning register:</p> <ol style="list-style-type: none">1. Follow this link2. Search the address or application number of planning application you want to comment on3. Click make a comment4. Complete form	<p>Alternatively, you can send us your comments by email or letter.</p> <p>Please email comments to the case officer or to: planning.applications@southwark.gov.uk</p> <p>Post letters to:</p> <p>Planning Division Southwark Council, PO BOX 645529 London SE1P 5LX</p>	<p>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.</p>

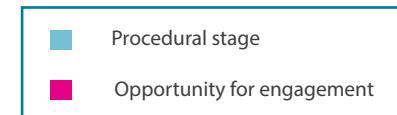
How to submit your comments

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

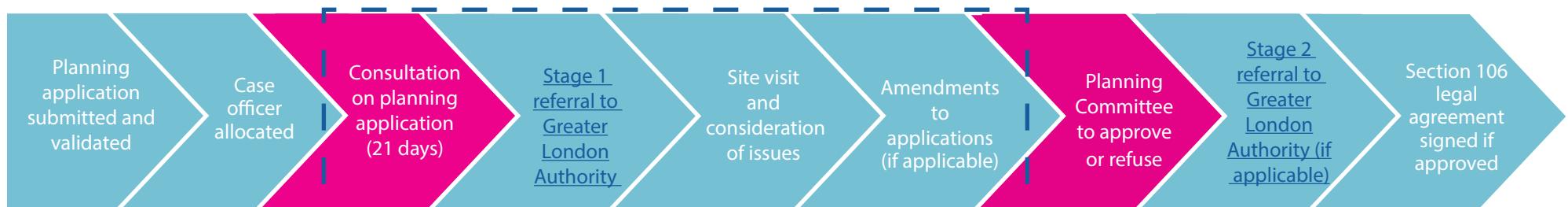


Minor planning applications



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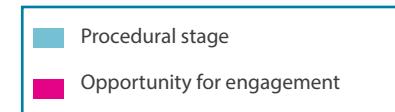
Major planning applications



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.



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Getting involved

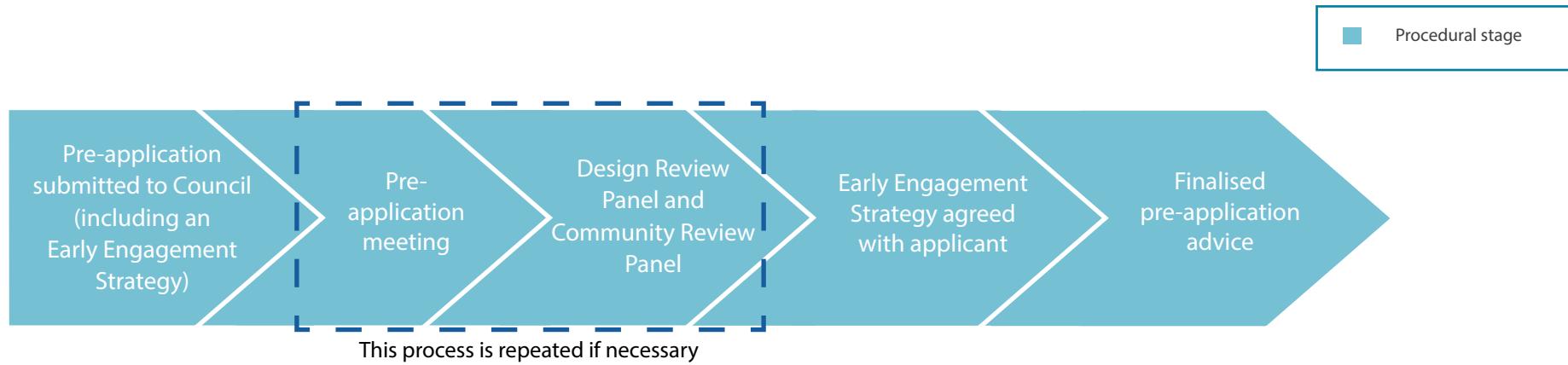
Written Representations

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](#).

PRE-APPLICATIONS



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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
<p>It is quickest and easiest to send us your comments via our Consultation Hub</p>	<p>Please email comments to: planningpolicy@southwark.gov.uk</p>	<p>Post letters to: Planning and Growth, Southwark Council, PO BOX 645529 London SE1P 5LX</p>

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 31,000 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](#).

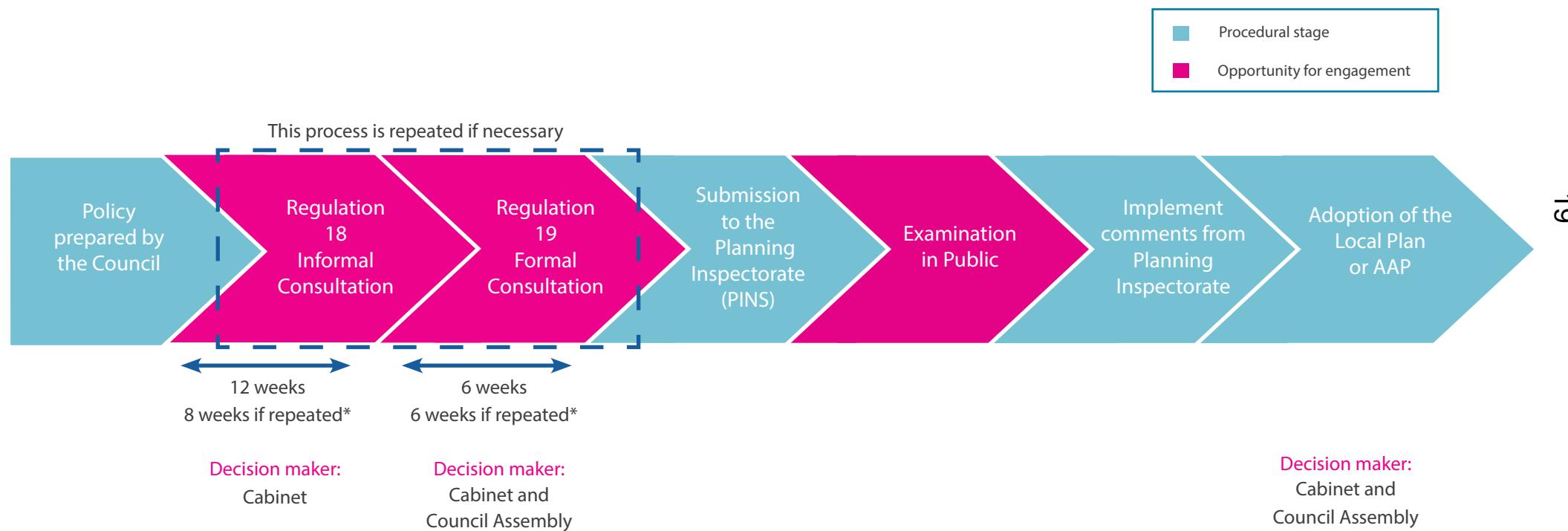
CONSULTATION ON THE LOCAL PLAN AND AREA ACTION PLANS

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 reconduct 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.

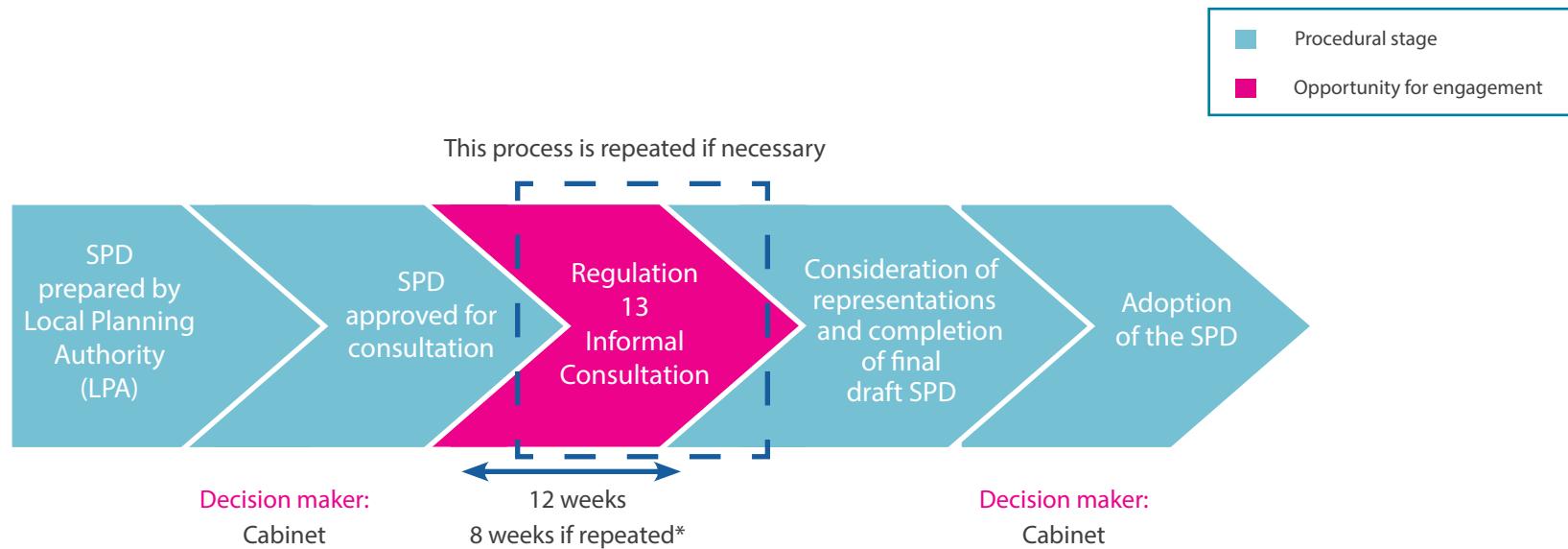
Consulting in exceptional circumstances

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 reconduct for 8 weeks following the initial consultation if changes are proposed that require further consultation.

CONSULTING IN EXCEPTIONAL CIRCUMSTANCES

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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](#)

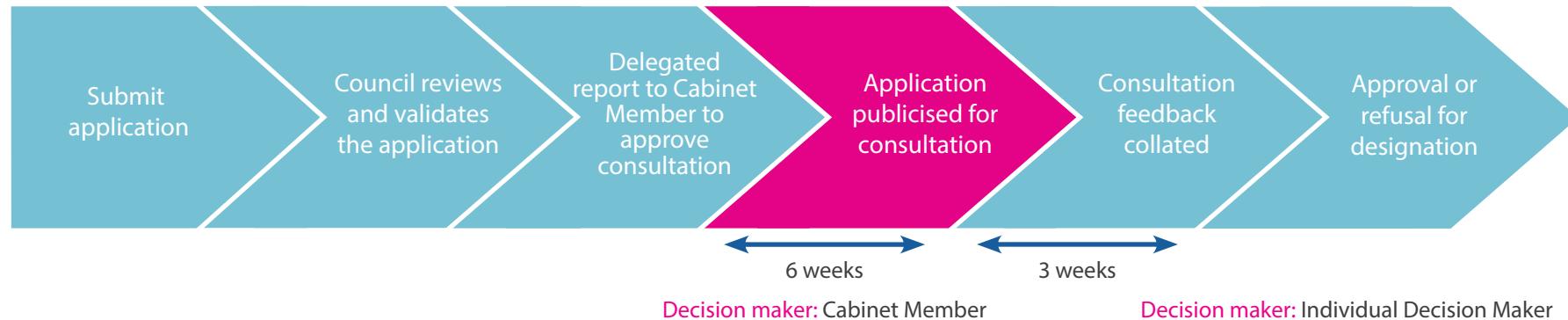
[Planning Portal](#)

[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

JUNE 2025



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		
Documents submitted by applicant	At pre-application stage Prepare an Early Engagement Strategy (EES). Make EES publicly available and share with Ward councillors.	Before submission of planning application Engagement Summary (ES) Equalities Impact and Needs Analysis (EINA)	Consultation Updated Engagement Summary (ES) (where further engagement has been undertaken)	Determination of planning application	During construction 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.	Make the final version of the EES publicly available prior to the submission of the planning application. Undertake engagement activities with the community and relevant stakeholders.	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 the 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
- **NHS providers (such as the South East London Integrated Care Board)**
- **Community Health Ambassadors**

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.

As part of developing the Early Engagement Strategy, applicants should make drafts of the strategy publicly available for residents and stakeholders, including Ward councillors.

The final 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? Are there health facilities on or around the site? 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?
4. **Heritage, Site Layout and Climate Mitigation** - is the site located in a Conservation Area? How is the site currently accessed by its current users? What climate change mitigation and adaption considerations are relevant for the site?

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.

The preference is for engagement to be carried out by the applicant. This helps to ensure that all attendees are familiar with the key issues and the local context. The expectation is that consultation events are run and attended by those with sufficient experience and seniority, so that issues raised by stakeholders can be properly addressed and followed up.

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 this further engagement.

3. Equalities Impact and Needs Analysis

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 Analysis (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 <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				
<u>Submit an Early Engagement Strategy</u> that includes a fact-based audit of the site <u>during the pre-application process</u> .	<u>Follow 'Normal circumstances'</u>	√	√	√	√
Display a notice / board at the application site, which includes images of the proposed scheme and contact details of the developer.	<u>Follow 'Normal circumstances'</u>	√	√	√	√
A leaflet drop with a follow-up door-knock to those within close proximity to the site (including images of the proposed scheme, contact details of the developer and how to make comments on the proposal to the developer).	Developer to send Neighbourhood Notification 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).	√	√	√	√

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.	Follow 'Normal circumstances'	√	√	√	√
Present the proposed scheme to the Design Review Panel and/or Community Review Panel (Old Kent Road Opportunity Area).	Follow 'Normal circumstances'		√	√	√
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 Notification 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).			√	√
Set up website providing details and images of the proposal.	Follow 'Normal circumstances'			√	√

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 Engagement Summary	Follow 'Normal circumstances'	√	√	√	√
Construction boards (hoardings) displayed	Construction boards (hoardings) displayed where relevant	√	√	√	√
Leaflet drop (and/or at pre-application stage)	Neighbourhood Notification Letters to those within close proximity of the site. This should include the contact details of the developer.	√	√	√	√
Computer Generated Images/ 3D modelling	Computer Generated Images/ 3D modelling A video presentation of the site and the proposed scheme should be available on the developer's website where possible.	√	√	√	√
Consider the council's Climate Change Strategy and Movement Plan	Follow 'Normal circumstances'	√	√	√	√
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 Multi-ward Forum if requested by the Council (For Strategic Applications only)	<p>Use online surveys and digital tools to find out the views of the community.</p> <p>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.</p>			√	√
Feed back to people on how they have shaped development from: <ul style="list-style-type: none"> Multiple public consultation workshops; and A public community meeting 	<p>Provide detailed feedback on how they have shaped the development:</p> <ul style="list-style-type: none"> Update the website Where possible, use visuals and images that demonstrate changes to the development 			√	√
Equalities Impact and Needs Analysis	Follow 'Normal circumstances'	√	√	√	√
Submit a 3D model file for use in VU.CITY (FBX file, 1:1 scale and details of program modelled in)	Follow 'Normal circumstances'		√	√	√

Stages 2 and 3 - Consult and Inform Best practice that a developer must undertake during the planning application process and after 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	Follow 'Normal circumstances'	√	√	√	√
Construction boards (hoardings) displayed on site with updates on progress and contact details of 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 website up-to-date	Follow 'Normal circumstances'			√	√
Website with the progress updates by developer	Follow 'Normal circumstances'			√	√
Where applicable, comply with any Construction Environment Management Plan that is secured through by condition on the decision notice or a S106 obligation	Follow 'Normal circumstances'		√	√	√

* 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 Analysis 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.





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.

As part of developing the Early Engagement Strategy, applicants should make drafts of the strategy publicly available for residents and stakeholders, including Ward councillors.

Before submission of a planning application, applicants should make the final version of the EES publicly available and undertake the engagement activities outlined in the strategy. The outcome of this engagement should then be reflected in an Engagement Summary (ES).

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](#)
- [Fingertips - Public health profiles](#)

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, including residents and groups 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? If there is a plan, what are the key issues and priorities for the area and how does this proposal help achieve those priorities?	

Local Economy and Community Infrastructure	
Schools and educational facilities	
4. Are there any schools or educational institutions on and around the site? How did you determine this?	
5. How have you considered the impact on any identified schools or educational institutions which are within or impacted by the scheme? Please provide information on how these organisations have been consulted on the scheme.	
Health facilities	
6. Are there any health facilities on and around the site?	
7. How have you considered the impact on any identified health facilities which are within or impacted by the scheme? Please provide information on how these organisations have been consulted on the scheme (for example, Southeast London Integrated Care Board).	

Local businesses	
8. Are there any local or independent businesses on and around the site? How did you determine this?	
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? How did you determine this? 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.	
11. How have you considered the impact on any sites of significance to the local community within the scheme?	

The following questions may be covered in supporting documents (e.g. Design and Access Statement, Transport Statement, Energy Statement). Please refer to these strategies where relevant and summarise the key points below.

Heritage, Site Layout, and Climate Mitigation	
Heritage	
12. Is the site situated in a conservation area? If so, how have you considered this in your proposed scheme?	
13. Are there any listed or locally listed building on the site? If so, how have you considered this in your proposed scheme?	
Accessibility and Movement	
14. How is the site accessed by its current users? How did you determine this?	
15. What are the important routes through the site and why are they important? Who currently uses these routes? What data or information did you use to come to this conclusion?	
Climate Change and Sustainability	
16. What climate change mitigation and adaption measures are relevant for the site?	
17. What carbon reduction measures have you included 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 local 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 to 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

APPENDIX 5



Southwark Council's Development Consultation Charter requires the submission of an Engagement Summary as a validation requirement for planning applications. This applies to 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](#)
- [Fingertips - Public health profiles](#)

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, including residents and groups 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? If there is, what are the key issues and priorities for the area and how does this proposal help achieve those priorities?	

Local Economy and Community Infrastructure	
Schools and educational facilities	
<p>4. Are there any schools or educational institutions on and around the site? How did you determine this?</p>	
<p>5. 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>	
Health facilities	
<p>6. Are there any health facilities on and around the site?</p>	
<p>7. How have you considered the impact on any identified health facilities which are within or impacted by the scheme?</p> <p>Please provide information on any organisations that have been consulted on the scheme (for example, Southeast London Integrated Care Board).</p>	

Local businesses	
8. Are there any local or independent businesses on and around the site? How did you determine this?	
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? How did you determine this? 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.	
11. How have you considered the impact on any sites of significance to the local community within the scheme?	

The following questions may be covered in supporting documents (e.g. Design and Access Statement, Transport Statement, Energy Statement). Please refer to these strategies where relevant and summarise the key points below.

Heritage, Site Layout, and Climate Mitigation	
Heritage	
12. Is the site situated in a conservation area? If so, how have you considered this in your proposed scheme?	
13. Are there any listed or locally listed building on the site? If so, how have you considered this in your proposed scheme?	
Accessibility and Movement	
14. How is the site accessed by its current users? How did you determine this?	
15. What are the important routes through the site and why are they important? Who currently uses these routes? What data or information did you use to come to this conclusion?	
Climate Change and Sustainability	
16. What climate change mitigation and adaption measures are relevant for the site?	
17. What carbon reduction measures have you included within the scheme?	

Part 2 – Summary of Engagement Activities

Activity and Date	Attendees	Format	Accessibility measures
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 attended the event? How many people attended the event?	How did the participants feedback in the session?	Were any accessibility measures put in place? e.g. translators

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 play facilities)</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. Community
2. Economy
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, during construction and in how a building is used and occupied. A key aspect of Social Value is that it goes above what and beyond minimum planning policy expectations. More information can be found on Southwark's approach to Social Value [here](#).

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).

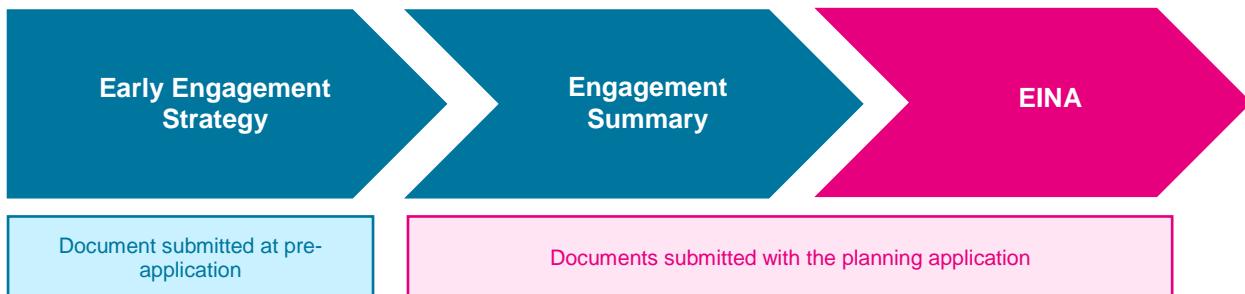
Goal 1. Decent homes for all	
How does the scheme provide new affordable homes?	

<p>How does the scheme provide a housing mix that responds to local need?</p>	
<p>Goal 2. A good start in life</p> <p>How does the proposal support the upskilling of local people?</p>	
<p>How does the scheme deliver and/or enhance social and community infrastructure?</p>	
<p>Goal 3. A safer Southwark</p> <p>How does the proposal include features that design out crime?</p>	
<p>Goal 4. A strong and fair economy</p> <p>How does the proposal create jobs for local people and support the local economy?</p>	
<p>Have local businesses been consulted and involved in the development of the scheme?</p>	

Goal 5. Staying well	
How does the proposal support the long-term health and wellbeing of existing residents and neighbours?	
How 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	
How does the scheme include energy infrastructure or climate mitigation measures to improve the quality of life for existing and new residents? This could include reducing overheating, reducing energy bills, and improvements to biodiversity.	

Part 6 – Monitoring Data

Monitoring Data	
How many engagement events did you hold?	
How did you advertise the engagement events? Please attach 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 the people who attended consultation events live or work? Please give an area breakdown.	



How to Fill in Your EINA

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 **Analysis** 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 Southwark.
- [Office for National Statistics Census 2021 Population and Household Estimates](#) – most useful for understanding age and sex of the population of Southwark. Future publications of the Census will also include demography and migration, sexual orientation and gender identity and health, disability and unpaid care from early 2023.
- [The Office for National Statistics Mid-Year Population Estimates](#) – for gaps in data from the 2021 Census, consider using the ONS Mid-Year Estimates that are produced annually.
- [The Greater London Authority London Datastore](#) – the datastore contains a number of databases on specific topics such as demographics, employment and skills and the environment.

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 requires the consideration of socio-economic impacts in all equality analysis, including any 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



APPENDIX 7

Equality Impact and Needs Analysis Statement of Community Involvement and Development Consultation Charter: Annual Review and Updates June 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).

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

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

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

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

Section 4: Pre-implementation equality impact and needs analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based 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>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).</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p> <p>Statement of Community Involvement (SCI)</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>Development Consultation Charter (DCC)</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>Potential Socio-Economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</p> <p>Statement of Community Involvement (SCI)</p> <p>There are no positive or negative socio-economic impacts identified for the above protected characteristic and the SCI.</p> <p>Development Consultation Charter (DCC)</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.	
Equality information on which above analysis is based	Socio-Economic data on which above analysis is based
<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>
Mitigating and/or improvement actions to be taken	
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><i>Statement of Community Involvement</i></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><i>Development Consultation Charter</i></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><i>Statement of Community Involvement</i></p> <p>There are no positive or negative socio-economic impacts identified for the above protected characteristic.</p> <p><i>Development Consultation Charter</i></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 & 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. (https://www.sense.org.uk/media/latest-press-releases/loneliness-rises-dramatically-among-disabled-people/)</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: https://www.jrf.org.uk/report/uk-poverty-2023))</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>

<p>Gender reassignment: - The process of transitioning from one gender to another.</p> <p>Gender Identity: Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>Statement of Community Involvement</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>Statement of Community Involvement</p> <p>There are no positive or negative socio-economic impacts identified for the above protected characteristic and the SCI.</p> <p>Development Consultation Charter</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><i>Development Consultation Charter</i></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, ENAs 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>Equality information on which above analysis is based.</p>	<p>Socio-economic data on which above analysis is based</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: https://www.stonewall.org.uk/system/files/lgbt_in_britain_-_trans_report_final.pdf))</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: https://www.stonewall.org.uk/system/files/lgbt_in_britain_-_trans_report_final.pdf))</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>

<p>Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)</p>	<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p> <p>Statement of Community Involvement</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>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</p> <p>Statement of Community Involvement</p> <p>There are no positive or negative socio-economic impacts identified for persons who are married or in a civil partnership.</p> <p>Development Consultation Charter</p> <p>There are no socio-economic impacts identified for the persons who are married or in a civil partnership.</p>
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<p>Development Consultation Charter</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>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</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>Mitigating or improvement actions to be taken</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>

<p>Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p> <p>Statement of Community Involvement</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>Development Consultation Charter</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>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</p> <p>Statement of Community Involvement</p> <p>There are no positive or negative socio-economic impacts identified for persons who are pregnant.</p> <p>Development Consultation Charter</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.	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
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: https://www.npeu.ox.ac.uk/mbrrace-uk/reports)
Mitigating and/or improvement actions to be taken	
As there are no negative impacts, no mitigating actions are required.	As there are no negative impacts. No mitigating actions are required.

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others	
Potential impacts (positive and negative) of proposed policy/decision/business plan; 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>Statement of Community Involvement</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>Statement of Community Involvement</p> <p>There are no positive or negative socio-economic impacts identified relating to race.</p> <p>Development Consultation Charter</p> <p>There are no socio-economic impacts identified, relating to race.</p>
Development Consultation Charter	

<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>	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<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>

<p>respectively) compared to White and mixed or 'other' ethnicity adults of the same age (both 4%).</p> <p>https://www.ucl.ac.uk/ioe/news/2020/jan/older-ethnic-minority-adults-have-fewer-close-friends</p>	<p>Borough and Southwark Street (19%). These areas overlap with the Elephant and Castle and London Bridge/Bankside Opportunity Areas. (Census 2021)</p>
<p>Mitigating and/or improvement actions to be taken</p>	
<p>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.</p>	<p>As there are no negative impacts. No mitigating actions are required.</p>

<p>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.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>Statement of Community Involvement</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>Development Consultation Charter</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>Statement of Community Involvement</p> <p>There are no positive or negative socio-economic impacts identified, relating to religion and belief.</p> <p>Development Consultation Charter</p> <p>There are no socio-economic impacts identified, relating to religion and belief.</p>

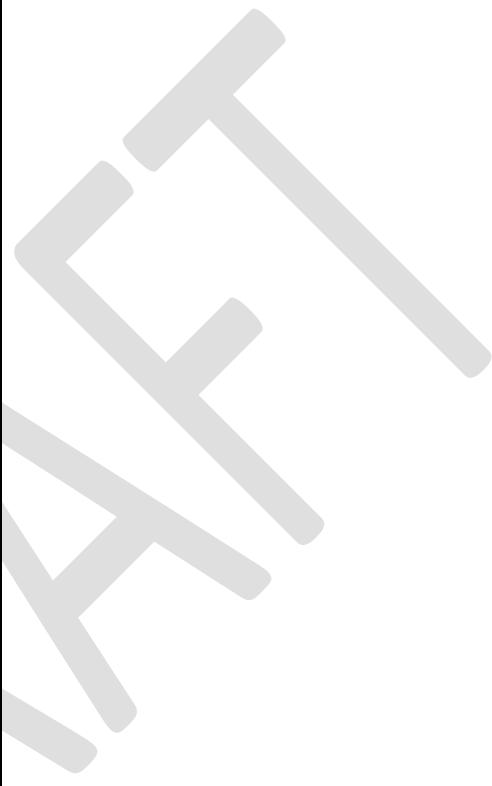
<p>The additional questions may also aid applicants in considering the impacts on local places of worship around the site.</p> <p>The amendment of the questions relating to Site Layout, Accessibility and Movement is anticipated to have a neutral effect, because this data is still provided in other validation 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>	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<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>	None
Mitigating and/or improvement actions to be taken	
As there are no negative impacts, no mitigating actions are required.	As there are no negative impacts, no mitigating actions are required.

Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
<p>Statement of Community Involvement</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>Statement of Community Involvement</p> <p>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>Development Consultation Charter</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>Development Consultation Charter</p> <p>There are no socio-economic impacts identified, relating to religion and belief.</p>
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</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: https://plan-uk.org/street-harassment/its-not-ok))</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: https://www.unwomenuk.org/site/wp-content/uploads/2021/03/APPG-UN-Women-Sexual-Harassment-Report_Updated.pdf))</p>	<p>2023 (available at: 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))</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>

<p>Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p> <p>Statement of Community Involvement</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>Development Consultation Charter</p> <p>The proposed changes to the DCC are anticipated to have neutral benefits for all people living and working in Southwark</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p> <p>Statement of Community Involvement</p> <p>There are no positive or negative socio-economic impacts identified, relating to religion and belief.</p> <p>Development Consultation Charter</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>	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<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: https://www.stonewall.org.uk/sites/default/files/lgbt_in_britain_home_and_communities.pdf))</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: https://www.stonewall.org.uk/system/files/lgbt_in_britain_hate_crime.pdf))</p>	
<p>Mitigating and/or improvement actions to be taken</p>	
<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>	

Human Rights

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

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

The Statement of Community Involvement and 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.

Information on which above analysis is based

None

Mitigating and/or improvement actions to be taken

We will continue to monitor and review the implementation and use of Statement of Community Involvement and Developer Consultation Charters to ensure that the likelihood of negative impacts arising is minimal. The Council will mitigate against any unforeseen issues that arise.



DRAFT

Statement of Community Involvement and Development Consultation Charter Review: Consultation Report

June 2025

Contents

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1. Introduction

1.1 What is the Statement of Community Involvement (SCI) and Development Consultation Charter (DCC)?

1.1.1 The SCI provides details on 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 approach to Community Engagement.

1.1.2 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 (developments of over 10 homes and 1000sqm). The charter provides the developer with guidance on how to engage effectively with the public, before any application has been submitted.

1.1.3 The DCC requires applicants 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.

1.2 What is a consultation report?

1.2.1 A consultation report explains the consultation that has been undertaken to inform the minor changes to the SCI and DCC. This report sets out how we have met statutory requirements as well as any additional local requirements for consultation.

1.2.2 This report also sets out how the comments received from individuals and organisations during the consultation have been considered and how they have influenced the final version of the updated SCI and DCC.

1.2.3 Officer responses have been provided to common themes arising from the consultation, with similar comments grouped together under thematic subheadings.

