APPENDIX F

Statement of Community Involvement

Consultation Report

December 2022

APPENDICES

No.	Title
Appendix A	Statement of Community Involvement
Appendix B	Development Consultation Charter
Appendix C	Early Engagement Strategy Template
Appendix D	Engagement Summary Template
Appendix E	EQIA Template
Appendix F	Consultation Report
Appendix G	Equalities Impact Assessment

Introduction

What is the SCI?

1. The Statement of Community Involvement (SCI) is our commitment to people about how we will consult and engage with the community throughout the planning process.

2. The Development Consultation Charter forms part of the SCI and sets out standards of consultation for developers who wish to develop in the borough.

3. We want to make planning matters more accessible and create a better experience for people around engaging during the planning application process and the preparation of planning policy.

4. In providing opportunities for people to get involved in shaping and improving the current SCI we can create more engagement and collaboration around local planning decisions and the preparation of planning and growth strategies for the future.

What is a consultation report?

5. This consultation report summarises the consultation that took place for the SCI. It sets out what events took place, how the SCI was publicised and provides a summary of the responses received throughout the consultation period.

Who was consulted and how?

6. The second round of consultation on the Statement of Community Involvement (SCI) and Development Consultation Charter (DCC) began in December 2021 and closed at the end of March 2022. The first round took place between January 2020 and May 2020 and was disrupted by the COVID-19 pandemic.

7. The SCI Engagement Plan set out a series of actions and groups of people to engage with, with a particular emphasis on engaging with people who do not usually get involved with planning.

8. To achieve this, the Council collaborated with community groups such as the Community Southwark and the Forum for Equality and Human Rights in Southwark (FEHRS) to combine resources and reach as many people as possible. Council officers also organised and attended meetings with a variety of community groups and forums. Officers were particularly keen to engage with those with protected characteristics under the Public Sector Equality Duty, who are often marginalised by the planning system. Members of

community groups were asked to encourage other members of the groups they represent to take part in the consultation.

9. The SCI was advertised through Southwark Council's social media with a Twitter update released regularly. Those signed up to MySouthwark (over 22,000 people) also received regular reminders of the consultation.

10. An online survey was published on the Consultation Hub to reach those who would not attend one of the consultation events. A link to this survey was sent to MySouthwark users and was in Twitter posts.

Consultation events summary

11. The SCI and DCC Engagement Plan sought to implement the principles set out in the council's new Approach to Community Engagement as well as engage with those who do not usually engage with planning. Engagement throughout the consultation of the SCI focused on reaching different groups of people from our diverse communities. These include older people, younger people, faith groups, developers and those already engaged in planning.

12. Officers worked with Community Southwark to attend a variety of forums that they facilitate with different groups across the borough. Additionally, Officers attended an Old Kent Road Community Review Panel who provided a response to the consultation and arranged a faith groups workshop to target a traditionally underrepresented group.

13. Officers were also keen to ensure that the consultation sought the opinion of different community groups than those that contributed to the first round of consultation to achieve a broad range of views. Officers are aware of consultation fatigue experienced by those groups who are regularly consulted by the council on a variety of matters and were keen to avoid this where possible.

14. The list below outlines the key events of the SCI consultation.

Date	Meeting	Delivery	Online or In Person
25.01.2022	The Forum for Equality and Human Rights in Southwark (FEHRS)	Delivered an informative presentation via Zoom directing participants to the consultation and provided opportunity for questions and discussion.	Online
22.02.2022	Disability Provider Network Meeting (Community Southwark)	Delivered an informative presentation via Zoom directing participants to the consultation and provided	Online

		opportunity for questions and discussion.	
24.02.2022	Sports Network (Community Southwark)	Delivered an informative presentation via Zoom directing participants to the consultation and provided opportunity for questions and discussion.	Online
28.02.2022	Mental Health Network (Community Southwark)	Delivered an informative presentation via Zoom directing participants to the consultation and provided opportunity for questions and discussion.	Online
10.03.2022	Older People's Network (Community Southwark)	Delivered an informative presentation via Zoom directing participants to the consultation and provided opportunity for questions and discussion.	Online
07.03.2022	Children, Families and Young People's Network (Community Southwark)	Delivered an informative presentation via Zoom directing participants to the consultation and provided opportunity for questions and discussion.	Online
21.03.2022	Old Kent Road Community Review Panel	Attended the panel review where officers presented the DCC and went through in detail the processes and requirements of the document. Officers then answered questions and discussed the requirements with the panel who followed up with a formal response and recommendations.	In person
16.03.2022	Faith Groups Workshop	Officers arranged with the Community Engagement team to host a workshop with local faith group leaders where the SCI and DCC were presented and opportunities were provided for comments and questions.	Online

Summary of comments received

15. Below is a summary of the comments received throughout the formal consultation period – this includes comments submitted via the Consultation Hub, emails and discussions through consultation events. A summary You Said/We Did report will be uploaded to the website with how the council has taken on board the comments received and Appendix A sets out a summary of all of the written comments received with an officer response.

16. Despite regular updates on the council's Twitter page and reminders sent out via MySouthwark, the response rate to the Consultation Hub or responses received via email remained low. We received 16 written emails regarding the consultation and 30 responses to the online survey. However, a broad range of views and comments were also captured by attending the various group meetings as outlined above.

Emerging Themes	Comments
Accessibility and Transparency	- The website's user interface is not friendly. It needs to be updated regularly, particularly the notifications section. - Many people feel that they should be involved at the earliest possible point for proposed developments. - The document needs to prioritise inclusivity; particular attention should be given to marginalised groups and those with protected characteristics under the Public Sector Equality Duty. - Better use of social media should be considered to provide notifications regarding applications. - Operational issues with the planning portal need to be rectified. - Need for more robust offline measures of consultations as well as digital media measures. - Request to hold consultation feedback meetings and provide consultation reports.

	• Use of posters for notifications and summaries of consultations on public notice boards, schools, churches, community centres and hospitals for better reach.
	• Redesign of existing posters to make them more legible and accessible for those who may have difficulty understanding.
	• It is suggested that the community of Tenant and Resident Associations on the Old Kent Road can help reach older residents and for those who do not have internet access.
Language and Formatting	• Officers must keep in mind that there is a fraction of population who necessarily do not have English as their first language
	• A few respondents were concerned that the council were deliberately using obscure language in order to exclude certain residents.
	• Careful measures should be taken to double check the data before publishing it along with the opportunity to refute misinterpretations.
	• The document is too long, confusing and very text heavy.
	• The language is unnecessarily convoluted.
	• Need to redefine the term 'disabled' as it could mean different things to different people and should not be generalised.
	• The language needs to be simplified especially for technical terms/keywords. Emphasis should be put into avoiding jargon and simplifying complex information on processes.
	• There should be a more flexible definition for 'community' to ensure the consultation reaches a wider demographic.
	• Diagrams should be used as an explanatory device for complex information and processes.

	• There is a need to reconsider how we define 'consultees' and 'local community groups' to include a wider range of stakeholders.
Processes and Procedures	• Developers should have to provide a facts-based audit of the development site as part of the documents required in the DCC. • There needs to be a formalised procedure for providing consultees with updates on the outcome of consultations when they supply comments. • Community members feel that they are not listened to and that decisions will be made regardless of residents' concerns. • Locals tend find out about proposed changes to their environment when it is too late - generally post Pre- App. • The EQIA (Equality Impact Assessment) template needs to be improved to make sure it is actively promoting equality. • Suggestion for Planning Policy department to forge better links with voluntary organisations and existing community networks in the borough. • People have asked for more sessions of consultation. • Requests for responses from small, local organisations and community groups should be monitored to prevent them from being overwhelmed by a succession of large developers asking for their input. • A minimum standard of consultation for developers (I.e., a minimum number of events, or minimum number of stakeholders) should be established to avoid overloading council resources. • Officers should be mandated to refuse to engage with applications that do not meet the baseline

	requirements of the DCC, so that developers have no option but to resource, their engagement teams sufficiently at an early stage. • Requests for templates for the documents required in the DCC to ensure consistency of information to be provided by developers.
Ideas and Innovations	• Request to create a register of innovative ideas for sustainable development in the borough • A suggestion to introduce incentive-based community involvement to encourage wider masses to take part in consultations. • Informed research of best practices and past failures (of consultation exercises) should be done in the due process of developing the new SCI/DCC • Suggestions to involve external groups, such as academic teams or charities, in generating data and carrying out research, to measure the impact of development on groups especially with protected characteristics
Any Other Business	• Request has been put forward to conduct a more robust examination of applicant's claims during the application process. • The weight given to noise abatement measures is insufficient to prevent nuisance. • Request to revise application charges at the pre-apps stage • Concerns over vandalism and erosion of the original indigenous street behaviour • There should be an opportunity to refute inaccuracies in planning applications at planning committee when the correction can be readily substantiated with a document or plan that is in the room.

