



**New Southwark Plan
Southwark Council's Proposed
Changes to the Submitted New
Southwark Plan 2018-2033
August 2020**

Consultation Plan

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1. Introduction

What is the New Southwark Plan?

- 1.1. The New Southwark Plan (NSP) is a statutory planning document that will provide an overarching strategy for managing growth and development across the borough for the next 15 years. The plan will set out how we will deliver further regeneration and wider improvements to our borough in the years to come.
- 1.2. The New Southwark Plan explains our strategy for regeneration from 2018 to 2033. It will:
 - Set policies to support the provision of new homes including 11,000 new Council homes
 - Protect our existing schools and community facilities in the borough and provide more where this is needed
 - Protect local businesses and attract more businesses into the borough to increase job opportunities
 - Support our high streets and increase the range of shops to increase their vitality
 - Direct growth to certain areas of the borough, predominantly in the Old Kent Road, Elephant and Castle, Canada Water, East Walworth, Blackfriars Road, Bankside and along the River Thames where there is greater public transport accessibility
 - Introduce policies to improve places by enhancing local distinctiveness and protecting our heritage assets
 - Set policies to provide more green infrastructure and to promote opportunities for healthy activities
- 1.3. The NSP is a spatial plan. Not only does it set out planning policies to guide development but it also explains how development will be delivered and may inform future decisions about investment in infrastructure. The final NSP will replace the saved policies of the Southwark Plan 2007 and the Core Strategy 2011 and will be used to make decisions on planning applications.
- 1.4. This consultation plan should be read alongside the NSP: Southwark Council's Proposed Changes to the Submitted Plan. This document can be found on the [Examination website](#) along with all of the supporting documents and evidence base that have been submitted to the Planning Inspector.
- 1.5. This consultation will focus on the NSP: Southwark Council's Proposed Changes to the Submitted New Southwark Plan 2020 as well as a number of updated evidence base documents that have been submitted to the Inspectors after the submission of the plan. These evidence base documents include a Habitats Regulation Assessment, Viability Assessments, Strategic Flood Risk Assessment and a Gypsy and Traveller Accommodation Assessment Report which have not required an amendment to the plan. The following documents have been prepared:
 - NSP Southwark Council's Proposed Changes to the Submitted New Southwark Plan 2020 and to include a Key Diagram (update to NSP01 and NSP01A) (EIP27A–C)
 - Schedule of Changes from the PSV/APV NSP (EIP27D)
 - Consultation Plan (updated August 2020) and statement of representations procedure (EIP74)
 - NSP Consultation Report (updated 2022 with tracked changes) and appendices (EIP73)
 - Health impact assessment (updated July 2020) (EIP77)
 - Updated Equalities Analysis Impact Assessment (updated July 2020) (EIP76A–C)
 - Statement of Conformity and legal checklist (EIP75)
 - Updated Integrated Impact Assessment – IIA (EIP72)

- Integrated Impact Assessment: Appendices 1-11 (updated July 2020) (EIP72A)
- Habitats Regulation Assessment (updated April 2020) (EIP23)
- NSP Director's Report (August 2020) (EIP71)
- Inspectors' response to Southwark Law Centre (June 2020) (EIP26)
- List of examination documents (EIP70A-B)
- Letter from Natural England (April 2020) (EIP21)
- Updated Statement of Common Ground with Environment Agency (July 2020) (EIP64)
- Southwark Site Allocations Methodology Paper (updated July 2020) (EIP82)
- Viability Appraisal Background Paper (EIP20)
- Viability Assessments (EIP17–EIP19)
- Housing background paper addendum – Gypsy and Traveller Update (EIP78)
- Gypsy and Traveller Needs Assessment (EIP22)
- Tall building background paper (July 2020) (EIP54)
- Heritage supplementary planning document Consultation Version (July 2020) (EIP55)
- Energy Background Paper (EIP59)
- Strategic Flood Risk Assessment update (EIP15A–D)
- The Local Development Scheme (EIP66)

1.6. **The purpose and objectives of this consultation plan**

1.7. The NSP was submitted to the Planning Inspectorate for Examination in January 2020. Since the last rounds of consultation, January - May 2019 for the Amended Policies and October 2017 - February 2018 for the Proposed Submission Version, we have made modifications to the plan as a result of the comments that were received from the Inspectors. Because of this, we are consulting on the Council's Proposed Changes to the Submitted New Southwark Plan, which includes amendments to the plan that was submitted to the Inspectorate in January 2020. This will ensure we have the most up to date plan possible. Consultation will last from 27 August 2020 - 26 October 2020 (11:59pm). The Examination will remain open during this time.