1.2.4 The full responses received during the consultation are included in Appendix A (consultation hub) and Appendix B (emails). Responses have been anonymised with any identifying information redacted unless the response was received by a statutory consultee or public organisation.

2. Consultation overview

2.1. Consultation process

2.1.1 Southwark Council consulted on the minor changes to the SCI and DCC between 16 December 2024 and 19 February 2025.

2.1.2 The consultation was hosted on the council's consultation hub and can be viewed [here](#). Responses were also accepted via email to planningpolicy@southwark.gov.uk.

2.1.3 Whilst there is no requirement in the Southwark Constitution for the proposed changes to be consulted upon, public consultation on the SCI was held. Table 1 sets out how the consultation was undertaken.

Table 1: Consultation undertaken

Method of consultation	Consultee	Date
Email sent to all statutory consultees informing them of the consultation and inviting comments	All on planning policy consultee database	From 16 th December 2024
Consultation documents available at Tooley Street office.	All	From 16 th December 2024
Documents uploaded onto the Council website for the public to view	All	From 16th December 2024
Consultation advertised in the local press	All	From 16th December 2024
Copy of the SCI / DCC available for an individual if requested	Individuals	From 16th December 2024

2.2 Consultation responses received

2.2.1 Twenty-one responses were received as part of the consultation process, as follows:

Table 2: Consultation responses

Method of consultation	Type of consultee	Total per type of consultee	Total responses
Council's online consultation hub	Residents	7	16
	Community / Resident Groups	4	
	Statutory consultee / LPA	1	
	Other / not specified	4	
By email	Residents	0	5
	Community / Resident Groups	2	
	Planning agents / Developers	1	
	Statutory consultee / LPA	1	
	Other / not specified	1	
Total			21

3. Officer responses to public consultation

3.1 Summary of Consultation Responses and Key Issues on the SCI

3.1.1 There was positive sentiment towards increasing public participation and enhancing transparency in planning decisions. Some comments related to how residents are engaged in the planning process, with suggestions that it can occur too late. The comments emphasised the need for early and genuine engagement, allowing local input at the initial feasibility stage as well as planning.

Officer response: The SCI and DCC aim to ensure that community engagement occurs as early as possible in the planning process. Changes have been made to the documents to clarify when Early Engagement Strategy documents should be submitted, and that these should be publicly available.

3.2.3 Southwark Law Centre expressed the view that current methods of notifying the public, such as site notices and letters, are insufficient. The group suggested using social media, emails, and events to better inform and engage the community. There was also a suggestion to expand the consultation radius beyond 100 metres for letters to be sent out (as set out on page 8 of the SCI), especially for larger developments.

Officer response: These proposed changes would be out of the scope of the current consultation, as the consultation is limited to the minor proposed amendments.

However, the wording on page 8 of the SCI states that for major applications, letters sent will 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. This wording allows for case officer discretion in enlarging the radius, while providing proportionate guidance on neighbour notification letters. The DCC also outlines extra measures that should be undertaken by applicants before and after the submission of a planning application.

This includes the Fact-Based Audit section of the EES and ES. This requires applicants to identify (and subsequently consult) local stakeholders who are often further away than 100m, including community infrastructure, cultural groups/ organisations, education and healthcare providers, as well as Tenant and Community Organisations. This ensures that applicants fully engage with stakeholders within the larger impact area of developments, before submission of any major planning application.

Developers are also expected to publicise their consultation events, which would typically include the use of social media and their website.

3.2.4 Two respondents emphasised the importance of transparency in the consultation process. Southwark Law Centre suggested that full viability assessments should be published early in the application process and that the council should ensure that all material changes lead to further consultation.

Officer response: The Affordable Housing SPD has been revised to set out the requirements for publishing viability assessments earlier in the planning process.

3.2.5 Health providers have asked that the NHS is included in the SCI as a relevant consultation body for major schemes with pre-application engagement on schemes comprising 50 or more homes.

Officer response: This has been discussed with colleagues within Development Management. Engagement with health care providers should occur once there is more certainty around delivery, at planning application stage. The decision on timing will therefore be case specific, and these conversations may be appropriate to have earlier. There is frequent dialogue between NHS providers and planning officers on strategic objectives and direction.

3.2.6 Clarification on GLA Stage 1 and 2 referrals to aid understanding was requested by Southwark Law Centre.

Officer response: Web links have been added to the SCI to clarify this.

3.2 Summary of Consultation Responses and Key Issues on the DCC

3.2.1 Many appreciated the requirement for developers to consult and engage residents at an early stage. The emphasis on early stakeholder engagement at the pre-application stage was seen as positive steps, strengthening the stakeholder voice and aligning with best practice for public engagement.

3.2.4 Respondents noted the benefit of making the Early Engagement Strategy publicly available before submission, with greater clarity on the process and timing.

Officer response: Wording has been added to the DCC to clarify when the EES should be submitted.

3.2.5 Respondents highlighted the need for clearer language to ensure compliance with requirements. There was a strong call for the DCC to include mechanisms to ensure developers act on community feedback, rather than conducting 'tick-box' consultations.

Officer response: A section has been added to the DCC relating to expectation for applicants to undertake consultation themselves and ensure there is the appropriate level of seniority and experience of those attending meetings.

3.2.6 Health providers noted the need for early engagement with NHS organisations was emphasised to prevent negative impacts on health services, stressing the

importance of including health sector representatives due to potential impacts on healthcare facilities.

Officer response: There is frequent dialogue between NHS providers and planning officers on strategic objectives and direction.

3.2.7 One respondent requested that engagement with Community Review Panels is clarified, as this is currently only required within the Old Kent Road Opportunity.

Officer response: The need to engage with the Community Review Panel in the Old Kent Road has been made clearer.

3.3 Summary of Consultation Responses and Key Issues on the Early Engagement Strategy

3.3.1 Respondents appreciated the intention behind the proposed amendments to the Early Engagement Strategy template. Some noted that it aligns well with existing guidance for stakeholder involvement. There was some concern about clarity and the level of detail in certain areas, such as the definition and protection of small and independent businesses.

Officer response: The Fact-Based Audit section of the EES aims to ensure that applicants consider the current situation on site. This will vary on a case-by-case basis and is discussed with the applicants at the pre-application stage. The template is intended to allow for the differences and specific context of each application to be captured. Specific Southwark Plan policies are used when assessing applications, and the impact of these policies and how they relate to the scheme are discussed with applicant early on, thus informing the EES. For example, the mitigation of impacts on existing businesses on site is subject to specific policies within the Southwark Plan.

3.3.3 Some respondents stated that there was a need for more detailed and mandatory engagement processes in the Early Engagement Strategy (EES) template. Many suggested that engagement should not just be offered but made compulsory.

Officer response: The Early Engagement Strategy must be submitted during the pre-application process. Wording has been added to the DCC to clarify when the document should be submitted.

3.3.4 There were requests for stronger requirements around climate change strategies and movement plans, suggesting that considering these issues is not sufficient.

Officer response: A consolidated set of questions relating to heritage, movement and climate change has been added in to the Fact-Based Audit.

3.3.7 The Integrated Care Board had asked for the Early Engagement Strategy Template to be expanded to include 'health facilities' with the NHS as a stakeholder to be consulted as part of early engagement.

Officer response: Two questions relating to health care facilities have been added to the Fact-Based Audit.

3.4 Summary of Consultation Responses and Key Issue on the Engagement Summary

3.4.1 Respondents generally did not provide specific feedback on the proposed amendments to the Engagement Summary template. Responses were generally positive.

3.4.2 One respondent suggested that the Engagement Summary (ES) should include a stronger requirement to detail each event separately, rather than providing an overall summary. Respondents also highlighted the importance of capturing what stakeholders dislike about the scheme, suggesting that this section should be expanded and scrutinised more heavily.

Officer response: The Engagement Summary requires that applicants list all the events that took place, and applicants must complete this section when submitting a planning application. Applicants should outline what respondents disliked about the scheme within the 'You Said, We Did' section. This is scrutinised by officers and if issues have not been addressed, the council requests justification.

3.4.4 One respondent requested that questions within the Engagement Summary related to the health and wellbeing of residents are aligned to the public health priorities within Southwark's statutory Joint Health and Wellbeing Strategy and/or Joint Strategic Needs Assessments. In addition, the respondent suggested adding 'Fingertips' (the national Public Health Profiles database) to the list of recommended data sources.

Officer response: Questions relating to health care facilities have been added to the Fact-Based Audit section of the ESS. Links to the JSNA were already included within the EES template. A link to 'Fingertips' has been added to the list of recommended neighbourhood-level data sources.

3.5 Summary of Consultation Responses and Key Issues on the Social Value Statement section

3.5.1 Southwark Law Centre commented that the social value section can be linked to the Social Purpose of Land Framework.

Officer response: The principles of the framework are included within these questions. The council's work on social value is ongoing and formal adoption of the recommendations of the commission has not yet occurred.

3.5.2 One respondent suggested changing the wording of the social value questions to "How can/How does the scheme...", which would encourage the developer to provide a full answer.

Officer response: The questions within the Social Value Statement have been amended to reflect this suggestion.

3.5.3 Another respondent welcomed the emphasis on social value under Part 5 of the document. Each of the goals can cross-reference to planning policies so that any Social Value Statement can address how the aims of that policy are being met by the development proposal.

Officer response: The Southwark Plan has a suite of policies that deliver social value. Wording has been added to clarify understanding that social value should be 'above and beyond' minimum policy expectations.

3.5 Summary of Consultation Responses and Key Issue on the Equalities Impact Assessment / Equalities Impact and Needs Assessment

3.5.3 One respondent set out that the EINA should set out the Public Sector Equalities Duty more clearly. One respondent set out that the EINA should be broken down into positive and negatives and focus not just on users of the sites. Socio-economic background should be considered more in the template.

Officer response: The scope of the consultation did not include changes to the EINA template. The EINA is a standard council wide template and is used for all reports where relevant to assess the equalities impacts of the development. Socio-economic background is not a protected characteristic but something that all protected characteristics may be impacted by. The consideration of socio-economic background is assessed under each individual protected characteristic.

Appendix A - Consultation Hub Responses

What do you think is positive about the proposed amendments to the SCI?

Please provide a summary of the proposed changes. The documents are too numerous to review.

genuine intentions

I think there is NO point engaging with the local community on developments if the local community are basically ignored which has happened on the Borough triangle development.

I think we are ignored by not only the developer but also the council. you need to widen the area of consultation when there are very high rise and huge developments.

The amendments aim to increase public participation in planning decisions and provides more structure and transparency on how and when the Council will engage with communities before making planning decisions.

What do you think can be improved to the proposed amendments to SCI?

Please provide a summary of the proposed changes. The documents are too numerous to review.

The amendments assume development: There needs to be space to challenge the need for a particular development at the outset.

There needs to be space to challenge the assumption that large development is the only way forward rather than, say, smaller piecemeal improvement or refurbishment schemes.

London has suffered considerably from over-development in recent years; where large development has been considered the only route toward improving an area or supplying affordable housing by leveraging the market value of 'marriage' sites, inflated private sector housing speculation and the like. Much of the current need to bring in 'social value' derives from the social destruction this has entailed where neighbourhoods and their social capital are effectively dismantled to make way for market-driven property development with social housing/value as a hoped-for spin off.

For too long, fig leaf 'engagement' schemes have asked too many residents to influence the finer details of a grand plan they actually had no influence in deciding should happen at all.

The proposals tacitly acknowledge this by talking of 'meaningful' engagement. But unless there is space to challenge the prevailing assumption that improvement automatically must mean re-development (at worst, the wholesale demolition/rebuilding of an entire postcode to the principle benefit of a small consortium of financial stake-holders) its likely that previous unhappy trends will continue and London's social capital, amenity value and diverse, human-scale functionality will continue to decline. The comparison is with European cities that preserve commercial and other identities and functions particular to individual premises - even though that may not be the most market-friendly option.

Let the amendments include local input at the initial feasibility stage, not just the planning stages. And let there be an acknowledgement that the assumption of outright development itself runs counter to the modes of improvement, enhancement, repair and repurposing that most of us would favour, given the option.

Developer should be required to obtain view from a minimum proportion of locals. Even if no comment view.

Then developer should be required to address every concern or justify why it will not be. This is the key part missing.

The sequencing of activities in the diagram on page 14, for major developments, should be amended in order to enable the council to meet its objective to put the community at the heart of planning and its other objectives on page 6.

First, the requirement on page 9 to follow the Development Consultation Charter should be enforced by the council. Then the pre-app sequence on page 14 should be: 1) agree the Early Engagement Strategy (EES) (and get community leaders/ward councillors agreement), 2) Do Early Engagement, 3) Agree Engagement Summary (ES) with community leaders/ward councillors, 4) Design Scheme, 5) Pre-app on initial scheme design and its response to the ES, 6) Finalised pre-app advice. This process, if followed effectively, would substantially reduce opposition to development and speed up the planning process to everyone's benefit.

'Minor Material Amendments' terminology should not be used.

Armstrong v Secretary of State for Levelling-Up, Housing and Communities [2023] EWHC 176 reaffirms the principle of Section 73 ('S73').

The judgement confirms that: "there is nothing in section 73, or in the TCPA 1990 ('the Act'), that limits its application to "minor material amendments", or to amendments which do not involve a "substantial" or "fundamental" variation". It goes on to state that: "if Parliament had intended the power to restrict its application further (for example to limit it to "minor material" amendments to a condition, or non-fundamental variations to a condition) one would have expected that to be expressed in the language used and it could readily have done so".

It should be amended to the verbatim wording of S73 of the Act: "Determination of applications to develop land without compliance with conditions previously attached." to accurately reflect recent case law.

I am commenting on behalf of Bermondsey Street.London which I chair.

We are a local association for residents and businesses and work together as volunteers to make our lovely area as good as it can be for all, people who live here, work here or come to visit. On behalf of members, Bermondsey Street.

London has been involved in many developer consultations, not one of which I could say worked well. A major problem has been that community consultation begins late in the process, once most of the thinking about what to build has already had years to form. The longer that process goes on before community consultation, the harder it is for developers' teams (and planning officers) to hear ideas, critical or otherwise from the community when the consultation finally takes place, as they are heavily invested in their own designs. Very often these poor quality consultations are managed and delivered by third party companies, where the community only rarely gets to talk to someone senior enough to have any influence over the proposed building designs.

The current Snowfields Lifesciences site may prove to be a positive example, but born out of very poor consultation managed by a third party company. The We Love Snowfields group that formed in response, to try to get community messages across effectively into the developer/designer team has required exceptional energy, stamina and knowledgeable leadership from within the community. It would be unreasonable to expect that degree of investment from the community in every consultation. The aim here, as I see it, must be to make excellent consultation the norm, not the exception.

Yet, my overall reading of the proposed changes to Southwark Council's community consultation documents is that they create yet more wriggle room for developers to meet the requirements on paper, while failing to hear and respond to community input. My key points are:

1 Development Consultation Charter Early Engagement Strategy – planned timing – I would like to see tighter timing requirements so that this document has to be made publicly available for review before the planning application is submitted. Currently, the charter doesn't say anything about how the document should be publicized or how long it should be publicly available before the application is submitted. A developer might publicise it at the last minute to meet the requirement, in the meanwhile having avoided scrutiny.

I suggest that the requirement should be that it be available at the first community engagement event, on a publicly-accessible website and physically at the event. Page 6 reinstate the heritage, accessibility and movement requirements which it is proposed to delete. 2 Engagement Strategy Template.

Part 2 Approach to Engagement – the document should give guidance that if the developer chooses to work with a third party to manage community engagement, the developer should be represented at every community engagement activity by a senior member of the developer team. (currently, in the documents use of third parties is not mentioned at all)

Part 3 Stakeholder Views and Vision for the Site Add a fourth prompt - What did the different stakeholders you spoke to NOT want as part of the development? (currently there is a prompt to the developer to summarise what people want but no prompt about what people DON'T want) Clare Birks Chair, Bermondsey Street London 7 February 2025

'- P. 7, 9 and 15: expand on "Site Notice, Neighbour Notification letter and/or Press Notice". These actions have been insufficient in spreading knowledge about future developments. For example, there could be social media posts, physical and online advertisements, emails and events at local public and community spaces.

P. 8: Expand on who is considered a neighbour. 100m is too small, especially for large developments.

P. 9: · "We may encourage applicants to: Liaise with Tenants Resident Associations, Neighbourhood Forums, and local community groups"o It should read "We will encourage"

Page 9 - "We will: Make planning applications and supporting documents available online on the planning register"o It should also be required to publish the viability assessment at the earliest possible stage, rather than only doing it at the very end of the application process.

Page 9 - Where it sets out 21/30-day consultation period, please explain that this is the statutory minimum and that consultations often will be longer for larger applications. This is mentioned several times across the document.

Page 9 - "Where appropriate, we will: Reconsult on an amended application for 14 days if there is a 'material' change to the original application"o All material changes should lead to a consultation.- Page 11 - the list of example material planning considerations should be extended to include things such as:o protection of onsite small and independent businesses o delivery of community benefits, including affordable and social housingo socioeconomic impacts on the local areao environmental impact- Page 14 - this should be updated to reflect the DCC amendment that the Early Engagement Strategy will be made publicly available before the submission of a planning application. - Page 16 - consider adding this: "The Southwark Plan (2022) and the London Plan (2021) together form the 'development plan' for Southwark. Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise."

Encouragement for publicity and engagement beyond site notices, notification letters and press notices.

Greater certainty on when scope of consultation will exceed 100m.

Greater effort from council to reach out to affected local community groups, and then stronger requirements on developers to consult any of such groups who have actively confirmed engagement.

Include express requirement to publish full FVA at application stage.

Clarity on consultation period.

Improve list of example material planning considerations (see list in note sent via email). Provide further clarity on GLA Stage 1 and 2 referrals to aid understanding.

While the amendments acknowledge that some groups (e.g., Black families, working-class residents, neurodivergent individuals, and young people) have been left out, they don't go far enough to ensure these groups are actively involved.

The SCI should include specific methods (e.g., community meetings in schools, local youth centers, or faith groups) to proactively engage those who are often overlooked in planning processes.

The amendments state that consultation should happen, but there is no clear accountability if developers or the Council fail to follow through.

A straightforward complaints process should be outlined so residents can challenge decisions if consultation is not done correctly.

The SCI is still written in a way many residents might find confusing or complicated.

Page 7 table - has there been consideration about doing something other than a Site Notice, Neighbour Notification letter and/or Press Notice?

- E.g. - email out, social media push, events, signs up at local public/community spaces?

Page 8 table

- Where an application departs from / does not accord with the development plan, suggest more is done (see above) - need for enhanced public input.
- But is this not a flawed question? How will Council determine this from outset? And isn't basically every large development non-compliant to some extent?

Note typo in first box - should be 'depart from' not 'department'.

Page 8 - who qualifies as a neighbour - includes people who live or work within approx 100m 'further where we think it is appropriate depending on the size of the development'. Can there be some guidelines about when this will be increased? There is a risk 100m becomes a default in each case - e.g. Borough Triangle (only increased because of community pushback, after some resistance).

- E.g. if building about [10] storeys, above [X] sqm, or above [X] residential units. Appreciate they won't want it to be absolute, but rough guide would be helpful.

Page 9 – 'We may encourage applicants to: Liaise with Tenants Resident Associations, Neighbourhood Forums, and local community groups'.

- Suggest the Council actively gets in touch with any such affected groups, and turn this into a "will" where those groups confirm they would like to be consulted.

Page 9 - "We will: Make planning applications and supporting documents available online on the planning register".

- Good opportunity to include express requirement to publish FVA once submitted.

Page 9 - once submitted - as above, consider alternative forms of publicity.

Page 9 - Where it sets out 21/30 day consultation period, it would be helpful to explain that consultation may (and often will) be longer for larger applications, and that this is only the statutory minimum period. This is a common source of confusion and stress.

- Note there's a few places where this is mentioned, so please pick up across the docs.
- Page 18 - this is slightly unclear - implies consultation will only ever be 21 or 28 days in exceptional circumstances.

Page 9 - "Where appropriate, we will: Reconsult on an amended application for 14 days if there is a 'material' change to the original application".

- Suggest remove "where appropriate" - where the application is a material change, surely this should be a firm commitment to reconsult.
- Clarify this will be from the date all relevant amendment documents are on the planning portal.
- Restate commitment to publicising where it is a material amendment.

Page 9 - "When we make a decision We will: ... Monitor the developer consultation process as set out in the Development Consultation Charter".

- What does this mean exactly - what will be done at this stage once decision made?

Page 11 - can the list of example material planning considerations include:

- "delivery of community benefits, including (where relevant) affordable housing",
- "protection of small and independent businesses onsite",
- "environmental impact",
- "socioeconomic impacts on the local area"
- [Anything else?]

Page 12 - major planning applications: it would be helpful to give a brief explanation of what the Stage 1 and Stage 2 GLA referrals are about, and how people can give comments to GLA (including link where possible).

Page 14 - this page should be updated to reflect DCC amendment that the Early Engagement Strategy will be made publicly available for residents and stakeholders to review prior to the submission of a planning application.

Page 15 - consider further publicisation about plan-making - including events and notices in public/community spaces.

Page 16 - consider adding a line in the first section: "The Southwark Plan (2022) and the London Plan 2021 together form the 'development plan' for Southwark. Planning applications must be determined in accordance with planning applications unless material considerations indicate otherwise" (or similar).

Page 20 - I think this can more clearly explain the difference between a Neighbourhood Plan and Neighbourhood Development Order. Might also be worth clarifying that a Plan/NDO cannot prevent certain types of development.

Development Consultation Charter

- General comment: The requirements in the DCC must be clearly stated as requirements. The language in the document switches between saying what must happen, what is expected to happen, what is a requirement, and what is best practice. There must be clarity that the EES, ES and EINA must be produced (on time) and must meet minimum standards.

Page 4 - "At submission of planning application"

- "Prepare and submit required [note typo here - currently 'requried'] documents with planning application" - confirm this includes FVA.
- "If insufficient engagement, request developer undertakes further engagement" - clarify engagement must be before validation of the planning application.

Page 5 - "Who should developers engage with?" - as per comment on SCI, the Council should initially notify the organisations listed (on large schemes), so that they can express interest. If they do express interest, the developer should have to engage with them at the

pre-app stage. This would be in addition to the Developer having to do its own research and outreach.

Page 5 - "Council schemes" - include "Any gain or loss in community floorspace".

Page 6 - Suggest rewrite: "If the Council takes the initial view that a scheme is broadly policy compliant, the requirement for an EES will be discussed...".

Page 6 - greatly welcome requirement for EES to be made publicly available for residents and stakeholders prior to submission.

- What is the intended process for this? Where will it be made available, and how will people be made aware? Consider adding detail.
- IMPORTANT: How far in advance can the community see the EES? It's important this is early on - the purpose of the EES is to ensure developers engage with residents/local stakeholders from the start of the development process. So surely it's important the approach can be scrutinised early on in the process?

Page 6 - final para on EES - consider saying "The EES should be submitted as a completed document on the planning portal when any planning application is submitted" - this will explain the difference between this step and the previous step.

Page 6 - FBA: reference to "local or independent businesses" - suggest this is amended to mirror language of SP policies P32 and P33, i.e. "small businesses, independent businesses or small shops".

Page 6 - FBA: reference to "Sites of Community Importance" - the specific wording risks giving the impression this is limited to visual interest. Consider clarifying this includes other community interest/importance.

Page 7 - "Approach to Engagement" - consider building on these paragraphs to ensure the EES sets out what aspects of the scheme are intended to be "on the table" for each engagement activity (or perhaps what topics are not "on the table"). Often, the events will be vague, or communities will be told that key aspects of the proposals are already fixed / not relevant to that specific meeting. This often leads to frustration from participants, and the sense they're not being given any chance for meaningful input.

Page 7 - EES: "Refer to the EES template for the full list of audit expected". Consider more firm wording here, that the developer must follow the EES format (or ensure that all of the substantive points are covered).

- Same applies for EINA and ES.

Page 7 - Engagement Summary - as above, the "summary of engagement activities undertaken" should include what topics were open for discussion during the session.

Page 7 - ES - following bullet should perhaps be written as a more absolute statement about what stakeholders dislike: "We expect to see a clear summary of what stakeholders not only liked, but importantly also what they disliked, and what further they would like to see as part of the development". Usually the developer overlooks this aspect (unsurprisingly).

Page 7 - ES - reference to 'You Said, We Did' format should be made stronger. It should make clear that all substantive comments received should be responded to. It should also clarify that it relates to this specific application, and it's not appropriate to refer to changes made from earlier designs from before the community comments were made.

- E.g. - For the Aylesham Centre, many people commented how they thought the new scheme was too bulky. Berkeley relied on the fact they had reduced the height from the previous scheme - but this did not respond to the fact that the community comments were about the new scheme (i.e. were made even after that reduction had occurred).

Para 7 - ES - final bullet on monitoring data: statistics should include numbers on how many of the total responses mentioned key issues. Often developers will understate the strength of response on certain issues, or use the fact there were a couple positive responses to suggest there was a "balanced" or "mixed" range of opinions, allowing them to basically ignore the stronger community view.

Page 8 - EINA

- "Public Sector Equalities Duty (PSED) does not apply to developers" - add express clarification that the ultimate decision of the Council (committee) is subject to PSED (I appreciate this is implicit in wording that follows, but potential for confusion).
- Include acknowledgement that Southwark has elected in its constitution to treat socioeconomic status as a protected characteristic.
- "An overview of the users of the site and the stakeholders within the decision-making process" - this should include reference to those who live or work around the site and may be affected.
- Section should draw on EHRC Technical Guidance on PSED, including the need to (1) look beyond general area demographics and assess the specific users of the site and their needs, (2) proactively reaching people that might not already be engaged or may be currently under-served and (3) understand the broad range of experience within each group under a protected characteristic. Currently, most EINAs are very generic, and don't take a site-specific approach - this leads to poor mitigation, sometimes even having the negative impact of homogenising certain groups.
- I appreciate this is referenced in the EINA template, but think it should be alluded to in the actual SCI docs themselves.

Page 9 - requirement to display a notice: ensure consistency in approach with the SCI, which suggests a Neighbour Notification Letter will sometimes be used instead of a Site Notice.

Page 9 - as with SCI comments, consider alternative modes of engagement.

Page 11 - "Consider the Council's Climate Change Strategy and Movement Plan": this should be made more of a clear requirement to follow this plan. Merely requiring them to consider it becomes unenforceable and meaningless in practice. The Plan is already sufficiently caveated that this will not create an undue burden on the developer.

Page 14 - appreciate you have removed ref to EES when you mention what will be monitored at the validation stage - we agree, but think there needs to be a new bullet point in relation to how the EES will be monitored - i.e. it is required early in pre-application discussions, and must be made public to stakeholders at that stage (as above, please include detail of how this will be expected to happen, with clarity on timeframe as far as possible).

EINA Template

- Page 1 - grateful for references from EHRC guidance, however:

- References to "policy" are confusing - surely we mean a decision here? i.e. the decision to approve a planning application (and in the developer's case, the details of what goes in that application). Otherwise it may be unclear what is being referred to and what is required.
- Reference to good evidence should refer to the need for site-specific evidence, not just general demographic data.
- Page 2 - note formatting error - two overlapping boxes. *Please send the wording of the hidden text box for comment.
- Page 2 - Southwark Council must do more than recommend considering socio-economic analysis. It has formally confirmed in its constitution that it will consider socio-economic analysis as a protected characteristic. This means:
 - It must be considered;
 - It must be considered as a standalone protected characteristic, not just how it interplays with the other protected characteristics (although this intersectional analysis is also required).
- Page 3 - comment on socio-economic analysis above carries through to the table in Section 2: the right-hand part of the column (looking at how socio-economic impacts relate to each protected characteristic) but socio-economics should also have its own table.

Page 3 - consider breaking the positives and negatives into their own columns. This will make it harder for developers to just fill the box with positives (which is common practice) - the empty negative box would be more stark.

Page 4 - note slight formatting issue - Gender Reassignment heading is attached to previous table.

General comment - the EINA table should include assessment of impacts on those who live / work / etc around the site, not just users. PSED requires an assessment of equalities impacts on all those affected, not just those who use the site. Often these can be some of the greatest impacts.

EES Template

- Page 1 - Consider providing more detail on what is intended for "stakeholder surveys" - what sort of questions you want to find out.
- Page 2 - Local Economy and Community Infrastructure table - for impact on schools, consider including express reference to a shortfall of school places resulting from lack of family homes. The usual approach considers if there are enough school places, but the reality in most of Southwark is that school numbers are falling, in some part due to the lack of family housing, particularly affordable family housing.
- Page 3 - Local Businesses: it's crucial that the developer, Council and community agree on which businesses meet the definitions of "small shop" (SP policy P32), "small business" (P33) and "independent business" (P33).
 - This is incredibly important, because developers often overlook the fact that these terms each have a different definition and different requirements: i.e. while all of them are protected under P33, small shops have additional protection under P32 that requires retention on site and (where feasible) affordable space.
 - Consultation with these businesses should be happening as early as possible, and this consultation will not be effective (and may not happen at all) unless the full policy context applying to each business is understood.
 - It is incredibly difficult for us as a third party to get developers to engage with this point - it needs to be led by the Council and from the outset.
 - For example, on the Aylesham centre, the developer has failed (and continues to fail) to identify certain small shops and small/independent businesses on site. This has led to great deal of stress and uncertainty for these businesses. Similarly on the Borough Triangle site, lots of Mercato

traders have walked away because the situation is too precarious. Having this conversation expressly at the start would avoid this issue.

- Page 4 - engagement table
 - Consider including confirmation of what topics were discussed / what was "on the table". The reality is most of these events are too general in nature, and only a one-way stream of information. There is no opportunity for the community to even get a proper grasp of what is proposed, let alone meaningfully give their opinions or substantively shape proposals.
- Page 5 - this section on incorporating feedback is welcome, and I strongly encourage the Council to place greater emphasis on this. In practice we are seeing no evidence that these sessions are leading to any meaningful change to scheme design.

ES Template

- See comments above regarding table summarising engagement activities (i.e. Part 2 on Page 5). In particular, the ES should look back and give greater detail on what was discussed, and what the feedback was. It's important this is broken into each event: developers often summarise the entire series of events in one go, which allows them to brush over detail, or imply that each event had more meaningful engagement than it actually did. Often, it feels like developers hold lots of events, but at no point are the substantive points ever properly grappled with. These amendments would add a greater focus on the quality of each event in addition to quantity.
- Page 6 - Part 3: suggest making these sections larger, particularly "What elements of the scheme did stakeholders dislike?". This is a key section, which should give a detailed summary of community views. Currently developers often fail to put much detail into this section, and I think this is encouraged by how small the box is.