What have we learned from the consultation?

17. A consistent theme across all methods of consultation was the need to simplify both documents to improve clarity and accessibility. The SCI and DCC should avoid the use of jargon and technical language where possible or alternatively provide explanations and definitions. We have revised the language we use throughout the SCI and DCC to try to eliminate any unnecessary jargon.

18. Furthermore, participants in the planning process often feel that their contributions are not valued because they are not provided with sufficient updates on the progress of consultations and applications. We have updated the SCI so that we commit to sending consultation reports and updates to participants of consultations where possible.

What happens next?

19. We have amended the SCI and DCC to take on board the comments received. Cabinet will then formally adopt the updated SCI and DCC.

20. Engaging with the community in an effective way is a council priority and officers are already implementing the requirements of the DCC in an efficient but effective manner, since the documents have been on our validation checklist. Once adopted, planning officers will be trained on how to deliver the requirements of the adopted SCI and DCC so that they ensure applicants carry out effective engagement with residents and our communities.

Appendix A: Officer responses to a summary of comments received via the consultation hub, email and consultation events

No.	Organisation or Individual	Comment	Officer Response
1	Individual	I would like to see community responses to Planning applications taken more seriously than they are at the moment. Planning is our last defence. Southwark's enforcement is inadequately resourced. Southwark takes in enormous CIL moneys for developments that bring in crowds and drinkers, who attract buskers, drug-dealers and thieves. None of the CIL goes to enforcing on these things that bring great grief and disturbance to the residents. It feels as if Southwark is selling our community's wellbeing to the developers, who give nothing back. Some of the CIL money needs to go into enforcing the asb, litter, noise and disturbance that is created by the profitable developments. Or, if Southwark refuses to do that, more account needs to be taken of the fact that there is effectively no enforcement of the antisocial effects of the profitable developments. Southwark should stop pretending at Planning that there will be.	Noted
2	Individual	On a procedural basis, we were shocked at how Southwark simply let Borough Yards redefine itself from a retail and cultural hub to an eating and drinking hub, how ludicrous statements from the applicants were treated as truth: that 1564 extra drinkers and diners would bring just one extra taxi to our narrow streets - just one example. Another was that the Everyman cinema would not be treated as licensable space because 'it isn't really a bar'. Lovely as it is, every square inch of the huge premises, apart from the toilets, is a site of drinking and eating. But this lie was accepted. We would like to see more robust examination of applicants' claims on this basis. We would like the Chair of Planning to allow residents to refute mistruths in Planning Meetings.	Noted

3	Individual	We would also like to be able to receive automatic notification of new planning applications that affect us. The website claims this is possible. But it is not. So it is a process of horrible surprises - and more difficult than it needs to be. Just this one notification system would make citizens' lives much easier.	Our website allows residents to sign up for updates on planning applications in their area via email by signing up for a MySouthwark account. We recognise that some users have experienced issues receiving these notifications and we will pass this feedback onto the relevant team to ensure that this is rectified as a matter of urgency.
4	Individual	We were also told in a recent Planning Committee that because we had won some conditions at Licensing, we needn't think we were going to get any more conditions at Planning. This does not feel appropriate: to meld the jurisdiction of Planning and Licensing	Noted
5	Individual	All resident must be consulted at every level of any new proposed redevelopment/ Development. Southwark councils failure to consult residents properly had had a detrimental affect on residents with Southwark council.	Planning officers work hard to ensure that the local community are represented in all application decisions. However, we recognise the need for a consistent approach across the council to including the community in decision-making. The SCI and DCC are intended as mechanisms of accountability to ensure that developers and officers alike are taking into consideration the views and needs of the local community. These documents set the standard for community engagement in the borough.
6	Individual	The consultation for the Dulwich LTN's has been completely undemocratic and I hope the new SCI will give power to the electorate and residents such that the Council will take heed of what people want and believe	The SCI and DCC are intended as mechanisms of accountability to ensure that developers and officers alike are taking into consideration the views and needs of the local community. These documents set the standard for community engagement in the borough. We are constantly striving to achieve best practice consultation. Therefore, we take these concerns very seriously and will look to ensure a consistently high standard of consultation going forward.
7	Individual	It is extremely hard to see whom this is addressed to. If members of the community, then the assumptions behind it are entirely questionable. The only members of the community who will or be able to access this are those with an excellent command of language (it is written in a peculiarly pseudo 'everyday' language which	We have reviewed the wording of both the SCI and DCC to improve clarity and remove any ambiguity. We have included alternative explanatory devices such as diagrams to improve understanding and a link to an online glossary for key terminology.

		attempts to obscure the bureaucratic function of the statement). For those for whom English is a second language or who face barriers to access due to socio-economic factors and/or access to technology this document may as well have been written in code.	
8	Individual	The document and the intention to address and involve the community need to be inclusive and accessible. This document creates an immediate barrier for the majority of Southwark residents who are not white, middle-class and are the lucky beneficiaries of a good education.	We have reviewed the wording of both the SCI and DCC to improve clarity and remove any ambiguity. We have included alternative explanatory devices such as diagrams to improve understanding and a link to an online glossary for key terminology. We have also revised and improved the accessibility of both documents.
9	Individual	Either the document has been deliberately presented in this way to prevent meaningful engagement or it has been executed incompetently. In neither case can the community have confidence in the local authority.	We have reviewed the wording of both the SCI and DCC to improve clarity and remove any ambiguity. We have included alternative explanatory devices such as diagrams to improve understanding and a link to an online glossary for key terminology. We have also revised and improved the accessibility of both documents.
10	Individual	Better use of social media to notify the public about consultation in their postcode/ ward. Not everyone buys local papers and I for one have not seen the lamppost notice referring to an application so I have been unable to comment.	We advertise all consultations for planning policy documents on the Council social media accounts. However, we have revised the communication strategy proposed in the SCI to ensure that it is clear how residents can hear about consultations the council are undertaking.
11	Individual	It's still hard to believe that council will ask for locals to say their opinions about any changes in the local area. Very strange indeed. Around me, in Walworth, I can see changes happing every day. May those changes didn't affect me, but those changes should be known to locals aswell. The big question is, who's in charge to accept those changes? So many necessary things have been done in Walworth, but the main ones left behind.	The SCI and DCC are intended as mechanisms of accountability to ensure that developers and officers alike are taking into consideration the views and needs of the local community. These documents set the standard for community engagement in the borough. We are constantly striving to achieve best practice consultation. Therefore, we take these concerns very seriously and will look to ensure a consistently high standard of consultation going forward.
12	Individual	I am persuaded that the efforts to secure community engagement in planning have been sincere and considered. But there is a glaring lacuna in that the community is not	We have revised the DCC to encourage developers to engage with local stakeholders from the outset of the development process. We encourage developers to submit

| | | given the opportunity for pre-app representations extended to applicants. I feel that the consultation provisions, though welcome, delegate too much reliance to applicants, who may not have an entirely objective approach, or comparable sincerity in heeding the views of consultees and conveying them to planning officials. I like the idea of the Old Kent Road Community Review Panel, and would like to see it extended to other major projects, not least the development of Peckham's Aylesham Centre and Library Square. | an early engagement strategy, which outlines how developers intend to undertake engagement with the community at the pre-application stage. The DCC also requires developers to submit an engagement summary with their planning application that gives an overview of how engagement activities have informed the proposed scheme's design.