1.8. The Inspectors' have agreed the following for moving forward with the Examination (as detailed in their letter dated 2nd June 2020):

"The proposed submission plan can only be the 2017/18 Proposed Submission Version of the plan. We will have regard to representations already made on the Amended Policies Version in 2019 and hear from anyone who made comments at that stage who wishes to be heard. However, to ensure transparency and fairness we endorse the Council's suggested approach to undertake additional consultation at this early stage of the examination. The consultation will be confined to (i) allowing those who were unable to comment on the Amended Policies Version to now make representations on its content; and (ii) to enable wider comment on the Council's proposed changes (the January 2020 tracked changes and any other changes on or since submission) together with latest evidence base updates. We will work with the Council on ensuring the consultation assists the examination in that time taken now will make for more expedient process during and after the hearings."

1.9. The purpose of this consultation plan is to explain how this stage of consultation on the New Southwark Plan: The Council's Proposed Changes to the Submitted Plan will take place. The Inspectors will be taking into account all duly made representations on the 2017/18 Proposed Submission Version (PSV) plan. They will also take into account those representations already received on the 2019 Amended Policies Version (APV) content.

1.10. Accordingly, as part of the next consultation representations that have already been made on either the PSV or APV plan content should not be re-submitted. Representations should be received from:

- **anyone who was unable to comment on the APV content and now wishes to do so; and**
- **anyone who now wishes to comment on the latest proposed changes (the January 2020 schedule of changes and its accompanying tracked change version of the plan and any other changes on or since submission) and the latest evidence base**
- **The Inspectors have already received all representations from the PSV and APV consultations and so these should not be resubmitted**

1.11. The consultation plan explains how the consultation will meet the requirements of the Town and Country Planning (Local planning) (England) Regulations 2012 (as amended) (The Regulations). It also meets the guidance set out in Southwark's currently adopted 2008 Statement of Community Involvement (SCI) as well as the SCI which is currently being updated in consultation with the local community. The SCI explains how we will consult the community in the preparation of planning documents. Further information is set out in section 3 of this plan. However, given the situation with COVID-19 and the current restrictions in place, there may need to be some alternatives to the consultation standards set out in the adopted SCI. The draft SCI is being updated with alternatives

to consultation when face-to-face engagement is not possible. This is in line with the Government's Planning Practice Guidance: Plan-making (updated on 13 May 2020).

- 1.12. Several stages of consultation have already been undertaken for the New Southwark Plan. Between November 2013 and March 2014 the council carried out an informal stage of consultation through a survey focused on the borough's high streets. Interested parties had the opportunity to respond online, by post or through attending community outreach consultation sessions at neighbourhood groups. We received over 500 questionnaire responses.
- 1.13. The Issues and Options version of the New Southwark Plan was consulted on from October 2014 to March 2015. This version of the plan set out early draft policies and area visions. The document presented different options on policy approaches and we sought feedback on these. We received over 300 written responses during this stage of consultation as well as feedback through a variety of channels including workshops, meetings and conversations with the interested residents, people who worked and owned businesses in the borough, professional bodies and organisations, landowners and other interested stakeholders.
- 1.14. Between October 2015 and February 2016 the council consulted on the Preferred Option draft of the policies of the New Southwark Plan, including high-level strategic policies, set out across the key "fairer future" themes that the council will help to deliver (such as "Quality Affordable Homes" and "Cleaner, Greener, Safer"). The outcome to this stage of consultation is set out in the consultation report that was published concurrently with the NSP: Area Visions and Site Allocations (Preferred Option) document.
- 1.15. The Area Visions and Site Allocations consultation formed the second part of the Preferred Option stage and was consulted on from February to July 2017. Since the close of these consultations, the council has had the opportunity to review the responses received and produced a set of New and Amended policies which was consulted on in an 'interim' consultation from June to September 2017.
- 1.16. The Proposed Submission Version, which contains all policies including strategic policies, detailed development management policies, the area visions for the borough's neighbourhoods and the final list of development site allocations, was consulted on between October 2017 and February 2018. This consultation led to further amendments to certain policies; Southwark Council subsequently produced the Amended Policies which was consulted on between 15 January 2019 and 17 May 2019.
- 1.17. Consultation on the Proposed Submission Version and the Amended Policies led to changes being made to the plan and the New Southwark Plan Submission Version – Proposed Modifications for Examination was submitted to the Planning Inspectorate for Examination in January 2020. Although we are consulting on the Council's Proposed Changes to the Submitted Plan the Examination will remain open. Hearing sessions for the Examination in Public are currently unable to take place, however, this will be reviewed following the close of the consultation and a review of more up to date government guidance relating to restrictions as a result of COVID-19.