Page 6 - Part 4 - You Said, We Did: this is arguably the most crucial section of the whole ES document. However, the reality is that developers fail to properly engage with the more challenging aspects of community feedback. Perhaps some stronger wording could be added here, along the lines of "This section must include a detailed analysis of feedback received, especially negative feedback". Consider adding a line that the ES will not be valid if it fails to include any fundamental issues, or issues raised extensively.

- More importantly, we strongly encourage the Council to more heavily scrutinise this section, including reviewing other evidence of community feedback and querying why certain issues haven't been included here. Otherwise, there is nothing to stop the developer cherry-picking what to include.
- As per comments on DCC, the 'We Did' must only refer to changes happening after the feedback was received. Any attempt by the developer to explain why they have already designed the scheme to pick up these points should be resisted.
- It would be useful to require a summary of how many people raised a certain point - this would encourage developers to record data more robustly. Although, we are mindful that the developer may massage these figures - but it would at least give a better sense of the strength of feeling on each issue.

Page 7 - Part 5 - Social Value:

- We note that the amendments here make this section more prescriptive, following the goals of the Southwark 2030 strategy. We appreciate the alignment with Southwark's broader policy, and also appreciate that a more prescriptive approach will lead to more detailed answers. However, there is a risk here that the approach ends up overlooking key aspects of 'social value'. For example, the categories overlook:

- Community and/or cultural space - what is being lost and what is being added, who it was/is for etc.
- Analysis of who the development will serve more generally - did a specific demographic previously use/enjoy the site, and will they still be able to?
- How does the proposed scheme fit into the surrounding social context - does it support it, or offer something new?
- What does the proposed scheme offer that gives it a unique social value - what distinguishes it from other schemes?
- Social value here must be linked to the notion of "social purpose" from the Southwark Land Commission Report, and specifically the proposed Social Purpose of Land Framework. See attached SPN paper on this point. Ideally, this should move beyond more limited/corporatised notions of social value.
 - This is the best opportunity to make good on this commitment in the Council's response to the Land Commission Report and work towards a Social Purpose of Land Framework.
 - A failure to link the two up will likely lead to the Framework never being established, or an awkward overlap between the two. We strongly encourage the Council to use this opportunity to progress the Framework.
- The current approach boils social value down to more concrete, measurable statistics around homes, upskilling, design, climate measures etc. These are all crucial, but they are already measured and assessed in the planning process through planning policy. This section should seek to add something new, that isn't already being captured - the approach suggested above provides a more nuanced analysis of social context. We think that is what the DCC process should be for.

I think that you could:

- Consider more than just letters and site notices ie Social Media pushes
- I feel that although you think you are Clear & Consistent and Simple and Accessible in plain English. The letters you send out are not that clear to everyone. You are competing with glossy sales literature from Developers. It would be nice if the facts could be laid out in a more interesting format for everyone to fully understand.
- Although I agree you are Collaborative and Responsive it would be nice if you could be more proactive in big developments to reach out to those affected, not just reactive.
- The standard 100m consultation radius is not always enough. Each development should be considered individually.

What do you think is positive about the proposed amendments to the DCC?

Please provide a summary of the proposed changes. The documents are too numerous to review.

Exemptions for small scale council own projects (e.g. minor operational development).

<p>Requirement to make EES publicly available for residents and stakeholders prior to submission - but note need for greater clarity on process and timings.</p> <p>The amendments clarify that developers must consult local residents before making significant changes to an area.</p> <p>This helps prevent communities from being left out of important decisions about new buildings and regeneration projects.</p> <p>If the Council commits to specific consultation rules, it creates the potential of a legally binding 'legitimate expectation.'</p> <p>If developers or the Council ignore community input, residents could challenge decisions through legal action.</p>
<p>We welcome the added requirements to engage stakeholders early in the process, and to provide early engagement strategies at pre-application. This helps to strengthen the stakeholder voice in the development of plans, and aligns with Trust advice on patient and public engagement in such developments.</p> <p>The guidance on completing stakeholder analysis, providing summaries of and reports on engagement activity and the need to complete equalities impact assessment are helpful. The tables from p9 outlining requirements for developers at various stages in different scales of development are also helpful and make it easy to see what developers will be expected to provide.</p>
<h2>What do you think can be improved in the proposed amendments to the DCC?</h2>
<p>Please provide a summary of the proposed changes. The documents are too numerous to review.</p>
<p>Similar to SCI. Consultation is only one step. Forcing to act on results is missing</p>
<p>We ❤️ Snowfields welcomes this important consultation.</p> <p>We have listened to the introduction of this at Cabinet and were disappointed in how it was described, in the lack of discussion, and in the decision apparently made to adopt prior to the consultation, particularly given the recognised community interest. We don't know if we were one of the community groups referred to, but we have certainly raised our disappointment in how this potentially excellent process is being poorly implemented.</p> <p>The proposed changes are a substantial backwards step at a time when the council should be stepping forward to evolve a better process that better supports growth, increases in council revenues, and an improved environment in the borough.</p> <p>We have been subject to a failure in the Development Consultation Strategy process and our comments are informed by that damaging experience and the subsequent more positive experience of trying to repair the damage done to community confidence.</p> <p>We ❤️ Snowfields was formed in response to a proposal for the development of a site that we support in principle so long as it is the best possible scheme for the site. This should be the objective of the admirable intentions of the Development Consultation Charter.</p> <p>In our view the failure of the process we experienced was due to a combination of failures by the local authority, the landowner, the developer and the developer's PR consultants. We are not convinced that the changes to the documents will be sufficient to prevent this</p>

happening again.

The first failure was in the lack of clarity in the wording of the original Charter that presumably this consultation is designed to address.

In our case we believe the landowner undertook detailed pre-app discussions with the planners without an Early Engagement Strategy and without any meaningful local community engagement. This may have been because their process commenced before the introduction of the Development Consultation Charter.

The planners did not require an Early Engagement Strategy (EES) at the first pre-application meeting by the landowner or the first pre-application meeting by the subsequently appointed developer and this omission substantially contributed to a disastrous community engagement. The original Charter is poorly drafted and self-contradictory in this respect. In any event a policy is of no use unless it is adhered to by all parties and unless the Strategy is meaningful, balanced and effective.

This subsequently led to the Council breaching its own Statement of Community Involvement - page 9 'We will: Require applicants to consult with the community.....in accordance with the requirements of the Development Consultation Charter' and page 14 'Pre- application submitted to Council (including an Early Engagement Strategy)'.

As a result the planners encouraged the landowners to believe their scheme (unconsulted on at the point of the initial pre-app) would be broadly acceptable (despite being substantially non-compliant with detailed provisions of the Southwark Plan).

The proposed clarifying changes on page 4 and page 6 of the Charter will make this situation worse. If the council is serious about putting the community 'at the centre' of the development process then the early engagement should happen before any pre-application advice is given to the developers (this advice should be informed by community views).

The proposed changes to the Charter do not require the EES to be delivered to the council until the pre-application process is finished, so before the community has had a chance to comment on the plans the developer is discussing, in detail and secret, with the planners.

A more sensible approach that would better achieve the objectives of the Council for the Charter, putting the community at the heart of the development process, would be to have a first pre-app meeting with the developer just on the EES, and then a second pre-app meeting, following the early engagement with the community, on the design and the Engagement Summary (ES). Pre-apps involve multiple meetings would likely reduce the length of the planning process and enhance the quality of advice given.

There is an important condition for this process to work properly. The EES and the ES need to be confirmed by the leading community representatives/ward councillors as a balanced approach to, and view of, the engagement process. Sadly, the third party PR consultants typically involved in these engagement activities are incentivised to paint a glowing picture of support to the planners and the planners have little incentive or resources to check whether this is correct. The council could usefully recommend against the use of third party PR/engagement consultants to ensure that developers properly understand the site and the community before briefing their design team.

As a result of the failure of the process in our case, the landowner procured a developer on the basis of a scheme that the local community hadn't seen, hadn't inputted to, and

didn't support.

The proposed revisions to the Charter would virtually guarantee that this happens every time.

The developers were then committed to a scheme that could never be acceptable to the community.

The developer then employed a third party PR consultant who undertook an engagement that the community viewed as manipulative in order to seek to avoid generating opposition and to avoid changing the scheme design.

We were subject to a particularly egregious 'engagement' but generally PR consultants are only employed by developers if they manage to convince the planners that they have adequately 'ticked the community engagement box' rather than genuinely engaged a community on the best scheme for a site (rather than the landowner's or developer's value or profit maximising scheme).

In our case, despite the second round of pre-application discussions at this stage the planners did not seek an Early Engagement Strategy until AFTER the 'engagement' had been 'completed'.

The community backlash this generated was painful but had some positive outcomes.

The community organised, and held, with the support of charity Create Streets, a Community Design Review.

This may be similar to the 'Community Review Panel' mentioned, but not defined, and to our knowledge not used except in Old Kent Road, in the council's Statement of Community Involvement. The council may wish to consider using this approach for all major development schemes.

The planners encouraged the developer to engage constructively, and a number of productive discussions resulted that generated some positive changes to the scheme, a better understanding by the development team, the planners, and other stakeholders, of the genuine challenges the proposed development created.

The scheme we are involved in has still not reached planning application stage. These delays are unnecessary and unwelcome and would have been avoided by a proper consultation along the lines of that imagined in the current version of the Charter.

In our case the developer has still not engaged the community on one of the critical planning considerations, the existing transport situation in relation to the development. A properly thought through EES would have timetabled this much earlier in the process.

For this proposed scheme, in an historic neighbourhood with a medieval street pattern of narrow streets and high pedestrian and cycle usage, traffic is a critical issue and should have been one of the main items the council considered properly at pre-app stage. The failure of the council to deal properly with these issues in the past is currently apparent in relation to the failure of the construction traffic arrangements on Fenning Street.

We ❤️ Snowfields are also conscious that the current planning application consultation process does not support high quality or effective community consultation. The Southwark planning portal, the complexity and quantity of information on each application, the way it

is poorly labelled and structured on the site, and the way it then changes during the planners' consideration and negotiation with the developer, means that the objectives of the Charter cannot be achieved by the current approach.

In our case we will, again, be forced into the position of undertaking this consultation ourselves.

We therefore propose, based on what appears to be our fairly typical experience, the following detailed changes to the Development Consultation Strategy:

In the first column of section 1 'Engage' in the table on page 4 insert a requirement for the developer to send the EES to the planning officer one week prior to the first pre-application meeting. And move the requirement on the developer to circulate this to ward councillors and local community representatives and to publish it locally before engagement begins, and for no pre-application advice on the design to be given by the planning officer until the early engagement has been completed, documented in the ES and signed off as balanced by the lead community representatives (and/or ward councillors). As a result the requirement for publication in the second column of this section that has been added should be deleted/moved to the first column. The first section (paras 2-6) on page 6 should be amended or deleted accordingly.

The Stage 2 'Consultation' column on the table on page 4 should have a requirement that the developer, council and community should collaborate on the post planning submission consultation. This is a critical moment in the process where the community finally sees how the developer has responded to the early engagement and is their final opportunity to influence the scheme and the planning decision. The developer should be required to make their proposals available to the community, in an honest and neutral way.

The Construction Management and Traffic and Transport Plans should be consulted on in the pre-application 'Engage' period. The community can add a lot of value to these based on a much more detailed understanding of the current situation than that of planners, council highways officers, developers and consultants who, with the best will in the world, will not spend as much time in the area as the community who lives there.

On page 5, second paragraph, the word 'also' should be inserted between 'should' and 'research' to make it clear that local residents and businesses should be the main focus of the engagement.

On page 6, the requirement for Accessibility and Movement and Heritage and site layout to be part of the fact based audit should be reinstated. Planners need this information in order to give pre-application advice and the community needs the developer to understand them before it briefs its architects.

The new template for the fact based audit and approach to engagement is a huge backwards step. In particular the first three paragraphs under 'Approach to Engagement' should be reinstated.

And on page 6 a No.4 should be inserted 'What did the different stakeholders you spoke to NOT want to see as part of the development?'

see earlier comments

Guy's and St Thomas' NHS Foundation Trust ("GSTT" or "The Trust") covers two of London's best known teaching hospitals: St Thomas' Hospital in the London Borough of Lambeth and Guy's Hospital in the London Borough of Southwark. The hospitals provide a full range of local hospitals services and community services for people in these Boroughs.

The Trust manages the NHS Southeast London Cluster area and has positive strategic and operational relationships with local Integrated Care Boards (ICBs) in Southwark. The Trust is part of King's Health Partners, an academic health science centre that brings together three of the leading NHS Foundation Trusts, world-leading University for health and research education King's College London and other services across central and outer London locations.

The Trust also operates and manages a number of other medical and occupational health services across Southwark. The DCC document states that the DCC is primarily aimed at developers, but also the Council and the community. Page 5 goes on to state that "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."

A list is then provided of consultees that developers are advised to engage with. GSTT are concerned that the Health sector is not considered, and therefore Trusts such as ourselves and the South East London Integrated Care Board (SELICB), as well as other NHS Health providers would be excluded from consultations.

Health assets such as hospitals, GP surgeries, clinics etc are a vital part of any community and can be negatively impacted by new development, either during the demolition and/or construction phases and once completed and in operation. It is imperative for developers to seek early engagement with GSTT and SELICB, where their site is located in close proximity to a health asset. We therefore request that NHS health providers are included in the list of consultees within in the DCC.

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any community and can be negatively impacted by new development, either during the demolition and/or construction phases and once completed and in operation. It is imperative for developers to seek early engagement with local NHS Health Providers such as GSTT working in partnership with the NHS South East London Integrated Care Board, where their site is located in close proximity to a health asset. We therefore request that NHS health providers are included in the list of consultees within the DCC.

The language in the document switches between saying what must happen, what is expected to happen, what is a requirement and what is best practice. The requirements in the DCC must be clearly stated as requirements. It must also be clear that the EES, ES and EINA must be produced on time and meet minimum standards.

Page 4 - "At submission of planning application" o "Prepare and submit required documents with planning application" – please clarify whether this includes viability assessments.o "If insufficient engagement, request developer undertakes further engagement" - clarify whether engagement must be before the validation of the planning application.

Page 5 - "Who should developers engage with?" – on large schemes, the Council must initially notify the organisations listed, so that they can express interest. If they do express interest, the developer must engage with them at the pre-application stage, in addition to the developer having to do its own research and outreach. • Page 5 - "Council schemes" - include "Any gain or loss in community floorspace" • Page 6 - we welcome the requirement for the EES to be made publicly available before submission, however the intended process is not set-out: where will it be made available and how will people be made aware? The purpose of the EES is to ensure developers engage with residents and local stakeholders from the start. How far in advance will the community be able to view the EES?

Page 6 - FBA: "local or independent businesses" – please amend this to be consistent with Southwark Plan policies P32 and P33, "small businesses, independent businesses or small shops"

Page 6 - FBA: "Sites of Community Importance" - the specific wording risks giving the impression this is limited to visual interest. Consider clarifying this includes other community interest/importance.

Page 7 - "Approach to Engagement" – these paragraphs must ensure the EES sets out what aspects of the scheme are intended to be "on the table" and "not on the table" for each engagement activity. Very often, the events will be vague, or communities will be told that key aspects of the proposals are already fixed and not pertinent to that specific meeting, which leads to participants feeling that they do not have the opportunity to have their say.

Page 7 - EES: "Refer to the EES template for the full list of audit expected"• Please clarify that the developer must follow the EES format and ensure that all of the substantive points are covered.

Page 7 - Engagement Summary• As above, the "summary of engagement activities undertaken" should include what topics were actually open for discussion during the session. • Please add "We expect to see a clear summary of what stakeholders not only liked, but importantly also what they disliked, and what further they would like to see as part of the development". • The reference to 'You Said, We Did' format must be made stronger. It should make clear that all substantive comments received will be responded to. It should also clarify that it is unacceptable to refer to changes made from earlier designs from before the community comments were made. • The statistics should include numbers on how many of the total responses mentioned key issues, perhaps using a 'tagging' system. Very often, developers will underestimate the strength of response on certain issues, or use the fact there were a couple positive responses to suggest there was a "balanced" or "mixed" range of opinions, allowing them to ignore the views of the community. Perhaps, when one submits a consultation response, one could choose from a list of tags of topics (with the option to add your own). This way, it would be clearly shown what consultees care most about. Moreover, it should be done in a way that is sorted into 'positive' and 'negative' tags. It should also show how many people have tagged each topic.

Page 8 - EINA o "Public Sector Equalities Duty (PSED) does not apply to developers" - add express clarification that the ultimate decision of the Council is subject to PSED.o State that Southwark has elected in its constitution to treat socioeconomic status as a protected characteristic. o "An overview of the users of the site and the stakeholders within the decision-making process" - this should include reference to those who live or work around the site and who may be affected .o This should draw on the EHRC Technical Guidance on PSED, including the need to (1) look beyond general area demographics and assess the specific users of the site and their needs, (2) proactively reach people that might not already be engaged or may be currently under-served (3) understand the broad range of experience within each group under a protected characteristic. Currently, most EINAs are generic and don't take a site-specific approach, which results in poor mitigation and negative consequences for the local community.EINA Template:The EINA table should include assessment of impacts on those who live or work around the site, not just users (the PSED requires an assessment of equalities impacts on all those affected, not just those who use the site.) • Page 1 – The reference to "good evidence" should make reference for the need for site-specific evidence, not just general demographic data.

Page 2 - Southwark Council must do more than recommend considering socio-economic analysis. It has formally confirmed in its constitution that it will consider socio-economic analysis as a protected characteristic. This means: o It must be considered;o It must be considered as a standalone protected characteristic, not just how it interplays with other protected characteristics (although this intersectional analysis is also required). • Page 3 - socio-economics should also have its own table.

Page 3 – Break the positives and negatives into their own columns. This will make it harder for developers to just fill the box with positives, which is common practice.

Page 9 – "Display a notice / board at the application site": ensure consistency in approach with the SCI, which suggests a Neighbour Notification Letter will sometimes be used instead of a Site Notice. As stated above, please also implement additional modes of engagement.

Page 11 - "Consider the Council's Climate Change Strategy and Movement Plan": Merely requiring a developer to consider this means it becomes unenforceable and, in practice, meaningless. The Plan is already sufficiently caveated that this will not create an undue burden on the developer. Thus, it should be made a clear requirement to follow this plan.

Page 14 – There needs to be further clarity on how the EES will be monitored. It is required early in pre-application discussions and must be made public at that stage (as above, please include detail of how this will be expected to happen, with clarity on the timeframe.)

State more clearly that the requirements in the DCC must be complied with - language is inconsistent and confusing. Any uncertainty will prevent enforceability. Requirements around 'You Said, We Did' format, and need to set out what stakeholders didn't like, need to be made stronger.

Monitoring data should include number of responses on each point.

EINA section should provide more clarity on how PSED applies to Council, and the express inclusion of socioeconomic status as a protected characteristic in Southwark. EINA section should also insist on higher standard of demographic assessment and engagement, following EHRC technical guidance (see note sent via email for more detail).

Amend wording around Climate Change Strategy and Movement Plan to require compliance, not just consideration.

While the amendments set out expectations for consultation, they do not clearly state what happens if developers fail to meet them. Developers who ignore community input or conduct 'tick-box' consultations without real engagement should face strict consequences. A straightforward complaints process should be included so residents can challenge developers who fail to consult properly.

Currently, developers listen to feedback but are not required to act on it. The DCC should require public summaries showing what feedback was received, what changes were made because of that feedback, and, if no changes were made, a clear explanation of why.

The current amendments do not include NHS providers and partners as a potential stakeholder on p5. NHS organisations and partners would be key stakeholders in planning processes for residential or mixed use developments which may have potential impact on healthcare facilities and provision e.g. by increasing the local healthcare user population. Or where developments may impact healthcare service planning. Those developments that do not affect the Trust directly, may still impact NHS partners across the system/region.

The guidance does not relate to NHS organisations as a potential developer/partner in planning applications. NHS providers, are required to engage patients and stakeholders in estate developments and changes. It would be helpful to understand where healthcare estates fit in the categories outlined on p5 under "What type of applications must consult and engage?"

Likewise, as an NHS provider, the PSED will usually apply to building/estates developments for healthcare services. A caveat in section 3 would be helpful to ensure guidance for healthcare developments. Because the PSED applies to our organisation, we have internal templates for equalities impact assessment. It would be helpful to understand whether existing templates and forms would be acceptable.

What do you think is positive about the proposed amendments to the Early Engagement Strategy template?

good intention

- Page 1 – Please provide further information on "stakeholder surveys", including what questions you want to be asked.
- Page 2 - Local Economy and Community Infrastructure table - for the impact on schools, reference to the shortfall of school places resulting from a lack of affordable family homes. In most of Southwark, school numbers are falling, in strong part due to the lack of affordable family housing.
- Page 3 - Local Businesses: it's crucial that Southwark Council, the developer and community agree on which businesses meet the definitions of "small shop" (Southwark Plan policy P32), "small business" (Southwark Plan policy P33) and "independent business" (Southwark Plan policy P33).
 - o This is extremely important because developers regularly overlook the fact that these terms each have a different definition and different requirements: i.e. while all of them are protected under P33, small shops have additional protection under P32 that requires retention on site and, where feasible, affordable space.
 - o Consultation with these businesses must be happening as early as possible, and this consultation will not be effective – and may not happen, at all – if the full policy context is misunderstood.
 - o For example, on the Aylesham centre, the developer continues to fail to identify onsite small shops and small/independent businesses. This has led to great deal of stress and uncertainty. Similarly, on the Borough Triangle site, lots of Mercato traders have already left because of the precarity of their situation.
- Page 4 - engagement table
 - o Please including confirmation of what topics where discussed and what was "on the table". These events are a one-way stream of information, with no opportunity for the community to grasp of what is proposed, let alone meaningfully give their opinions or substantively shape proposals.
- Page 5 - this section on incorporating feedback is welcome. Unfortunately, in reality, these sessions are not leading to any meaningful changes.

The template and the requirement to complete it at pre-application is helpful. As noted above, plans for early engagement and stakeholder analysis fit with Trust guidance for involvement in service development.

What do you think can be improved in the proposed amendments to the Early Engagement Strategy template?

see foregoing

Make it mandatory to engage not just offer engagement

The new template for the fact based audit and approach to engagement is a backwards step. In particular the first three paragraphs under 'Approach to Engagement' should be reinstated.

More detail on what is intended for "stakeholder surveys". Impact on schools must include assessment of how failure to delivery policy compliant level of family homes may lower school places - focus on there being enough schools places does not reflect reality of low school roll numbers and closures. Section on local businesses should better align with policies P32 and P33 and be more clear on what's required (see note sent via email for more detail). Engagement table should require detail on what substantive points were discussed at each event.

The stakeholder analysis table does not provide a space for developers working on healthcare estates to identify patients, carers, members of the public as stakeholders. While many may be local residents, and therefore fit within the first section, many are not but would be essential stakeholders in the case of healthcare developments.

EES Template

- **Page 1** - Consider providing more detail on what is intended for "stakeholder surveys" - what sort of questions you want to find out.
- **Page 2** - Local Economy and Community Infrastructure table - for impact on schools, consider including express reference to a shortfall of school places resulting from lack of family homes. The usual approach considers if there are enough school places, but the reality in most of Southwark is that school numbers are falling, in some part due to the lack of family housing, particularly affordable family housing.
- **Page 3** - Local Businesses: it's crucial that the developer, Council and community agree on which businesses meet the definitions of "small shop" (SP policy P32), "small business" (P33) and "independent business" (P33).
 - This is incredibly important, because developers often overlook the fact that these terms each have a different definition and different requirements: i.e. while all of them are protected under P33, small shops have additional protection under P32 that requires retention on site and (where feasible) affordable space.
 - Consultation with these businesses should be happening as early as possible, and this consultation will not be effective (and may not happen at all) unless the full policy context applying to each business is understood.
 - It is incredibly difficult for us as a third party to get developers to engage with this point - it needs to be led by the Council and from the outset.
 - For example, on the Aylesham centre, the developer has failed (and continues to fail) to identify certain small shops and small/independent businesses on site. This has led to great deal of stress and uncertainty for these businesses. Similarly on the Borough Triangle site, lots of Mercato traders have walked away because the situation is too precarious. Having this conversation expressly at the start would avoid this issue.

- **Page 4** - Engagement table

- Consider including confirmation of what topics were discussed / what was "on the table". The reality is most of these events are too general in nature, and only a one-way stream of information. There is no opportunity for the community to even get a proper grasp of what is proposed, let alone meaningfully give their opinions or substantively shape proposals.

- **Page 5** - This section on incorporating feedback is welcome, and I strongly encourage the Council to place greater emphasis on this. In practice we are seeing no evidence that these sessions are leading to any meaningful change to scheme design.

Welcome requirement for EES to be made publicly available for residents and stakeholders prior to submission.

But what is the intended process for this? Where will it be made available, and how will people be made aware?

How far in advance can the community see the EES? It is important this is early on in the process.

What do you think is positive about the proposed amendments to the Engagement Summary template?

see foregoing

As above, the requirement for the summary as part of a planning application, to show the impact of the stakeholder voice.

What do you think can be improved in the proposed amendments to the Engagement Summary template?

see foregoing

Set minimum engagement quantities not just one side of an engagement with other side not even aware or unable to engage due to time and location

On page 6 a No.4 should be inserted 'What did the different stakeholders you spoke to NOT want to see as part of the development?'

Stronger requirements to summarise engagement activities - information must be provided specifically for each event, not just vague summary.

Stronger requirements to set out what stakeholders dislike about the scheme.

Stronger requirements around 'You Said, We Did' format - include express requirement to cover all points, and a statement that the ES will not be valid if it omits key concerns raised. Clarity that any 'We Did' response must actually be in response to concerns, i.e. after concerns raised - not just explanation of existing aspects / general merits of the scheme.

Amendments to Social Value section overlook key aspects, instead focusing on points that are already covered by planning policy and will be answerable by developers without doing anything new / additional. Missed opportunity to use this section to capture more nuanced sense of social value that planning regime otherwise misses. This section should be linked to the Social Purpose of Land framework committed to in response to the Southwark Land Commission Report (see note sent via email for more detail).

As above, it is not clear how the stakeholder categories relate to developments in healthcare services.

See comments above regarding table summarising engagement activities (i.e. Part 2 on Page 5). In particular, the ES should look back and give greater detail on what was discussed, and what the feedback was. It's important this is broken into each event: developers often summarise the entire series of events in one go, which allows them to brush over detail, or imply that each event had more meaningful engagement than it actually did. Often, it feels like developers hold lots of events, but at no point are the substantive points ever properly grappled with. These amendments would add a greater focus on the quality of each event in addition to quantity.

Page 6 - Part 3: suggest making these sections larger, particularly "What elements of the scheme did stakeholders dislike?". This is a key section, which should give a detailed summary of community views. Currently developers often fail to put much detail into this section, and I think this is encouraged by how small the box is.

Page 6 - Part 4 - You Said, We Did: this is arguably the most crucial section of the whole ES document. However, the reality is that developers fail to properly engage with the more challenging aspects of community feedback. Perhaps some stronger wording could be added here, along the lines of "This section must include a detailed analysis of feedback received, especially negative feedback". Consider adding a line that the ES will not be valid if it fails to include any fundamental issues, or issues raised extensively.

- More importantly, we strongly encourage the Council to more heavily scrutinise this section, including reviewing other evidence of community feedback and querying why certain issues haven't been included here. Otherwise, there is nothing to stop the developer cherry-picking what to include.
- As per comments on DCC, the 'We Did' must only refer to changes happening after the feedback was received. Any attempt by the developer to explain why they have already designed the scheme to pick up these points should be resisted.
- It would be useful to require a summary of how many people raised a certain point - this would encourage developers to record data more robustly. Although, we are mindful that the developer may massage these figures - but it would at least give a better sense of the strength of feeling on each issue.
-

Page 7 - Part 5 - Social Value:

- We note that the amendments here make this section more prescriptive, following the goals of the Southwark 2030 strategy. We appreciate the alignment with Southwark's broader policy, and also appreciate that a more prescriptive approach will lead to more detailed answers. However, there is a risk here that the approach ends up overlooking key aspects of 'social value'. For example, the categories overlook:
 - Community and/or cultural space - what is being lost and what is being added, who it was/is for etc.
 - Analysis of who the development will serve more generally - did a specific demographic previously use/enjoy the site, and will they still be able to?
 - How does the proposed scheme fit into the surrounding social context - does it support it, or offer something new?
 - What does the proposed scheme offer that gives it a unique social value - what distinguishes it from other schemes?
- Social value here must be linked to the notion of "social purpose" from the Southwark Land Commission Report, and specifically the proposed Social Purpose of Land Framework. See attached SPN paper on this point. Ideally, this should move beyond more limited/corporatised notions of social value.
 - This is the best opportunity to make good on this commitment in the Council's response to the Land Commission Report and work towards a Social Purpose of Land Framework.
 - A failure to link the two up will likely lead to the Framework never being established, or an awkward overlap between the two. We strongly encourage the Council to use this opportunity to progress the Framework.
- The current approach boils social value down to more concrete, measurable statistics around homes, upskilling, design, climate measures etc. These are all crucial, but they are already measured and assessed in the planning process through planning policy. This section should seek to add something new, that isn't already being captured - the approach suggested above provides a more nuanced analysis of social context. We think that is what the DCC process should be for.

What do you think can be improved in the amendments to the Engagement Summary template?

see foregoing

Must report success level. Both involvement and concern resolution

The ES must give greater detail on what was discussed and the feedback given. This must also be broken down for each event: developers often brush over concerns and suggest that each event had more meaningful engagement than it actually did. Often, it feels like developers hold lots of events, but at no point are the substantive points ever properly grappled with, let alone do participants feel that they are ever meaningfully contributing to developments. There must be a greater focus on the quality of each event, in addition to quantity.

Page 6 - Part 3: suggest making these sections larger, particularly "What elements of the scheme did stakeholders dislike?". This is a key section, which should give a detailed summary of community views. Currently, developers often do not put much detail here, which could change if the space is enlarged.

Page 6 - Part 4 - You Said, We Did: we believe that this is the most crucial section of the whole ES document. Developers systematically neglect to properly engage with the more negative aspects of community feedback. Stronger wording could be added here, perhaps: "This section must include a detailed analysis of feedback received, especially negative feedback". Please also consider adding that the ES will be invalid if it fails to include any fundamental issues or issues that have been raised by more than 10% of people.