This will ensure developers engage with stakeholders before submitting an application and will require them to provide evidence of having done so. We have revised the wording of the DCC to ensure that this is clear. Furthermore, we will keep under review the expansion of community review panels across the borough. |
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| 13 | Individual | I don't know what it is. Sorry. You asked for input on how you communicate with people but I didn't realise there was homework to do, first.(Perhaps that's useful input in itself) | Noted |
| 14 | Individual | If its the usual "Southwark Council wants to involve you".........!! ie Let us know what you think and we will then ignore you and do what we intended anyway . | Noted |
| 15 | Individual | Dear sirs , as a small buisness whom has been trading from the same premises for over 22 years , I've sent in various communications with yourselves LBS, you either don't respond directly take note, even when people have voted against ltns etc , so this does not seem to be a democratically run council, I await your response. | Noted |
| 16 | Individual | The Southwark Planning Portal is not working for planning alerts. I have reported this before. More small local organisations like our own should be stat cons. | Our website allows residents to sign up for updates on planning applications in their area via email by signing up for a MySouthwark account. We recognise that some users have experienced issues receiving these notifications and we will pass this feedback onto the relevant team to ensure that this is rectified as a matter of urgency.

We have reviewed our definition of consultees in the SCI to include a wider variety of stakeholders. We |

			have kept this intentionally broad, so that we can reach out to as many people as possible.
17	Individual	Currently having a planning officer who says he hasn't got time to put emailed representations online, and that he plans to censor some commenting on the Cathedral precinct if the writers don't live next to it - when these are heritage and conservation comments	Noted
18	Individual	I have been in a full Planning Committee meeting where the applicant was allowed to tell two extremely egregious lies that were pertinent to the case in hand and swayed the Committee. The chair allowed no correction of factual matters. There should be an opportunity to refute misrepresentations, when the correction can be readily substantiated with a document or plan that is in the room. This was the case with the hearing in question.	Noted
19	Individual	Three minutes for all objectors in Planning meetings: insufficient. Obviously Licensing and Planning are separate, but Licensing is much fairer, giving 15 minutes to all objectors. Effectively, the objectors nominate one or two people to represent them and the process does not become longer. The chair should not allow the applicants longer to answer questions than he allows the objectors in the same situation.	Noted
20	Individual	Its impossible for me to make any valid comments because I don't know or understand what the SCI genuinely means for me or the Borough of Southwark. What I do know is that every available empty spot is being reclaimed for public housing which contributes to over density and an increased burden on antiquated infrastructures roads and transport.	We have reviewed the wording of both the SCI and DCC to improve clarity and remove any ambiguity. We have included alternative explanatory devices such as diagrams to improve understanding and a link to an online glossary for key terminology. We have also improved the accessibility of both documents.
21	Individual	I also see that in my environs the neighbourhood is daily covered in graffiti, street furniture vandalised and not repaired, rubbish and dumping everywhere, and a general erosion of street behaviours where scooters and cyclists regularly and	Noted

		unpoliced terrorise pedestrians along Tower Bridge Road. Where the historical Market in Bermondsey Square every Friday is coming to an end and tourism ignored. Where new and expensive flats being built everywhere for the profit of property speculators and not for a real concern for urban planning and Community Involvement.	
22	Individual	I feel the council give planning permission as a default and without due consideration to the community – I assume because it's easier and cheaper that challenging appeals. Also, I know of developers who do things without planning permission and bank on it being granted retrospectively, of which there is a very high chance. Plus, developers and big business have deeper pockets than the council, so just keep on appealing until the council no longer think it's financially viable to continue challenging them. Then the local community suffers and feel it has no agency.	Planning officers work hard to ensure that the local community are represented in all application decisions. However, we recognise the need for a consistent approach across the council to including the community in decision-making. The SCI and DCC are mechanisms of accountability that ensure developers and officers alike are taking into consideration the views and needs of the local community. These documents set the standard for community engagement in the borough.
23	Individual	I firmly believe that not enough consideration is given to noise abatement. Noise is a major cause of stress and issues of traffic management which on first sight might seem to improve the environment may have the opposite effect and create more noise and pollution. I am mainly speaking of the introduction of speed humps without consultation of local residents. Measures taken to create low traffic zones, one-way systems, no left or right turn, usually have the effect of creating problems elsewhere, and that is unfair to everyone.	Noted
24	Individual	A lot of resident's suggestions about proposed planning is ignored during the consultation. Councillors and council staff will need to be more helpful and informative and not just pretend to listen otherwise the SCI the engagement would be wasted. Document is too long and confusing. Needs to be more concise in its aim to see if it is followed up and will work in practice.	Planning officers work hard to ensure that the local community are represented in all application decisions. However, we recognise the need for a consistent approach across the council for including the community in decision-making. The SCI and DCC are mechanisms of accountability to ensure that developers and officers alike are taking into consideration the views and needs of the local community. These documents will therefore set a new standard for community engagement in the borough.

			We have reviewed the wording of both the SCI and DCC to improve clarity and remove any ambiguity. We have included alternative explanatory devices such as diagrams to improve understanding and a link to our online glossary for key terminology. We have also revised and improved the accessibility of both documents.
25	Individual	The language used is unnecessarily convoluted	We have revised the wording of both the SCI and DCC to improve clarity and remove any ambiguity. We have included alternative explanatory devices such as diagrams to improve understanding and a link to an online glossary for key terminology. We have also revised and improved the accessibility of both documents.
26	Individual	The local community of Southwark seriously appears to be overwhelmed with Southwark Councils' new building projects policy. There is a lot of discussion around tree felling. loss of green space and 'infilling' on estates. The noise pollution and traffic increase from current building works is cause for concern. Community members feel that they are not listened too and that decisions will be made regardless of residents concerns	Planning officers work hard to ensure that the local community are represented in all application and policy-making decisions. However, we recognise the need for a consistent approach across the council for including the community in decision-making. The SCI and DCC are mechanisms of accountability to ensure that developers and officers alike are taking into consideration the views and needs of the local community. These documents set a new standard for community engagement in the borough.
27	Individual	This sounds reasonable. it's good to consult with people.	Support noted
28	Individual	The ways listed to "find out about planning" are not inclusive, nor accessible, as they are only found online. There are many homes in Southwark that do not have suitable access to computers or Wifi and you need to be considering how people from such homes will contribute. You say that you want to ensure that consultations are listening to communities with protected characteristics, but so far I can't see how you're putting plans in place to actually achieve that?? I would recommend putting in place consultation feedback meetings and a consultation telephone hotline if you want to be truly inclusive and accessible.	We have reviewed the SCI and DCC to ensure that the methods proposed sufficiently cater to those who do not have access to the internet. We have ensured that we provide a range of tools to communicate with the local community.

29	Individual	In addition to this, the posters you currently use to advertise consultations in the local area are written in incredibly small type - I am not visually impaired, but I struggle to read them. If you are to be inclusive and accessible, as you claim to want to be, then you must increase the type size of the words in these posters.	Noted
30	Individual	Long overdue. We support it.	Support noted
31	Individual	The SCI is very clear explanation of the planning process and the way small, medium, large applications are dealt with and the planning policy framework. However, for anyone new to planning it is an enormous amount of technical detail. It is likely that people will only engage once there is a planning application and that is too late to influence developers. Far more emphasis is needed on the initial ideas and options for the site. Community groups and individuals with ideas should be encouraged to engage with developers.	We have reviewed the wording of both the SCI and DCC to improve clarity and remove any ambiguity. We have included alternative explanatory devices such as diagrams to improve understanding and a link to an online glossary for key terminology. We have also revised and improved the accessibility of both documents.

We have revised the DCC to encourage developers to engage with local residents and stakeholders prior to submitting an application. Developers are required to submit an engagement summary at the validation stage that summarises the engagement work undertaken prior to submitting an application. Officers will be able to ask developers to undertake further engagement with the community if it is not undertaken to a sufficient standard. |
| 32 | Individual | In the same way as the council has S106 project ideas gathered from the community there should also be a register of other ideas that people would like to see in their area. This does not mean developers should not go out and engage with local communities and groups as appropriate for the size and scale of the development. Information from the council or Community Southwark could assist, including TRAs and other groups. There is a such a huge amount of development taking place in Southwark that groups/civic society need to keep track of it. | We will take this idea into consideration as part of our ongoing work to implement the principles of the SCI and DCC. |
| 33 | Peckham Townscape Heritage Initiative | The PHRP welcomes the empathetic tone and inclusive methods set out in the draft SCI. We have concerns from our own experiences in Peckham that local people find out about proposed changes to their | Planning officers work hard to ensure that the local community are represented in all application decisions. However, we recognise the need for a consistent approach across the council for including the |

| | | environment when it is too late - generally post Pre- App. | community in decision making. The SCI and DCC are mechanisms of accountability to ensure that developers and officers alike are taking into consideration the views and needs of the local community. These documents will therefore set a new standard for community engagement in the borough.

