

APPENDIX 1**Response to Scrutiny Review of Regeneration in the borough of Southwark**

Recommendation	Response
1. The Council should review its consultation procedures for major regeneration projects. The review should take on board the following aspects:	
(i) Ensure before embarking on any regeneration exercise an audit of the current situation in a given locality as contained in the Council's Development Charter of the provision services, amenities, housing, transport, businesses, schools, GP surgeries, etc. This audit should be compiled and agreed with local community groups, tenants and residents associations, businesses and potential developers, and then incorporated into a Supplementary Planning Document (SPD).	The council has adopted this approach through its Southwark Plan process. The Plan has assessed the implications of growth for public services including that generated from individual housing/regeneration schemes. Policies and proposals to support public transport, health and community facilities etc which are needed to support growth are included in the plan. All such documents are subject to consultation with residents.
(ii) Specifically the Council should be mindful and include at all times, the given needs of a locality, particularly in terms of the 9 protected characteristics in reducing inequalities and meeting housing need, and the impact a given scheme would have on the local residents sense of belonging and pride of place in an area.	The council has had regard to its Public Sector Equalities Duty when considering regeneration, housing and other development projects and will continue to do so. Policy SP2 in the Southwark Plan, "Southwark Together", requires that developments are designed for the diverse communities in Southwark, including all principles of the Southwark Stands Together initiative and to ensure accessibility, inclusivity, and interaction, regardless of disability, age, race, religion or belief, sex, sexual orientation, pregnancy and maternity, marriage or civil partnership or gender, and allow all to participate equally, confidently and independently in everyday activities.
(iii) Evolve a Community Consultation Framework similar to the Lambeth Council model and incorporating the Council's own initiatives such as the Local	The Council has already adopted a Statement of Community Involvement. It was consulted on in 2019 and again from 14 December 2021 to 23 March 2022. We are

Development Study in Camberwell, to enable local residents, tenants and residents associations, businesses and community groups to comment on identifying concerns with a masterplan in terms of design, content or omission

currently preparing the final version based on feedback we received earlier this year.

The Draft Southwark Statement of Community Involvement (SCI) takes a unique approach to public participation which focuses on transparency and accountability. Most notably, the SCI introduces a document called the Development Consultation Charter (DCC) which requires developers to provide evidence, throughout the planning application process, that demonstrates how they have consulted with local stakeholders. This evidence is listed as a validation requirement for any major applications and Council owned schemes. This allows planning officers to assess the extent to which developers have undertaken meaningful engagement with the local community and push back where necessary to require further consultation. In comparison, the Lambeth Statement of Community Involvement (adopted in October 2020) outlines some 'potential engagement methods' that it encourages developers to use. However, it does not include any explicit requirements for developers beyond what is required in statute. Therefore, the Southwark SCI and DCC set a benchmark for engagement with planning in the borough that goes beyond the traditional scope of an SCI which performs a statutory function in educating local residents about how to engage with planning.

[Statement of Community Involvement - Southwark Council](#)

(iv)Creating on-going consultative forums through the life of a regeneration project and the passed programming of works such as the Community Review Panel model on the Old Kent Road regeneration scheme.

The council has established different types of consultative forums over a number of years to support large area based schemes. The council will continue to do this where applicable in the future. For example discussions are taking place to establish a consultative forum for the Aylesham redevelopment. The type of forum and specific remit will be dependent on the type of scheme and other local circumstances

	and should therefore be agreed on a case by case basis.
2. The Council should continue to develop town centre based regeneration plans for the main centres of Bermondsey, Borough, Camberwell, Dulwich, Peckham, Rotherhithe and Walworth that are regularly reviewed and recalibrated.	Town centre plans are in the process of being developed as part of the Council's delivery plan. The initial focus is on Peckham which is a council priority but it is expected that this approach will then be applied to other town centres as resources allow.
3. In the implementation of regeneration schemes the Council should seek to adopt the following measures as good practice:	
(i) Be transparent and clear as to the objectives of the project in terms of the potential in realising residents and businesses aspirations for the locality and the Council's own preferred outcomes	<p>The council recognises that this is a key principle that should underpin all our consultation with residents. Planning and cabinet reports are already published in advance of meetings. Our Southwark Plan was adopted following extensive consultation and was subject to an independent examination in public at which residents could make representations.</p> <p>We are actively opening up the planning process to our residents and placing more information on line including digital forms of consultation, and reporting on planning application monitoring as well as monitoring affordable housing delivery.</p> <p>Monitoring affordable housing delivery - Southwark Council</p>
(ii) To promote the benefits of regeneration to a locality with the aim of evolving more integrated and sustainable communities in terms of good quality housing, job creation, apprenticeships, boosting the local economy, provision and improvement of local amenities (such as open spaces, green parks and trees, GP surgeries, schools, libraries, etc.), creating more socially diverse communities, improved educational attainment and facilities, increased community safety.	The council fully agrees with this recommendation. The objective underpins our policies in the Southwark Plan, Council delivery plan and how we approach the allocation of CiL. For example in the first round of local CiL we allocated £6.5m to a range of projects including investment to improve community facilities [Surrey Quay's Farms], parks [Leathermarket] , and public realm.
(iii) Ensure that the liaison and communication with developers is	Our planning service endeavours to make the application process as efficient as is