2. How we are consulting?

- 2.1. Tables 1-4 of this Consultation Plan set out how we will consult on the New Southwark Plan: The Council's Proposed Changes to the Submitted Plan.
- 2.2. Once we have finished consulting on the New Southwark Plan: Southwark Council's Proposed Changes to the Submitted Plan we will collate all the responses we receive, and these will be passed to the Inspectors via the Programme Officer.
- 2.3. This consultation plan should be read alongside the New Southwark Plan: Southwark Council's Proposed Changes to the Submitted Plan. This document sets out the policies used for decision making, visions for the borough's neighbourhoods and identifies the proposed key development sites which will help the council and its partners deliver on these visions.
- 2.4. The Examination will remain open throughout this consultation. After the consultation, the Examination in Public will proceed to the next stages, including hearing sessions. Following the close of the hearings and any consultation on additional changes that arise during the hearings, the Inspectors will write a report which may include modifications to the NSP: Southwark Council's Proposed Changes to the Submitted New Southwark Plan 2020. The final New Southwark Plan will then be adopted by the council. This is a decision taken by all councillors at the Council Assembly.
- 2.5. As with the previous two rounds of consultations, at this stage we are required to ask two specific questions which will give our residents and stakeholders an opportunity to comment on how the New Southwark Plan has been prepared, that its aims are achievable and that the plan is based on a robust evidence base. These questions are more commonly known as the 'Test of Soundness.' These are the same questions the independent Planning Inspectors will be asking as part of the examination.

1. Is the Local Plan Legal?

A plan is considered legal when it complies with section 20(5) (a) of the Planning and Compulsory Purchase Act 2004.

You may wish to consider the following before making a representation on legal compliance:

- Whether the Local Plan has regard to national policy and guidance issued by the Secretary of State
- Whether the Local Plan has been prepared in-line with our Local Development Scheme (LDS)
- Whether community consultation has been carried out in accordance with our adopted Statement of Community Involvement
- Whether an Integrated Impact Assessment assessing social, environmental and economic factors has been prepared and made public.
- Whether the requirements of the Duty to Co-operate have been met. The Localism Act, section 110, and the National Planning Policy Framework, paragraphs 24 to 27, creates a duty on all local planning authorities and other bodies to cooperate with each other to address strategic issues in the preparation of the Local Plan

2. Is the Local Plan 'Sound'?

As part of the examination, the independent Planning Inspector is required to consider if the New Southwark Plan has been positively prepared, justified, effective, and is consistent with national policy.

You may wish to consider the following before making a representation on the Soundness of our plan:

- **Positively Prepared:** This means that we have objectively assessed the need for homes, jobs, services and infrastructure and these have been delivered sustainably. If you think that our assessments are not objective or do not take sufficient account of unmet needs in neighbouring authorities then your comments relate to whether our Local Plan has been positively prepared or not.

- **Justified:** This means that the Plan is based upon a robust and credible evidence base. If you think that the evidence doesn't support the choice made in our Local Plan or there are realistic alternatives then your comments relate to whether it is justified.

- **Effective:** This means that the Plan is achievable. If you think that what we are proposing in the Local Plan will not happen as the required infrastructure cannot be provided, the groups who will deliver elements of it haven't signed up to it or our Local Plan does not join up with the strategies of our neighbouring authorities, then your comments relate to whether our Local Plan is effective or not.

- **Consistent with national policy:** Do you consider that our Local Plan accords with the National Planning Policy Framework, the London Plan, other policies or includes clear and convincing reasons for doing something different? Alternatively, you may think that the Local Plan should depart from national policy due to an identified and justified local need.