- The Council must heavily scrutinise this section, including reviewing other evidence of community feedback and querying, if applicable, why certain issues have not been included here.
- As stated above, the 'We Did' must only refer to changes happening after the feedback was received. Any attempt by the developer to explain why they have already designed the scheme to pick up these points should be resisted.
- As outlined earlier, there could be a 'tagging' system to ensure that developers cannot ignore the view of the community.

Page 7 - Part 5 - Social Value:

We note that the amendments here make this section more prescriptive and we also appreciate the alignment with Southwark's broader policy. However, there is a risk here that the approach ends up overlooking key aspects of 'social value'. For example, the categories overlook:

- Community and/or cultural space: what is being lost and what is being added, and for whom?
- Analysis of who the development will serve more generally: did a specific demographic previously use and enjoy the site and, going forward, will they still be able to?
- What does the proposed scheme offer that gives it a unique social value: what distinguishes it from other schemes?

Social value here must be linked to the notion of "social purpose" from the Southwark Land Commission Report, and specifically the proposed Social Purpose of Land Framework. Ideally, this should move beyond limited and corporatised notions of social value, as outlined in the recent paper by the Southwark Planning Network (SPN). This is the optimal opportunity for the Council to carry out its commitment to a Social Purpose of Land Framework, as stated in its response to the Land Commission Report. A failure to link the two will likely lead to the Framework never being established. The Council must

use this opportunity to substantially work towards the Social Purpose of Land Framework. The current approach to social value concerns elements that are already assessed in the planning process, such as design and climate measures. The DCC should include a more nuanced approach that adds something new.

See above

Appendix B - Responses Received on the Hub



Planning Policy

12th February 2025

By email

Representations to Development Consultation Charter (DCC) and Accompanying Documents, October 2024

Thank you for the opportunity to comment on the proposed changes to the Statement of Community Involvement (SCI) and Development Consultation Charter (DCC) and accompanying documents which are currently being consulted on until 19th February 2025.

As you are aware, we previously submitted representations on the emerging SCI and DCC prior to their adoption in December 2022 as well as our letter to you on 28 November 2019 regarding the emerging DCC and British Land's approach for future Canada Water Masterplan Reserved Matters Applications.

British Land continue to welcome meaningful community engagement so that development responds to its local context, as shared by our British Land Local Charter objective which commits us to engaging and connecting with local communities and stakeholders to understand local needs, and so that they have the opportunity to influence our thinking and decisions during the development process.

Having reviewed the proposed changes to the SCI, DCC and supporting documents, we wish to make comments on the Development Consultation Charter, the Engagement Summary Template and the Early Engagement Strategy. We have no comments to make on the Statement of Community Involvement and it does not appear that changes are proposed to the example EINA template.

Development Consultation Charter and Early Engagement Strategy Template

We note under the revised DCC that there is requirement for additional information to be included as part of the Fact-based Audit in the Early Engagement Strategy template. Whilst we consider that stakeholder mapping is an essential and worthwhile exercise, it is very resource intensive. We would welcome the opportunity for information sharing and the potential for any research/data to be open source to better inform the Developer's own stakeholder mapping exercise.

The DCC introduces the requirement for a Community Review Panel (CRP) during Stage 1 of the process. The table across pages 9-13 should confirm that a CRP is only required for schemes within the Old Kent Road Opportunity Area (OKR OA), as made clear later in the document. The table is currently unclear as to which schemes would warrant a CRP, as only described as "if required". Establishing, maintaining and engaging a CRP would be resource intensive so Developers would need to understand at an early stage if there is an expectation to work with a CRP outside of the OKR OA and if so, what the criteria is for requiring one.

Engagement Summary Template

We reiterate comments made above in relation to the outcomes of the Fact-based Audit and potential opportunities to share information.



We welcome the emphasis on social value under Part 5 of the document, however, it would be helpful to understand how each of the goals relate to planning policy. Under each goal or question posed, the table should cross-reference the relevant planning policy so that any Social Value Statement can clearly address how the aims of that policy are being met by the development proposal.

Summary

We trust our comments will be taken on board in progressing the changes to the SCI and DCC and we look forward to engaging further with you in the future.

Yours sincerely,

Freddie Broadhurst
British Land

SOUTHWARK LAW CENTRE

RESPONSE TO CONSULTATION ON 'STATEMENT OF COMMUNITY INVOLVEMENT' AND 'DEVELOPMENT CONSULTATION CHARTER'

Link to consultation: [Project: Statement of Community Involvement and Developm... | London Borough of Southwark](#)

Deadline: **19 February**

Statement of Community Involvement

- Page 7 table - has there been consideration about doing something other than a Site Notice, Neighbour Notification letter and/or Press Notice?
 - E.g. - email out, social media push, events, signs up at local public/community spaces?
- Page 8 table
 - Where an application departs from / does not accord with the development plan, suggest more is done (see above) - need for enhanced public input.
 - But is this not a flawed question? How will Council determine this from outset? And isn't basically every large development non-compliant to some extent?
 - Note typo in first box - should be "depart from" not "department"
- Page 8 - who qualifies as a neighbour - includes people who live or work within approx 100m *"or further where we think it is appropriate depending on the size of the development"*
 - Can there be some guidelines about when this will be increased?
 - There is a risk 100m becomes a default in each case - e.g. Borough Triangle (only increased because of community pushback, after some resistance)
 - E.g. if building about [10] storeys, above [X] sqm, or above [X] residential units
 - Appreciate they won't want it to be absolute, but rough guide would be helpful.
- Page 9 - *"We may encourage applicants to: Liaise with Tenants Resident Associations, Neighbourhood Forums, and local community groups"*
 - Suggest the Council actively gets in touch with any such affected groups, and turn this into a "will" where those groups confirm they would like to be consulted
- Page 9 - *"We will: Make planning applications and supporting documents available online on the planning register"*
 - Good opportunity to include express requirement to publish FVA once submitted
- Page 9 - once submitted - as above, consider alternative forms of publicity

- Page 9 - Where it sets out 21/30 day consultation period, it would be helpful to explain that consultation *may* (and often will) be longer for larger applications, and that this is only the statutory minimum period. This is a common source of confusion and stress.
 - Note there's a few places where this is mentioned, so please pick up across the docs.
 - Page 18 - this is slightly unclear - implies consultation will only ever be 21 or 28 days in exceptional circumstances
- Page 9 - "*Where appropriate, we will: Reconsult on an amended application for 14 days if there is a 'material' change to the original application*"
 - Suggest remove "where appropriate" - where the application is a material change, surely this should be a firm commitment to reconsult.
 - Clarify this will be from the date all relevant amendment documents are on the planning portal.
 - Restate commitment to publicising where it is a material amendment.
- Page 9 - "*When we make a decision We will: ... Monitor the developer consultation process as set out in the Development Consultation Charter*"
 - What does this mean exactly - what will be done at this stage once decision made?
- Page 11 - can the list of example material planning considerations include
 - "delivery of community benefits, including (where relevant) affordable housing",
 - "protection of small and independent businesses onsite",
 - "environmental impact",
 - "socioeconomic impacts on the local area"
 - [Anything else?]
- Page 12 - major planning applications: it would be helpful to give a brief explanation of what the Stage 1 and Stage 2 GLA referrals are about, and how people can give comments to GLA (including link where possible)
- Page 14 - this page should be updated to reflect DCC amendment that the Early Engagement Strategy will be made publicly available for residents and stakeholders to review prior to the submission of a planning application.
- Page 15 - consider further publicisation about plan-making - including events and notices in public/community spaces
- Page 16 - consider adding a line in first section: "*The Southwark Plan (2022) and the London Plan 2021 together form the 'development plan' for Southwark. Planning applications must be determined in accordance with planning applications unless material considerations indicate otherwise*" (or similar)

- Page 20 - I think this can more clearly explain the difference between a Neighbourhood Plan and Neighbourhood Development Order. Might also be worth clarifying that a Plan/NDO cannot *prevent* certain types of development.

Development Consultation Charter

- General comment: The requirements in the DCC must be clearly stated as requirements. The language in the document switches between saying what must happen, what is expected to happen, what is a requirement, and what is best practice. There must be clarity that the EES, ES and EINA must be produced (on time) and must meet minimum standards.
- Page 4 - *"At submission of planning application"*
 - *"Prepare and submit required [not typo here - currently "requried"] documents with planning application"* - confirm this includes FVA
 - *"If insufficient engagement, request developer undertakes further engagement"* - clarify engagement must be before validation of the planning application
- Page 5 - *"Who should developers engage with?"* - as per comment on SCI, the Council should initially notify the organisations listed (on large schemes), so that they can express interest. If they do express interest, the developer should *have to* engage with them at the pre-app stage. This would be in addition to the Developer having to do its own research and outreach.
- Page 5 - *"Council schemes"* - include *"Any gain or loss in community floorspace"*
- Page 6 - Suggest rewrite: *"If the Council takes the initial view that a scheme is broadly policy compliant, the requirement for an EES will be discussed..."*
- Page 6 - greatly welcome requirement for EES to be made publicly available for residents and stakeholders prior to submission.
 - What is the intended process for this? Where will it be made available, and how will people be made aware? Consider adding detail.
 - IMPORTANT: How far in advance can the community see the EES? It's important this is early on - the purpose of the EES is to ensure developers engage with residents/local stakeholders from the start of the development process. So surely it's important the approach can be scrutinise early on in the process?
- Page 6 - final para on EES - consider saying *"The EES should be submitted as a completed document on the planning portal when any planning application is submitted"* - this will explain different between this step and previous step.
- Page 6 - FBA: reference to *"local or independent businesses"* - suggest this is amended to mirror language of SP policies P32 and P33, i.e. *"small businesses, independent businesses or small shops"*

- Page 6 - FBA: reference to "*Sites of Community Importance*" - the specific wording risks giving the impression this is limited to *visual* interest. Consider clarifying this includes other community interest/importance.
- Page 7 - "Approach to Engagement" - consider building on these paragraphs to ensure the EES sets out what aspects of the scheme are intended to be "on the table" for each engagement activity (or perhaps what topics are not "on the table"). Often, the events will be vague, or communities will be told that key aspects of the proposals are already fixed / not relevant to that specific meeting. This often leads to frustration from participants, and the sense they're not being given any chance for meaningful input.
- Page 7 - EES: "*Refer to the EES template for the full list of audit expected*". Consider more firm wording here, that the developer must follow the EES format (or ensure that all of the substantive points are covered).
 - *Same applies for EINA and ES
- Page 7 - Engagement Summary - as above, the "summary of engagement activities undertaken" should include what topics were open for discussion during the session
- Page 7 - ES - following bullet should perhaps be written as more absolute statement about what stakeholders dislike: "*We expect to see a clear summary of what stakeholders not only liked, but importantly also what they disliked, and what further they would like to see as part of the development*". Usually the developer overlooks this aspect (unsurprisingly).
- Page 7 - ES - reference to 'You Said, We Did' format should be made stronger. It should make clear that all substantive comments received should be responded to. It should also clarify that it relates to this specific application, and it's not appropriate to refer to changes made from earlier designs from before the community comments were made.
 - E.g. - For the Aylesham Centre, many people commented how they thought the new scheme was too bulky. Berkeley relied on the fact they had reduced the height from the previous scheme - but this did not respond to the fact that the community comments were about the *new* scheme (i.e. were made even after that reduction had occurred).
- Para 7 - ES - final bullet on monitoring data: statistics should include numbers on how many of the total responses mentioned key issues. Often developers will understate the strength of response on certain issues, or use the fact there were a couple positive responses to suggest there was a "balanced" or "mixed" range of opinions, allowing them to basically ignore the stronger community view.
- Page 8 - EINA
 - "*Public Sector Equalities Duty (PSED) does not apply to developers*" - add express clarification that the ultimate decision of the Council (committee) is subject to PSED (I appreciate this is implicit in wording that follows, but potential for confusion).
 - Include acknowledgement that Southwark has elected in its constitution to treat socioeconomic status as a protected characteristic.

- *"An overview of the users of the site and the stakeholders within the decision-making process"* - this should include reference to those who live or work around the site and may be affected
- Section should draw on EHRC Technical Guidance on PSED, including the need to (1) look beyond general area demographics and assess the specific users of the site and their needs, (2) proactively reaching people that might not already be engaged or may be currently under-served and (3) understand the broad range of experience within each group under a protected characteristic. Currently, most EINAs are very generic, and don't take a site-specific approach - this leads to poor mitigation, sometimes even having the negative impact of homogenising certain groups.
 - I appreciate this is referenced in the EINA template, but think it should be alluded to in the actual SCI docs themselves
- Page 9 - requirement to display a notice: ensure consistency in approach with the SCI, which suggests a Neighbour Notification Letter will sometimes be used instead of a Site Notice.
- Page 9 - as with SCI comments, consider alternative modes of engagement.
- Page 11 - "Consider the Council's Climate Change Strategy and Movement Plan": this should be made more of a clear requirement to follow this plan. Merely requiring them to consider it becomes unenforceable and meaningless in practice. The Plan is already sufficiently caveated that this will not create an undue burden on the developer.
- Page 14 - appreciate you have removed ref to EES when you mention what will be monitored at the validation stage - we agree, but think there needs to be a new bullet point in relation to how the EES will be monitored - i.e. it is required early in pre-application discussions, and must be made public to stakeholders at that stage (as above, please include detail of how this will be expected to happen, with clarity on timeframe as far as possible).

EINA Template

- Page 1 - grateful for references from EHRC guidance, however:
 - References to "policy" are confusing - surely we mean a decision here? i.e. the decision to approve a planning application (and in the developer's case, the details of what goes in that application). Otherwise it may be unclear what is being referred to and what is required.
 - Reference to good evidence should refer to the need for *site-specific* evidence, not just general demographic data
- Page 2 - note formatting error - two overlapping boxes. *Please send the wording of the hidden text box for comment.
- Page 2 - Southwark Council must do more than *recommend* considering socio-economic analysis. It has formally confirmed in its constitution that it will consider socio-economic analysis as a protected characteristic. This means:

- It *must* be considered;
- It must be considered as a *standalone* protected characteristic, not just how it interplays with the other protected characteristics (although this intersectional analysis is also required).
- Page 3 - comment on socio-economic analysis above carries through to the table in Section 2: the right-hand part of the column (looking at how socio-economic impacts relate to each protected characteristic) but socio-economics should also have its own table.
- Page 3 - consider breaking the positives and negatives into their own columns. This will make it harder for developers to just fill the box with positives (which is common practice) - the empty negative box would be more stark.
- Page 4 - note slight formatting issue - Gender Reassignment heading is attached to previous table.
- General comment - the EINA table should include assessment of impacts on those who live / work / etc around the site, not just users. PSED requires an assessment of equalities impacts on all those affected, not just those who use the site. Often these can be some of the greatest impacts.

EES Template

- Page 1 - Consider providing more detail on what is intended for "stakeholder surveys" - what sort of questions you want to find out
- Page 2 - Local Economy and Community Infrastructure table - for impact on schools, consider including express reference to a *shortfall* of school places resulting from lack of family homes. The usual approach considers if there are enough school places, but the reality in most of Southwark is that school numbers are falling, in some part due to the lack of family housing, particularly *affordable* family housing.
- Page 3 - Local Businesses: it's crucial that the developer, Council and community agree on which businesses meet the definitions of "small shop" (SP policy P32), "small business" (P33) and "independent business" (P33).
 - This is incredibly important, because developers often overlook the fact that these terms each have a different definition and different requirements: i.e. while all of them are protected under P33, small shops have additional protection under P32 that requires retention on site and (where feasible) affordable space.
 - Consultation with these businesses should be happening as early as possible, and this consultation will not be effective (and may not happen at all) unless the full policy context applying to each business is understood.
 - It is incredibly difficult for us as a third party to get developers to engage with this point - it needs to be led by the Council and from the outset.

- For example, on the Aylesham centre, the developer has failed (and continues to fail) to identify certain small shops and small/independent businesses on site. This has led to great deal of stress and uncertainty for these businesses. Similarly on the Borough Triangle site, lots of Mercato traders have walked away because the situation is too precarious. Having this conversation expressly at the start would avoid this issue.
- Page 4 - engagement table
 - Consider including confirmation of what topics were discussed / what was "on the table". The reality is most of these events are too general in nature, and only a one-way stream of information. There is no opportunity for the community to even get a proper grasp of what is proposed, let alone meaningfully give their opinions or substantively shape proposals.
- Page 5 - this section on incorporating feedback is welcome, and I strongly encourage the Council to place greater emphasis on this. In practice we are seeing no evidence that these sessions are leading to any meaningful change to scheme design.

ES Template

- See comments above regarding table summarising engagement activities (i.e. Part 2 on Page 5). In particular, the ES should look back and give greater detail on what was discussed, and what the feedback was. It's important this is broken into each event: developers often summarise the entire series of events in one go, which allows them to brush over detail, or imply that each event had more meaningful engagement than it actually did. Often, it feels like developers hold lots of events, but at no point are the substantive points ever properly grappled with. These amendments would add a greater focus on the *quality* of each event in addition to quantity.
- Page 6 - Part 3: suggest making these sections larger, particularly "What elements of the scheme did stakeholders dislike?". This is a key section, which should give a detailed summary of community views. Currently developers often fail to put much detail into this section, and I think this is encouraged by how small the box is.
- Page 6 - Part 4 - You Said, We Did: see is arguably the most crucial section of the whole ES document. However, the reality is that developers fail to properly engage with the more challenging aspects of community feedback. Perhaps some stronger wording could be added here, along the lines of "*This section must include a detailed analysis of feedback received, especially negative feedback*". Consider adding a line that the ES will not be valid if it fails to include any fundamental issues, or issues raised extensively.
 - More importantly, we strongly encourage the Council to more heavily scrutinise this section, including reviewing other evidence of community feedback and querying why certain issues haven't been included here. Otherwise, there is nothing to stop the developer cherry-picking what to include.
 - As per comments on DCC, the 'We Did' must only refer to changes happening *after* the feedback was received. Any attempt by the developer to explain why

they have already designed the scheme to pick up these points should be resisted.

- It would be useful to require a summary of how many people raised a certain point - this would encourage developers to record data more robustly. Although, we are mindful that the developer may massage these figures - but it would at least give a better sense of the strength of feeling on each issue.
- Page 7 - Part 5 - Social Value:
 - We note that the amendments here make this section more prescriptive, following the goals of the Southwark 2030 strategy. We appreciate the alignment with Southwark's broader policy, and also appreciate that a more prescriptive approach will lead to more detailed answers. However, there is a risk here that the approach ends up overlooking key aspects of 'social value'. For example, the categories overlook:
 - Community and/or cultural space - what is being lost and what is being added, who it was/is for etc
 - Analysis of who the development will serve more generally - did a specific demographic previously use / enjoy the site, and will they still be able to?
 - How does the proposed scheme fit into the surrounding social context - does it support it, or offer something new?
 - What does the proposed scheme offer that gives it a unique social value - what distinguishes it from other schemes?
 - Social value here must be linked to the notion of "social purpose" from the Southwark Land Commission Report, and specifically the proposed Social Purpose of Land Framework? See attached SPN paper on this point. Ideally this should move beyond more limited / corporatised notions of social value.
 - This is the best opportunity to make good on this commitment in the Council's response to the Land Commission Report and work towards a Social Purpose of Land Framework.
 - A failure to link the two up will likely lead to the Framework never being established, or an awkward overlap between the two. We strongly encourage the Council to use this opportunity to progress the Framework.
 - The current approach boils social value down to more concrete, measurable statistics around homes, upskilling, design, climate measures etc. These are all crucial, but they are already measured and assessed in the planning process through planning policy. This section should seek to add something new, that isn't already being captured - the approach suggested above provides a more nuanced analysis of social context. We think that is what the DCC process should be for.

[REDACTED]

[REDACTED]

Subject: Consultation: Statement of Community Involvement (SCI) and Development Consultation Charter (DCC)

Dear LB Southwark,

Thank you for consulting the Environment Agency on the above consultation.

We can confirm that we have **no comments** on the Statement of Community Involvement (SCI), Development Consultation Charter (DCC) and supporting documents as submitted.

Please contact us if you have any questions.

Kind regards,

[REDACTED]

[REDACTED]

[Environment Agency](#) | Kent & South London | South London Sustainable Places team

[REDACTED]



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London Healthy Urban Development Unit

Planning Policy

[REDACTED]

19 February 2025

To whom it may concern,

Statement of Community Involvement and Development Consultation Charter: Minor Updates

This response has been prepared by the NHS Healthy Urban Development Unit (HUDU) in collaboration with the South East London Integrated Care Board (SEL ICB). It is acknowledged that a separate representation by Guy's and St Thomas' NHS Foundation Trust (GSTT) is being prepared.

The Guy's and St Thomas' Trust (GSTT) has forwarded to NHS HUDU and SEL ICB notice of consultation of minor amendments to the Southwark Statement of Community Involvement (SCI) and Development Consultation Charter (DCC). SEL ICB is the NHS body responsible for much of the planning and funding of health services and forms part of the South East London Integrated Care System, which is a partnership that brings together the organisations responsible for publicly funded health and care services in south east London. It includes the local NHS Trusts and Southwark Council. ICBs replaced the former clinical commissioning groups (CCGs) in 2022. It is requested that NHS HUDU and SEL ICB be added to the list of consultees for all engagement activities conducted by Southwark that either have an impact on health infrastructure or establish ways of working between the Borough and health stakeholders.

While the NHS is a statutory consultee in the plan-making process it does not have the same status in the planning application process. However, given the important role of health and wellbeing in residents' quality of life and in the Council's plans and strategies, we ask that the Council consults the NHS early on major developments and encourages developers to do the same.

NHS HUDU has reviewed the consultation material and is generally supportive of the minor updates which intend to make the planning and development rules clearer for both residents and applicants. It is acknowledged that this consultation relates only to the minor amendments to the SCI and DCC.

Southwark is fast-growing but also has significant levels of deprivation and inequality across the borough. The NHS raises concern over the omission of health bodies from this key element of the development plan for the borough. This is particularly important given that Health Impact Assessments are not a validation requirement for major planning applications.

Therefore, the NHS cannot be satisfied that health impacts are fully considered during the development process given that developers are neither asked to consult with health providers nor complete a health impact assessment.

The NHS appreciates that this update is an opportunity to set out clearly the expectation for engagement with the NHS particularly given that access to healthcare facilities and increased demand on existing healthcare services is a frequent community concern in development-related consultation. The DCC should be amended to include NHS service providers (HUDU, SEL ICB, etc.) under the section '*Who should developers engage with*'. Early engagement between developers and the NHS ensures not only that health is given due consideration in the early development process, but also allows the NHS to plan for future capacity in a more targeted manner.

The Statement of Community Involvement page 9 refers to consultation with relevant organisations. We ask that the NHS is included in the SCI as a relevant body for major schemes with pre-application engagement on schemes comprising 50 or more homes. NHS HUDU together with the SEL ICB can respond to proposals seeking input from providers as appropriate.

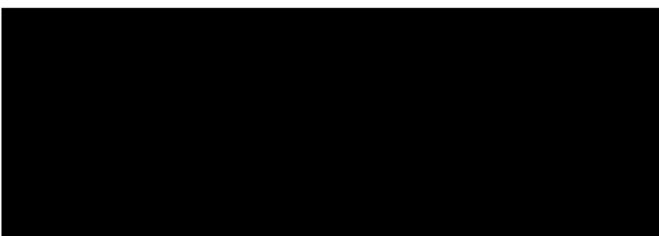
Similarly, the Early Engagement Strategy Template takes a limited view in defining engagement in relation to 'Local Economy and Community Infrastructure' – with only Schools and educational facilities, local businesses and sites of community importance listed as stakeholders. The SEL ICB, together with its partner organisations, play a key role in the local community, with many NHS facilities playing an anchor role in proving space for other community and social infrastructure providers. The Early Engagement Strategy Template should be expanded to include 'health facilities' with the NHS as a stakeholder to be consulted as part of early engagement.

With reference to the Engagement Summary template, questions relating to health and wellbeing of residents should be aligned to the known public health priorities within Southwark's statutory Joint Health and Wellbeing Strategy and/or Joint Strategic Needs Assessments. In addition, neighbourhood level (ward) health outcome data is also available from Fingertips, the national Public Health Profiles Database, and we recommend including reference to this in the list of data sources.

NHS HUDU emphasises the importance of embedding health and wellbeing into development planning and management to ensure accessible health services to all Londoners. The amendments requested in this submission will require health to be considered before major planning applications are submitted meaning that greater emphasis will be placed on health and wellbeing outcomes earlier in the development process. NHS HUDU is keen to work closely with Southwark Council going forward, in the implementation of the local plan and early opportunities to help shape future policies.

If you have any questions regarding this response, please contact me to discuss these.

Yours faithfully





LATIN ELEPHANT

Submission of Evidence

Social Value in Planning and Regeneration

Statement of Community Involvement and Development Consultation Charter
 19 February 2025

INTRODUCTION

Latin Elephant is a registered charity based in Elephant and Castle. For the past 10 years, we have worked intimately with local independent traders — nearly all of whom are from racialised and migrant backgrounds, and who have been disproportionately and negatively impacted by development in the area — to fight the regeneration-led retail gentrification that is impacting our community. As a direct result of this state-led regeneration, which forced the expulsion of more than 3,000 of social housing tenants and leaseholders (traders' customers and extended community) from the Heygate Estate and in the closure of the Elephant and Castle Shopping Centre, the area has been over time stripped of much of its social value. Local migrant and racialised traders have been displaced, the local economy decimated and key social spaces erased.

In working collectively to combat this, Latin Elephant has built strong, trust-based relationships with the traders in the community. These important connections have allowed us to gain an intimate understanding of how our community has experienced development and 'regeneration'. Our submission is informed by this experience and knowledge.

Our submission is also supported by the extensive research we have conducted with the traders and others in the community, including [Southwark Law Centre](#) and [35% Campaign](#). The trust alluded to above is central to this research; without it, and without the active participation of traders in our work through knowledge sharing exercises, we would not have been able to produce the findings we have nor to engage as substantively with policy and practice over the last decade. Relevant examples of this research are addressed in greater detail below, and attached as an appendix to this submission.

Over the last year and a half, building on our long-standing recognition that our local experiences are part of more expansive, systemic challenges, we have concordently integrated a cross-London perspective into our daily work. We currently facilitate a coalition of nine community campaigns and organisations from across London. Each of these campaigns — Catford Against Social Cleansing, Fight the Tower (Brixton), Friends of Queen's Market, Friends of Shepherd's Bush Market, Plush SE16/No Price on Culture, Save

Ridley Road, Save Brick Lane, Ward's Corner Community Benefit Society/Save Latin Village — is also fighting local retail gentrification and the loss of important local, independent commercial spaces including railway arches and markets. These campaigns also recognise that each of these spaces serve more than just economic purposes: they are important sites of social connection, of cultural expression and celebration of solidarity and care. Relevant experiences and lived knowledge contributed by our coalition partners is also shared herein.

Our colleague, Sarah Goldzweig, spoke on 9 October 2024 at the London Assembly's Planning and Regeneration Committee meeting, and shared aspects of our organisational perspective, as well as thoughts from our coalition partners. We see this submission as a follow up to some of the discussion points raised during that meeting. We note that we've also spoken in front of Southwark's Planning and Regeneration Committee meeting about related issues in the past as well.

This submission addresses the 'Social Value' section of the Engagement Summary. It includes our responses in the form of questions, as well as some additional thoughts and concerns which we think are important to consider in future discussion of social value, both of markets and arches as well as other spaces in the Borough.

CALL FOR EVIDENCE QUESTIONS

(1) WHAT DOES 'SOCIAL VALUE' MEAN TO US?

Southwark Planning Network (SPN), in a follow-up to the Southwark Land Commission Report, have offered '[Proposals for Social Purpose of Land Framework](#)',¹ in which they share a clear and expansive definition of 'social value', which highlights some of the limitations of existing definitions. We have shared excerpts from this document below, but encourage more substantial engagement with the ideas therein.

SPN asserts (and we agree) that:

[1.2] Often, notions of "social value" (or similar terms) have failed to step outside of the prevailing market-oriented approach to land and the planning decision-making process'. For example, developers often demonstrate social value, measured in monetary terms, using the so-called "QALY" approach (quality-adjusted life year). This is a metric used in health economics / public health decision-making that tries to capture the benefit of an action in terms of quality and length of life. While this might be appropriate in a health context (including assessing health impacts of a development), it is clearly an inappropriate metric when considering the social purpose of a development as a whole... this approach fails to grasp notions of community cohesion and gentrification. It also fails to fully meet the public sector equality duty and the need to have due regard to the impacts on those with protected characteristics (which in Southwark must include socioeconomic status). Thirdly, to quantify social value in monetary terms and to talk about the "price" of something is

¹ In particular, see sections 1.2-1.5.

already to use a transactional, market-oriented approach that unduly restricts the scope of what can be considered. Accordingly, it is clear that an alternative approach is required.

Highlighting the strength of the existing definition of “social value” in the [GLA Characterisation and Growth Strategy LPG](#), which attempts to incorporate “the tangible and less tangible cultural and social characteristics and landscape that contribute to a sense of place”. Likewise, we feel like this is a great place to start. We are especially supportive of the inclusion of the following components (listed within the LPG, and in section 1.3 of [linked document](#)):

- *Intangible assets – presence of positive intangible characteristics that make a place unique or distinctive, and that foster a sense of belonging and identity.*
- *Cultural assets – presence and significance of attributes, spaces and activities that celebrate a place's artistic, historic, cultural and creative character.*
- *Community assets – presence and significance of highly valued community uses, spaces, services or infrastructure that meet the needs of the local community (such as pubs, community centres and public spaces).*
- *Need and deficiency – a place with a wide range of economic opportunities, where the benefits of economic success are shared equitably.*
- *Town centres and high streets – presence of a vibrant town centre or high street that provides varied economic, civic and cultural offers throughout the day and night.*

With that being said, we argue that any definition **must** also include intentional reference to spaces which serve racialised and migrant communities and diverse working class communities, in particular. Any definition of social value which does not seek to ameliorate the disproportionately negative impact of regeneration and development on such communities and the spaces they feel are important is inadequate.