We have revised the DCC to encourage developers to engage with local residents and stakeholders from the outset of development or prior to submitting an application. Developers are required to submit an engagement summary at the validation stage that summarises the engagement work undertaken prior to submitting an application and how this has influenced the proposed scheme. Officers will be able to ask developers to undertake further engagement with the community if it is not undertaken to a sufficient standard. |
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| 34 | Disability Provider Network | Need to be careful when using the word 'disabled' as a generalised term as this encompasses a number of different groups who will have vastly differing needs | We have revised the language used throughout the SCI and DCC to improve clarity and ensure that we are inclusive to as many stakeholders as possible in our application and planning policy adoption process. |
| 35 | Community Southwark Disability Provider Network | Concerns around accessibility for those with learning difficulties in particular. Participants offered to show the document to their clients and provide feedback. | We have revised and improved the accessibility of both documents. |
| 36 | Community Southwark Disability Provider Network | Sought clarification about when changes can't be made as a result of feedback how developers would need to respond(with regards to you said, we did document) | We have reviewed the wording of both the SCI and DCC to improve clarity and remove any ambiguity. We have included alternative explanatory devices such as diagrams to improve understanding and a link to an online glossary for key terminology. |
| 37 | Community Southwark Sports Network | Positive feedback from the group on the intention of the document (i.e., the requirement for developers to be more proactive in consulting the community). No major concerns or comments. | Support noted |
| 38 | Community Southwark | Question raised around how people are consulted earlier on in the process and whether fliers are put | We have outlined how we will let you know about planning applications in the SCI. We send |

		Mental Health Network	through the door for local residents. Comments raised over accessibility of consultation for older people and those without access to internet.	neighbour notification letters, put up site notices and put out a press notice for applications in accordance with statutory requirements.
39	Community Southwark Older People's Network	EQIA – improve template – target needs better consultation more widely needs to be addressed by the council beyond planning. Need to more specifically look at needs of older people, especially internet access etc. General comments on equalities - need to improve EQIA template and make sure it is targeting needs and actually promoting equality.	We have prepared an updated EQIA template, in line with the Council's wider approach to assessing equalities impacts.
40	Southwark Council Faith Communities Workshop	Participants were concerned that too much focus is placed on online consultation methods and that this could exclude senior citizens or those that struggle to connect online. In addition to online methods, we should be producing posters to be put up on physical notice boards in schools, churches, community centres etc.	We have outlined how we will let you know about planning applications in the SCI. We send neighbour notification letters, put up site notices and put out a press notice for applications in accordance with statutory requirements.
41	Southwark Council Faith Communities Workshop	Participants also encouraged Planning Policy to forge better links with voluntary organisations and existing community networks in the borough	As part of our ongoing work to implement the key principles of the SCI and DCC, we will collaborate with our community engagement team to improve links with key community groups in the borough.
42	Southwark Council Faith Communities Workshop	It was highlighted that often communities feel reluctant to contribute to consultations because they feel that they are not given sufficient updates on how feedback has been used. They suggested following up with participants to consultation events afterwards with clear and concise feedback.	We recognise that participants in the planning process often feel that their contributions are not valued because they are not provided with sufficient updates on the progress of consultations and applications. We have revised the SCI to ensure that we include sending consultation reports and updates to consultees as part of our ongoing engagement with Southwark residents and stakeholders.
43	Southwark Council Faith Communities Workshop	Language was highlighted as an important barrier to understanding. Not just limiting the use of jargon, but also clarity and explaining processes thoroughly. Keep things simple, conversational and informative. What has been acted on? What has not been acted on?	We have revised the wording of both the SCI and DCC to improve clarity and remove any ambiguity. We have included alternative explanatory devices such as diagrams to improve understanding and a glossary for key terminology. We have also revised and improved the accessibility of both documents.
44	Southwark Council Faith	Breakdown sections to facilitate understanding of potential impact;	We have revised the wording of both the SCI and DCC to improve clarity

		communities often do not understand technical jargon. For example, simplifying environmental impact assessments so that those with no prior knowledge would be able to understand the impact of development.	and remove any ambiguity. We have included alternative explanatory devices such as diagrams to improve understanding and a link to an online glossary for key terminology. We have also revised and improved the accessibility of both documents.
45	Southwark Council Faith Communities Workshop	Openness goes a long way in service delivery.	Noted
46	Old Kent Road Community Review Panel	The panel is pleased to see the level of commitment Southwark Council shows in the draft Developer Consultation Charter (DCC) to requiring community engagement from developers. It is good to see strong minimum requirements of developers, expressed in a clear way, and standardised so they apply to all applicants in the same way.The panel supports the proposed 'Engagement Principles in Planning' as a laudable statement of intent.	Support noted
47	Old Kent Road Community Review Panel	However, the panel feels that power currently lies with developers with applications usually recommended by officers, and rarely turned down at planning committee. Although much of the work done by Southwark officers to improve applications is behind the scenes, there is little evidence that past consultations have stopped, or significantly changed, developments that are not good enough.	The documents are on our validation checklist and officers will enforce them appropriately. This will ensure that officers push back on developments, which do not meet the minimum standard of engagement we outline in the SCI.
48	Old Kent Road Community Review Panel	The panel therefore emphasises the need for the DCC to provide a tool that Southwark officers can use to stop applications progressing if they do not meet its requirements. It should be explicit that,if applications do not satisfy the DCC's requirements for community involvement, they will not be allowed to progress any further through the planning process.	The documents are on our validation checklist and officers will enforce them appropriately. The DCC requires developers to provide evidence of the engagement and consultation they have undertaken throughout the development process. If officers do not feel that sufficient engagement has taken place, they will ask developers to undertake further engagement.
49	Old Kent Road Community Review Panel	The panel also suggests that a 'People's Awards' scheme could provide an extra incentive, by recognising high quality development achieved with successful community involvement.	Noted

50	Old Kent Road Community Review Panel	The panel also emphasises the importance of requiring developers to communicate outcomes from community consultation, and to explain what changes have been made to proposals in response to local views. This should include communicating consultation outcomes to those who are not online–careful thought is needed on how best to achieve this.	We recognise that participants in the planning process often feel that their contributions are not valued because they are not provided with sufficient updates on the progress of consultations and applications. We have revised the SCI to ensure that we include sending consultation reports and updates to consultees as part of our ongoing engagement with Southwark residents and stakeholders. We have also revised the wording of the DCC to ensure that our expectations of standards of consultation are as clear.
51	Old Kent Road Community Review Panel	The panel points out the importance of using a clear but flexible definition of 'community' to ensure engagement reaches the right people, and reflects the constantly evolving nature of the area. Southwark Council's dynamic list of community groups will play an important role in helping to ensure consultation is comprehensive and current.	We have reviewed our definition of community so that it aligns with the Council's approach to community engagement and is inclusive to the wide variety of groups in Southwark.
52	Old Kent Road Community Review Panel	It is also important to avoid consultation fatigue. The requirements placed on local organisations, which are often very small, should be tracked to prevent them being overwhelmed by a succession of large developments asking for their input.	Officers are aware of consultation fatigue experienced by those groups who are regularly consulted by the council on a variety of matters and are keen to avoid this where possible. We reach out to a wide range of groups and are mindful of the contribution of those groups who we regularly consult with.
53	Old Kent Road Community Review Panel	The panel asks Southwark officers to continue making a particular effort to reach those who do not use the internet, older people in particular, as part of their consultation on the DCC and the Statement of Community Involvement (SCI). It suggests the community of Tenant and Resident Associationson the Old Kent Road can help reach older residents.	We have outlined how we will let you know about planning applications in the SCI. We send neighbour notification letters, put up site notices and put out a press notice for applications in accordance with statutory requirements. We are aware of the need to avoid a digital-only approach to consultation and aim to use a variety of methods of communication that are inclusive.
54	Old Kent Road Community Review Panel	The panel encourages Southwark Council's plans to promote equality by helping developers understand how they can better serve groups of people at risk of experiencing negative impacts from development. It points to people with disabilities and families, of whom there are many in the area, as two groups who should benefit more from	The DCC requires developers to prepare an equalities impact assessment (EQIA) for all major developments. In the EQIA, they must consider the impact of development on those with protected characteristics under the Public Sector Equalities Duty. We have revised the wording of the DCC to ensure that the