2.6. We will also ask respondents to specify if they wish to start working with us on a Statement of Common Ground which we will consider prior to Hearing sessions starting. If you have no further comments to make in this round of consultation we will can start preparing a Statement of Common Ground with you now. If you have new comments to make, a Statement of Common Ground can be prepared once they are made.

2.7. New Southwark Plan documents can be found on our website at:
<https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/new-southwark-plan>

Tailoring the SCI to meet the circumstances of the NSP and consulting during COVID-19

2.8. The Statement of Community Involvement 2008 and the draft Statement of Community Involvement 2019 sets out how the community can expect to be consulted throughout the planning process. Because of current government restrictions relating to COVID-19 there will be a need for some alternatives to the way in which we consult. This consultation is going ahead to ensure that we can continue to deliver housing, businesses and other projects under a plan with a set of

strategic policies and visions. To make sure that we can carry out this consultation safely, we will adhere to current government guidelines around social distancing and will carry out this consultation online. The draft Statement of Community Involvement 2019 is being updated to reflect alternatives to consultation when face-to-face consultation is not possible. This is in line with the Government's Planning Practice Guidance: Plan-making (updated on 13 May 2020).

3. Consultation timetable and methods of consultation

Consultation timeframe

- 3.1. Consultation will last for 8 weeks as recommended by the Planning Inspectors.
- 3.2. The New Southwark Plan: Southwark Council's Proposed Changes to the Submitted Plan and updated evidence base will be available for comment with the date to be updated.
- 3.3. Further details on how to make representations are set out in the 'Statement of Representations Procedure' which accompanies this consultation.
- 3.4. **All responses must be received by 11:59pm on 26 October 2020.**

Consultation methods

- 3.5. The tables below set out the different consultation methods we propose to use. Throughout preparing the New Southwark Plan we have sought to consult with as many people as possible so that the New Southwark Plan: The Council's Proposed Changes to the Submitted Plan reflects the needs and aspirations of our diverse community.
- 3.6. We set out the minimum SCI requirements that we will carry out, and then the additional consultation we propose to carry out. We set out dates where these are already agreed.
- 3.7. This table is not exhaustive and throughout the consultation period we will look at ways in which to carry out different types of consultation with as many different groups as possible.

TABLE 1: MINIMUM CONSULTATION AS REQUIRED BY THE 2012 REGULATIONS¹ AND NATIONAL POLICIES

Method of Consultation	Consultee	Date	Comments
<p>As per Regulation 35(1)(b):</p> <p>Display the plan and accompanying documents on the council's website.</p>	<p>All</p>	<p>27 August 2020</p>	<p>Our website will continually be updated. The New Southwark Plan document and associated documents is available on our website: https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/new-southwark-plan?chapter=2</p>
<p>As per Regulation 35(1)(a):</p> <p>Our 2008 SCI requires us to place a copy of the plan in local libraries and in the council office.</p>	<p>All</p>	<p>n/a</p>	<p>In line with the Chief Planner's newsletter July 2020, the plan will be available online only. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904586/Chief_Planners_Newsletter_-_July_2020.pdf</p>

¹ Town and Country Planning (Local Planning) Regulations 2012

Method of Consultation	Consultee	Date	Comments
<p>As per Regulation 18(1):</p> <p>Mail out to all the statutory prescribed bodies and consultees as listed under Regulation 4(1)</p>	<p>All consultees defined as statutory consultees in the SCI and all the prescribed bodies and neighbouring boroughs referred to in the Duty to co-operate.</p>	<p>27 August 2020</p>	<p>This includes the bodies identified as statutory consultees in the SCI, all the prescribed bodies as set out in the Localism Act and that we are required to consult with as part of the Duty to co-operate, and all our neighbouring boroughs. This will be through our planning policy mailing database including those listed within the 2008 SCI (or any superseded bodies to any defunct organisations specified within the SCI).</p>
<p>As per Regulation 18(1)(b):</p> <p>Invite people to make representations on the New Southwark Plan: Southwark Council's Proposed Changes to the Submitted Plan and accompanying evidence base documents</p>	<p>All on planning policy consultee database</p>	<p>27 August 2020</p>	<p>An email will be sent to the 15,000+ contacts signed up for planning policy email notifications and updates via MySouthwark.</p>
<p>As per Regulation 3:</p> <p>Comments will also be accepted by email and by letter</p>	<p>All</p>	<p>Until 26 October 2020 11.59pm</p>	<p>Comments can be emailed to planningpolicy@southwark.gov.uk</p> <p>Comments can be posted to Planning Policy Southwark Council PO BOX 64529 London</p>