We propose this in addition to concerns highlighted by Southwark Planning Network in its Proposals (copied below for ease; see also, section 1.4 in [linked document](#)):

- *Places that foster a sense of pride or strong emotional response from the community.*
- *Organisations and businesses that demonstrate a commitment and dedication to the local community.*
- *Places run by people with an organic rapport with the community – they may themselves be part of the community outside of their business.*
- *Places that the community will journey to, even from far away or if there are similar services closer by.*
- *Places that offer services and benefits beyond traditional market transactions – places offering something “extra”, often at no additional cost. For example, people may be able to experience or benefit from the place without having to spend money; a place where people can come to simply be there.*

We also want to highlight contributions from this [Proposal](#) which address not only establishing what social value exists in a given place, but also what the impact of losing such social value might be (see section 1.5). Any suitable definition or policy must consider:

...how a proposed development might have negative aspects from a social purpose perspective. This flipside of considering social purpose/value has traditionally been overlooked, but is essential to fully considering social purpose. This must include weighing up the loss of social purpose that will (or might) result from a development.

This section speaks to a topic which has been raised, repeatedly, by coalition members: that social value, once lost, cannot be recovered. This characteristic is at risk of being hidden by definitions which solely assign quantitative value to 'social value', and which provide opportunities for 'net' calculations. Spaces with social value have such value because they provide something to the existing community, which is built up over years through lasting and meaningful interpersonal relationships and opportunities for organic cultural expression. This is not just facilitated by the existence of a specific 'space', but by the activities and histories which are able to play out within that given space.

Furthermore, we argue that the following conditions must be met in any definition of 'social value':

1. Social value must be contextually-specific and locally-defined and grounded. By this, we mean that communities are, themselves, able to define what is important to them. Social value must be bottom-up and informed by the grassroots. It cannot be determined by developers and those with vested financial interests and profit motives, resting on specific definitions of the social value of/within a given space. Notably, this cannot be done through existing tick-box forms of consultation. Hyper-local contextualisation is necessary for avoiding further marginalisation of already-impacted communities, increased inequality and failure to protect local economies.
2. As a member in our coalition has emphasised, there is an important aspect of social value which is intangible. This organic and underecognised component is absent from existing calculations and definitions and, thus, often excluded from consideration. Yet, communities have been adamant about its existence. Some of this intangibility speaks to '**belonging**' as an important aspect of social value, and one which is challenging to quantify, but which can still be understood. In fact, we want to highlight '**belonging**' as a key component of 'social value' which must be included in any attempt at defining it. We feel that the documentaries Élefan (2022) and The Palace (2021) – both linked in the Appendix section of this submission — highlight this aspect brilliantly. Respectively, they demonstrate the importance of Latin American businesses and the former Palace Bingo Hall to the diverse working class Elephant and Castle community, and the devastation that their loss or the threat of their loss has had. We propose that these documentaries be considered as part of this evidence gathering process.

(2) HOW SHOULD SOCIAL VALUE BE MEASURED, PARTICULARLY IN RELATION TO MARKET TRADERS AND ARCH-BASED BUSINESSES?

Importantly, however it is determined, value should be measured in a culturally sensitive, holistic and contextually-aware way. This is especially important in London, where [46.2%](#) of

residents identify as Asian, black, mixed or “other” ethnic groups, and a further 17.0% with white ethnic minorities’ and where [over 300](#) languages are spoken.

Which communities are served by these businesses, not just in terms of the products and services they are providing but in their provision of spaces for people to come together around their shared cultures and experiences, in which emerge sites of informal but life-saving community networks? What needs do these communities have which are met by the infrastructure of these ‘commercial’ spaces, and which are not being met elsewhere?

Businesses and traders are often part of communities for years, and create and sustain trust with the members of these communities. This is reflected in deeper connections of care between community members, and even in close friendships, ultimately supporting wider networks of support which are often strengthened by shared lived experiences. This is especially important in migrant and racialised communities, where members have faced similar challenges. Ultimately, markets and small businesses contribute to an ecosystem that sustains community wellbeing. This is all in addition to the services and goods they provide, which meet the needs of diverse working class communities; other retail spaces do not meet the needs of working class Londoners in these ways.

We’d like to call attention here to some of our findings in King et al. (2017). One (now former) Shopping Centre trader shared that, *‘There is a retired builder that passes here every day. The other day he didn’t and I phoned him. We went to his house, and he needed help. He spent one week in intensive care.’*

Another trader explained about their restaurant: *‘We are not just a food place. We are an information point. People come here and ask for a doctor or a bank. Some people even ask about other restaurants! It is kind of sad because if we moved to other places people may see it more difficult to come in.’*

What both these traders identify is that the role of their business within the larger community ecosystem is far more significant than just their profitability and economic turnover. Rather, these businesses provide necessary and even life-saving support to the wider community. This is *in addition* to their contributions to the local economy. Small businesses are widely recognised as keeping money and investment local, supporting circular economies and employing local people. Small and medium enterprises (SMEs) contribute on a national scale as well: in 2015, it was found that the 300,000 BAME-led SMEs in the UK were estimated to contribute a GVA of £30 billion (figure from Department for Business, Innovation and Skills, 2015).

We propose that the loss of these spaces has rebound effects that impact health (mental, physical, community), housing and employment outcomes, to name a few. This is significantly representative of their social value.

Furthermore, the loss of these spaces need to be measured not in terms of quantifiable indicators, but those affective ways in which such spaces contribute to community wellbeing. We argue that, when measuring social value, what is there and what will be lost is equally important.

With this in mind, we want to raise concerns about who is determining what is ‘valuable’: Is it the businesses and communities, collectively and individually, themselves? Or, is this being determined by outsiders (e.g., developers) who are unaware of the inner workings of these spaces and the unique needs of individual communities, and/or who are financially-incentivised to ignore them?

Quantification of value runs the risk of leaving out unanticipated or unfamiliar aspects of a given space. It also runs the risk of co-optation, in that it opens up the possibility of framing ‘social value’ contribution as a net equation, which can be manipulated as long as developers claim to be contributing more than they are demolishing and ‘replacing’. But this does not address issues of who is served by the spaces that contribute social value, or which of their needs are being met. Developers, proposing that they are contributing a total ‘greater’ amount of social value than existed prior, can justify the erasure of existing social value. Quantification in this way can obfuscate what is lost in favour of what is allegedly being added. This is particularly concerning in the context of markets and arches and other retail spaces which provide significant ‘hidden’ value, but which may not fulfil common perceptions of ‘social value’.

(3) WHAT SPECIFIC CHALLENGES DO MARKET TRADERS AND ARCH-BASED BUSINESSES FACE IN LONDON TODAY? HOW DOES THIS IMPACT THE ABILITY OF TRADERS AND ARCH-BASED BUSINESSES TO DELIVER ‘SOCIAL VALUE’ TO LOCAL COMMUNITIES?

1. **Lack of affordable retail space:** Across London, there is a dearth of affordable retail space. This is particularly true in those parts of London which are designated as Opportunity Areas or which are undergoing state-led/sanctioned regeneration. There was so little affordable retail space in Elephant and Castle, for example, that Southwark Council had to convert (arguably, unsuccessfully) a residential garage into retail space for displaced shopping centre traders in order to accommodate need. Despite doing so, and despite leasing land to Delancey/Get Living/Elephant and Castle Co. Ltd. to create a temporary retail area (Castle Square), around half of the shopping centre traders ‘eligible’ for relocation [remain un-relocated](#).²

We see the lack of affordable workspace as part of a much larger phenomenon: In a 2017 [report](#), we recognise that, ‘the loss of affordable and independent retail space is situated in the wider national context of a significant shift in the growth of small-scale self-employment over the period from 2001 to 2017, in which independent retail is key’. These businesses are also at the centre of developing an understanding of social value for a number of reasons. As evidenced in the report, ‘the disappearance of affordable workspace jeopardises the productive fabric of central London and precludes possibilities of a wider range of innovation and job creation’. These spaces are ‘crucial economic and social anchor[s] for comparatively low-entry retail and service activities’ and, in particular, meet the needs of racialised communities. All traders interviewed for this report also revealed that each consistently ‘went beyond their ‘formal’ role by offering various forms of support and care to local residents.’

² See also this [map](#) by Latin Elephant.

2. **Relatedly, rent increases under 'market value':**

More and more, Planning applications by developers, Council Officers' reports and considerations, and Mayor of London recommendations on local planning applications include the 'market value' reference to determine how much each square foot is worth in a specific 'opportunity area'. We have witnessed at Elephant and Castle's plans for redevelopment that these figures under 'market value' can be overestimated by as much as 40% the real area's value (per square footage)³.

The term was designed in such a vague way leaving developers in a strong position to determine how much monetary value an area has, with no room for SMEs nor local authorities or the GLA to contribute to a fairer definition, or establish new definitions for a quantifiable unit which can include or exclude certain SMEs simply by overestimating the area's value.

3. **Lack of lease protections:** Lack of lease protections (including lack of protected leases) has emerged as a pressing issue in Elephant and Castle, and has also been raised by our coalition members. As one of our coalition partners from Shepherd's Bush has pointed out, protected leases with all the stipulations of the 1954 act are necessary for protecting the diverse and affordable character of markets and less gentrified retail. In addition, businesses in Elephant and Castle that were relocated as part of development and regeneration receive leases that are highly anti-tenant, and which severely restrict their rights and access to recourse. This puts them at a distinct disadvantage, and has made their collective efforts at securing improved treatment much more difficult.

As a result of vague leases that put landlords in advantage, we've witnessed an increased need for commercial property advice for small businesses to help them navigate complicated language, and a lack of specificity in contracts where usually traders are given very little to no option on how to hold landlords accountable. Consequently, when seeking this advice we have also seen a lack of commercial legal resources available to traders. Our experiences over the last decade have revealed a lack of *affordable* or *pro bono* commercial lease support. Traders are rarely made aware of their rights; in the instances that they are, there is little effort to ensure comprehension. This is particularly an issue given language barriers and, we argue, is thus also representative of a larger equalities issue. This argument was strong enough that in a recent CPO process in Elephant and Castle, Southwark Council and Elephant and Castle Co. Ltd (developer) acquiesced to Latin Elephant and traders' demands that arch traders impacted by the CPO be provided information about the CPO in Spanish, and that traders be provided a Spanish translator/interpreter to help them navigate the CPO process.

The lack of legal support has also become apparent as traders are attempting to negotiate heads of terms for new leases following their relocation. We have seen ongoing challenges — including uneven power dynamics — impacting traders working out of different London markets and arch sites, including in Elephant and

³ See Southwark Planning Sub-Committee B on 'Castle Square' Application, December 2018
https://www.youtube.com/watch?app=desktop&v=YiRsaPRmKHI&ab_channel=LondonSE1

Castle, Shepherd's Bush and Ridley Road.

4. **Racialised vulnerability to regeneration schemes:** As Latin Elephant has repeatedly addressed, Opportunity Area designations (and the consequences of resulting development) disproportionately negatively impact racialised communities, migrant communities and other diverse working class communities. As we recognise in a report by Román-Velázquez and Hill ([2016, p. 6](#)), 'regeneration schemes in London are taking place in deprived boroughs where there is a high proportion of diverse ethnic populations, thus minority groups and MEB's are disproportionately affected by these schemes'. Retail gentrification, which is consistently connected to such Opportunity Area intensive development, thus impacts communities with similar prejudice.

Elephant and Castle is known for its unique utilisation of arch space, in which traders self-divide up the space and cluster multiple businesses. This was recognised by Theatrum Mundi as a key characteristic of cultural infrastructure in the area, and what they termed an urban backstage, or 'the hidden spaces where cultural production, experimentation and rehearsals take place and the underlying conditions that underpin these activities'. [Karimnia et al.](#) (2020) write:

While local authorities have determined the arches suitable for commerce and retail, the fact remains that they are culturally idiomatic forms derived from the home countries of the migrants, and require more attention in classification. Activities such as food, arts and crafts are, as local activist and scholar Patricia Román-Velázquez describe: 'extremely important and defining elements of any culture, which bring communities together and attract others to join in and understand more'.

The authors also acknowledge that the arches — including those along Maldonado Walk — have been directly impacted by the demolition of the Heygate Estate. One can only assume that the subsequent demolition of the shopping centre compounded these consequences. They recognise that this demolition, and the displacement that was central to its implementation, fragmented 'hard-won social and economic relationships' thus impacting the stability and success of not only the businesses in the arches, but the communities that have emerged through and around them.

Such creative uses of space are not unique to Elephant and Castle. Across the city, there are culturally-mediated forms of business organisation taking place, which should be protected because they support local economic activity and local cultural needs. Importantly, some of these uses of space may not be strictly in compliance with certain regulations or 'expected'; yet, the importance these spaces serve for communities should, arguably, outweigh strict limitations on use.

5. **Developer-Landlord intimidation and conflicting interests:** The imbalances in access to expertise and resources described above become especially apparent in the situations where developers become landlords. This has been an acute issue in Elephant and Castle where traders are afraid to make complaints in case doing so will impact their future relocation. A conflict of interest in this developer/landlord

overlap has emerged in the Elephant and Castle context: the developer is obliged by S106 terms to give priority to displaced traders applying for affordable retail units in the new development (a measure designed to mitigate the disproportionately negative impact of the scheme on long-term MEBs). However, the S106 also contains clauses that give the developer discretion to design the eligibility criteria for this application process. As a result, the developer serves to benefit from creating conditions as a landlord at temporary retail sites that weaken the financial and reputational position of businesses they lease to. A business with rent arrears and low turnover is likely to be excluded from accessing an affordable retail unit in the new development on these grounds (regardless of the conditions that created or exacerbated this financial precarity). There is a strong risk that the developer will use this reasoning to discharge their responsibility to provide affordable retail to displaced MEBs, and charge at market rent to new bigger businesses.

6. De-Clustering of businesses during relocation processes:

The relocation plans should consider the value of how businesses and services work as clusters not simply as single entities. Clusters of specialist activities have been credited by The Mayor in the New London Plan (2017) however areas such as Elephant and Castle were not included, disregarding the importance of these spaces while also falling short in capturing the impact of de-clustering and how the latter has a direct effect on the loss of social value.

(4) TO WHAT EXTENT DO THE PLANNING AND REGENERATION POLICIES OF LOCAL AUTHORITIES SUPPORT MARKET TRADER AND ARCH-BASED BUSINESSES?

Planning and Regeneration policies at the local authority level do **not** support market traders and arch-based businesses. In fact, we argue that the existence of so many community campaigns, from multiple boroughs across London, each of which is fighting against retail gentrification and displacement, is evidence of this. This is especially true in boroughs where there are significant Opportunity Areas, and where speculative development and property investment remains a strong motivator for local authority decision-making processes.

Additionally, there is plenty of evidence of Cabinet members, local councillors and other planning officers who leave their positions at local Councils (e.g., Southwark Council) to work for developers, taking with them their inside, privileged knowledge which they then use to advise developers on future planning applications. Knowing that these jobs await them, there is little incentive for local authorities to demand the most from developers, and to hold them to their promises. We see this in vague, ineffective and weak enforcement of supposed scrutiny and accountability mechanisms including section 106 agreements. This is a clear conflict of interest which remains unresolved within planning and regeneration policies.

(5) HOW COULD THE DEVELOPMENT CONSULTATION CHARTER BETTER SUPPORT COUNCIL-RUN MARKETS AND ARCH-BASED BUSINESSES THAT DELIVER HIGH SOCIAL VALUE?

1. Improving the way consultations are done, so that they are truly inclusive and not tick-box exercises that compound existing distrust of government. Businesses and communities should both have a say in how development is actually carried out, but this should come with clear explanations of rights and possible outcomes and challenges. Successful consultation requires community engagement at *all* points of the planning process: from inception to implementation and management of spaces. This might be done via consistent forums. Additionally, greater power should be attributed to neighbourhood plans and people's plans.
2. Consultations should be made accessible to full-time workers, carers and others who might otherwise find it difficult to attend consultations (e.g., through provision of childcare, scheduling for after-work hours, hybrid meetings). Consultations should take place in community languages, and all materials should be translated.
Partnering with community members on surveys of existing social value, which are carried out over long periods of time to ensure inclusion, accuracy, and mass participation. Also, there should be consideration on compensating constituents' for their time, so that there's a more active consultation during the planning process.
3. Addressing language justice issues, for example by translating all planning documents into community languages, holding consultations in community languages and always having a translator present for any engagement with community members.
4. Replacing unaffordable 80% market rental units with the London Living Rent.
5. Adhering more strongly to existing policy, strengthening of existing protective frameworks and scrutiny over application (e.g. EIAs, s106 agreements).
6. Legislating the burdens of proof should *always* fall on the developer and not on the community. If a developer wants to do something, they must evidence their argument, and provide clear plans for how they will remain accountable to communities even after planning permission has been granted. Community opposition should not have to fight an uphill battle against developers whose profit-seeking consistently leads to local displacement. Developers should be responsible for losses, including those which are unanticipated and experienced after planning permission is granted.
7. Ensuring that 'social value' is not being used to justify development and appease local authorities while it is still impacting communities. This is the inevitable consequence of co-option of 'social value' by developers, and means that using 'social value' in policy will still result in considerable harm. 'Social value' cannot be turned into a tick-box.
8. Building stronger scrutiny mechanisms into the planning system, to ensure that communities can continue to advocate for themselves and experience

leverage even after the approval of any planning applications. This will also ensure that there are avenues for recourse for unanticipated losses and challenges.

APPENDIX // WORKS CITED

Alvarez, N., Andrews, B., Lung-Amam, W., & June-Friesen, K. (2024). *Small Business Anti-Displacement Toolkit: A Guide for Small Business Advocates*. Small Business Anti-Displacement Network.
<https://antidisplacement.org/wp-content/uploads/2024/07/2024-SBAN-Toolkit-FINAL-1.pdf>

CommonWealth. (2023). *Social Value Index: Building the Case for the Democratic Commons in Tottenham*.
<https://www.common-wealth.org/publications/social-value-index-building-the-case-for-the-democratic-commons-in-tottenham>

Diaz, D. (Director). (2022). *Élefán* [Short film]. CiNEOLA.
 [ÉLEFAN: Latino London documentary \(by Daniel Díaz\)](#)

Goldzweig, S., Machado López, M., Román-Velázquez, P., Peluffo Soneyra, S., Perez, N., & Wall, S. (2023). *Migrant and ethnic economies in times of crisis: Displacement, Brexit, Covid and Cost of Living*. Latin Elephant.
<https://latinelephant.org/migrant-and-ethnic-economies-in-times-of-crisis-new-report/>

Karimnia, E., Kostourou, F., Chua, C., Cetrulo, A., Bingham-Hall, J., & Tribillon, J. (2020). *Urban Backstages: Fieldwork Journal #1: London*. Theatrum Mundi.
<https://theatrum-mundi.org/library/urbanbackstages-londonfieldwork/#book-reader/29>

King, J., Hall, S., Román-Velázquez, P., Fernandez, A., Mallins, J., Peluffo-Soneyra, S., & Perez, N. (2017). *Socio-economic value at the Elephant and Castle*. Latin Elephant, Loughborough University London, & London School of Economics.
https://eprints.lse.ac.uk/90160/1/Hall_socio-economic-value.pdf

London Prosperity Board research, see:

- <https://londonprosperityboard.org/communities-rethinking-prosperity>
- <https://seriouslydifferent.org/igp-stories/rethinking-prosperity-uks-first-longitudinal-study-of-prosperity-based-on-community-led-research>
- <https://londonprosperityboard.org/stories-home>
- <https://londonprosperityboard.org/stories-about>

Multiple authors. *Shopping Centre Stories, My Elephant Story* [Local history archive]. Latin Elephant
<https://myelephantstory.latinelephant.org/stories/>

Prichard, J. (Director; Producer). (2021). *The Palace* [Short film]. <https://www.joprichard.com/>

Southwark Planning Network. (2024). *Follow-up to Southwark Land Commission Report: Proposals for Social Purpose of Land Framework*.
<https://docs.google.com/document/d/1vgoouWzotLvfrtLJWtdnr2N1wrrwnl6D/edit>

Velazquez-Roman, P. & Hill, N. (2016). *The Case for London's Latin Quarter: Retention, Growth and Sustainability*. Latin Elephant.
<https://latinelephant.org/wp-content/uploads/2015/03/The-Case-for-Londons-Latin-Quarter-WEB-FINAL.pdf>

Vormittag, L. & Latin Elephant. *Walking the/Recorriendo Elephant*.
<https://latinelephant.org/walkingtheelephant/>

Appendix A - Consultation Hub Responses

What do you think is positive about the proposed amendments to the SCI?

Please provide a summary of the proposed changes. The documents are too numerous to review.

genuine intentions

I think there is NO point engaging with the local community on developments if the local community are basically ignored which has happened on the Borough triangle development.

I think we are ignored by not only the developer but also the council. you need to widen the area of consultation when there are very high rise and huge developments.

The amendments aim to increase public participation in planning decisions and provides more structure and transparency on how and when the Council will engage with communities before making planning decisions.

What do you think can be improved to the proposed amendments to SCI?

Please provide a summary of the proposed changes. The documents are too numerous to review.

The amendments assume development: There needs to be space to challenge the need for a particular development at the outset.

There needs to be space to challenge the assumption that large development is the only way forward rather than, say, smaller piecemeal improvement or refurbishment schemes.

London has suffered considerably from over-development in recent years; where large development has been considered the only route toward improving an area or supplying affordable housing by leveraging the market value of 'marriage' sites, inflated private sector housing speculation and the like. Much of the current need to bring in 'social value' derives from the social destruction this has entailed where neighbourhoods and their social capital are effectively dismantled to make way for market-driven property development with social housing/value as a hoped-for spin off.

For too long, fig leaf 'engagement' schemes have asked too many residents to influence the finer details of a grand plan they actually had no influence in deciding should happen at all.

The proposals tacitly acknowledge this by talking of 'meaningful' engagement. But unless there is space to challenge the prevailing assumption that improvement automatically must mean re-development (at worst, the wholesale demolition/rebuilding of an entire postcode to the principle benefit of a small consortium of financial stake-holders) its likely that previous unhappy trends will continue and London's social capital, amenity value and diverse, human-scale functionality will continue to decline. The comparison is with European cities that preserve commercial and other identities and functions particular to individual premises - even though that may not be the most market-friendly option.

Let the amendments include local input at the initial feasibility stage, not just the planning stages. And let there be an acknowledgement that the assumption of outright development itself runs counter to the modes of improvement, enhancement, repair and repurposing that most of us would favour, given the option.

Developer should be required to obtain view from a minimum proportion of locals. Even if no comment view.

Then developer should be required to address every concern or justify why it will not be. This is the key part missing.

The sequencing of activities in the diagram on page 14, for major developments, should be amended in order to enable the council to meet its objective to put the community at the heart of planning and its other objectives on page 6.

First, the requirement on page 9 to follow the Development Consultation Charter should be enforced by the council. Then the pre-app sequence on page 14 should be: 1) agree the Early Engagement Strategy (EES) (and get community leaders/ward councillors agreement), 2) Do Early Engagement, 3) Agree Engagement Summary (ES) with community leaders/ward councillors, 4) Design Scheme, 5) Pre-app on initial scheme design and its response to the ES, 6) Finalised pre-app advice. This process, if followed effectively, would substantially reduce opposition to development and speed up the planning process to everyone's benefit.

'Minor Material Amendments' terminology should not be used.

Armstrong v Secretary of State for Levelling-Up, Housing and Communities [2023] EWHC 176 reaffirms the principle of Section 73 ('S73').

The judgement confirms that: "there is nothing in section 73, or in the TCPA 1990 ('the Act'), that limits its application to "minor material amendments", or to amendments which do not involve a "substantial" or "fundamental" variation". It goes on to state that: "if Parliament had intended the power to restrict its application further (for example to limit it to "minor material" amendments to a condition, or non-fundamental variations to a condition) one would have expected that to be expressed in the language used and it could readily have done so".

It should be amended to the verbatim wording of S73 of the Act: "Determination of applications to develop land without compliance with conditions previously attached." to accurately reflect recent case law.

I am commenting on behalf of Bermondsey Street.London which I chair.

We are a local association for residents and businesses and work together as volunteers to make our lovely area as good as it can be for all, people who live here, work here or come to visit. On behalf of members, Bermondsey Street.

London has been involved in many developer consultations, not one of which I could say worked well. A major problem has been that community consultation begins late in the process, once most of the thinking about what to build has already had years to form. The longer that process goes on before community consultation, the harder it is for developers' teams (and planning officers) to hear ideas, critical or otherwise from the community when the consultation finally takes place, as they are heavily invested in their own designs. Very often these poor quality consultations are managed and delivered by third party companies, where the community only rarely gets to talk to someone senior enough to have any influence over the proposed building designs.

The current Snowfields Lifesciences site may prove to be a positive example, but born out of very poor consultation managed by a third party company. The We Love Snowfields group that formed in response, to try to get community messages across effectively into the developer/designer team has required exceptional energy, stamina and knowledgeable leadership from within the community. It would be unreasonable to expect that degree of investment from the community in every consultation. The aim here, as I see it, must be to make excellent consultation the norm, not the exception.

Yet, my overall reading of the proposed changes to Southwark Council's community consultation documents is that they create yet more wriggle room for developers to meet the requirements on paper, while failing to hear and respond to community input. My key points are:

1 Development Consultation Charter Early Engagement Strategy – planned timing – I would like to see tighter timing requirements so that this document has to be made publicly available for review before the planning application is submitted. Currently, the charter doesn't say anything about how the document should be publicized or how long it should be publicly available before the application is submitted. A developer might publicise it at the last minute to meet the requirement, in the meanwhile having avoided scrutiny.

I suggest that the requirement should be that it be available at the first community engagement event, on a publicly-accessible website and physically at the event. Page 6 reinstate the heritage, accessibility and movement requirements which it is proposed to delete. 2 Engagement Strategy Template.

Part 2 Approach to Engagement – the document should give guidance that if the developer chooses to work with a third party to manage community engagement, the developer should be represented at every community engagement activity by a senior member of the developer team. (currently, in the documents use of third parties is not mentioned at all)

Part 3 Stakeholder Views and Vision for the Site Add a fourth prompt - What did the different stakeholders you spoke to NOT want as part of the development? (currently there is a prompt to the developer to summarise what people want but no prompt about what people DON'T want) Clare Birks Chair, Bermondsey Street London 7 February 2025

'- P. 7, 9 and 15: expand on "Site Notice, Neighbour Notification letter and/or Press Notice". These actions have been insufficient in spreading knowledge about future developments. For example, there could be social media posts, physical and online advertisements, emails and events at local public and community spaces.

P. 8: Expand on who is considered a neighbour. 100m is too small, especially for large developments.

P. 9: · "We may encourage applicants to: Liaise with Tenants Resident Associations, Neighbourhood Forums, and local community groups"o It should read "We will encourage"

Page 9 - "We will: Make planning applications and supporting documents available online on the planning register"o It should also be required to publish the viability assessment at the earliest possible stage, rather than only doing it at the very end of the application process.

Page 9 - Where it sets out 21/30-day consultation period, please explain that this is the statutory minimum and that consultations often will be longer for larger applications. This is mentioned several times across the document.

Page 9 - "Where appropriate, we will: Reconsult on an amended application for 14 days if there is a 'material' change to the original application"o All material changes should lead to a consultation.- Page 11 - the list of example material planning considerations should be extended to include things such as:o protection of onsite small and independent businesses o delivery of community benefits, including affordable and social housingo socioeconomic impacts on the local areao environmental impact- Page 14 - this should be updated to reflect the DCC amendment that the Early Engagement Strategy will be made publicly available before the submission of a planning application. - Page 16 - consider adding this: "The Southwark Plan (2022) and the London Plan (2021) together form the 'development plan' for Southwark. Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise."

Encouragement for publicity and engagement beyond site notices, notification letters and press notices.

Greater certainty on when scope of consultation will exceed 100m.

Greater effort from council to reach out to affected local community groups, and then stronger requirements on developers to consult any of such groups who have actively confirmed engagement.

Include express requirement to publish full FVA at application stage.

Clarity on consultation period.

Improve list of example material planning considerations (see list in note sent via email). Provide further clarity on GLA Stage 1 and 2 referrals to aid understanding.

While the amendments acknowledge that some groups (e.g., Black families, working-class residents, neurodivergent individuals, and young people) have been left out, they don't go far enough to ensure these groups are actively involved.

The SCI should include specific methods (e.g., community meetings in schools, local youth centers, or faith groups) to proactively engage those who are often overlooked in planning processes.

The amendments state that consultation should happen, but there is no clear accountability if developers or the Council fail to follow through.

A straightforward complaints process should be outlined so residents can challenge decisions if consultation is not done correctly.

The SCI is still written in a way many residents might find confusing or complicated.

Page 7 table - has there been consideration about doing something other than a Site Notice, Neighbour Notification letter and/or Press Notice?

- E.g. - email out, social media push, events, signs up at local public/community spaces?

Page 8 table

- Where an application departs from / does not accord with the development plan, suggest more is done (see above) - need for enhanced public input.
- But is this not a flawed question? How will Council determine this from outset? And isn't basically every large development non-compliant to some extent?

Note typo in first box - should be 'depart from' not 'department'.

Page 8 - who qualifies as a neighbour - includes people who live or work within approx 100m 'further where we think it is appropriate depending on the size of the development'. Can there be some guidelines about when this will be increased? There is a risk 100m becomes a default in each case - e.g. Borough Triangle (only increased because of community pushback, after some resistance).

- E.g. if building about [10] storeys, above [X] sqm, or above [X] residential units. Appreciate they won't want it to be absolute, but rough guide would be helpful.

Page 9 – 'We may encourage applicants to: Liaise with Tenants Resident Associations, Neighbourhood Forums, and local community groups'.

- Suggest the Council actively gets in touch with any such affected groups, and turn this into a "will" where those groups confirm they would like to be consulted.

Page 9 - "We will: Make planning applications and supporting documents available online on the planning register".

- Good opportunity to include express requirement to publish FVA once submitted.

Page 9 - once submitted - as above, consider alternative forms of publicity.

Page 9 - Where it sets out 21/30 day consultation period, it would be helpful to explain that consultation may (and often will) be longer for larger applications, and that this is only the statutory minimum period. This is a common source of confusion and stress.

- Note there's a few places where this is mentioned, so please pick up across the docs.
- Page 18 - this is slightly unclear - implies consultation will only ever be 21 or 28 days in exceptional circumstances.

Page 9 - "Where appropriate, we will: Reconsult on an amended application for 14 days if there is a 'material' change to the original application".

- Suggest remove "where appropriate" - where the application is a material change, surely this should be a firm commitment to reconsult.
- Clarify this will be from the date all relevant amendment documents are on the planning portal.
- Restate commitment to publicising where it is a material amendment.

Page 9 - "When we make a decision We will: ... Monitor the developer consultation process as set out in the Development Consultation Charter".