<p>maintained at all times and that the resultant planning applications are dealt with in an energised and timely manner.</p>	<p>practical. Inevitably however there can be resource challenges which may impact on the speed of delivery. We now require Pre application agreements with developers to ensure resource plans are in place for complex schemes. It will inevitably remain the case that applications which comply with the full range of policies the council has adopted will make more rapid process through the system than those which don't and therefore require more negotiation.</p>
<p>(iv) That the allocation of Section 106/CiL funds be transparent and linked to the long-term benefits of communities and meeting their needs across the locality.</p>	<p>The Southwark Plan includes policies for the use of s106 to mitigate the impacts of development on our residents. Cabinet will shortly be asked to consider a report on the priorities for the allocation of CIL.</p> <p>The S106 and CIL SPD provides more detail and this will be updated following the adoption of the Southwark Plan to give further guidance.</p>
<p>(v) The Council should provide a dedicated team linking all relevant services for each major regeneration scheme to ensure smooth progress and increased speed of delivery, together with more planning lawyers and highways staff to cover increased volumes of work.</p>	<p>We have recently completed an internal reorganisation to create dedicated delivery teams to continue to deliver the council's housing and regeneration programmes. These are supplemented by cross departmental project boards to increase coordination where appropriate.</p>
<p>4. Strategically the Council should seek to establish the following:</p>	
<p>(i) Publish annually income levels across the borough's population, the sales and rent levels across the borough and the discrepancy between them.</p>	<p>The Southwark Plan includes information on this from 2018.</p> <p>The council housing department reports on private rents and sales prices as part it's market trend bulletin. We occasionally source information on income levels from external specialist organisations at a cost when this is required for specific policy work such as Strategic Housing market Assessment work</p>
<p>(ii) A review of the affordable housing policy with a view to increasing the level of affordable housing in regeneration schemes to 50% (whilst retaining the social housing element of the council's affordable housing policy).</p>	<p>Policy SP1 of the Southwark Plan has a strategic target of 50% affordable homes which is consistent with the London Plan.</p> <p>The Plan will continue to support delivery by the public and private sectors of one of the highest levels of new homes nationally in Southwark.</p>

	<p>As set out in the Southwark Plan currently in Southwark development by the public and private sectors is producing on average around 42% affordable housing. This equates to 9,200 gross new affordable homes and 6,416 net affordable homes between 2004-2019.</p> <p>The London Plan includes a requirement for 50% affordable homes on public land. Where existing estates are being developed there is a further requirement to replace affordable housing with the equivalent sq.m of new affordable accommodation.</p> <p>We will seek to meet the SP1 target of 50% affordable homes through a combination of the following;</p> <ol style="list-style-type: none"> a. Policy compliant private sector developments [35% affordable of which 25% social rent and 10% intermediate] b. Through new council homes delivery programme on public land. c. RSL development which often exceed the minimum 35% policy requirement. d. Encouraging developers to exceed 35% social rented and intermediate homes delivery. To facilitate this we have introduced a fast track policy for development which provides 40% social rented and intermediate housing, with a policy compliant tenure mix, (a minimum of 25% social rented and a minimum of 10% intermediate housing) with no grant subsidy. Where developments follow the fast track route they will not be subject to a viability appraisal.
<p>(iii)Embody the core principles of recycling and reuse in all regeneration plans in line with meeting the Council's own objectives concerning climate change and sustainability. This investigation should focus on how to long-term fix many housing disrepair issues in existing stock in order to make</p>	<p>The Southwark Plan 2022 Policy P70 (Energy) and Policy P62 (Reducing waste) sets out requirements for all major development that is referable to the Mayor to submit a Whole Life Cycle Carbon Assessment and Circular Economy Statements following the GLA's London Plan Guidance. These documents together assess the embodied carbon in existing</p>

