

## Headline points in the Southwark Law Centre's email sending the legal letter of 4<sup>th</sup> June 2024

- BH has failed to comply with the Development Consultation Charter by not providing an Early Engagement Strategy, creating the risk of an unlawful process.
- The Council admits consultation has not yet been good enough, but there is no clear plan on how to fix this. More events are not enough – the *content* and *quality* must also change.
- The Council is refusing to allow the ACCF to review the Engagement Summary prior to validation, creating a further risk of an unlawful process.
- There is inadequate assessment and mitigation of indirect socioeconomic and equalities impacts on Peckham residents and businesses. BH has chosen to exclude broader indirect effects on Peckham from its socioeconomic assessment and the Council approved this without proper scrutiny.
- BH has done a selective assessment of retail use nearby to justify over-delivering on bars, cafes, clubs and gyms – rather than meeting community needs.
- There is a high risk that BH will not actively seek to retain small shops and small and independent businesses onsite (as per policies P32 and P33). BH have incorrectly excluded arcade traders and food market vendors. The Council needs to ensure early, detailed engagement with businesses.
- Affordable housing policy P1 is being misapplied by the Council and BH. The Council must ensure the maximum viable amount of affordable housing (particularly social rent) is delivered, including above 35%.
- BH's proposals breach family housing policy P2 by delivering too many studios and 1-bed flats.
- There is a high risk that the Community Land Trust ("CLT") units will not be properly delivered.
- BH materials misstate the reality of the development, including the extent of delivery of public open space and views of the development behind the clock Jones and Higgins Clock Tower. Consultation has therefore been inherently misleading and based on false information.