- What does this mean exactly - what will be done at this stage once decision made?

Page 11 - can the list of example material planning considerations include:

- "delivery of community benefits, including (where relevant) affordable housing",
- "protection of small and independent businesses onsite",
- "environmental impact",
- "socioeconomic impacts on the local area"
- [Anything else?]

Page 12 - major planning applications: it would be helpful to give a brief explanation of what the Stage 1 and Stage 2 GLA referrals are about, and how people can give comments to GLA (including link where possible).

Page 14 - this page should be updated to reflect DCC amendment that the Early Engagement Strategy will be made publicly available for residents and stakeholders to review prior to the submission of a planning application.

Page 15 - consider further publicisation about plan-making - including events and notices in public/community spaces.

Page 16 - consider adding a line in the first section: "The Southwark Plan (2022) and the London Plan 2021 together form the 'development plan' for Southwark. Planning applications must be determined in accordance with planning applications unless material considerations indicate otherwise" (or similar).

Page 20 - I think this can more clearly explain the difference between a Neighbourhood Plan and Neighbourhood Development Order. Might also be worth clarifying that a Plan/NDO cannot prevent certain types of development.

Development Consultation Charter

- General comment: The requirements in the DCC must be clearly stated as requirements. The language in the document switches between saying what must happen, what is expected to happen, what is a requirement, and what is best practice. There must be clarity that the EES, ES and EINA must be produced (on time) and must meet minimum standards.

Page 4 - "At submission of planning application"

- "Prepare and submit required [note typo here - currently 'requried'] documents with planning application" - confirm this includes FVA.
- "If insufficient engagement, request developer undertakes further engagement" - clarify engagement must be before validation of the planning application.

Page 5 - "Who should developers engage with?" - as per comment on SCI, the Council should initially notify the organisations listed (on large schemes), so that they can express interest. If they do express interest, the developer should have to engage with them at the

pre-app stage. This would be in addition to the Developer having to do its own research and outreach.

Page 5 - "Council schemes" - include "Any gain or loss in community floorspace".

Page 6 - Suggest rewrite: "If the Council takes the initial view that a scheme is broadly policy compliant, the requirement for an EES will be discussed...".

Page 6 - greatly welcome requirement for EES to be made publicly available for residents and stakeholders prior to submission.

- What is the intended process for this? Where will it be made available, and how will people be made aware? Consider adding detail.
- IMPORTANT: How far in advance can the community see the EES? It's important this is early on - the purpose of the EES is to ensure developers engage with residents/local stakeholders from the start of the development process. So surely it's important the approach can be scrutinised early on in the process?

Page 6 - final para on EES - consider saying "The EES should be submitted as a completed document on the planning portal when any planning application is submitted" - this will explain the difference between this step and the previous step.

Page 6 - FBA: reference to "local or independent businesses" - suggest this is amended to mirror language of SP policies P32 and P33, i.e. "small businesses, independent businesses or small shops".

Page 6 - FBA: reference to "Sites of Community Importance" - the specific wording risks giving the impression this is limited to visual interest. Consider clarifying this includes other community interest/importance.

Page 7 - "Approach to Engagement" - consider building on these paragraphs to ensure the EES sets out what aspects of the scheme are intended to be "on the table" for each engagement activity (or perhaps what topics are not "on the table"). Often, the events will be vague, or communities will be told that key aspects of the proposals are already fixed / not relevant to that specific meeting. This often leads to frustration from participants, and the sense they're not being given any chance for meaningful input.

Page 7 - EES: "Refer to the EES template for the full list of audit expected". Consider more firm wording here, that the developer must follow the EES format (or ensure that all of the substantive points are covered).

- Same applies for EINA and ES.

Page 7 - Engagement Summary - as above, the "summary of engagement activities undertaken" should include what topics were open for discussion during the session.

Page 7 - ES - following bullet should perhaps be written as a more absolute statement about what stakeholders dislike: "We expect to see a clear summary of what stakeholders not only liked, but importantly also what they disliked, and what further they would like to see as part of the development". Usually the developer overlooks this aspect (unsurprisingly).

Page 7 - ES - reference to 'You Said, We Did' format should be made stronger. It should make clear that all substantive comments received should be responded to. It should also clarify that it relates to this specific application, and it's not appropriate to refer to changes made from earlier designs from before the community comments were made.

- E.g. - For the Aylesham Centre, many people commented how they thought the new scheme was too bulky. Berkeley relied on the fact they had reduced the height from the previous scheme - but this did not respond to the fact that the community comments were about the new scheme (i.e. were made even after that reduction had occurred).

Para 7 - ES - final bullet on monitoring data: statistics should include numbers on how many of the total responses mentioned key issues. Often developers will understate the strength of response on certain issues, or use the fact there were a couple positive responses to suggest there was a "balanced" or "mixed" range of opinions, allowing them to basically ignore the stronger community view.

Page 8 - EINA

- "Public Sector Equalities Duty (PSED) does not apply to developers" - add express clarification that the ultimate decision of the Council (committee) is subject to PSED (I appreciate this is implicit in wording that follows, but potential for confusion).
- Include acknowledgement that Southwark has elected in its constitution to treat socioeconomic status as a protected characteristic.
- "An overview of the users of the site and the stakeholders within the decision-making process" - this should include reference to those who live or work around the site and may be affected.
- Section should draw on EHRC Technical Guidance on PSED, including the need to (1) look beyond general area demographics and assess the specific users of the site and their needs, (2) proactively reaching people that might not already be engaged or may be currently under-served and (3) understand the broad range of experience within each group under a protected characteristic. Currently, most EINAs are very generic, and don't take a site-specific approach - this leads to poor mitigation, sometimes even having the negative impact of homogenising certain groups.
- I appreciate this is referenced in the EINA template, but think it should be alluded to in the actual SCI docs themselves.

Page 9 - requirement to display a notice: ensure consistency in approach with the SCI, which suggests a Neighbour Notification Letter will sometimes be used instead of a Site Notice.

Page 9 - as with SCI comments, consider alternative modes of engagement.

Page 11 - "Consider the Council's Climate Change Strategy and Movement Plan": this should be made more of a clear requirement to follow this plan. Merely requiring them to consider it becomes unenforceable and meaningless in practice. The Plan is already sufficiently caveated that this will not create an undue burden on the developer.

Page 14 - appreciate you have removed ref to EES when you mention what will be monitored at the validation stage - we agree, but think there needs to be a new bullet point in relation to how the EES will be monitored - i.e. it is required early in pre-application discussions, and must be made public to stakeholders at that stage (as above, please include detail of how this will be expected to happen, with clarity on timeframe as far as possible).

EINA Template

- Page 1 - grateful for references from EHRC guidance, however:

- References to "policy" are confusing - surely we mean a decision here? i.e. the decision to approve a planning application (and in the developer's case, the details of what goes in that application). Otherwise it may be unclear what is being referred to and what is required.
- Reference to good evidence should refer to the need for site-specific evidence, not just general demographic data.
- Page 2 - note formatting error - two overlapping boxes. *Please send the wording of the hidden text box for comment.
- Page 2 - Southwark Council must do more than recommend considering socio-economic analysis. It has formally confirmed in its constitution that it will consider socio-economic analysis as a protected characteristic. This means:
 - It must be considered;
 - It must be considered as a standalone protected characteristic, not just how it interplays with the other protected characteristics (although this intersectional analysis is also required).
- Page 3 - comment on socio-economic analysis above carries through to the table in Section 2: the right-hand part of the column (looking at how socio-economic impacts relate to each protected characteristic) but socio-economics should also have its own table.

Page 3 - consider breaking the positives and negatives into their own columns. This will make it harder for developers to just fill the box with positives (which is common practice) - the empty negative box would be more stark.

Page 4 - note slight formatting issue - Gender Reassignment heading is attached to previous table.

General comment - the EINA table should include assessment of impacts on those who live / work / etc around the site, not just users. PSED requires an assessment of equalities impacts on all those affected, not just those who use the site. Often these can be some of the greatest impacts.

EES Template

- Page 1 - Consider providing more detail on what is intended for "stakeholder surveys" - what sort of questions you want to find out.
- Page 2 - Local Economy and Community Infrastructure table - for impact on schools, consider including express reference to a shortfall of school places resulting from lack of family homes. The usual approach considers if there are enough school places, but the reality in most of Southwark is that school numbers are falling, in some part due to the lack of family housing, particularly affordable family housing.
- Page 3 - Local Businesses: it's crucial that the developer, Council and community agree on which businesses meet the definitions of "small shop" (SP policy P32), "small business" (P33) and "independent business" (P33).
 - This is incredibly important, because developers often overlook the fact that these terms each have a different definition and different requirements: i.e. while all of them are protected under P33, small shops have additional protection under P32 that requires retention on site and (where feasible) affordable space.
 - Consultation with these businesses should be happening as early as possible, and this consultation will not be effective (and may not happen at all) unless the full policy context applying to each business is understood.
 - It is incredibly difficult for us as a third party to get developers to engage with this point - it needs to be led by the Council and from the outset.
 - For example, on the Aylesham centre, the developer has failed (and continues to fail) to identify certain small shops and small/independent businesses on site. This has led to great deal of stress and uncertainty for these businesses. Similarly on the Borough Triangle site, lots of Mercato

traders have walked away because the situation is too precarious. Having this conversation expressly at the start would avoid this issue.

- Page 4 - engagement table
 - Consider including confirmation of what topics were discussed / what was "on the table". The reality is most of these events are too general in nature, and only a one-way stream of information. There is no opportunity for the community to even get a proper grasp of what is proposed, let alone meaningfully give their opinions or substantively shape proposals.
- Page 5 - this section on incorporating feedback is welcome, and I strongly encourage the Council to place greater emphasis on this. In practice we are seeing no evidence that these sessions are leading to any meaningful change to scheme design.

ES Template

- See comments above regarding table summarising engagement activities (i.e. Part 2 on Page 5). In particular, the ES should look back and give greater detail on what was discussed, and what the feedback was. It's important this is broken into each event: developers often summarise the entire series of events in one go, which allows them to brush over detail, or imply that each event had more meaningful engagement than it actually did. Often, it feels like developers hold lots of events, but at no point are the substantive points ever properly grappled with. These amendments would add a greater focus on the quality of each event in addition to quantity.
- Page 6 - Part 3: suggest making these sections larger, particularly "What elements of the scheme did stakeholders dislike?". This is a key section, which should give a detailed summary of community views. Currently developers often fail to put much detail into this section, and I think this is encouraged by how small the box is.

Page 6 - Part 4 - You Said, We Did: this is arguably the most crucial section of the whole ES document. However, the reality is that developers fail to properly engage with the more challenging aspects of community feedback. Perhaps some stronger wording could be added here, along the lines of "This section must include a detailed analysis of feedback received, especially negative feedback". Consider adding a line that the ES will not be valid if it fails to include any fundamental issues, or issues raised extensively.

- More importantly, we strongly encourage the Council to more heavily scrutinise this section, including reviewing other evidence of community feedback and querying why certain issues haven't been included here. Otherwise, there is nothing to stop the developer cherry-picking what to include.
- As per comments on DCC, the 'We Did' must only refer to changes happening after the feedback was received. Any attempt by the developer to explain why they have already designed the scheme to pick up these points should be resisted.
- It would be useful to require a summary of how many people raised a certain point - this would encourage developers to record data more robustly. Although, we are mindful that the developer may massage these figures - but it would at least give a better sense of the strength of feeling on each issue.

Page 7 - Part 5 - Social Value:

- We note that the amendments here make this section more prescriptive, following the goals of the Southwark 2030 strategy. We appreciate the alignment with Southwark's broader policy, and also appreciate that a more prescriptive approach will lead to more detailed answers. However, there is a risk here that the approach ends up overlooking key aspects of 'social value'. For example, the categories overlook:

- Community and/or cultural space - what is being lost and what is being added, who it was/is for etc.
- Analysis of who the development will serve more generally - did a specific demographic previously use/enjoy the site, and will they still be able to?
- How does the proposed scheme fit into the surrounding social context - does it support it, or offer something new?
- What does the proposed scheme offer that gives it a unique social value - what distinguishes it from other schemes?
- Social value here must be linked to the notion of "social purpose" from the Southwark Land Commission Report, and specifically the proposed Social Purpose of Land Framework. See attached SPN paper on this point. Ideally, this should move beyond more limited/corporatised notions of social value.
 - This is the best opportunity to make good on this commitment in the Council's response to the Land Commission Report and work towards a Social Purpose of Land Framework.
 - A failure to link the two up will likely lead to the Framework never being established, or an awkward overlap between the two. We strongly encourage the Council to use this opportunity to progress the Framework.
- The current approach boils social value down to more concrete, measurable statistics around homes, upskilling, design, climate measures etc. These are all crucial, but they are already measured and assessed in the planning process through planning policy. This section should seek to add something new, that isn't already being captured - the approach suggested above provides a more nuanced analysis of social context. We think that is what the DCC process should be for.

I think that you could:

- Consider more than just letters and site notices ie Social Media pushes
- I feel that although you think you are Clear & Consistent and Simple and Accessible in plain English. The letters you send out are not that clear to everyone. You are competing with glossy sales literature from Developers. It would be nice if the facts could be laid out in a more interesting format for everyone to fully understand.
- Although I agree you are Collaborative and Responsive it would be nice if you could be more proactive in big developments to reach out to those affected, not just reactive.
- The standard 100m consultation radius is not always enough. Each development should be considered individually.

What do you think is positive about the proposed amendments to the DCC?

Please provide a summary of the proposed changes. The documents are too numerous to review.

Exemptions for small scale council own projects (e.g. minor operational development).

<p>Requirement to make EES publicly available for residents and stakeholders prior to submission - but note need for greater clarity on process and timings.</p> <p>The amendments clarify that developers must consult local residents before making significant changes to an area.</p> <p>This helps prevent communities from being left out of important decisions about new buildings and regeneration projects.</p> <p>If the Council commits to specific consultation rules, it creates the potential of a legally binding 'legitimate expectation.'</p> <p>If developers or the Council ignore community input, residents could challenge decisions through legal action.</p>
<p>We welcome the added requirements to engage stakeholders early in the process, and to provide early engagement strategies at pre-application. This helps to strengthen the stakeholder voice in the development of plans, and aligns with Trust advice on patient and public engagement in such developments.</p> <p>The guidance on completing stakeholder analysis, providing summaries of and reports on engagement activity and the need to complete equalities impact assessment are helpful. The tables from p9 outlining requirements for developers at various stages in different scales of development are also helpful and make it easy to see what developers will be expected to provide.</p>
<h2>What do you think can be improved in the proposed amendments to the DCC?</h2>
<p>Please provide a summary of the proposed changes. The documents are too numerous to review.</p>
<p>Similar to SCI. Consultation is only one step. Forcing to act on results is missing</p>
<p>We ❤️ Snowfields welcomes this important consultation.</p> <p>We have listened to the introduction of this at Cabinet and were disappointed in how it was described, in the lack of discussion, and in the decision apparently made to adopt prior to the consultation, particularly given the recognised community interest. We don't know if we were one of the community groups referred to, but we have certainly raised our disappointment in how this potentially excellent process is being poorly implemented.</p> <p>The proposed changes are a substantial backwards step at a time when the council should be stepping forward to evolve a better process that better supports growth, increases in council revenues, and an improved environment in the borough.</p> <p>We have been subject to a failure in the Development Consultation Strategy process and our comments are informed by that damaging experience and the subsequent more positive experience of trying to repair the damage done to community confidence.</p> <p>We ❤️ Snowfields was formed in response to a proposal for the development of a site that we support in principle so long as it is the best possible scheme for the site. This should be the objective of the admirable intentions of the Development Consultation Charter.</p> <p>In our view the failure of the process we experienced was due to a combination of failures by the local authority, the landowner, the developer and the developer's PR consultants. We are not convinced that the changes to the documents will be sufficient to prevent this</p>

happening again.

The first failure was in the lack of clarity in the wording of the original Charter that presumably this consultation is designed to address.

In our case we believe the landowner undertook detailed pre-app discussions with the planners without an Early Engagement Strategy and without any meaningful local community engagement. This may have been because their process commenced before the introduction of the Development Consultation Charter.

The planners did not require an Early Engagement Strategy (EES) at the first pre-application meeting by the landowner or the first pre-application meeting by the subsequently appointed developer and this omission substantially contributed to a disastrous community engagement. The original Charter is poorly drafted and self-contradictory in this respect. In any event a policy is of no use unless it is adhered to by all parties and unless the Strategy is meaningful, balanced and effective.

This subsequently led to the Council breaching its own Statement of Community Involvement - page 9 'We will: Require applicants to consult with the community.....in accordance with the requirements of the Development Consultation Charter' and page 14 'Pre- application submitted to Council (including an Early Engagement Strategy)'.

As a result the planners encouraged the landowners to believe their scheme (unconsulted on at the point of the initial pre-app) would be broadly acceptable (despite being substantially non-compliant with detailed provisions of the Southwark Plan).

The proposed clarifying changes on page 4 and page 6 of the Charter will make this situation worse. If the council is serious about putting the community 'at the centre' of the development process then the early engagement should happen before any pre-application advice is given to the developers (this advice should be informed by community views).

The proposed changes to the Charter do not require the EES to be delivered to the council until the pre-application process is finished, so before the community has had a chance to comment on the plans the developer is discussing, in detail and secret, with the planners.

A more sensible approach that would better achieve the objectives of the Council for the Charter, putting the community at the heart of the development process, would be to have a first pre-app meeting with the developer just on the EES, and then a second pre-app meeting, following the early engagement with the community, on the design and the Engagement Summary (ES). Pre-apps involve multiple meetings would likely reduce the length of the planning process and enhance the quality of advice given.

There is an important condition for this process to work properly. The EES and the ES need to be confirmed by the leading community representatives/ward councillors as a balanced approach to, and view of, the engagement process. Sadly, the third party PR consultants typically involved in these engagement activities are incentivised to paint a glowing picture of support to the planners and the planners have little incentive or resources to check whether this is correct. The council could usefully recommend against the use of third party PR/engagement consultants to ensure that developers properly understand the site and the community before briefing their design team.

As a result of the failure of the process in our case, the landowner procured a developer on the basis of a scheme that the local community hadn't seen, hadn't inputted to, and

didn't support.

The proposed revisions to the Charter would virtually guarantee that this happens every time.

The developers were then committed to a scheme that could never be acceptable to the community.

The developer then employed a third party PR consultant who undertook an engagement that the community viewed as manipulative in order to seek to avoid generating opposition and to avoid changing the scheme design.

We were subject to a particularly egregious 'engagement' but generally PR consultants are only employed by developers if they manage to convince the planners that they have adequately 'ticked the community engagement box' rather than genuinely engaged a community on the best scheme for a site (rather than the landowner's or developer's value or profit maximising scheme).

In our case, despite the second round of pre-application discussions at this stage the planners did not seek an Early Engagement Strategy until AFTER the 'engagement' had been 'completed'.

The community backlash this generated was painful but had some positive outcomes.

The community organised, and held, with the support of charity Create Streets, a Community Design Review.

This may be similar to the 'Community Review Panel' mentioned, but not defined, and to our knowledge not used except in Old Kent Road, in the council's Statement of Community Involvement. The council may wish to consider using this approach for all major development schemes.

The planners encouraged the developer to engage constructively, and a number of productive discussions resulted that generated some positive changes to the scheme, a better understanding by the development team, the planners, and other stakeholders, of the genuine challenges the proposed development created.

The scheme we are involved in has still not reached planning application stage. These delays are unnecessary and unwelcome and would have been avoided by a proper consultation along the lines of that imagined in the current version of the Charter.

In our case the developer has still not engaged the community on one of the critical planning considerations, the existing transport situation in relation to the development. A properly thought through EES would have timetabled this much earlier in the process.

For this proposed scheme, in an historic neighbourhood with a medieval street pattern of narrow streets and high pedestrian and cycle usage, traffic is a critical issue and should have been one of the main items the council considered properly at pre-app stage. The failure of the council to deal properly with these issues in the past is currently apparent in relation to the failure of the construction traffic arrangements on Fenning Street.

We ❤️ Snowfields are also conscious that the current planning application consultation process does not support high quality or effective community consultation. The Southwark planning portal, the complexity and quantity of information on each application, the way it

is poorly labelled and structured on the site, and the way it then changes during the planners' consideration and negotiation with the developer, means that the objectives of the Charter cannot be achieved by the current approach.

In our case we will, again, be forced into the position of undertaking this consultation ourselves.

We therefore propose, based on what appears to be our fairly typical experience, the following detailed changes to the Development Consultation Strategy:

In the first column of section 1 'Engage' in the table on page 4 insert a requirement for the developer to send the EES to the planning officer one week prior to the first pre-application meeting. And move the requirement on the developer to circulate this to ward councillors and local community representatives and to publish it locally before engagement begins, and for no pre-application advice on the design to be given by the planning officer until the early engagement has been completed, documented in the ES and signed off as balanced by the lead community representatives (and/or ward councillors). As a result the requirement for publication in the second column of this section that has been added should be deleted/moved to the first column. The first section (paras 2-6) on page 6 should be amended or deleted accordingly.

The Stage 2 'Consultation' column on the table on page 4 should have a requirement that the developer, council and community should collaborate on the post planning submission consultation. This is a critical moment in the process where the community finally sees how the developer has responded to the early engagement and is their final opportunity to influence the scheme and the planning decision. The developer should be required to make their proposals available to the community, in an honest and neutral way.

The Construction Management and Traffic and Transport Plans should be consulted on in the pre-application 'Engage' period. The community can add a lot of value to these based on a much more detailed understanding of the current situation than that of planners, council highways officers, developers and consultants who, with the best will in the world, will not spend as much time in the area as the community who lives there.

On page 5, second paragraph, the word 'also' should be inserted between 'should' and 'research' to make it clear that local residents and businesses should be the main focus of the engagement.

On page 6, the requirement for Accessibility and Movement and Heritage and site layout to be part of the fact based audit should be reinstated. Planners need this information in order to give pre-application advice and the community needs the developer to understand them before it briefs its architects.

The new template for the fact based audit and approach to engagement is a huge backwards step. In particular the first three paragraphs under 'Approach to Engagement' should be reinstated.

And on page 6 a No.4 should be inserted 'What did the different stakeholders you spoke to NOT want to see as part of the development?'

see earlier comments

Guy's and St Thomas' NHS Foundation Trust ("GSTT" or "The Trust") covers two of London's best known teaching hospitals: St Thomas' Hospital in the London Borough of Lambeth and Guy's Hospital in the London Borough of Southwark. The hospitals provide a full range of local hospitals services and community services for people in these Boroughs.

The Trust manages the NHS Southeast London Cluster area and has positive strategic and operational relationships with local Integrated Care Boards (ICBs) in Southwark. The Trust is part of King's Health Partners, an academic health science centre that brings together three of the leading NHS Foundation Trusts, world-leading University for health and research education King's College London and other services across central and outer London locations.

The Trust also operates and manages a number of other medical and occupational health services across Southwark. The DCC document states that the DCC is primarily aimed at developers, but also the Council and the community. Page 5 goes on to state that "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."

A list is then provided of consultees that developers are advised to engage with. GSTT are concerned that the Health sector is not considered, and therefore Trusts such as ourselves and the South East London Integrated Care Board (SELICB), as well as other NHS Health providers would be excluded from consultations.

Health assets such as hospitals, GP surgeries, clinics etc are a vital part of any community and can be negatively impacted by new development, either during the demolition and/or construction phases and once completed and in operation. It is imperative for developers to seek early engagement with GSTT and SELICB, where their site is located in close proximity to a health asset. We therefore request that NHS health providers are included in the list of consultees within in the DCC.

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Page 5 goes on to state that "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." A list is then provided of consultees that developers are advised to engage with. GSTT are concerned that the Health sector is not considered, and therefore Trusts such as ourselves and the South East London Integrated Care Board (SELICB), as well as other NHS Health providers would be excluded from consultations. Health assets such as hospitals, GP surgeries, clinics etc are a vital part of

any community and can be negatively impacted by new development, either during the demolition and/or construction phases and once completed and in operation. It is imperative for developers to seek early engagement with local NHS Health Providers such as GSTT working in partnership with the NHS South East London Integrated Care Board, where their site is located in close proximity to a health asset. We therefore request that NHS health providers are included in the list of consultees within the DCC.

The language in the document switches between saying what must happen, what is expected to happen, what is a requirement and what is best practice. The requirements in the DCC must be clearly stated as requirements. It must also be clear that the EES, ES and EINA must be produced on time and meet minimum standards.

Page 4 - "At submission of planning application" o "Prepare and submit required documents with planning application" – please clarify whether this includes viability assessments.o "If insufficient engagement, request developer undertakes further engagement" - clarify whether engagement must be before the validation of the planning application.

Page 5 - "Who should developers engage with?" – on large schemes, the Council must initially notify the organisations listed, so that they can express interest. If they do express interest, the developer must engage with them at the pre-application stage, in addition to the developer having to do its own research and outreach. • Page 5 - "Council schemes" - include "Any gain or loss in community floorspace" • Page 6 - we welcome the requirement for the EES to be made publicly available before submission, however the intended process is not set-out: where will it be made available and how will people be made aware? The purpose of the EES is to ensure developers engage with residents and local stakeholders from the start. How far in advance will the community be able to view the EES?

Page 6 - FBA: "local or independent businesses" – please amend this to be consistent with Southwark Plan policies P32 and P33, "small businesses, independent businesses or small shops"

Page 6 - FBA: "Sites of Community Importance" - the specific wording risks giving the impression this is limited to visual interest. Consider clarifying this includes other community interest/importance.

Page 7 - "Approach to Engagement" – these paragraphs must ensure the EES sets out what aspects of the scheme are intended to be "on the table" and "not on the table" for each engagement activity. Very often, the events will be vague, or communities will be told that key aspects of the proposals are already fixed and not pertinent to that specific meeting, which leads to participants feeling that they do not have the opportunity to have their say.

Page 7 - EES: "Refer to the EES template for the full list of audit expected"• Please clarify that the developer must follow the EES format and ensure that all of the substantive points are covered.

Page 7 - Engagement Summary• As above, the "summary of engagement activities undertaken" should include what topics were actually open for discussion during the session. • Please add "We expect to see a clear summary of what stakeholders not only liked, but importantly also what they disliked, and what further they would like to see as part of the development". • The reference to 'You Said, We Did' format must be made stronger. It should make clear that all substantive comments received will be responded to. It should also clarify that it is unacceptable to refer to changes made from earlier designs from before the community comments were made. • The statistics should include numbers on how many of the total responses mentioned key issues, perhaps using a 'tagging' system. Very often, developers will underestimate the strength of response on certain issues, or use the fact there were a couple positive responses to suggest there was a "balanced" or "mixed" range of opinions, allowing them to ignore the views of the community. Perhaps, when one submits a consultation response, one could choose from a list of tags of topics (with the option to add your own). This way, it would be clearly shown what consultees care most about. Moreover, it should be done in a way that is sorted into 'positive' and 'negative' tags. It should also show how many people have tagged each topic.

Page 8 - EINA o "Public Sector Equalities Duty (PSED) does not apply to developers" - add express clarification that the ultimate decision of the Council is subject to PSED.o State that Southwark has elected in its constitution to treat socioeconomic status as a protected characteristic. o "An overview of the users of the site and the stakeholders within the decision-making process" - this should include reference to those who live or work around the site and who may be affected .o This should draw on the EHRC Technical Guidance on PSED, including the need to (1) look beyond general area demographics and assess the specific users of the site and their needs, (2) proactively reach people that might not already be engaged or may be currently under-served (3) understand the broad range of experience within each group under a protected characteristic. Currently, most EINAs are generic and don't take a site-specific approach, which results in poor mitigation and negative consequences for the local community.EINA Template:The EINA table should include assessment of impacts on those who live or work around the site, not just users (the PSED requires an assessment of equalities impacts on all those affected, not just those who use the site.) • Page 1 – The reference to "good evidence" should make reference for the need for site-specific evidence, not just general demographic data.

Page 2 - Southwark Council must do more than recommend considering socio-economic analysis. It has formally confirmed in its constitution that it will consider socio-economic analysis as a protected characteristic. This means: o It must be considered;o It must be considered as a standalone protected characteristic, not just how it interplays with other protected characteristics (although this intersectional analysis is also required). • Page 3 - socio-economics should also have its own table.

Page 3 – Break the positives and negatives into their own columns. This will make it harder for developers to just fill the box with positives, which is common practice.

Page 9 – "Display a notice / board at the application site": ensure consistency in approach with the SCI, which suggests a Neighbour Notification Letter will sometimes be used instead of a Site Notice. As stated above, please also implement additional modes of engagement.

Page 11 - "Consider the Council's Climate Change Strategy and Movement Plan": Merely requiring a developer to consider this means it becomes unenforceable and, in practice, meaningless. The Plan is already sufficiently caveated that this will not create an undue burden on the developer. Thus, it should be made a clear requirement to follow this plan.

Page 14 – There needs to be further clarity on how the EES will be monitored. It is required early in pre-application discussions and must be made public at that stage (as above, please include detail of how this will be expected to happen, with clarity on the timeframe.)

State more clearly that the requirements in the DCC must be complied with - language is inconsistent and confusing. Any uncertainty will prevent enforceability. Requirements around 'You Said, We Did' format, and need to set out what stakeholders didn't like, need to be made stronger.

Monitoring data should include number of responses on each point.

EINA section should provide more clarity on how PSED applies to Council, and the express inclusion of socioeconomic status as a protected characteristic in Southwark. EINA section should also insist on higher standard of demographic assessment and engagement, following EHRC technical guidance (see note sent via email for more detail).

Amend wording around Climate Change Strategy and Movement Plan to require compliance, not just consideration.

While the amendments set out expectations for consultation, they do not clearly state what happens if developers fail to meet them. Developers who ignore community input or conduct 'tick-box' consultations without real engagement should face strict consequences. A straightforward complaints process should be included so residents can challenge developers who fail to consult properly.

Currently, developers listen to feedback but are not required to act on it. The DCC should require public summaries showing what feedback was received, what changes were made because of that feedback, and, if no changes were made, a clear explanation of why.

The current amendments do not include NHS providers and partners as a potential stakeholder on p5. NHS organisations and partners would be key stakeholders in planning processes for residential or mixed use developments which may have potential impact on healthcare facilities and provision e.g. by increasing the local healthcare user population. Or where developments may impact healthcare service planning. Those developments that do not affect the Trust directly, may still impact NHS partners across the system/region.