Method of Consultation	Consultee	Date	Comments
			SE1P 5LX As the office is currently closed due to restrictions relating to COVID-19, we ask that anyone who wishes to write a letter, emails or phones us first on 0207-525-4929 or 07731325511 so that we can ensure that someone will be there to receive the representation. We will however check all post received addressed to Planning Policy at the above address at the end of the consultation period.

TABLE 2: CONSULTATION REQUIRED BY OUR ADOPTED STATEMENT OF COMMUNITY INVOLVEMENT 2008 ADDITIONAL TO THE REGULATIONS 2012

Method of Consultation	Consultee	Date	Comments
Place a press notice in the local newspaper to advertise the start of the formal consultation period.	All	27 August 2020	This will be in the Southwark News.

TABLE 3: CONSULTATION AS REQUIRED BY OUR EMERGING STATEMENT OF COMMUNITY INVOLVEMENT 2019 ADDITIONAL TO THE 2012 REGULATIONS AND THE STATEMENT OF COMMUNITY INVOLVMENT 2008

Method of Consultation	Consultee	Date	Comments
Advertise the consultation through posters in libraries	All	Once libraries have re-opened	Restrictions relating to COVID-19 may mean that this is not possible
Advertise consultation on the plan through council social media	All	27 August 2020	Send out regular updates and reminders through council social media pages
Provide an online questionnaire on the Consultation Hub with links to where the New Southwark Plan and accompanying documents can be found on the council's website.	All	27 August 2020	Consultation Hub will be available for the consultation period.

TABLE 4: FURTHER CONSULTATION

Method of Consultation	Consultee	Date	Comments
We will allocate timeslots for people to give feedback over the phone where they cannot write a letter/send an email/ access the Consultation Hub	All	27 August 2020- 26 October	Phone calls will allow those who cannot access the internet or send a letter to engage with the consultation and provide comments on the plan

4. How to comment on the New Southwark Plan

4.1 We welcome your comments on the New Southwark Plan: Southwark Council's Proposed Changes to the Submitted Plan and updated evidence base documents regarding the legal tests of soundness. Representations should be received from:

- **anyone who was unable to comment on the APV content and now wishes to do so; and**
- **anyone who now wishes to comment on the latest proposed changes (the January 2020 tracked changes and any other changes on or since submission) and the latest evidence base**
- **The Inspectors have already received all representations from the PSV and APV consultations and so these should not be resubmitted**

4.2 Please contact us if you would like to know more about the plan or to find out more about our consultation.

4.3 All comments must be received by **11:59pm on 26 October 2020**.

4.4 Representations can be made via the Consultation Hub:
www.southwark.gov.uk/nsp2020

Representations can be made via email: planningpolicy@southwark.gov.uk

Representations can be made in writing and sent to:
Planning Policy
PO BOX 64529
London
SE1P 5LX

*Please note that the office is currently closed and all officers are working remotely. Therefore there will be a delay in acknowledging the receipt of a written response. We would ask that anyone wishing to send a letter rings us first so that we can ensure that there will be someone to receive a response.

If you have any additional queries please e-mail: planningpolicy@southwark.gov.uk or call either 0207-525-4929 or 07731325511

5. Monitoring and reporting

- 5.1 The outcomes of the New Southwark Plan: Southwark Council's Proposed Changes to the Submitted Plan consultation will be set out at the Examination in Public and uploaded to the Council's examination webpage.
- 5.2 After this consultation, all written comments received will be published alongside the Submission Version of the plan for the Examination in Public and the council will provide responses to representations received. All respondents will be notified of the examination hearings and the publication of the Inspectors' Issues and Questions. A report summarising the consultation responses will be submitted into the Examination including the Council's advice to the Examination on any areas of the plan that may need to be amended for soundness in light of consultation responses at this stage.