		development than is currently the case.	requirements of this document are clear and created a template for developers to follow.
55	Old Kent Road Community Review Panel	Measuring the impact of development on groups with protected characteristics is a time-consuming job. The panel suggests that external groups, such as academic teams or charities, could be involved in generating data and carrying out research, rather than relying entirely on council resources.	We have revised the requirements of the DCC so that developers have to submit a facts-based audit of the site as part of their early engagement strategy and engagement summary. This will ensure that development take into account the spatial context of the site and how the development will affect groups and existing users of the site.
56	Old Kent Road Community Review Panel	The panel suggests that developers are not necessarily qualified to hold engagement sessions with local communities, especially with groups of people who have not historically been heard in the development process. It is important that consultation does not make people feel less engaged and more alienated from what is happening in their area, which could be the result if conducted poorly. The panel therefore asks for assurances that engagement will be more than a box-ticking exercise, and that developers will be required to meet standards as part of the baseline expectation before applications Are considered. The onus is on Southwark Council to understand and communicate what constitutes high quality consultation, and to be able to require developers to engage better, rather than just to engage.	We recognise the need for a consistent approach across the council with regards for consulting the community on planning application decision making. This consistency must also ensure that engagement is meaningful and able to enact real change. The SCI and DCC are mechanisms of accountability that ensure developers and officers alike are taking into consideration the views and needs of the local community. These documents set a new standard for community engagement in the borough.

The required documents are placed on our Validation Checklist and officers ensure that developments that do not meet our required standards of engagement are improved. The DCC requires developers to provide evidence of the engagement and consultation they have undertaken throughout the development process. If officers do not feel that sufficient engagement has taken place, they will ask developers to undertake further engagement. |
| 57 | Old Kent Road Community Review Panel | The panel also asks whether developers could be required to provide funding for Southwark Council to carry out consultation on their behalf, to help provide assurances about the quality of the process. | We will consider this proposal as part of our ongoing work to ensure successful adoption of the SCI and DCC. |
| 58 | Old Kent Road Community Review Panel | The panel suggests that the process of developing the DCC and the SCI should be informed by research into | In the process of writing the DCC, we have engaged with our colleagues in development |

		the successes and failures of past consultation exercises. Although dating back several decades, major design failures on the Old Kent Road such as the Ledbury Estate could also provide important lessons for understanding how engagement can be done better in future	management to learn from their experiences working on major developments. This has informed the requirements and standards set out in the DCC and our requirement for engagement with the community to be undertaken from the earliest possible stage of development.
59	Old Kent Road Community Review Panel	While the panel supports the prioritisation of community engagement, it notes that the new requirements of developers will also place new burdens on council officers, and will potentially require a lot of work to manage and monitor. It asks for assurances that the proposals are realistic, as well as desirable. It is important that local expectations are not raised if they cannot be met, and that the planning process is not overwhelmed and continues to function effectively.	We have written the SCI and DCC in collaboration with our development management officers to ensure that it is feasible for officers to assess this information as part of the application decision-making process. Engaging with the community in an effective way is a council priority and officers are already implementing the requirements of the SCI and DCC in an efficient but effective manner.
60	Old Kent Road Community Review Panel	The panel also recommends that Southwark Council charges more for its services at pre-application stage if at all possible, passing more of the real cost of delivering community involvement onto developers.	Noted
61	Old Kent Road Community Review Panel	The Community Review Panel asks for a further opportunity to review the Statement of Community Involvement, as there was not enough time to discuss this at the meeting	Noted
62	Balfour Street Housing Co-op & Southwark Pensioners Action Group	I would say planning is a very inaccessible process and it is easy to confuse and wear out local residents. It is hard for them to speak truth to power and for those in power to listen carefully given the pressures of time and legislation.	The purpose of the SCI is to show residents and local stakeholders how to get involved in planning decision-making. We have revised the wording of the SCI to make this as clear as possible.
63	Balfour Street Housing Co-op & Southwark Pensioners Action Group	Council has had very little resources or expertise to insist on and undertake effective consultation activities and that officers and members have generally been outflanked in negotiations by the 'wriggling' of developers as they seek to maximise their profits.	We have written the SCI and DCC in collaboration with our development management officers to ensure that it is feasible for officers to assess this information as part of the application decision-making process. Engaging with the community in an effective way is a council priority and officers are already implementing the requirements of the SCI and DCC in an efficient but effective manner..
64	Balfour Street Housing Co-op	Some of the wording is tightened up to prevent developers from wriggling	We have revised the wording of both the SCI and DCC to improve clarity

		and also to enable residents to feel more involved in the development of their neighbourhoods.	and remove any ambiguity. We have included alternative explanatory devices such as diagrams to improve understanding and a glossary for key terminology. We have also revised and improved the accessibility of both documents.
65	Balfour Street Housing Co-op & Southwark Pensioners Action Group	The reference to an engagement plan on page 3 seems to contradict the reference on page 5. To avoid any ambiguity it should be very clear in both places the plan is required at the outset.	We have revised the requirements of the documents of the DCC to improve clarity and remove ambiguity. We are clear that we expect developers to undertake engagement from the outset of the development process.
66	Balfour Street Housing Co-op & Southwark Pensioners Action Group	Developers must also pay due regard to businesses and other economic assets as well as the other groups mentioned and should be added to the list	We have introduced a facts-based audit of a site that developers will have to complete as part of the early engagement strategy and engagement summary. The facts-based audit requires developers to have a detailed understanding of the existing uses of the site before finalising the design of their scheme. This includes understanding the impact of development on local businesses operating near the development site.
67	Balfour Street Housing Co-op & Southwark Pensioners Action Group	the 'community' affected by any application will depend on the size of the development and must be clearly defined and agreed at the beginning of the process.	The DCC requires developers to have a detailed understanding of the impact of their scheme and demonstrate how they have altered their design to minimise negative impacts on the local community. We have been clear that this work should be proportionate to the size and scale of development.
68	Balfour Street Housing Co-op & Southwark Pensioners Action Group	The aspirations outlined on page 4 are very welcome. However, achieving them and also putting flesh on some of the other points requires a robust fact-based audit of the neighbourhood (clearly defined based on the scale of the development) at the outset. Careful thought needs to be given to the detail of such an audit.	We have introduced a facts-based audit as a requirement of the early engagement strategy and engagement summary documents. This is to ensure that developers have a detailed knowledge of the spatial context of the site before finalising their design for submission for planning permission.
69	Balfour Street Housing Co-op & Southwark Pensioners Action Group	There may be other groups than those specified on page 5 so the list should say local groups (including TRAs, faith, schools, heritage, businesses, park friends etc.)	We revised our definition of community groups make it clear that the examples we provide are not exhaustive. We want developers to consult the groups that are most acutely impacted by the development and this will be different for every site.
70	Balfour Street Housing Co-op & Southwark	There are a number of issues with the EIA accompanying the SCI and DCC. There is a lack of proper	The EQIA prepared when writing the SCI and DCC was written in line with Council requirements. We have

		analysis of the equality information using baseline data, data received in previous consultations and the policies of the SCI and DCC themselves. Mitigating actions are not connected to the potential negative impacts because no concrete potential negative impacts are recorded, and lack of proper, inclusive community consultation would clearly have potential negative impacts.	revised the wording of the DCC to ensure that the requirements of this document are clear and created a template for developers to follow.
71	Balfour Street Housing Co-op & Southwark Pensioners Action Group	The categorisation of application types as outlined is difficult to comment on and needs careful explanation and rationale	We have revised our explanation of the application types to improve clarity and included them as definitions in our online glossary.
72	Balfour Street Housing Co-op & Southwark Pensioners Action Group	Meetings with local groups or neighbours should be required for all applications once the area of impact has been identified	The DCC requires developers to demonstrate they have undertaken sufficient engagement with the community prior to submitting their application. This includes providing evidence that they have met with local groups and neighbours and have considered their concerns in delivering their proposed scheme.
73	Balfour Street Housing Co-op & Southwark Pensioners Action Group	A website should be required for all applications and a newsletter circulated to all properties in a prescribed area.	The DCC requires developers to have a website for their development and to update local stakeholders regularly.
74	Balfour Street Housing Co-op & Southwark Pensioners Action Group	The requirement of a Social Value Statement is welcomed but it needs to be thought through more and its relation to the Social Impact report needs clarifying. Previous work done on Social Regeneration Charters could be highlighted and they should be built upon.	We have reviewed the requirements of social value statement to ensure that it can provide a meaningful overview of the benefits for well-being that a site can provide.
75	Balfour Street Housing Co-op & Southwark Pensioners Action Group	The various characteristics of the community listed is a very good start but some thought needs to be given to where they will be applied as they highlight the need for a fact based audit as a baseline to consider these matters. Such an audit will also inform how consultation should be taken and with whom during the application process.	We have introduced a facts-based audit as a requirement of the early engagement strategy and engagement summary documents. This is to ensure that developers have a detailed knowledge of the spatial context of the site before finalising their design for submission for planning permission.
76	Balfour Street Housing Co-op & Southwark Pensioners Action Group	Signage Boards should be displayed on the site from the moment planning permission is given keeping the community informed on the timing of the development and the fact that permission has been granted.	The DCC requires developers to display a notice or board at the application site that includes images of the proposed scheme and contact details for the developer.