The guidance does not relate to NHS organisations as a potential developer/partner in planning applications. NHS providers, are required to engage patients and stakeholders in estate developments and changes. It would be helpful to understand where healthcare estates fit in the categories outlined on p5 under "What type of applications must consult and engage?"

Likewise, as an NHS provider, the PSED will usually apply to building/estates developments for healthcare services. A caveat in section 3 would be helpful to ensure guidance for healthcare developments. Because the PSED applies to our organisation, we have internal templates for equalities impact assessment. It would be helpful to understand whether existing templates and forms would be acceptable.

What do you think is positive about the proposed amendments to the Early Engagement Strategy template?

good intention

- Page 1 – Please provide further information on "stakeholder surveys", including what questions you want to be asked.
- Page 2 - Local Economy and Community Infrastructure table - for the impact on schools, reference to the shortfall of school places resulting from a lack of affordable family homes. In most of Southwark, school numbers are falling, in strong part due to the lack of affordable family housing.
- Page 3 - Local Businesses: it's crucial that Southwark Council, the developer and community agree on which businesses meet the definitions of "small shop" (Southwark Plan policy P32), "small business" (Southwark Plan policy P33) and "independent business" (Southwark Plan policy P33).
 - o This is extremely important because developers regularly overlook the fact that these terms each have a different definition and different requirements: i.e. while all of them are protected under P33, small shops have additional protection under P32 that requires retention on site and, where feasible, affordable space.
 - o Consultation with these businesses must be happening as early as possible, and this consultation will not be effective – and may not happen, at all – if the full policy context is misunderstood.
 - o For example, on the Aylesham centre, the developer continues to fail to identify onsite small shops and small/independent businesses. This has led to great deal of stress and uncertainty. Similarly, on the Borough Triangle site, lots of Mercato traders have already left because of the precarity of their situation.
- Page 4 - engagement table
 - o Please including confirmation of what topics where discussed and what was "on the table". These events are a one-way stream of information, with no opportunity for the community to grasp of what is proposed, let alone meaningfully give their opinions or substantively shape proposals.
- Page 5 - this section on incorporating feedback is welcome. Unfortunately, in reality, these sessions are not leading to any meaningful changes.

The template and the requirement to complete it at pre-application is helpful. As noted above, plans for early engagement and stakeholder analysis fit with Trust guidance for involvement in service development.

What do you think can be improved in the proposed amendments to the Early Engagement Strategy template?

see foregoing

Make it mandatory to engage not just offer engagement

The new template for the fact based audit and approach to engagement is a backwards step. In particular the first three paragraphs under 'Approach to Engagement' should be reinstated.

More detail on what is intended for "stakeholder surveys". Impact on schools must include assessment of how failure to delivery policy compliant level of family homes may lower school places - focus on there being enough schools places does not reflect reality of low school roll numbers and closures. Section on local businesses should better align with policies P32 and P33 and be more clear on what's required (see note sent via email for more detail). Engagement table should require detail on what substantive points were discussed at each event.

The stakeholder analysis table does not provide a space for developers working on healthcare estates to identify patients, carers, members of the public as stakeholders. While many may be local residents, and therefore fit within the first section, many are not but would be essential stakeholders in the case of healthcare developments.

EES Template

- **Page 1** - Consider providing more detail on what is intended for "stakeholder surveys" - what sort of questions you want to find out.
- **Page 2** - Local Economy and Community Infrastructure table - for impact on schools, consider including express reference to a shortfall of school places resulting from lack of family homes. The usual approach considers if there are enough school places, but the reality in most of Southwark is that school numbers are falling, in some part due to the lack of family housing, particularly affordable family housing.
- **Page 3** - Local Businesses: it's crucial that the developer, Council and community agree on which businesses meet the definitions of "small shop" (SP policy P32), "small business" (P33) and "independent business" (P33).
 - This is incredibly important, because developers often overlook the fact that these terms each have a different definition and different requirements: i.e. while all of them are protected under P33, small shops have additional protection under P32 that requires retention on site and (where feasible) affordable space.
 - Consultation with these businesses should be happening as early as possible, and this consultation will not be effective (and may not happen at all) unless the full policy context applying to each business is understood.
 - It is incredibly difficult for us as a third party to get developers to engage with this point - it needs to be led by the Council and from the outset.
 - For example, on the Aylesham centre, the developer has failed (and continues to fail) to identify certain small shops and small/independent businesses on site. This has led to great deal of stress and uncertainty for these businesses. Similarly on the Borough Triangle site, lots of Mercato traders have walked away because the situation is too precarious. Having this conversation expressly at the start would avoid this issue.

- **Page 4** - Engagement table

- Consider including confirmation of what topics were discussed / what was "on the table". The reality is most of these events are too general in nature, and only a one-way stream of information. There is no opportunity for the community to even get a proper grasp of what is proposed, let alone meaningfully give their opinions or substantively shape proposals.

- **Page 5** - This section on incorporating feedback is welcome, and I strongly encourage the Council to place greater emphasis on this. In practice we are seeing no evidence that these sessions are leading to any meaningful change to scheme design.

Welcome requirement for EES to be made publicly available for residents and stakeholders prior to submission.

But what is the intended process for this? Where will it be made available, and how will people be made aware?

How far in advance can the community see the EES? It is important this is early on in the process.

What do you think is positive about the proposed amendments to the Engagement Summary template?

see foregoing

As above, the requirement for the summary as part of a planning application, to show the impact of the stakeholder voice.

What do you think can be improved in the proposed amendments to the Engagement Summary template?

see foregoing

Set minimum engagement quantities not just one side of an engagement with other side not even aware or unable to engage due to time and location

On page 6 a No.4 should be inserted 'What did the different stakeholders you spoke to NOT want to see as part of the development?'

Stronger requirements to summarise engagement activities - information must be provided specifically for each event, not just vague summary.

Stronger requirements to set out what stakeholders dislike about the scheme.

Stronger requirements around 'You Said, We Did' format - include express requirement to cover all points, and a statement that the ES will not be valid if it omits key concerns raised. Clarity that any 'We Did' response must actually be in response to concerns, i.e. after concerns raised - not just explanation of existing aspects / general merits of the scheme.

Amendments to Social Value section overlook key aspects, instead focusing on points that are already covered by planning policy and will be answerable by developers without doing anything new / additional. Missed opportunity to use this section to capture more nuanced sense of social value that planning regime otherwise misses. This section should be linked to the Social Purpose of Land framework committed to in response to the Southwark Land Commission Report (see note sent via email for more detail).

As above, it is not clear how the stakeholder categories relate to developments in healthcare services.

See comments above regarding table summarising engagement activities (i.e. Part 2 on Page 5). In particular, the ES should look back and give greater detail on what was discussed, and what the feedback was. It's important this is broken into each event: developers often summarise the entire series of events in one go, which allows them to brush over detail, or imply that each event had more meaningful engagement than it actually did. Often, it feels like developers hold lots of events, but at no point are the substantive points ever properly grappled with. These amendments would add a greater focus on the quality of each event in addition to quantity.

Page 6 - Part 3: suggest making these sections larger, particularly "What elements of the scheme did stakeholders dislike?". This is a key section, which should give a detailed summary of community views. Currently developers often fail to put much detail into this section, and I think this is encouraged by how small the box is.

Page 6 - Part 4 - You Said, We Did: this is arguably the most crucial section of the whole ES document. However, the reality is that developers fail to properly engage with the more challenging aspects of community feedback. Perhaps some stronger wording could be added here, along the lines of "This section must include a detailed analysis of feedback received, especially negative feedback". Consider adding a line that the ES will not be valid if it fails to include any fundamental issues, or issues raised extensively.

- More importantly, we strongly encourage the Council to more heavily scrutinise this section, including reviewing other evidence of community feedback and querying why certain issues haven't been included here. Otherwise, there is nothing to stop the developer cherry-picking what to include.
- As per comments on DCC, the 'We Did' must only refer to changes happening after the feedback was received. Any attempt by the developer to explain why they have already designed the scheme to pick up these points should be resisted.
- It would be useful to require a summary of how many people raised a certain point - this would encourage developers to record data more robustly. Although, we are mindful that the developer may massage these figures - but it would at least give a better sense of the strength of feeling on each issue.
-

Page 7 - Part 5 - Social Value:

- We note that the amendments here make this section more prescriptive, following the goals of the Southwark 2030 strategy. We appreciate the alignment with Southwark's broader policy, and also appreciate that a more prescriptive approach will lead to more detailed answers. However, there is a risk here that the approach ends up overlooking key aspects of 'social value'. For example, the categories overlook:
 - Community and/or cultural space - what is being lost and what is being added, who it was/is for etc.
 - Analysis of who the development will serve more generally - did a specific demographic previously use/enjoy the site, and will they still be able to?
 - How does the proposed scheme fit into the surrounding social context - does it support it, or offer something new?
 - What does the proposed scheme offer that gives it a unique social value - what distinguishes it from other schemes?
- Social value here must be linked to the notion of "social purpose" from the Southwark Land Commission Report, and specifically the proposed Social Purpose of Land Framework. See attached SPN paper on this point. Ideally, this should move beyond more limited/corporatised notions of social value.
 - This is the best opportunity to make good on this commitment in the Council's response to the Land Commission Report and work towards a Social Purpose of Land Framework.
 - A failure to link the two up will likely lead to the Framework never being established, or an awkward overlap between the two. We strongly encourage the Council to use this opportunity to progress the Framework.
- The current approach boils social value down to more concrete, measurable statistics around homes, upskilling, design, climate measures etc. These are all crucial, but they are already measured and assessed in the planning process through planning policy. This section should seek to add something new, that isn't already being captured - the approach suggested above provides a more nuanced analysis of social context. We think that is what the DCC process should be for.

What do you think can be improved in the amendments to the Engagement Summary template?

see foregoing

Must report success level. Both involvement and concern resolution

The ES must give greater detail on what was discussed and the feedback given. This must also be broken down for each event: developers often brush over concerns and suggest that each event had more meaningful engagement than it actually did. Often, it feels like developers hold lots of events, but at no point are the substantive points ever properly grappled with, let alone do participants feel that they are ever meaningfully contributing to developments. There must be a greater focus on the quality of each event, in addition to quantity.

Page 6 - Part 3: suggest making these sections larger, particularly "What elements of the scheme did stakeholders dislike?". This is a key section, which should give a detailed summary of community views. Currently, developers often do not put much detail here, which could change if the space is enlarged.

Page 6 - Part 4 - You Said, We Did: we believe that this is the most crucial section of the whole ES document. Developers systematically neglect to properly engage with the more negative aspects of community feedback. Stronger wording could be added here, perhaps: "This section must include a detailed analysis of feedback received, especially negative feedback". Please also consider adding that the ES will be invalid if it fails to include any fundamental issues or issues that have been raised by more than 10% of people.

- The Council must heavily scrutinise this section, including reviewing other evidence of community feedback and querying, if applicable, why certain issues have not been included here.
- As stated above, the 'We Did' must only refer to changes happening after the feedback was received. Any attempt by the developer to explain why they have already designed the scheme to pick up these points should be resisted.
- As outlined earlier, there could be a 'tagging' system to ensure that developers cannot ignore the view of the community.

Page 7 - Part 5 - Social Value:

We note that the amendments here make this section more prescriptive and we also appreciate the alignment with Southwark's broader policy. However, there is a risk here that the approach ends up overlooking key aspects of 'social value'. For example, the categories overlook:

- Community and/or cultural space: what is being lost and what is being added, and for whom?
- Analysis of who the development will serve more generally: did a specific demographic previously use and enjoy the site and, going forward, will they still be able to?
- What does the proposed scheme offer that gives it a unique social value: what distinguishes it from other schemes?

Social value here must be linked to the notion of "social purpose" from the Southwark Land Commission Report, and specifically the proposed Social Purpose of Land Framework. Ideally, this should move beyond limited and corporatised notions of social value, as outlined in the recent paper by the Southwark Planning Network (SPN). This is the optimal opportunity for the Council to carry out its commitment to a Social Purpose of Land Framework, as stated in its response to the Land Commission Report. A failure to link the two will likely lead to the Framework never being established. The Council must

use this opportunity to substantially work towards the Social Purpose of Land Framework. The current approach to social value concerns elements that are already assessed in the planning process, such as design and climate measures. The DCC should include a more nuanced approach that adds something new.

See above



Planning Policy



12th February 2025

By email

Representations to Development Consultation Charter (DCC) and Accompanying Documents, October 2024

Thank you for the opportunity to comment on the proposed changes to the Statement of Community Involvement (SCI) and Development Consultation Charter (DCC) and accompanying documents which are currently being consulted on until 19th February 2025.

As you are aware, we previously submitted representations on the emerging SCI and DCC prior to their adoption in December 2022 as well as our letter to you on 28 November 2019 regarding the emerging DCC and British Land's approach for future Canada Water Masterplan Reserved Matters Applications.

British Land continue to welcome meaningful community engagement so that development responds to its local context, as shared by our British Land Local Charter objective which commits us to engaging and connecting with local communities and stakeholders to understand local needs, and so that they have the opportunity to influence our thinking and decisions during the development process.

Having reviewed the proposed changes to the SCI, DCC and supporting documents, we wish to make comments on the Development Consultation Charter, the Engagement Summary Template and the Early Engagement Strategy. We have no comments to make on the Statement of Community Involvement and it does not appear that changes are proposed to the example EINA template.

Development Consultation Charter and Early Engagement Strategy Template

We note under the revised DCC that there is requirement for additional information to be included as part of the Fact-based Audit in the Early Engagement Strategy template. Whilst we consider that stakeholder mapping is an essential and worthwhile exercise, it is very resource intensive. We would welcome the opportunity for information sharing and the potential for any research/data to be open source to better inform the Developer's own stakeholder mapping exercise.

The DCC introduces the requirement for a Community Review Panel (CRP) during Stage 1 of the process. The table across pages 9-13 should confirm that a CRP is only required for schemes within the Old Kent Road Opportunity Area (OKR OA), as made clear later in the document. The table is currently unclear as to which schemes would warrant a CRP, as only described as "if required". Establishing, maintaining and engaging a CRP would be resource intensive so Developers would need to understand at an early stage if there is an expectation to work with a CRP outside of the OKR OA and if so, what the criteria is for requiring one.

Engagement Summary Template

We reiterate comments made above in relation to the outcomes of the Fact-based Audit and potential opportunities to share information.



We welcome the emphasis on social value under Part 5 of the document, however, it would be helpful to understand how each of the goals relate to planning policy. Under each goal or question posed, the table should cross-reference the relevant planning policy so that any Social Value Statement can clearly address how the aims of that policy are being met by the development proposal.

Summary

We trust our comments will be taken on board in progressing the changes to the SCI and DCC and we look forward to engaging further with you in the future.

Yours sincerely,

Freddie Broadhurst
British Land

SOUTHWARK LAW CENTRE

RESPONSE TO CONSULTATION ON 'STATEMENT OF COMMUNITY INVOLVEMENT' AND 'DEVELOPMENT CONSULTATION CHARTER'

Link to consultation: [Project: Statement of Community Involvement and Developm... | London Borough of Southwark](#)

Deadline: **19 February**

Statement of Community Involvement

- Page 7 table - has there been consideration about doing something other than a Site Notice, Neighbour Notification letter and/or Press Notice?
 - E.g. - email out, social media push, events, signs up at local public/community spaces?
- Page 8 table
 - Where an application departs from / does not accord with the development plan, suggest more is done (see above) - need for enhanced public input.
 - But is this not a flawed question? How will Council determine this from outset? And isn't basically every large development non-compliant to some extent?
 - Note typo in first box - should be "depart from" not "department"
- Page 8 - who qualifies as a neighbour - includes people who live or work within approx 100m *"or further where we think it is appropriate depending on the size of the development"*
 - Can there be some guidelines about when this will be increased?
 - There is a risk 100m becomes a default in each case - e.g. Borough Triangle (only increased because of community pushback, after some resistance)
 - E.g. if building about [10] storeys, above [X] sqm, or above [X] residential units
 - Appreciate they won't want it to be absolute, but rough guide would be helpful.
- Page 9 - *"We may encourage applicants to: Liaise with Tenants Resident Associations, Neighbourhood Forums, and local community groups"*
 - Suggest the Council actively gets in touch with any such affected groups, and turn this into a "will" where those groups confirm they would like to be consulted
- Page 9 - *"We will: Make planning applications and supporting documents available online on the planning register"*
 - Good opportunity to include express requirement to publish FVA once submitted
- Page 9 - once submitted - as above, consider alternative forms of publicity

- Page 9 - Where it sets out 21/30 day consultation period, it would be helpful to explain that consultation *may* (and often will) be longer for larger applications, and that this is only the statutory minimum period. This is a common source of confusion and stress.
 - Note there's a few places where this is mentioned, so please pick up across the docs.
 - Page 18 - this is slightly unclear - implies consultation will only ever be 21 or 28 days in exceptional circumstances
- Page 9 - "*Where appropriate, we will: Reconsult on an amended application for 14 days if there is a 'material' change to the original application*"
 - Suggest remove "where appropriate" - where the application is a material change, surely this should be a firm commitment to reconsult.
 - Clarify this will be from the date all relevant amendment documents are on the planning portal.
 - Restate commitment to publicising where it is a material amendment.
- Page 9 - "*When we make a decision We will: ... Monitor the developer consultation process as set out in the Development Consultation Charter*"
 - What does this mean exactly - what will be done at this stage once decision made?
- Page 11 - can the list of example material planning considerations include
 - "delivery of community benefits, including (where relevant) affordable housing",
 - "protection of small and independent businesses onsite",
 - "environmental impact",
 - "socioeconomic impacts on the local area"
 - [Anything else?]
- Page 12 - major planning applications: it would be helpful to give a brief explanation of what the Stage 1 and Stage 2 GLA referrals are about, and how people can give comments to GLA (including link where possible)
- Page 14 - this page should be updated to reflect DCC amendment that the Early Engagement Strategy will be made publicly available for residents and stakeholders to review prior to the submission of a planning application.
- Page 15 - consider further publicisation about plan-making - including events and notices in public/community spaces
- Page 16 - consider adding a line in first section: "*The Southwark Plan (2022) and the London Plan 2021 together form the 'development plan' for Southwark. Planning applications must be determined in accordance with planning applications unless material considerations indicate otherwise*" (or similar)

- Page 20 - I think this can more clearly explain the difference between a Neighbourhood Plan and Neighbourhood Development Order. Might also be worth clarifying that a Plan/NDO cannot *prevent* certain types of development.

Development Consultation Charter

- General comment: The requirements in the DCC must be clearly stated as requirements. The language in the document switches between saying what must happen, what is expected to happen, what is a requirement, and what is best practice. There must be clarity that the EES, ES and EINA must be produced (on time) and must meet minimum standards.
- Page 4 - *"At submission of planning application"*
 - *"Prepare and submit required [not typo here - currently "requried"] documents with planning application"* - confirm this includes FVA
 - *"If insufficient engagement, request developer undertakes further engagement"* - clarify engagement must be before validation of the planning application
- Page 5 - *"Who should developers engage with?"* - as per comment on SCI, the Council should initially notify the organisations listed (on large schemes), so that they can express interest. If they do express interest, the developer should *have to* engage with them at the pre-app stage. This would be in addition to the Developer having to do its own research and outreach.
- Page 5 - *"Council schemes"* - include *"Any gain or loss in community floorspace"*
- Page 6 - Suggest rewrite: *"If the Council takes the initial view that a scheme is broadly policy compliant, the requirement for an EES will be discussed..."*
- Page 6 - greatly welcome requirement for EES to be made publicly available for residents and stakeholders prior to submission.
 - What is the intended process for this? Where will it be made available, and how will people be made aware? Consider adding detail.
 - IMPORTANT: How far in advance can the community see the EES? It's important this is early on - the purpose of the EES is to ensure developers engage with residents/local stakeholders from the start of the development process. So surely it's important the approach can be scrutinise early on in the process?
- Page 6 - final para on EES - consider saying *"The EES should be submitted as a completed document on the planning portal when any planning application is submitted"* - this will explain different between this step and previous step.
- Page 6 - FBA: reference to *"local or independent businesses"* - suggest this is amended to mirror language of SP policies P32 and P33, i.e. *"small businesses, independent businesses or small shops"*

- Page 6 - FBA: reference to "*Sites of Community Importance*" - the specific wording risks giving the impression this is limited to *visual* interest. Consider clarifying this includes other community interest/importance.
- Page 7 - "Approach to Engagement" - consider building on these paragraphs to ensure the EES sets out what aspects of the scheme are intended to be "on the table" for each engagement activity (or perhaps what topics are not "on the table"). Often, the events will be vague, or communities will be told that key aspects of the proposals are already fixed / not relevant to that specific meeting. This often leads to frustration from participants, and the sense they're not being given any chance for meaningful input.
- Page 7 - EES: "*Refer to the EES template for the full list of audit expected*". Consider more firm wording here, that the developer must follow the EES format (or ensure that all of the substantive points are covered).
 - *Same applies for EINA and ES
- Page 7 - Engagement Summary - as above, the "summary of engagement activities undertaken" should include what topics were open for discussion during the session
- Page 7 - ES - following bullet should perhaps be written as more absolute statement about what stakeholders dislike: "*We expect to see a clear summary of what stakeholders not only liked, but importantly also what they disliked, and what further they would like to see as part of the development*". Usually the developer overlooks this aspect (unsurprisingly).
- Page 7 - ES - reference to 'You Said, We Did' format should be made stronger. It should make clear that all substantive comments received should be responded to. It should also clarify that it relates to this specific application, and it's not appropriate to refer to changes made from earlier designs from before the community comments were made.
 - E.g. - For the Aylesham Centre, many people commented how they thought the new scheme was too bulky. Berkeley relied on the fact they had reduced the height from the previous scheme - but this did not respond to the fact that the community comments were about the *new* scheme (i.e. were made even after that reduction had occurred).
- Para 7 - ES - final bullet on monitoring data: statistics should include numbers on how many of the total responses mentioned key issues. Often developers will understate the strength of response on certain issues, or use the fact there were a couple positive responses to suggest there was a "balanced" or "mixed" range of opinions, allowing them to basically ignore the stronger community view.
- Page 8 - EINA
 - "*Public Sector Equalities Duty (PSED) does not apply to developers*" - add express clarification that the ultimate decision of the Council (committee) is subject to PSED (I appreciate this is implicit in wording that follows, but potential for confusion).
 - Include acknowledgement that Southwark has elected in its constitution to treat socioeconomic status as a protected characteristic.

- *"An overview of the users of the site and the stakeholders within the decision-making process"* - this should include reference to those who live or work around the site and may be affected
- Section should draw on EHRC Technical Guidance on PSED, including the need to (1) look beyond general area demographics and assess the specific users of the site and their needs, (2) proactively reaching people that might not already be engaged or may be currently under-served and (3) understand the broad range of experience within each group under a protected characteristic. Currently, most EINAs are very generic, and don't take a site-specific approach - this leads to poor mitigation, sometimes even having the negative impact of homogenising certain groups.
 - I appreciate this is referenced in the EINA template, but think it should be alluded to in the actual SCI docs themselves
- Page 9 - requirement to display a notice: ensure consistency in approach with the SCI, which suggests a Neighbour Notification Letter will sometimes be used instead of a Site Notice.
- Page 9 - as with SCI comments, consider alternative modes of engagement.
- Page 11 - "Consider the Council's Climate Change Strategy and Movement Plan": this should be made more of a clear requirement to follow this plan. Merely requiring them to consider it becomes unenforceable and meaningless in practice. The Plan is already sufficiently caveated that this will not create an undue burden on the developer.
- Page 14 - appreciate you have removed ref to EES when you mention what will be monitored at the validation stage - we agree, but think there needs to be a new bullet point in relation to how the EES will be monitored - i.e. it is required early in pre-application discussions, and must be made public to stakeholders at that stage (as above, please include detail of how this will be expected to happen, with clarity on timeframe as far as possible).

EINA Template

- Page 1 - grateful for references from EHRC guidance, however:
 - References to "policy" are confusing - surely we mean a decision here? i.e. the decision to approve a planning application (and in the developer's case, the details of what goes in that application). Otherwise it may be unclear what is being referred to and what is required.
 - Reference to good evidence should refer to the need for *site-specific* evidence, not just general demographic data
- Page 2 - note formatting error - two overlapping boxes. *Please send the wording of the hidden text box for comment.
- Page 2 - Southwark Council must do more than *recommend* considering socio-economic analysis. It has formally confirmed in its constitution that it will consider socio-economic analysis as a protected characteristic. This means:

- It *must* be considered;
- It must be considered as a *standalone* protected characteristic, not just how it interplays with the other protected characteristics (although this intersectional analysis is also required).
- Page 3 - comment on socio-economic analysis above carries through to the table in Section 2: the right-hand part of the column (looking at how socio-economic impacts relate to each protected characteristic) but socio-economics should also have its own table.
- Page 3 - consider breaking the positives and negatives into their own columns. This will make it harder for developers to just fill the box with positives (which is common practice) - the empty negative box would be more stark.
- Page 4 - note slight formatting issue - Gender Reassignment heading is attached to previous table.
- General comment - the EINA table should include assessment of impacts on those who live / work / etc around the site, not just users. PSED requires an assessment of equalities impacts on all those affected, not just those who use the site. Often these can be some of the greatest impacts.

EES Template

- Page 1 - Consider providing more detail on what is intended for "stakeholder surveys" - what sort of questions you want to find out
- Page 2 - Local Economy and Community Infrastructure table - for impact on schools, consider including express reference to a *shortfall* of school places resulting from lack of family homes. The usual approach considers if there are enough school places, but the reality in most of Southwark is that school numbers are falling, in some part due to the lack of family housing, particularly *affordable* family housing.
- Page 3 - Local Businesses: it's crucial that the developer, Council and community agree on which businesses meet the definitions of "small shop" (SP policy P32), "small business" (P33) and "independent business" (P33).
 - This is incredibly important, because developers often overlook the fact that these terms each have a different definition and different requirements: i.e. while all of them are protected under P33, small shops have additional protection under P32 that requires retention on site and (where feasible) affordable space.
 - Consultation with these businesses should be happening as early as possible, and this consultation will not be effective (and may not happen at all) unless the full policy context applying to each business is understood.
 - It is incredibly difficult for us as a third party to get developers to engage with this point - it needs to be led by the Council and from the outset.

- For example, on the Aylesham centre, the developer has failed (and continues to fail) to identify certain small shops and small/independent businesses on site. This has led to great deal of stress and uncertainty for these businesses. Similarly on the Borough Triangle site, lots of Mercato traders have walked away because the situation is too precarious. Having this conversation expressly at the start would avoid this issue.
- Page 4 - engagement table
 - Consider including confirmation of what topics were discussed / what was "on the table". The reality is most of these events are too general in nature, and only a one-way stream of information. There is no opportunity for the community to even get a proper grasp of what is proposed, let alone meaningfully give their opinions or substantively shape proposals.
- Page 5 - this section on incorporating feedback is welcome, and I strongly encourage the Council to place greater emphasis on this. In practice we are seeing no evidence that these sessions are leading to any meaningful change to scheme design.

ES Template

- See comments above regarding table summarising engagement activities (i.e. Part 2 on Page 5). In particular, the ES should look back and give greater detail on what was discussed, and what the feedback was. It's important this is broken into each event: developers often summarise the entire series of events in one go, which allows them to brush over detail, or imply that each event had more meaningful engagement than it actually did. Often, it feels like developers hold lots of events, but at no point are the substantive points ever properly grappled with. These amendments would add a greater focus on the *quality* of each event in addition to quantity.
- Page 6 - Part 3: suggest making these sections larger, particularly "What elements of the scheme did stakeholders dislike?". This is a key section, which should give a detailed summary of community views. Currently developers often fail to put much detail into this section, and I think this is encouraged by how small the box is.
- Page 6 - Part 4 - You Said, We Did: see is arguably the most crucial section of the whole ES document. However, the reality is that developers fail to properly engage with the more challenging aspects of community feedback. Perhaps some stronger wording could be added here, along the lines of "*This section must include a detailed analysis of feedback received, especially negative feedback*". Consider adding a line that the ES will not be valid if it fails to include any fundamental issues, or issues raised extensively.
 - More importantly, we strongly encourage the Council to more heavily scrutinise this section, including reviewing other evidence of community feedback and querying why certain issues haven't been included here. Otherwise, there is nothing to stop the developer cherry-picking what to include.
 - As per comments on DCC, the 'We Did' must only refer to changes happening *after* the feedback was received. Any attempt by the developer to explain why

they have already designed the scheme to pick up these points should be resisted.

- It would be useful to require a summary of how many people raised a certain point - this would encourage developers to record data more robustly. Although, we are mindful that the developer may massage these figures - but it would at least give a better sense of the strength of feeling on each issue.
- Page 7 - Part 5 - Social Value:
 - We note that the amendments here make this section more prescriptive, following the goals of the Southwark 2030 strategy. We appreciate the alignment with Southwark's broader policy, and also appreciate that a more prescriptive approach will lead to more detailed answers. However, there is a risk here that the approach ends up overlooking key aspects of 'social value'. For example, the categories overlook:
 - Community and/or cultural space - what is being lost and what is being added, who it was/is for etc
 - Analysis of who the development will serve more generally - did a specific demographic previously use / enjoy the site, and will they still be able to?
 - How does the proposed scheme fit into the surrounding social context - does it support it, or offer something new?
 - What does the proposed scheme offer that gives it a unique social value - what distinguishes it from other schemes?
 - Social value here must be linked to the notion of "social purpose" from the Southwark Land Commission Report, and specifically the proposed Social Purpose of Land Framework? See attached SPN paper on this point. Ideally this should move beyond more limited / corporatised notions of social value.
 - This is the best opportunity to make good on this commitment in the Council's response to the Land Commission Report and work towards a Social Purpose of Land Framework.
 - A failure to link the two up will likely lead to the Framework never being established, or an awkward overlap between the two. We strongly encourage the Council to use this opportunity to progress the Framework.
 - The current approach boils social value down to more concrete, measurable statistics around homes, upskilling, design, climate measures etc. These are all crucial, but they are already measured and assessed in the planning process through planning policy. This section should seek to add something new, that isn't already being captured - the approach suggested above provides a more nuanced analysis of social context. We think that is what the DCC process should be for.

[REDACTED]

[REDACTED]

Subject: Consultation: Statement of Community Involvement (SCI) and Development Consultation Charter (DCC)

Dear LB Southwark,

Thank you for consulting the Environment Agency on the above consultation.

We can confirm that we have **no comments** on the Statement of Community Involvement (SCI), Development Consultation Charter (DCC) and supporting documents as submitted.

