

Representation	Officer Response
<p data-bbox="188 316 694 347">IP7 Statement of Community Involvement</p> <p data-bbox="188 357 369 421">SE5 Forum NSPPSV465.13</p> <p data-bbox="188 464 1115 778">Statement of Community involvement. Not positively prepared The Councils statement of community involvement is not positively prepared. Although the document refers to Camberwell throughout it fails to note that Southwark has dissolved the Camberwell community council and the Multi Ward replacement splits the area between Walworth and Champion Hill. This means that there is no consultation mechanism at which Camberwell and its town centre, the historic nature and specific identity of the area is regularly considered and reviewed, or which enables the local community to contribute to the area vision</p>	<p data-bbox="1140 464 2065 603">Noted. The SCI is consulted on in partnership with community groups and organisations and well as directly with individual members of the community. There will be further opportunities to engage with and make a representation on the Statement of Community Involvement.</p>
<p data-bbox="188 826 678 890">Old Bermondsey Neighbourhood Forum NSPPSV132.30</p> <p data-bbox="188 933 1106 1289">Document EIP 27A Policy: IP6 Monitoring development and IP7 Statement of Community Involvement Not effective or legally compliant IP6 to be effective (in relation for example to SP2) there should be a statement about how engagement with communities can be a meaningful part of the monitoring process for things like social and community infrastructure and the success of designed places. This could be part of the Statement of Community involvement however this is out of date and has not been updated to reflect the new pandemic situation which it is widely accepted is affecting different groups in different ways.</p>	<p data-bbox="1140 933 2065 1109">Noted. IP7 sets out the Statement of Community Involvement (SCI) which is a document that sets out a strategy and statement for how we engage with communities in plan-making and decision-taking. The SCI is in the process of being updated and you will have further opportunities to engage and comment on the document.</p>
<p data-bbox="188 1337 465 1401">Southwark Law Centre NSPPSV167.15</p>	

<p>Statement of Community Involvement IP7 This consultation has not been carried out in accordance with Southwark Council’s adopted statement of community involvement, which itself has not been updated for 12 years and has not been interim amended to take into account restrictions due to the Covid-19 pandemic.</p>	<p>Noted. The Statement of Community Involvement (SCI) is in the process of being updated and has been through a number of rounds of consultation. It will go to consultation again with updates including the Southwark Stands Together Pledge and Consultation in the age of COVID. The SCI is being reviewed with input from public consultation, colleagues in community engagement, regeneration and planning.</p>
<p>Shiva Ltd NSPPSV297.2</p> <p>IP7 Statement of Community Involvement We do not consider this policy to be sound because it is not effective in making clear that the ‘New Development Charter’ approved in April 2019 is included in the SCI. the Development consultation charter sets out that the engagement will take place from the earliest possible stages in the process of developing proposals. The policy also does not make clear the objectives, role, transparency and the selection process of Design Review Panel and its meetings. The policy can only be deliverable by setting out statutory time limits for developers to carry out community engagement, for example a developer has to first consult with the local community 4 weeks prior to a pre-application being submitted. Having a statutory time limit on community engagement will eradicate the issue of developers circumventing the engagement process at the early stage.</p>	<p>Noted. The Statement of Community Involvement (SCI) in the process of being updated and this includes the inclusion of the Development Consultation Charter (DCC). The DCC is not an adopted document and therefore not included in this policy. The Design Review Panel is referred to within the SCI as a form of public consultation. The SCI sets out statutory consultation timelines for both plan making and the development management process.</p>
<p>John Taylor NSPPSV519</p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - legally compliant Yes</p> <p>Do you consider this policy is sound? – sound</p>	<p>Noted. The Statement of Community Involvement is consulted on in partnership with community groups, residents, other organisations and stakeholders. There will be further opportunities to engage with and make a representation on the SCI to raise these points.</p>

No

Do you consider this policy is sound? - why not sound – Effective
Effective

(1) As it stands the SCI is agreed by the Council Executive alone, in other words not merely by the ruling party but by the leadership of that party.

(2) Table 11 on Consultation methods says the council is required to "notify neighbours by letter." But it does not spell out how far this notification should range.

(1) On page 8, in the box headed "The Statement of Community " delete "Council Executive" in the second sentence and insert "Council Assembly."

My reason: The document needs to have the widest possible support. For that it needs to benefit from the widest political input.

(2) After "Notify neighbours by letter," add "within a range of at least 100 yards."

My reason: The skulduggery that occurred over the demolition of the Ship York.

Not even residents in the same street were notified, let alone the rest of the Redriff estate.

Representation	Officer Response
IP7 Statement of Community Involvement	
Richard Lee	

Which Statement of Community Involvement (SCI) is being used is unclear

The Consultation Plan has no regard or inadequate regard to:

- Government guidance (13 May 2020) on the Statement of Community Involvement (SCI) during Covid-19 , which should be read in full
- The engagement methods in Appendices A, C and D of the SCI (2008)

The changes to the New Southwark Plan are significant and require comprehensive consultation. If this cannot be provided under the circumstances of COVID-19, because the Council is unable to devise “alternative and creative ways” (words of Government guidance) and does not have a credible SCI that meets legal tests, then the entire examination process is uncertain.

The Council seems to be running with 3 different SCI documents – 2008, 2019 and the Consultation Plan - which is complex and confusing for the participant. It appears that the Consultation Plan August 2020 is regarded by the Council as its updated Statement of Community Involvement reflecting alternatives to consultation when face-to-face consultation is not possible. This is required by Planning Practice Guidance: Plan-making (updated on 13 May 2020).

However, the Council’s menu of alternatives is limited. An earlier version of the Consultation Plan (July 2020) offered the mitigation of printed copies on request, since libraries were now closed. This was deleted in the August 2020 version. I have had personal experience. When I asked for a printed copy of EIP27B, I was initially told there would be a charge of £110. I complained that this infringed the Public Sector Equality Duty and was then sent a copy free of charge. I am grateful to the Council for supplying me with this, but I do wonder how many others managed to overcome the barrier that was put in my way.

Noted. The adopted Statement of Community Involvement applies. However a new version is being developed to reflect recent changes to consultation in light of COVID-19. Consultation on this version of the SCI will happen after the examination in public on the SCI.

Representation	Officer Response
IP8 Local Development Scheme	
No representations received.	