77	Balfour Street Housing Co-op & Southwark Pensioners Action Group	The Engagement Summary should be required to show how research of the facts audit and impact assessment has informed the design and development of the proposed scheme. The following factors must be considered, but are not exhaustive: neighbourhood/community, heritage and physical structures, social infrastructure, transport links, climate change and sustainability.	We have revised the requirements of the engagement summary to ensure that developers undertake a facts-based audit of the site and demonstrate how this has informed the design of their scheme. The factors listed in this comment have been included as part of the scope of a facts-based audit.
78	BermondseyStreet.London	Our comments focus on page 5 of the Developer Consultation Charter..We believe it would be much more effective to require developers to consult the community at the same time as any pre-application discussions with the Council. If the community is not involved at this formative stage, there is a clear risk that both developer and Council officials may become committed, emotionally if not formally, to a particular scheme or elements of a scheme. If later, members of the community seek to challenge those designs, the chances of achieving changes are much lower because the challenges come after the ideas have already taken root in developer and official minds. In this context we were very interested to see that Westminster has produced a consultation guide which involves the community at the pre-application stage, earlier than Southwark proposes. That sounds healthy to us and we look forward to hearing more about how that works in Westminster. It would be good to see such a requirement here in Southwark.	We have revised the requirements of the DCC to require developers to provide evidence that they have undertaken extensive engagement with the community prior to submitting their planning application.

First, we require developers to submit an early engagement strategy at a pre-application meeting outlining how they intend to engage with the community before submitting their planning application. This includes outlining any engagement activities and providing a justification for these activities.

When submitting an application, developers will then be asked to submit an engagement summary. This should provide evidence that they have undertaken the activities outlined in the early engagement strategy. If developers have not undertaken sufficient engagement work, we will ask them to go out to go out for further engagement work. |
| 79 | BermondseyStreet.London | The fact-based audit should include buildings, spaces, uses, users and their local social and economic value, agreed with all stakeholders before development plans are drawn up. | We have revised the requirements of the DCC to ensure that developers undertake a facts-based audit of the site and require them to demonstrate how this has informed the design of their scheme. |
| 80 | BermondseyStreet.London | Still on page 5, the list of community organisations to be consulted is missing two important types of group civic societies and amenity associations. Adding these in will provide a better-balanced set of examples. | We have included civic societies and amenity associations in our list of examples of community organisations. |

81	Southwark Liberal Democrat Group	There needs to be better engagement with councillors and the community on preparation of all planning policy and guidance documents, with officers doing proper pro-active outreach and continuous engagement events with community groups and ward councillors. There should be a cross party, local plan working group that looks at production, amendments, updates and implementation of the local plan, as happens in other boroughs. Those meetings should be in public and recorded, with published minutes.There should be a clear and written explanation of the weight that will be given to the responses from consultees, including statutory consultees.	The SCI and DCC set a minimum standard of engagement between all stakeholders in the planning process, and aim to improve communication as a result. As a planning department, we engage a wide variety of stakeholders in our plan-making process and the SCI represents our continued commitment to consultation.
82	Southwark Liberal Democrat Group	Officers should meet at least once with residents and developers together on major applications, at the pre application stage. All parties should be in listening mode at these meetings and be prepared to hear and respond appropriately to counter arguments. There needs to be more clarity on what constitutes community engagement by applicants on major schemes (and this includes the smaller major schemes, not just the huge schemes), including setting out a more detailed minimum expectation of what level of engagement is considered sufficient. There also needs to be a system for checking that this engagement has taken place and is being reported in an unbiased way.	Officers work hard to ensure that the local community are represented in all major application decisions. The SCI and DCC are intended as mechanisms of accountability to ensure that developers and officers alike are taking into consideration the views and needs of the local community. These documents set the standard for community engagement in the borough.
83	Southwark Liberal Democrat Group	There needs to be a review of the resident notification letter process, as we are getting too many reports of letters not being received by residents. The letters also need to be written in a different style so that people actually realise what they are about, and the impact that the proposals may have on them.	We have outlined how we will let residents and neighbours know about planning applications in the SCI. We send neighbour notification letters, put up site notices and put out a press notice for applications in accordance with statutory requirements.
84	Southwark Liberal Democrat Group	There needs to be a better structure/protocol for engagement with case officers – for ward members, external stakeholders and residents.	Noted

85	Southwark Liberal Democrat Group	There needs to be consistency in how the responses from consultees, including statutory consultees, are treated by planning officers.	The SCI and DCC set a minimum standard of engagement between all stakeholders in the planning process. This includes how we will manage and respond to consultees.
86	Southwark Liberal Democrat Group	In areas where there is intensive development there should be a dedicated team leader who familiarises themselves with the full range of benefits and dis-benefits that will arise from any new development. All planning officers that work on applications in that area should familiarise themselves with the area, with any local issues, and particularly to understand where residents are living in places that might not be obvious (warehouse/office conversions, above shops etc) That way case officers should be alert to the fact that a lack of response/objection might mean information hasn't got through. Case officers should check in with ward councillors before approving applications in complex areas where there have been no responses to the consultation.	Engaging with the community in an effective way is a council priority and officers are already implementing the requirements of the SCI and DCC in an efficient but effective manner. In further training delivered to officers, we will highlight the need to undertake site visits and understand the spatial context of a site in order to assess the documents provided by developers and ensure that this is taken into consideration.
87	Southwark Liberal Democrat Group	How will engagement be measured?	The DCC requires developers to demonstrate how the engagement undertaken has influenced the proposed scheme and what steps have been taken to account for the potential impacts of the scheme. Officers will be given training on how to evaluate the efficacy of engagement and encouraged to ask developers to complete more engagement if they feel it is insufficient.
88	Southwark Liberal Democrat Group	What are the feedback channels for engagement?	We accept comments on plan making through our online consultation hub, letters and emails. We also undertake engagement workshops with groups that are often difficult to reach.

For planning applications, we accept comments on our planning register, through letters and emails. Major applications need to meet the requirements of the DCC and therefore will be required to undertake a variety of engagement activities (such as workshops or brainstorming). |

89	Southwark Liberal Democrat Group	What support is going to be given to groups who want to do Neighbourhood Plans, given that so far no Southwark based Neighbourhood Plan has progressed to adoption?	We have outlined the process for establishing a neighbourhood plan in the SCI and opportunities for residents to engage with the council to achieve this.
90	Southwark Liberal Democrat Group	How is post application monitoring being done? Who is checking to see whether multiple amendments end up making something far removed from what was originally consented?	The Southwark Plan 2022 monitoring framework outlines the departments approach to monitoring planning applications. In order to implement the monitoring framework, the department is working towards a digitalised monitoring platform that will allow us to review data from all applications in a more holistic way. As part of this work, we are considering how we will monitor community engagement going forward.
91	Southwark Liberal Democrat Group	Who is looking at the Authority Monitoring Reports? They used to be presented to planning committee and should be again.	These are prepared by the planning policy team and uploaded to the planning division website.
92	Southwark Liberal Democrat Group	Many other authorities report back to planning committee on appeals on a monthly basis. Why does Southwark not do this?	Noted.
93	Southwark Liberal Democrat Group	When will it be straightforward for residents and other interested parties to access information on affordable housing delivery, S106 and CiL monies?	We are currently updating and reviewing our digital strategy to improve accessibility and make the website more user friendly. This work is ongoing and is undertaken by our digital transformation team.
94	Individual	This is way too complicated and framed in obscure and bureaucratic language designed to obscure not consult.	We have revised the wording of both the SCI and DCC to improve clarity and remove any ambiguity. We have included alternative explanatory devices such as diagrams to improve understanding and a link to an online glossary for key terminology. We have also revised and improved the accessibility of both documents.
95	Individual	A table showing the draft DCC text in one column and my comment in a second column alongside. These comments are mainly to show how the fact-based audit is relevant, and what references might be appropriate in those sections. They are not intended to be prescriptive comments about presentation or text, but rather comments to illuminate the point about how the fact-based audit could work in relation to the DCC. Probably	We have revised the requirements of the DCC to ensure that developers undertake a facts-based audit of the site and require them to demonstrate how this has informed the design of their scheme.