<p>conditions more suitable for tenants to stay in their properties.</p>	<p>structures and materials, and assess sustainable approaches. The Circular Economy Statement provides more detail on the recycling and reuse strategy for the materials on site. The reduction and proper management of waste to reduce carbon emissions is crucial for mitigating against climate change. An Environment and Climate Change Supplementary Planning Document (SPD) to give further guidance is currently being scoped out and prepared. The case for retention or redevelopment of a block/estate would need to be assessed on a case by case basis having regard to policy at the time and the outcome of the assessment together with the financial implications would inform the recommendations in a report to cabinet.</p>
<p>(iv) Spell out the financial cost/benefit analysis of any given regeneration scheme, not only concerning the loss of homes/businesses and number of replacement homes/businesses, but also that the viability tests reflect the true increase in land value over time.</p>	<p>The council's delivery plan includes a commitment to establish a Land Commission [LC]. It is recommended that the LC consider this matter and make recommendations as appropriate.</p>
<p>(v) Undertake a cost benefit analysis that evaluates the opportunity area policies, and looks specifically at the comparison between large private sector opportunity projects being delivered, and longer term slower, but local authority driven projects being delivered. This piece of work be brought back through the scrutiny function once it is completed.</p>	<p>The London Plan designates 4 Opportunity Areas [OA's] in Southwark – Borough, Bankside and London Bridge, Old Kent Road, Elephant and Castle and Canada Water. All 4 are also in the Southwark Plan and on Southwark Maps – the Southwark Plan has Area Visions for each area.</p> <p>OA's are identified as areas of growth in new homes and jobs. They require the development of both public and private land. OA's also require significant investment in Public Transport and other social infrastructure [parks, health and other community facilities] which also require financial contributions from both the public and private sectors [via CIL]. As a consequence there isn't in a practical choice between public only and private only regeneration of OA's.</p> <p>Where the council is considering new regeneration schemes within OA's it can evaluate delivery options including direct</p>

	<p>delivery and development agreements with private partners. Such an evaluation would need to have regard to the council's financial position at that time.</p>
<p>(vi) Guarantee that displaced secure tenants are offered secure tenancies on return to the locality, and that leaseholders are given options reflecting a fair market price pre-regeneration.</p>	<p>Planning policy in respect of existing businesses is set out in P33 of the Southwark Plan 2022 "Business Relocation". This policy requires that where existing small or independent businesses or small shops may be displaced by development a business relocation strategy, written in consultation with affected businesses, must be provided.</p> <p>Generally where schemes in private ownership are being redeveloped these are Landlord and Tenant issues and therefore the council has limited scope beyond this adopted policy to intervene directly in them.</p>
<p>5. That the cabinet consider stating that in the instance of any council estate regeneration in the future, that the first preferred option in all circumstances be to deliver such a programme as local authority homes. If the council wishes to propose a partnership agreement with private or third sector organisations in future, then the cabinet must lay forth in a report why an in-house/council controlled regeneration is not possible, and any such report must be considered through the council's overview and scrutiny functions.</p>	<p>Southwark Construction will lead on estate regeneration schemes in the future. Options for delivery of future schemes will be considered through the council's decision making processes.</p>
<p>6. Specifically for transport related aspects of regeneration the Council should:</p>	
<p>(i) Develop and improve its strategy for the implementation of better sustainable networks whether large or small as a catalyst for regeneration in the borough.</p>	<p>The Sustainable Growth team is responsible for a programme of investment in the council's town centres that support contribute to the delivery of these recommendations. Projects include working with partners to improve Elephant & Castle underground station; Peckham, Surrey Quays, Denmark Hill and Elephant and Castle overground stations. In addition there are a number of interventions to improve cycling and pedestrian routes which are being implemented using local CiL or are secured through agreements with development partners.</p>
<p>(ii) Seek to promote and introduce healthy streets through more localised street space schemes providing feeder links to create more of a community way in or out routes.</p>	

The programme of work is taking place within the policy framework and priorities established by the Council's Movement Plan [MP] and the council's delivery plan for 2022/26. The MP is currently being prepared following a monitoring report which Cabinet considered in February 2022. <https://moderngov.southwark.gov.uk/documents/s104619/Report%20Movement%20Plan%20update.pdf>

As noted in that report the MP takes a people centred approach that coordinates all modes, public realm and environment. The primary focus of the MP is to increase walking, riding, and public transport, making it the easiest choice by reducing driving, vehicle ownership and reallocating space from vehicles to people. Consultation on the Movement Plan is scheduled to start in October and the current programme anticipates a report to Cabinet in May next year.