Appendix A: Statement of Representations Procedure



Statement of Representations Procedure

This document has been prepared pursuant to the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulation 19, 20 and 35) and sets out the items described in 1) – 8) below:

The following items listed no. 1 - 8 sets out what this Statement of Representations Procedure addresses:

1) Title of document

Title of the development plan document published for consultation

2) Subject matter

What this document is about

3) Period for submission of representations

When the consultation closes

4) Where to view the plan and supporting documents

Link to web page

5) Things to consider when making a representation

Regarding 'soundness' and legal compliance

6) How to submit your representation

Online, by email or by post

7) Notification of next stages

Tell us if you want to be notified

8) Contact for more information

Phone and email of the Southwark Council planning policy team

1) Title of the document

New Southwark Plan: Southwark Council's Proposed Changes to the Submitted Plan and updated evidence base documents. These can be viewed on the Council's [Examination webpage](#) and are listed in the schedule of Examination documents.

2) Subject Matter

The New Southwark Plan (NSP) is Southwark Council's new Local Plan which has been submitted to the Secretary of State for Communities and Local Government. The NSP sets out the council's primary planning and regeneration strategy up to 2033 to deliver a fairer future for all in the borough. The plan includes strategic and detailed planning policies, visions for each of the borough's neighbourhoods, and sites identified and allocated for development which will help deliver on these visions. The plan sets out how and where much needed new homes, jobs, social, green and transport infrastructure can and should be delivered to meet the borough's needs. The plan also includes monitoring indicators which set out how we will monitor the impacts of these policies and the strategy set out in the New Southwark Plan.

The New Southwark Plan has been submitted to the Secretary of State and is now at Examination stage. Independent Inspectors have been appointed to examine the plan. The role of this consultation is to provide the opportunity for representations to be made on the changes made to the plan since the last round of consultation on the Proposed Submission Version and Amended Policies. A Schedule of Changes outlining where updates have been made from the Proposed Submission Version/Amended Policies Version will accompany the plan. All previous comments made on the Proposed Submission Version/Amended Policies remain valid and do not need to be repeated. These have been submitted to the Inspectors and published on the [Examination webpage](#). Accordingly, as part of the next consultation representations that have already been made on either the PSV or APV plan content should not be re-submitted. Representations should be received from:

- anyone who was unable to comment on the APV content and now wishes to do so; and
- anyone who now wishes to comment on the latest proposed changes (the January 2020 tracked changes and any other changes on or since submission) and the latest evidence base
- The Inspectors have already received all representations from the PSV and APV consultations and so these should not be resubmitted

The plan was submitted to the Planning Inspectorate for Examination in January 2020. The Examination will remain open throughout this consultation. Hearing sessions are currently unable to take place however the situation will be reviewed following the close of the consultation in light of COVID-19.

3) Period for submission of representations

Consultation will last from 27 August 2020– 26 October 2020 (11:59pm).

4) Where to view the plan and supporting documents

The plan and all supporting documents, including previous consultation responses that have been submitted to the Planning Inspectorate can be found on the Council's [Examination webpage](#).

5) Things to consider when making a representation

Comments made in this round of consultation should be focused on the changes made to the plan since the last two rounds of consultation on the Proposed Submission Version/Amended Policies. All previous comments made at the last two stages of consultation remain valid and do not need to be repeated. Accordingly, as part of the next consultation representations that have already been made on either the PSV or APV plan content should not be re-submitted. We will encourage respondents to review our published responses to their previous representations and use the opportunity to raise points that they feel remain unresolved. Representations and officers responses to these representations can be found on the Council's [Examination webpage](#). Representations should be received from:

- **anyone who was unable to comment on the APV content and now wishes to do so; and**
- **anyone who now wishes to comment on the latest proposed changes (the January 2020 tracked changes and any other changes on or since submission) and the latest evidence base**
- **The Inspectors have already received all representations from the PSV and APV consultations and so these should not be resubmitted**

As with the previous two rounds of consultations, we are required to ask two specific questions which will give our residents and stakeholders an opportunity to comment on how the New Southwark Plan has been prepared, that its aims are achievable and that the plan is based on a robust evidence base. These questions are more commonly known as the 'Test of Soundness.' These are the same questions the independent Planning Inspector will be asking as part of the examination.

1. Is the Local Plan Legal?

A plan is considered legal when it complies with [section 20\(5\) \(a\) of the Planning and Compulsory Purchase Act 2004](#).