		some such illustrations will be clearer than others.	
96	Individual	a copy and paste of Page 7 from the DCC on which I have illustratedhe suggestion for a fact-based audit by indicating with that text the distinction that needs to be made between facts on the ground and assessments of the impact of development.	We have revised the requirements of the DCC to ensure that developers undertake a facts-based audit of the site and require them to demonstrate how this has informed the design of their scheme.
97	Transport for London	Although the revised Statement of Community Involvement (SCI) provides details of how local residents will be involved in the planning process, it has relatively little to say about engagement with stakeholders such as Transport for London. For completeness it may be helpful to include a brief section on stakeholder engagement including a list of organisations that will be consulted on planning policy documents and planning applications.	We have included a section on how we will notify statutory bodies about plan-making and planning applications, including TfL.
98	Transport for London	It is essential that TfL is consulted on all applications on the Transport for London Road Network (TLRN) or affecting transport assets such as London Underground or London Overground stations or tracks, bus stops, stands, stations and garages, cycle hire docking stations or where there is likely to be an impact on current or future transport projects. It is also essential that statutory safeguarding consultation requirements with TfL are observed for projects such as the Bakerloo line extension, and that there is consultation on planning applications or policies that are likely to have strategic transport policy impacts	We have included a section on how we will notify statutory bodies about plan-making and planning applications, including TfL.
99	Sydenham Hill Ridge Neighbourhood Forum	We are particularly encouraged by the aim "to bring forward effective and meaningful conversations between the community and the developer" (p5 DCC, our emphasis). Our experience over the past five years has been the reverse, so we would expect the implementation of the charter to bring about a demonstrable step-change in community outcomes.	The SCI and DCC set a minimum standard of engagement between all stakeholders in the planning process with the intention of improving communication in the planning process.

100	Sydenham Hill Ridge Neighbourhood Forum	That the reasons given for the community to get involved in planning are non-specific and difficult to measure. How will the Council ensure that these intended outcomes are met?	The Southwark Plan 2022 outlines the departments approach to monitoring the outcome of applications. In order to implement the monitoring framework, the department is working towards a digitalised monitoring platform that will allow us to review data from all applications in a more holistic way. As part of this work, we are considering how we will monitor community engagement going forward.
101	Sydenham Hill Ridge Neighbourhood Forum	How will the Council ensure that the community understands what these vague statements mean in practice?	We have introduced a framework for improving participation in planning in Southwark. This is based on three key principles: (1) inform, (2) consult, and (3) engage Inform is a key part of ensuring the success of the SCI. Inform means keeping Southwark residents informed about plan-making and planning decisions in a timely and transparent manner.
102	Sydenham Hill Ridge Neighbourhood Forum	There are glaring omissions in the topics proposed for the Engagement Plan and Summary(p7). There is no reference to the context, for example neighbouring listed buildings, trees with TPOs, wildlife, the physical geography of the proposed development site and its environs, no reference to accurate land measurements (for example, height above sea level), nor identification of ordinary water courses, natural springs, wells and the implications of the build on those passages of water on and in the environs of the site. Our experience is that these are poorly identified on Environment Agency and other maps, if at all, and local knowledge is crucial in avoiding water being dammed/diverted into other places, such as other dwellings and gardens. Our area in particular has underground streams, springs and wells, in addition to providing a significant watershed, and we ask that these omissions be corrected in checklists for developers' engagement with the community;	We have revised the requirements of the DCC to include a facts-based audit that requires developers to have a detailed understanding of the spatial context of the site. Included as part of this spatial context, is the local environment.
103	Sydenham Hill Ridge Neighbourhood Forum	Pre-application meetings with the council often appear to arrive at conclusions that are not necessarily seen as being in the community's interests by the neighbourhood.	We have revised the requirements of the DCC to require developers to provide evidence that they have undertaken extensive engagement

| | | Once these have been discussed at pre-application meetings, developers (justifiably) do not expect to re-visit nor to adjust these decisions. We ask the Council to put in safeguards that the preapplication meetings do not compromise community engagement and result in outcomes with which the community has profound concerns | with the community prior to submitting their planning application.

First, we require developers to submit an early engagement strategy at a pre-application meeting outlining how they intend to engage with the community before submitting their planning application. This includes outlining any engagement activities and providing a justification for these activities.

When submitting an application, developers will then be asked to submit an engagement summary. This should provide evidence that they have undertaken the activities outlined in the early engagement strategy. If developers have not undertaken sufficient engagement work, we will ask them to go out to go out for further engagement work. |
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| 104 | Sydenham Hill Ridge Neighbourhood Forum | Unless the Council supplies a template or list of questions with required answers, there will be little quality of responses nor consistency between applications, sufficient to allow both the community and planners to be sure that the responses are adequate and coherent. We ask that this be addressed by a pro forma suited to the needs of both the Council and the community; | We have revised the wording of the DCC to ensure that the requirements of the documents are clear and created templates for developers to follow. |
| 105 | Sydenham Hill Ridge Neighbourhood Forum | on occasion Councils do not make clear that a scheme must comply with equalities legislation and/or the National Planning Policy Framework, and at Planning Committee we have seen decisions taken (not necessarily by Southwark, as we cover an area of more than one borough) which knowingly set aside these considerations. We ask that there be no ambiguity, which developers must fully comply with legislative and NPPF requirements in relation to equalities. | We have revised the wording of both the SCI and DCC to improve clarity and remove any ambiguity. All planning officers are trained outlining their responsibilities under the Public Sector Equality Duty and NPPF. We have also extended the requirements of the PSED to developers through the DCC. |
| 106 | Sydenham Hill Ridge Neighbourhood Forum | Developers in our area have avoided the requirements for public consultation (and CIL payments) by proposing 9 or fewer homes. We ask the Council to consider requiring a sliding scale of consultation / CIL payments when fewer homes are proposed. | Noted |

107	Sydenham Hill Ridge Neighbourhood Forum	We ask that the developer be required to provide accurate proposals with accurate measurements, datum points and that it be made clear that the Community is relying on these measurements, that they cannot be subject to minor amendments at a later date. Our experience is that this has sometimes been neglected in the past, with the Council (including Southwark itself) and the Community left in limbo when a developer fails to adhere to their own proposals (and even has submitted inconsistent proposals within the planning application). We particularly welcome the inclusion of 3D imaging in the Requirements for developers (p11): we ask that this should be provided not only with regard to the existing site but also in relation to buildings, TPO trees and other heritage assets, including demonstrating the proposed build's impact on the surrounding landscape and landfall.	Noted
108	Southwark Law Centre	We recognise that there is a significant amount of information that must be included in the SCI, and it results in a text heavy document. However, the executive summary on page 3 would benefit from having buzzwords and a simplified summary connected to what is actually in it, and why it is important, and crucially why the community effected by a planning decision must be consulted on the planning matter.	We have revised the executive summary to improve clarity. We have also improved our online glossary to provide definitions for all key terminology used throughout the document.
109	Southwark Law Centre	The details about the approach to community engagement could be on the following page (page 4 which is titled "Community Engagement") with a digital link. Bullet points would help distil the key information. There is a link on page 5 which directs to the IDM decision on the new Approach to Community Engagement Principles. This is not particularly accessible at the moment; it will not easily provide the end-user with any more useful details.	We have provided a link to the Council's approach to community engagement webpage and simplified the information provided to improve accessibility.
110	Southwark Law Centre	the community engagement principles have been summarised without any connection to planning specifically. We are not clear what happened to the regeneration that works for all framework or the social	We have revised the wording of the engagement principles to ensure that they are connected more specifically to planning activities. We have also outlined a new framework for improving participation in

