

DRAFT TEMPLATE FOR REPRESENTATION ON NEW SOUTHWARK PLAN

Response on Consultation

This submission relates to IP6 Statement of Community Involvement (SCI). We believe that the new Southwark Plan is not sound on the basis that the SCI has not been positively prepared. There are three elements to this assertion:

- 1) The SCI is not visible or integrated into the plan
- 2) The consultation approach in the development of the plan has not engaged the local voluntary and community sectors effectively.
- 3) The SCI itself is outdated, in need of urgent review and so not fit for purpose

Visibility of the SCI

The proposed submission version of the new Southwark Plan only refers to the Statement of Community Involvement at one place IP6 on page 15. In this paragraph it states it is 'available to download here' but there is no inclusion of a link to the SCI (an external document). The document of the SCI is also not visible in the appendices or policy schedules related to the NSP.

Approach to consultation in the development of the plan

The lack of visibility of the Statement of Community Involvement is indicative of a wider issue of the approach to consultation throughout the plan.

We fully appreciate the importance of the new Social Regeneration Policy (SP2) now referred to in the plan; it is as an approach built on engagement and co-production which mirrors other strategic developments within the borough building cross-sectoral collaboration and partnership. However, this was included late in the development of the plan, and the principles of this policy are not reflected throughout; and, therefore, has not been used to ensure that the plan has been produced through early and meaningful engagement.

In February 2016 Community Southwark (then Community Action Southwark, CAS) submitted a representation to the preferred option version of the NSP. In our representation we noted that:

“Consideration needs to be given to the role that CAS should itself be playing to secure more extensive, accessible and inclusive Community Engagement on the NSP; as with other Council activities and consultations. CAS has contractual obligations to the Council in this regard for the next three years, and in helping ensure Southwark's communities are properly involved in shaping decisions that affect their lives.”

We received no response to this submission and as the umbrella body for the voluntary and community sectors in the borough have been poorly engaged with in the development of the plan. In not adequately engaging with or consulting the voluntary and community sectors in the development of the plan, and thus missing the opportunity of reflecting the most immediate and up-to-date local intelligence, we feel that an assessment of need cannot have been objectively garnered and thus it has failed in its duty to be positively prepared.

Form of the SCI

The Current Statement of Community involvement that is referred to in the NSP has not been reviewed since 2008. It does not take account of legal changes under the Localism Act, more

up to date guidance on planning good practice on consultation, or even reflect changes to local relationships that the Council is party to.

The National Planning Policy Framework emphasises the need for *“early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses”* So that local plans reflect a *“collective Vision”* (Paragraph 155). There is only one reference in the SCI linked to this regarding involving people in the preparation of documents, proposals or planning applications which highlights that *“this enables people to have more influence as they are involved from an early stage before options are created”* however this then goes on to state that *“participation will follow the guidelines of the Southwark Compact”* and links to the Southwark Alliance Website. The Southwark Alliance has not been active for some years, and there is no link to the Southwark Compact on the Southwark Alliance site. Thus the principles underpinning the approach to engagement stated in the SCI are not accessible not agreed and outdated.

In the Southwark Voluntary and Community Sector strategy, Common Purpose Common Cause (2016), under the workstream of Community Assets there is a specific action listed to review the Statement of Community involvement.

“To achieve this, we will undertake a rapid review of engagement processes with the wider community in relation to place based decisions and make recommendations on how the process can move on from consultation and informing to co-production. For example, we will review the 2008 Statement of Community Involvement for planning. The aim will be to bring it into line with the principles of co-production outlined in this strategy.”

This is something that the community sector has been championing in Southwark for some time. However, to date there has been no action on this. Therefore, the SCI that has been used as the basis to consult on the plan is one that has, for some time, needed urgent review; and it is a major concern that it has continued to be used even though it is recognised it needs to be reviewed.

Proposed better approaches

1. The SCI is reviewed immediately to both reflect the changes that should have taken place before now and, most importantly, to embed the values, principles and processes of
 - the Council’s Social Regeneration policy, and
 - the Common Purpose, Common Cause strategy.
2. The NSP is reviewed to identify and address any policies that should have been the subject of greater involvement of local people *“from an early stage before options were created”* in the manner that the revised SCI would require.
3. It is then further reviewed to re-examine Area Visions, which are key to enabling local people to engage as the least technical of NSP documents, and then each of the Site Allocations that derive from those Area Visions.
4. No developments, either identified in Site Allocations or more generally, should be agreed until there is a real opportunity for *“early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses”* and local plans reflect a *“collective Vision”* as the NPPF requires.