Please contact us if you have any questions.

Kind regards,

[REDACTED]

[REDACTED]

[Environment Agency](#) | Kent & South London | South London Sustainable Places team

[REDACTED]



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London Healthy Urban Development Unit

Planning Policy

[REDACTED]

19 February 2025

To whom it may concern,

Statement of Community Involvement and Development Consultation Charter: Minor Updates

This response has been prepared by the NHS Healthy Urban Development Unit (HUDU) in collaboration with the South East London Integrated Care Board (SEL ICB). It is acknowledged that a separate representation by Guy's and St Thomas' NHS Foundation Trust (GSTT) is being prepared.

The Guy's and St Thomas' Trust (GSTT) has forwarded to NHS HUDU and SEL ICB notice of consultation of minor amendments to the Southwark Statement of Community Involvement (SCI) and Development Consultation Charter (DCC). SEL ICB is the NHS body responsible for much of the planning and funding of health services and forms part of the South East London Integrated Care System, which is a partnership that brings together the organisations responsible for publicly funded health and care services in south east London. It includes the local NHS Trusts and Southwark Council. ICBs replaced the former clinical commissioning groups (CCGs) in 2022. It is requested that NHS HUDU and SEL ICB be added to the list of consultees for all engagement activities conducted by Southwark that either have an impact on health infrastructure or establish ways of working between the Borough and health stakeholders.

While the NHS is a statutory consultee in the plan-making process it does not have the same status in the planning application process. However, given the important role of health and wellbeing in residents' quality of life and in the Council's plans and strategies, we ask that the Council consults the NHS early on major developments and encourages developers to do the same.

NHS HUDU has reviewed the consultation material and is generally supportive of the minor updates which intend to make the planning and development rules clearer for both residents and applicants. It is acknowledged that this consultation relates only to the minor amendments to the SCI and DCC.

Southwark is fast-growing but also has significant levels of deprivation and inequality across the borough. The NHS raises concern over the omission of health bodies from this key element of the development plan for the borough. This is particularly important given that Health Impact Assessments are not a validation requirement for major planning applications.

Therefore, the NHS cannot be satisfied that health impacts are fully considered during the development process given that developers are neither asked to consult with health providers nor complete a health impact assessment.

The NHS appreciates that this update is an opportunity to set out clearly the expectation for engagement with the NHS particularly given that access to healthcare facilities and increased demand on existing healthcare services is a frequent community concern in development-related consultation. The DCC should be amended to include NHS service providers (HUDU, SEL ICB, etc.) under the section '*Who should developers engage with*'. Early engagement between developers and the NHS ensures not only that health is given due consideration in the early development process, but also allows the NHS to plan for future capacity in a more targeted manner.

The Statement of Community Involvement page 9 refers to consultation with relevant organisations. We ask that the NHS is included in the SCI as a relevant body for major schemes with pre-application engagement on schemes comprising 50 or more homes. NHS HUDU together with the SEL ICB can respond to proposals seeking input from providers as appropriate.

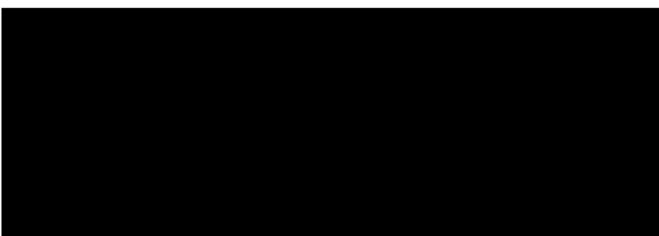
Similarly, the Early Engagement Strategy Template takes a limited view in defining engagement in relation to 'Local Economy and Community Infrastructure' – with only Schools and educational facilities, local businesses and sites of community importance listed as stakeholders. The SEL ICB, together with its partner organisations, play a key role in the local community, with many NHS facilities playing an anchor role in proving space for other community and social infrastructure providers. The Early Engagement Strategy Template should be expanded to include 'health facilities' with the NHS as a stakeholder to be consulted as part of early engagement.

With reference to the Engagement Summary template, questions relating to health and wellbeing of residents should be aligned to the known public health priorities within Southwark's statutory Joint Health and Wellbeing Strategy and/or Joint Strategic Needs Assessments. In addition, neighbourhood level (ward) health outcome data is also available from Fingertips, the national Public Health Profiles Database, and we recommend including reference to this in the list of data sources.

NHS HUDU emphasises the importance of embedding health and wellbeing into development planning and management to ensure accessible health services to all Londoners. The amendments requested in this submission will require health to be considered before major planning applications are submitted meaning that greater emphasis will be placed on health and wellbeing outcomes earlier in the development process. NHS HUDU is keen to work closely with Southwark Council going forward, in the implementation of the local plan and early opportunities to help shape future policies.

If you have any questions regarding this response, please contact me to discuss these.

Yours faithfully





LATIN ELEPHANT

Submission of Evidence

Social Value in Planning and Regeneration

Statement of Community Involvement and Development Consultation Charter
19 February 2025

INTRODUCTION

Latin Elephant is a registered charity based in Elephant and Castle. For the past 10 years, we have worked intimately with local independent traders — nearly all of whom are from racialised and migrant backgrounds, and who have been disproportionately and negatively impacted by development in the area — to fight the regeneration-led retail gentrification that is impacting our community. As a direct result of this state-led regeneration, which forced the expulsion of more than 3,000 of social housing tenants and leaseholders (traders' customers and extended community) from the Heygate Estate and in the closure of the Elephant and Castle Shopping Centre, the area has been over time stripped of much of its social value. Local migrant and racialised traders have been displaced, the local economy decimated and key social spaces erased.

In working collectively to combat this, Latin Elephant has built strong, trust-based relationships with the traders in the community. These important connections have allowed us to gain an intimate understanding of how our community has experienced development and 'regeneration'. Our submission is informed by this experience and knowledge.

Our submission is also supported by the extensive research we have conducted with the traders and others in the community, including [Southwark Law Centre](#) and [35% Campaign](#). The trust alluded to above is central to this research; without it, and without the active participation of traders in our work through knowledge sharing exercises, we would not have been able to produce the findings we have nor to engage as substantively with policy and practice over the last decade. Relevant examples of this research are addressed in greater detail below, and attached as an appendix to this submission.

Over the last year and a half, building on our long-standing recognition that our local experiences are part of more expansive, systemic challenges, we have concordently integrated a cross-London perspective into our daily work. We currently facilitate a coalition of nine community campaigns and organisations from across London. Each of these campaigns — Catford Against Social Cleansing, Fight the Tower (Brixton), Friends of Queen's Market, Friends of Shepherd's Bush Market, Plush SE16/No Price on Culture, Save

Ridley Road, Save Brick Lane, Ward's Corner Community Benefit Society/Save Latin Village — is also fighting local retail gentrification and the loss of important local, independent commercial spaces including railway arches and markets. These campaigns also recognise that each of these spaces serve more than just economic purposes: they are important sites of social connection, of cultural expression and celebration of solidarity and care. Relevant experiences and lived knowledge contributed by our coalition partners is also shared herein.

Our colleague, Sarah Goldzweig, spoke on 9 October 2024 at the London Assembly's Planning and Regeneration Committee meeting, and shared aspects of our organisational perspective, as well as thoughts from our coalition partners. We see this submission as a follow up to some of the discussion points raised during that meeting. We note that we've also spoken in front of Southwark's Planning and Regeneration Committee meeting about related issues in the past as well.

This submission addresses the 'Social Value' section of the Engagement Summary. It includes our responses in the form of questions, as well as some additional thoughts and concerns which we think are important to consider in future discussion of social value, both of markets and arches as well as other spaces in the Borough.

CALL FOR EVIDENCE QUESTIONS

(1) WHAT DOES 'SOCIAL VALUE' MEAN TO US?

Southwark Planning Network (SPN), in a follow-up to the Southwark Land Commission Report, have offered '[Proposals for Social Purpose of Land Framework](#)',¹ in which they share a clear and expansive definition of 'social value', which highlights some of the limitations of existing definitions. We have shared excerpts from this document below, but encourage more substantial engagement with the ideas therein.

SPN asserts (and we agree) that:

[1.2] Often, notions of "social value" (or similar terms) have failed to step outside of the prevailing market-oriented approach to land and the planning decision-making process'. For example, developers often demonstrate social value, measured in monetary terms, using the so-called "QALY" approach (quality-adjusted life year). This is a metric used in health economics / public health decision-making that tries to capture the benefit of an action in terms of quality and length of life. While this might be appropriate in a health context (including assessing health impacts of a development), it is clearly an inappropriate metric when considering the social purpose of a development as a whole... this approach fails to grasp notions of community cohesion and gentrification. It also fails to fully meet the public sector equality duty and the need to have due regard to the impacts on those with protected characteristics (which in Southwark must include socioeconomic status). Thirdly, to quantify social value in monetary terms and to talk about the "price" of something is

¹ In particular, see sections 1.2-1.5.

already to use a transactional, market-oriented approach that unduly restricts the scope of what can be considered. Accordingly, it is clear that an alternative approach is required.

Highlighting the strength of the existing definition of “social value” in the [GLA Characterisation and Growth Strategy LPG](#), which attempts to incorporate “the tangible and less tangible cultural and social characteristics and landscape that contribute to a sense of place”. Likewise, we feel like this is a great place to start. We are especially supportive of the inclusion of the following components (listed within the LPG, and in section 1.3 of [linked document](#)):

- *Intangible assets – presence of positive intangible characteristics that make a place unique or distinctive, and that foster a sense of belonging and identity.*
- *Cultural assets – presence and significance of attributes, spaces and activities that celebrate a place's artistic, historic, cultural and creative character.*
- *Community assets – presence and significance of highly valued community uses, spaces, services or infrastructure that meet the needs of the local community (such as pubs, community centres and public spaces).*
- *Need and deficiency – a place with a wide range of economic opportunities, where the benefits of economic success are shared equitably.*
- *Town centres and high streets – presence of a vibrant town centre or high street that provides varied economic, civic and cultural offers throughout the day and night.*

With that being said, we argue that any definition **must** also include intentional reference to spaces which serve racialised and migrant communities and diverse working class communities, in particular. Any definition of social value which does not seek to ameliorate the disproportionately negative impact of regeneration and development on such communities and the spaces they feel are important is inadequate.

We propose this in addition to concerns highlighted by Southwark Planning Network in its Proposals (copied below for ease; see also, section 1.4 in [linked document](#)):

- *Places that foster a sense of pride or strong emotional response from the community.*
- *Organisations and businesses that demonstrate a commitment and dedication to the local community.*
- *Places run by people with an organic rapport with the community – they may themselves be part of the community outside of their business.*
- *Places that the community will journey to, even from far away or if there are similar services closer by.*
- *Places that offer services and benefits beyond traditional market transactions – places offering something “extra”, often at no additional cost. For example, people may be able to experience or benefit from the place without having to spend money; a place where people can come to simply be there.*

We also want to highlight contributions from this [Proposal](#) which address not only establishing what social value exists in a given place, but also what the impact of losing such social value might be (see section 1.5). Any suitable definition or policy must consider:

...how a proposed development might have negative aspects from a social purpose perspective. This flipside of considering social purpose/value has traditionally been overlooked, but is essential to fully considering social purpose. This must include weighing up the loss of social purpose that will (or might) result from a development.

This section speaks to a topic which has been raised, repeatedly, by coalition members: that social value, once lost, cannot be recovered. This characteristic is at risk of being hidden by definitions which solely assign quantitative value to 'social value', and which provide opportunities for 'net' calculations. Spaces with social value have such value because they provide something to the existing community, which is built up over years through lasting and meaningful interpersonal relationships and opportunities for organic cultural expression. This is not just facilitated by the existence of a specific 'space', but by the activities and histories which are able to play out within that given space.

Furthermore, we argue that the following conditions must be met in any definition of 'social value':

1. Social value must be contextually-specific and locally-defined and grounded. By this, we mean that communities are, themselves, able to define what is important to them. Social value must be bottom-up and informed by the grassroots. It cannot be determined by developers and those with vested financial interests and profit motives, resting on specific definitions of the social value of/within a given space. Notably, this cannot be done through existing tick-box forms of consultation. Hyper-local contextualisation is necessary for avoiding further marginalisation of already-impacted communities, increased inequality and failure to protect local economies.
2. As a member in our coalition has emphasised, there is an important aspect of social value which is intangible. This organic and underecognised component is absent from existing calculations and definitions and, thus, often excluded from consideration. Yet, communities have been adamant about its existence. Some of this intangibility speaks to '**belonging**' as an important aspect of social value, and one which is challenging to quantify, but which can still be understood. In fact, we want to highlight '**belonging**' as a key component of 'social value' which must be included in any attempt at defining it. We feel that the documentaries Élefan (2022) and The Palace (2021) – both linked in the Appendix section of this submission — highlight this aspect brilliantly. Respectively, they demonstrate the importance of Latin American businesses and the former Palace Bingo Hall to the diverse working class Elephant and Castle community, and the devastation that their loss or the threat of their loss has had. We propose that these documentaries be considered as part of this evidence gathering process.

(2) HOW SHOULD SOCIAL VALUE BE MEASURED, PARTICULARLY IN RELATION TO MARKET TRADERS AND ARCH-BASED BUSINESSES?

Importantly, however it is determined, value should be measured in a culturally sensitive, holistic and contextually-aware way. This is especially important in London, where '[46.2%](#) of

residents identify as Asian, black, mixed or “other” ethnic groups, and a further 17.0% with white ethnic minorities’ and where [over 300](#) languages are spoken.

Which communities are served by these businesses, not just in terms of the products and services they are providing but in their provision of spaces for people to come together around their shared cultures and experiences, in which emerge sites of informal but life-saving community networks? What needs do these communities have which are met by the infrastructure of these ‘commercial’ spaces, and which are not being met elsewhere?

Businesses and traders are often part of communities for years, and create and sustain trust with the members of these communities. This is reflected in deeper connections of care between community members, and even in close friendships, ultimately supporting wider networks of support which are often strengthened by shared lived experiences. This is especially important in migrant and racialised communities, where members have faced similar challenges. Ultimately, markets and small businesses contribute to an ecosystem that sustains community wellbeing. This is all in addition to the services and goods they provide, which meet the needs of diverse working class communities; other retail spaces do not meet the needs of working class Londoners in these ways.

We’d like to call attention here to some of our findings in King et al. (2017). One (now former) Shopping Centre trader shared that, *‘There is a retired builder that passes here every day. The other day he didn’t and I phoned him. We went to his house, and he needed help. He spent one week in intensive care.’*

Another trader explained about their restaurant: *‘We are not just a food place. We are an information point. People come here and ask for a doctor or a bank. Some people even ask about other restaurants! It is kind of sad because if we moved to other places people may see it more difficult to come in.’*

What both these traders identify is that the role of their business within the larger community ecosystem is far more significant than just their profitability and economic turnover. Rather, these businesses provide necessary and even life-saving support to the wider community. This is *in addition* to their contributions to the local economy. Small businesses are widely recognised as keeping money and investment local, supporting circular economies and employing local people. Small and medium enterprises (SMEs) contribute on a national scale as well: in 2015, it was found that the 300,000 BAME-led SMEs in the UK were estimated to contribute a GVA of £30 billion (figure from Department for Business, Innovation and Skills, 2015).

We propose that the loss of these spaces has rebound effects that impact health (mental, physical, community), housing and employment outcomes, to name a few. This is significantly representative of their social value.

Furthermore, the loss of these spaces need to be measured not in terms of quantifiable indicators, but those affective ways in which such spaces contribute to community wellbeing. We argue that, when measuring social value, what is there and what will be lost is equally important.

With this in mind, we want to raise concerns about who is determining what is ‘valuable’: Is it the businesses and communities, collectively and individually, themselves? Or, is this being determined by outsiders (e.g., developers) who are unaware of the inner workings of these spaces and the unique needs of individual communities, and/or who are financially-incentivised to ignore them?

Quantification of value runs the risk of leaving out unanticipated or unfamiliar aspects of a given space. It also runs the risk of co-optation, in that it opens up the possibility of framing ‘social value’ contribution as a net equation, which can be manipulated as long as developers claim to be contributing more than they are demolishing and ‘replacing’. But this does not address issues of who is served by the spaces that contribute social value, or which of their needs are being met. Developers, proposing that they are contributing a total ‘greater’ amount of social value than existed prior, can justify the erasure of existing social value. Quantification in this way can obfuscate what is lost in favour of what is allegedly being added. This is particularly concerning in the context of markets and arches and other retail spaces which provide significant ‘hidden’ value, but which may not fulfil common perceptions of ‘social value’.

(3) WHAT SPECIFIC CHALLENGES DO MARKET TRADERS AND ARCH-BASED BUSINESSES FACE IN LONDON TODAY? HOW DOES THIS IMPACT THE ABILITY OF TRADERS AND ARCH-BASED BUSINESSES TO DELIVER ‘SOCIAL VALUE’ TO LOCAL COMMUNITIES?

1. **Lack of affordable retail space:** Across London, there is a dearth of affordable retail space. This is particularly true in those parts of London which are designated as Opportunity Areas or which are undergoing state-led/sanctioned regeneration. There was so little affordable retail space in Elephant and Castle, for example, that Southwark Council had to convert (arguably, unsuccessfully) a residential garage into retail space for displaced shopping centre traders in order to accommodate need. Despite doing so, and despite leasing land to Delancey/Get Living/Elephant and Castle Co. Ltd. to create a temporary retail area (Castle Square), around half of the shopping centre traders ‘eligible’ for relocation [remain un-relocated](#).²

We see the lack of affordable workspace as part of a much larger phenomenon: In a 2017 [report](#), we recognise that, ‘the loss of affordable and independent retail space is situated in the wider national context of a significant shift in the growth of small-scale self-employment over the period from 2001 to 2017, in which independent retail is key’. These businesses are also at the centre of developing an understanding of social value for a number of reasons. As evidenced in the report, ‘the disappearance of affordable workspace jeopardises the productive fabric of central London and precludes possibilities of a wider range of innovation and job creation’. These spaces are ‘crucial economic and social anchor[s] for comparatively low-entry retail and service activities’ and, in particular, meet the needs of racialised communities. All traders interviewed for this report also revealed that each consistently ‘went beyond their ‘formal’ role by offering various forms of support and care to local residents.’

² See also this [map](#) by Latin Elephant.

2. Relatedly, rent increases under 'market value':

More and more, Planning applications by developers, Council Officers' reports and considerations, and Mayor of London recommendations on local planning applications include the 'market value' reference to determine how much each square foot is worth in a specific 'opportunity area'. We have witnessed at Elephant and Castle's plans for redevelopment that these figures under 'market value' can be overestimated by as much as 40% the real area's value (per square footage)³.

The term was designed in such a vague way leaving developers in a strong position to determine how much monetary value an area has, with no room for SMEs nor local authorities or the GLA to contribute to a fairer definition, or establish new definitions for a quantifiable unit which can include or exclude certain SMEs simply by overestimating the area's value.

3. Lack of lease protections: Lack of lease protections (including lack of protected leases) has emerged as a pressing issue in Elephant and Castle, and has also been raised by our coalition members. As one of our coalition partners from Shepherd's Bush has pointed out, protected leases with all the stipulations of the 1954 act are necessary for protecting the diverse and affordable character of markets and less gentrified retail. In addition, businesses in Elephant and Castle that were relocated as part of development and regeneration receive leases that are highly anti-tenant, and which severely restrict their rights and access to recourse. This puts them at a distinct disadvantage, and has made their collective efforts at securing improved treatment much more difficult.

As a result of vague leases that put landlords in advantage, we've witnessed an increased need for commercial property advice for small businesses to help them navigate complicated language, and a lack of specificity in contracts where usually traders are given very little to no option on how to hold landlords accountable. Consequently, when seeking this advice we have also seen a lack of commercial legal resources available to traders. Our experiences over the last decade have revealed a lack of *affordable* or *pro bono* commercial lease support. Traders are rarely made aware of their rights; in the instances that they are, there is little effort to ensure comprehension. This is particularly an issue given language barriers and, we argue, is thus also representative of a larger equalities issue. This argument was strong enough that in a recent CPO process in Elephant and Castle, Southwark Council and Elephant and Castle Co. Ltd (developer) acquiesced to Latin Elephant and traders' demands that arch traders impacted by the CPO be provided information about the CPO in Spanish, and that traders be provided a Spanish translator/interpreter to help them navigate the CPO process.

The lack of legal support has also become apparent as traders are attempting to negotiate heads of terms for new leases following their relocation. We have seen ongoing challenges — including uneven power dynamics — impacting traders working out of different London markets and arch sites, including in Elephant and

³ See Southwark Planning Sub-Committee B on 'Castle Square' Application, December 2018
https://www.youtube.com/watch?app=desktop&v=YiRsaPRmKHI&ab_channel=LondonSE1

Castle, Shepherd's Bush and Ridley Road.

4. **Racialised vulnerability to regeneration schemes:** As Latin Elephant has repeatedly addressed, Opportunity Area designations (and the consequences of resulting development) disproportionately negatively impact racialised communities, migrant communities and other diverse working class communities. As we recognise in a report by Román-Velázquez and Hill ([2016, p. 6](#)), 'regeneration schemes in London are taking place in deprived boroughs where there is a high proportion of diverse ethnic populations, thus minority groups and MEB's are disproportionately affected by these schemes'. Retail gentrification, which is consistently connected to such Opportunity Area intensive development, thus impacts communities with similar prejudice.

Elephant and Castle is known for its unique utilisation of arch space, in which traders self-divide up the space and cluster multiple businesses. This was recognised by Theatrum Mundi as a key characteristic of cultural infrastructure in the area, and what they termed an urban backstage, or 'the hidden spaces where cultural production, experimentation and rehearsals take place and the underlying conditions that underpin these activities'. [Karimnia et al.](#) (2020) write:

While local authorities have determined the arches suitable for commerce and retail, the fact remains that they are culturally idiomatic forms derived from the home countries of the migrants, and require more attention in classification. Activities such as food, arts and crafts are, as local activist and scholar Patricia Román-Velázquez describe: 'extremely important and defining elements of any culture, which bring communities together and attract others to join in and understand more'.

The authors also acknowledge that the arches — including those along Maldonado Walk — have been directly impacted by the demolition of the Heygate Estate. One can only assume that the subsequent demolition of the shopping centre compounded these consequences. They recognise that this demolition, and the displacement that was central to its implementation, fragmented 'hard-won social and economic relationships' thus impacting the stability and success of not only the businesses in the arches, but the communities that have emerged through and around them.

Such creative uses of space are not unique to Elephant and Castle. Across the city, there are culturally-mediated forms of business organisation taking place, which should be protected because they support local economic activity and local cultural needs. Importantly, some of these uses of space may not be strictly in compliance with certain regulations or 'expected'; yet, the importance these spaces serve for communities should, arguably, outweigh strict limitations on use.

5. **Developer-Landlord intimidation and conflicting interests:** The imbalances in access to expertise and resources described above become especially apparent in the situations where developers become landlords. This has been an acute issue in Elephant and Castle where traders are afraid to make complaints in case doing so will impact their future relocation. A conflict of interest in this developer/landlord

overlap has emerged in the Elephant and Castle context: the developer is obliged by S106 terms to give priority to displaced traders applying for affordable retail units in the new development (a measure designed to mitigate the disproportionately negative impact of the scheme on long-term MEBs). However, the S106 also contains clauses that give the developer discretion to design the eligibility criteria for this application process. As a result, the developer serves to benefit from creating conditions as a landlord at temporary retail sites that weaken the financial and reputational position of businesses they lease to. A business with rent arrears and low turnover is likely to be excluded from accessing an affordable retail unit in the new development on these grounds (regardless of the conditions that created or exacerbated this financial precarity). There is a strong risk that the developer will use this reasoning to discharge their responsibility to provide affordable retail to displaced MEBs, and charge at market rent to new bigger businesses.

6. De-Clustering of businesses during relocation processes:

The relocation plans should consider the value of how businesses and services work as clusters not simply as single entities. Clusters of specialist activities have been credited by The Mayor in the New London Plan (2017) however areas such as Elephant and Castle were not included, disregarding the importance of these spaces while also falling short in capturing the impact of de-clustering and how the latter has a direct effect on the loss of social value.

(4) TO WHAT EXTENT DO THE PLANNING AND REGENERATION POLICIES OF LOCAL AUTHORITIES SUPPORT MARKET TRADER AND ARCH-BASED BUSINESSES?

Planning and Regeneration policies at the local authority level do **not** support market traders and arch-based businesses. In fact, we argue that the existence of so many community campaigns, from multiple boroughs across London, each of which is fighting against retail gentrification and displacement, is evidence of this. This is especially true in boroughs where there are significant Opportunity Areas, and where speculative development and property investment remains a strong motivator for local authority decision-making processes.

Additionally, there is plenty of evidence of Cabinet members, local councillors and other planning officers who leave their positions at local Councils (e.g., Southwark Council) to work for developers, taking with them their inside, privileged knowledge which they then use to advise developers on future planning applications. Knowing that these jobs await them, there is little incentive for local authorities to demand the most from developers, and to hold them to their promises. We see this in vague, ineffective and weak enforcement of supposed scrutiny and accountability mechanisms including section 106 agreements. This is a clear conflict of interest which remains unresolved within planning and regeneration policies.

(5) HOW COULD THE DEVELOPMENT CONSULTATION CHARTER BETTER SUPPORT COUNCIL-RUN MARKETS AND ARCH-BASED BUSINESSES THAT DELIVER HIGH SOCIAL VALUE?

1. Improving the way consultations are done, so that they are truly inclusive and not tick-box exercises that compound existing distrust of government. Businesses and communities should both have a say in how development is actually carried out, but this should come with clear explanations of rights and possible outcomes and challenges. Successful consultation requires community engagement at *all* points of the planning process: from inception to implementation and management of spaces. This might be done via consistent forums. Additionally, greater power should be attributed to neighbourhood plans and people's plans.
2. Consultations should be made accessible to full-time workers, carers and others who might otherwise find it difficult to attend consultations (e.g., through provision of childcare, scheduling for after-work hours, hybrid meetings). Consultations should take place in community languages, and all materials should be translated.
Partnering with community members on surveys of existing social value, which are carried out over long periods of time to ensure inclusion, accuracy, and mass participation. Also, there should be consideration on compensating constituents' for their time, so that there's a more active consultation during the planning process.
3. Addressing language justice issues, for example by translating all planning documents into community languages, holding consultations in community languages and always having a translator present for any engagement with community members.
4. Replacing unaffordable 80% market rental units with the London Living Rent.
5. Adhering more strongly to existing policy, strengthening of existing protective frameworks and scrutiny over application (e.g. EIAs, s106 agreements).
6. Legislating the burdens of proof should *always* fall on the developer and not on the community. If a developer wants to do something, they must evidence their argument, and provide clear plans for how they will remain accountable to communities even after planning permission has been granted. Community opposition should not have to fight an uphill battle against developers whose profit-seeking consistently leads to local displacement. Developers should be responsible for losses, including those which are unanticipated and experienced after planning permission is granted.
7. Ensuring that 'social value' is not being used to justify development and appease local authorities while it is still impacting communities. This is the inevitable consequence of co-option of 'social value' by developers, and means that using 'social value' in policy will still result in considerable harm. 'Social value' cannot be turned into a tick-box.
8. Building stronger scrutiny mechanisms into the planning system, to ensure that communities can continue to advocate for themselves and experience

leverage even after the approval of any planning applications. This will also ensure that there are avenues for recourse for unanticipated losses and challenges.

APPENDIX // WORKS CITED

Alvarez, N., Andrews, B., Lung-Amam, W., & June-Friesen, K. (2024). *Small Business Anti-Displacement Toolkit: A Guide for Small Business Advocates*. Small Business Anti-Displacement Network.
<https://antidisplacement.org/wp-content/uploads/2024/07/2024-SBAN-Toolkit-FINAL-1.pdf>

CommonWealth. (2023). *Social Value Index: Building the Case for the Democratic Commons in Tottenham*.
<https://www.common-wealth.org/publications/social-value-index-building-the-case-for-the-democratic-commons-in-tottenham>

Diaz, D. (Director). (2022). *Élefán* [Short film]. CiNEOLA.
 [ÉLEFAN: Latino London documentary \(by Daniel Díaz\)](#)

Goldzweig, S., Machado López, M., Román-Velázquez, P., Peluffo Soneyra, S., Perez, N., & Wall, S. (2023). *Migrant and ethnic economies in times of crisis: Displacement, Brexit, Covid and Cost of Living*. Latin Elephant.
<https://latinelephant.org/migrant-and-ethnic-economies-in-times-of-crisis-new-report/>

Karimnia, E., Kostourou, F., Chua, C., Cetrulo, A., Bingham-Hall, J., & Tribillon, J. (2020). *Urban Backstages: Fieldwork Journal #1: London*. Theatrum Mundi.
<https://theatrum-mundi.org/library/urbanbackstages-londonfieldwork/#book-reader/29>

King, J., Hall, S., Román-Velázquez, P., Fernandez, A., Mallins, J., Peluffo-Soneyra, S., & Perez, N. (2017). *Socio-economic value at the Elephant and Castle*. Latin Elephant, Loughborough University London, & London School of Economics.
https://eprints.lse.ac.uk/90160/1/Hall_socio-economic-value.pdf

London Prosperity Board research, see:

- <https://londonprosperityboard.org/communities-rethinking-prosperity>
- <https://seriouslydifferent.org/igp-stories/rethinking-prosperity-uks-first-longitudinal-study-of-prosperity-based-on-community-led-research>
- <https://londonprosperityboard.org/stories-home>
- <https://londonprosperityboard.org/stories-about>

Multiple authors. *Shopping Centre Stories, My Elephant Story* [Local history archive]. Latin Elephant
<https://myelephantstory.latinelephant.org/stories/>

Prichard, J. (Director; Producer). (2021). *The Palace* [Short film]. <https://www.joprichard.com/>

Southwark Planning Network. (2024). *Follow-up to Southwark Land Commission Report: Proposals for Social Purpose of Land Framework*.
<https://docs.google.com/document/d/1vgoouWzotLvfrtLJWtdnr2N1wrrwnl6D/edit>

Velazquez-Roman, P. & Hill, N. (2016). *The Case for London's Latin Quarter: Retention, Growth and Sustainability*. Latin Elephant.
<https://latinelephant.org/wp-content/uploads/2015/03/The-Case-for-Londons-Latin-Quarter-WEB-FINAL.pdf>

Vormittag, L. & Latin Elephant. *Walking the/Recorriendo Elephant*.
<https://latinelephant.org/walkingtheelephant/>

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