		regeneration charters, which were important planning policy objectives from Southwark Law Centre's perspective. There appears to be a lack of information about why consultation on planning is legally required and unique in terms of the consultations that a local authority carries out, and how community engagement on this is different.	planning that focuses on the activities of the planning department.
111	Southwark Law Centre	Much more detail needs to be supplied with the following paragraph: *"We will undertake public consultation for set periods of time depending on the type of planning document or plan. Whenever it is necessary, we may extend the time period depending on the type, size and nature of the project and who will be impacted."* **We do not agree with reducing the consultation period for a regulation 19 planning policy to six weeks.**	The department strives to take a best practice approach to consultation at all times, and this includes compliance with all statutory consultation requirements and going beyond this where necessary. We do not undertake consultation that does not meet statutory requirements.
112	Southwark Law Centre	The document should contain a link to the current local plan on adoption. There is also no working link to the facts and figures page.	We have reviewed all the links in the document to ensure that they are working and have provided a link to the Southwark Plan 2022.
113	Southwark Law Centre	In terms of consultation methods, there should be more examples of the types of consultation that could take place in the document so people are aware of what they should expect when there is a planning policy consultation.	We have now included examples of consultation and engagement methods in the DCC under the document requirements.
114	Southwark Law Centre	In respect of development management and consultation on planning applications, we think the section requires a rethink. The information should be accessible and informative. There needs to be differentiation between types of development, and detail the different criteria (e.g., what a council will do, what a developer will do, what a housing association will do, what a different public body will do etc.). These specificities could then be connected to the approach to community engagement principles. This is not clear in the *we will,* and *we may* section of what is to be done at the different stages of the planning application process.	We have revised the development management and consultation on planning applications section to improve clarity. We have also added definitions for different application types into our online glossary. Requirements for consultation for developers are included in the DCC.
115	Southwark Law Centre	In the pre-application stage, the 2020 version of the Statement of	We have revised the language in the DCC to ensure it is clear that we

		Community Involvement states the council *"requires developers to carry out engagement"* during the pre-application phase, whereas in the 2022 version it merely *"Encourage[s] applicants to consult with the community"* in this phase. This is a concerning watering down of the language in this section.	require developers to undertake extensive engagement with the community prior to submitting an application.
116	Southwark Law Centre	A link to or copies in an appendix of a model Pre-Submission Engagement Plan, Pre-Engagement Summary, a Social Value Statement and Equality Impact Assessment. Some of these were included in the 2020 version of the Development Consultation Charter.	We have produced templates for all the documents required as part of the DCC.
117	Southwark Law Centre	Community Networks should be added to the groups to be consulted with. Again, Community Southwark could detail these, and there should be an internal list updated by Southwark Council when new ones are made known. This information is continually picked up by the council and it is valuable in terms of seeking inclusive engagement on planning matters.	Noted
118	Southwark Law Centre	There should be a separate, standardised document for Southwark Council's consultations on new homes on council estates schemes. This could refer to the information available from the council on new homes, but it would differentiate the type of consultation and the collaboration involved here, such as through the Resident Project Groups.	Noted
119	Southwark Law Centre	There should be more information about what is to be expected in the Pre-Submission Engagement Plan and the Post-Submission Engagement Plan. Related to this, timelines should be included, and it should be made clear that after the submission of the plan there will be a 21-day consultation period. The DCC can refer to the SCI timelines for more detail on this	We have revised the DCC to add further clarity regarding the requirements of the documents of the DCC. We have also included a timeline that states when the documents will be required.
120	Southwark Law Centre	Accessing information at an early stage is very difficult and understanding the timescales and areas of influence are difficult. There	We have revised the wording of both the SCI and DCC to improve clarity and remove any ambiguity. We have included alternative explanatory

		should be a checklist of information to provide to the community in respect of developments.	devices such as diagrams to improve understanding and a link to an online glossary for key terminology. We have also revised and improved the accessibility of both documents.
121	Southwark Law Centre	Pre-applications processes really vary. More detail of the minimum requirements for engagement summaries (both pre and post submission) in different type of developments (council, housing association or private developer) should be provided.	We have revised the DCC to outline more clearly our expectations for developers prior to submitting a planning application. We have set a minimum standard for an early engagement strategy depending on the progress of the scheme when the developer brings it to us at a pre-application meeting.
122	Southwark Law Centre	A fact-based audit should be a requirement of pre-submission planning applications. This could include all of the details on page 6 but impacts of the proposed development should be separated from the details of what is currently on and surrounding the site and tie in with the specified current findings and assessment for the Social Value Statement.	We have revised the requirements of the DCC to ensure that developers undertake a facts-based audit of the site and require them to demonstrate how this has informed the design of their scheme.
123	Southwark Law Centre	We understand one of the significant disadvantages the community has when it comes to engaging with and influencing developments. A key reason for this is that developers or project officers can continually discuss the planning applications, and council officers regularly brief planning committee. We believe there should be dedicated space before a development is considered by planning committee for there to be community briefings from those who have submitted comments on planning applications. If it was not felt that planning committee members could attend these, they should at least be attended by the planning officers and local ward councillors. We would expect a minimum of one meeting but there may be more for larger applications.	Noted
124	Southwark Group of Tenants Organisations	When new homes are proposed to be built on existing Council estates, the Council must ensure that their consultation adheres to the principles of the SGTO New Homes Consultation Charter.	We have reviewed the SGTO New Homes consultation charter and ensured that the principles included in the SCI and DCC are aligned. Southwark Council, as a developer itself, is bound by the principles of the SCI and DCC and this will ensure compliance.

125	Southwark Group of Tenants Organisations	Where development is proposed on or near Council estates and a Tenant and Resident Association (TRA) exists, ensure that consulting with tenant and resident associations is a compulsory part of the pre-application consultation process. TRAs provide a wealth of knowledge and experience about their estate. While consulting with TRAs must not replace consultation with the general resident population, TRAs must be able to contribute.	We have revised our definition of community groups to include TRAs. We also encourage TRAs to get in contact us to ensure that we reach out to them for consultation.
126	Southwark Group of Tenants Organisations	For the Council to commit to sending letters to all residents who would be impacted by a proposed development. These letters would invite them to take part in the planning consultation either in-person, or by email, phone, or letter.	We send neighbour notification letters, put up site notices and put out a press notice for applications in accordance with statutory requirements. We are aware of the need to avoid a digital-only approach to consultation and aim to use a variety of methods of communication that are inclusive.
127	Southwark Group of Tenants Organisations	Point 7 of our New Homes Consultation Charter sets out that "the Council must demonstrate that a proposed development responds to the genuine housing needs of residents on an estate." This housing need could be established through a fact-based audit, made prior to the submission of the planning application. This could include all of the details on page 6 of the Developer Consultation Charter but impacts of the proposed development should be separated from the details of what is currently on and surrounding the site and tie in with the specified current findings and assessment for the Social Value Statement. The Council must ensure that any development responds to the needs identified within the audit.	We have revised the requirements of the DCC to ensure that developers undertake a facts-based audit of the site and require them to demonstrate how this has informed the design of their scheme.
128	Southwark Group of Tenants Organisations	the Council should commit to creating an equalities action plan for each development, prior to the submission of the planning application. This would be formed in partnership with community stakeholders, and would detail how the Council intends to engage harder to reach groups in consultation. This could include, for example, digitally excluded people, or people who speak English as a second language. The equalities action plan would contain mutually agreed goals for the	The DCC requires developers to prepare an equalities impact assessment (EQIA) for all major developments where they must consider the impact of development on those with protected characteristics under the Public Sector Equalities Duty. This includes how the developer will consult with these groups and incorporate their needs into the design of the development. We have revised the wording of the DCC to ensure that

		engagement of harder to reach groups.	the requirements of this document are clear.
129	Southwark Group of Tenants Organisations	Further to the above, the Statement of Community Involvement must include a commitment to work with residents to establish what is an acceptable level of resident engagement with a planning application. This includes mutually agreed goals on the quantity of responses required and the additional measures required to reach this number.	We have consulted with a wide variety of groups in writing and preparing the SCI and DCC. However, we recognise the need to engage consistently with the community and therefore we will continue to strive for improved communication with our local community.