You may wish to consider the following before making a representation on legal compliance:

- Whether the Local Plan has regard to [national policy](#) and [guidance](#) issued by the Secretary of State

- Whether the Local Plan has been prepared in-line with our Local Development Scheme (LDS)
- Whether community consultation has been carried out in accordance with our adopted Statement of Community Involvement
- Whether an Integrated Impact Assessment assessing social, environmental and economic factors has been prepared and made public.
- Whether the requirements of the Duty to Co-operate have been met. The Localism Act, section 110, and the National Planning Policy Framework, paragraphs 24 to 27, creates a duty on all local planning authorities and other bodies to cooperate with each other to address strategic issues in the preparation of the Local Plan

2. Is the Local Plan ‘Sound’?

As part of the examination, the independent Planning Inspector is required to consider if the New Southwark Plan has been positively prepared, justified, effective, and is consistent with national policy.

You may wish to consider the following before making a representation on the Soundness of our plan:

- **Positively Prepared:** This means that we have objectively assessed the need for homes, jobs, services and infrastructure and these have been delivered sustainably. If you think that our assessments are not objective or do not take sufficient account of unmet needs in neighbouring authorities then your comments relate to whether our Local Plan has been positively prepared or not.
- **Justified:** This means that the Plan is based upon a robust and credible evidence base. If you think that the evidence doesn’t support the choice made in our Local Plan or there are realistic alternatives then your comments relate to whether it is justified.
- **Effective:** This means that the Plan is achievable. If you think that what we are proposing in the Local Plan will not happen as the required infrastructure cannot be provided, the groups who will deliver elements of it haven’t signed up to it or our Local Plan does not join up with the strategies of our neighbouring authorities, then your comments relate to whether our Local Plan is effective or not.
- **Consistent with national policy:** Do you consider that our Local Plan accords with the National Planning Policy Framework, the London Plan, other policies or includes clear and convincing reasons for doing something different? Alternatively, you may think that the Local Plan should depart from national policy due to an identified and justified local need.

Please let us know in your representation if you would like to start working with us on a Statement of Common Ground which we will consider prior to Hearing sessions starting. If you have no further comments to make in this round of consultation we will can start preparing a Statement of Common Ground with you now. If you have new comments to make, a Statement of Common Ground can be prepared once they are made. This question will be asked on the online Consultation Hub where respondents can highlight whether they would like to work on a Statement of Common Ground. Those who submit an email/letter should clearly state in their representation that they would like to work on a Statement of Common Ground. If you would like to prepare a Statement of Common Ground based on representations

already submitted to the Proposed Submission Version/Amended Policies of the New Southwark Plan, please email planningpolicy@southwark.gov.uk to request this.

If you would like to be heard at the independent Examination in Public, please tell us in your representation. Please double check that the contact details you include with your representation are correct so we can contact you regarding this. Those who have previously stated that they would like to be heard at the Examination in Public have already been noted and do not need to state this again. This question will be asked on the online Consultation Hub where respondents can highlight whether or not they would like to be heard at the Hearings. Those who submit an email/letter should clearly state in their representation that they would like to be heard at the Examination in Public.

6) How to submit your representation

Online through our Consultation Hub: URL:
www.southwark.gov.uk/nsp2020

By email: planningpolicy@southwark.gov.uk

By post: Planning Policy, Southwark Council, PO BOX 64529, London, SE1P 5LX

Please note: all comments will be made public and will be submitted to the Secretary of State along with the New Southwark Plan and other relevant supporting evidence following this consultation. **We will not consider confidential or anonymous responses. Your comments and name will be published but other personal information will remain confidential.**

7) Notification of next steps

- The plan was submitted to the Planning Inspectorate in January 2020 for Examination
- Publication of the recommendations of the person appointed to carry out an independent examination of the New Southwark under section 20 of the Act
- The adoption of the New Southwark Plan by Southwark Council

Please double check that the contact details you include with your representation are correct so we can contact you regarding the Examination in Public.

Please note: Reference to 'Section 20 of the Act' refers to Section 20 of the Planning and Compulsory Purchase Act 2004. You can find out more information about this by viewing and downloading Section 20 of the Act here: <http://www.legislation.gov.uk/ukpga/2004/5/section/20>

8) Contact for more information:

Please contact the Southwark Council Planning Policy team by email at planningpolicy@southwark.gov.uk

or by phone at 0207-525-4929 or 07731325511