



Southwark Planning Voice

Southwark Law Centre

Independent Evaluation

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Southwark Law Centre

Southwark Planning Voice Project
Independent Evaluation, 2022

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Executive Summary

About the project

Southwark Planning Voice (SPV) is a project of Southwark Law Centre (SLC). Set up 4 years ago, after listening to local residents and community groups, the project has worked closely with individuals in need, and groups such as Southwark Planning Network (SPN) to support and empower local people to influence the redevelopment affecting their neighbourhoods.

The project contributes legal expertise and support to local groups and individuals seeking to influence planning decisions in their local area. This includes work to influence local strategy, legal input into the development of local policy, and action to ensure its implementation through scrutiny and challenge. It provides extensive legal advice and support, including legal representation. Alongside this, it works to increase public engagement with planning, through providing information and training to a wide range of people, from elected members to planning activists. It is the only project of its kind in Southwark.

Findings

This evaluation looked at client experiences, using a survey of service users and in-depth interviews to develop detailed case studies. It also interviewed strategic stakeholders across the statutory and voluntary sector. In the survey,

- 100% of people agreed or strongly agreed that Southwark Law Centre advice on planning issues offers a valuable service for people and organisations in Southwark
- 100% strongly agreed that has increased my/ our understanding of the planning process and how to engage with it
- 100% agreed or strongly agreed that SLC had increased their confidence in influencing planning decisions
- 100% agreed (34%) or strongly agreed (66%) that SLC had increased their understanding of how planning policy is developed
- 100% of those asked strongly agreed that SLC's representation allowed them to be heard, and that SLC had helped them hold statutory authorities and developers to account.

All clients expressed wholehearted support for legal advice, representation, and information they received, and said that they would not have been able to receive the support they did elsewhere – without spending a huge amount of money they did not have. There was particular praise for the project's solicitor.

There are many positive examples of increased engagement and activation regarding planning issues, and in many cases, involvement with SLC has galvanised community groupings as well as increased their capacity, partly through the building of confidence. All noted expanded knowledge and understanding of previously opaque processes. There have also been many significant 'wins' for marginalised and minority communities which clients say would not have been possible without SLC's support. Alongside supporting residents to develop their understanding and participation, SLC is lending credibility to otherwise unheard voices, and in this, helping increase civic participation and

democratic engagement. Elected members who had worked with the project noted that it increased their residents' ability to engage with democratic processes, and with planning 'on its own terms'.

Recommendations

In terms of its future direction, the project must first of all safeguard its day to day provision of legal advice and information, and if possible, expand it. It would also be helpful for the project to develop a full communications plan for stakeholders, and across all of its potential audiences, setting out who needs to know about the project and its area of work, and what they need to know. In terms of its stakeholder relationships, greater clarity in the purpose, objectives and focus of its key stakeholder liaison groups would be helpful.

The project will need to continue to reach out to communities of interest, and this is likely to need an active community development approach – however, this would best be taken through intensive and targeted partnerships with specialist community organisations.

Finally, the project could have a wider impact, alongside the considerable depth it already shows, by taking a 'funnel' approach to its delivery, whereby less intensive support and guidance can be provided for those with greater independence or lower levels of need. To do this, additional capacity to support training, information, and outreach would be necessary. If additional resources could be found to achieve this (especially another funded post), it could pay significant dividends strategically. This could also free up the time of the solicitor currently working on the project, ensuring more dedicated capacity for the legal advice and information which has been central to the project's achievements to date.

Overall, this is a successful project, run by an organisation with an exceptional reputation. It is making substantial positive contributions against all outcomes, and could deliver even further on these, significantly increasing its reach, if it were able to expand.

Key Achievements

In Numbers, Jan 2020 – December 2021

- 40+ organisations and individuals accessed legal advice services
- At least 7 campaigning organisations received regular advice and support:
 - Southwark Traveller Action Group
 - Latin Elephant
 - Southwark Planning Network
 - XR Southwark
 - Southwark Pensioner Action Group
 - Southwark Group of Tenants Organisations
 - South Marina Docks Berth-holders' Association
- 175+ people attended training on issues including
 - Planning legislation on climate change, including the Climate Change Act 2008.
 - Legal points and arguments on Climate Emergency
 - New Southwark Plan: Examination in public training
 - Equalities Act and green spaces – Permitted Development Rights
 - Housing policies and preparation for New Southwark Plan examination

Legal achievements

Burgess Business Park

- Prevented the building of a poorly designed and overly dense development not in line with the Council's Development Plan, representing local people against the developers, working alongside local Councillors.

New Southwark Plan

- Gained significant improvements to the New Southwark Plan for marginalised groups, Travellers and Boat-dwellers in the Borough.
- Held the Council to account over their declaration of a climate emergency, estate regeneration and the social improvement indicators of regeneration.

Elephant and Castle Shopping Centre site

- Secured a commitment to a new market at Elephant and Castle, as many market traders failed to find relocation sites in the area.
- Provided legal advice on relocation for individual traders
- Set in motion a legal challenge against the development which shone a valuable light on the delivery of genuine social housing in private developments and the use of public grants to fund this
- Continued to monitor the independent business relocation strategy since planning permission for the shopping centre was approved
- 83 more social-rent equivalent homes provided in the final planning application following a combination of detailed representations, campaigning and public and political pressure

The Climate Emergency

- Pushed Southwark Council to improve the New Southwark Plan and provide evidence in light of the declaration of Climate Emergency.
- Gained agreement that policies on sustainability and energy will be urgently amended when the plan gets approved
- Helped secure the Council's commitment to holding a Citizen's Jury on Climate Change.
- Held the Council to account on the Climate Strategy, ensuring it leads to tangible improvements, reductions in carbon emission and more sustainable development.

New Homes on Southwark Council's Estates – Protecting play space

- Supported residents to protect green space and outdoor sports facilities.
- Improved other estate redevelopment proposals - including some later dropped or significantly revised.

Peckham permitted development

- Helped residents prevent approval of a two-storey rooftop development of a House of Multiple Occupation on top of a private residential building

Introduction

About the evaluation

This evaluation was commissioned by Southwark Law Centre, and funded by the National Lottery Community Fund, as part of their grant for the Southwark Planning Voice project.

Methodology

This report uses a largely qualitative methodology, using in-depth interviews, surveys, and focus groups to gather thoughts and experiences of the project. It also compiles some quantitative data drawn from small surveys sent out to users and members of the Planning Advisory Group by SLC, and some basic performance metrics. Interviewees included project service users (both individuals and representatives of interest group and organisations), officers in statutory organisations, elected members of the local Council, and staff members from SLC. The evaluator also sat in as an external observer in meetings of the project's stakeholder groups (the Regeneration for All Liaison Group and the Planning Advisory Group), and ran a focus group for the Planning Advisory Group. Initial findings were presented to the Planning Advisory Group and SLC staff for comment before drawing up a final report. SLC staff and trustees made comments, suggestions, and some minor editorial changes to the report, which have not affected the overall findings. Quotations have been reproduced verbatim where they were provided in writing, and reconstructed from hand-written notes in the case of interviews. The quotations represent the views of the individual respondents. Survey respondents had the option to remain anonymous.

About the evaluator

Dr Alex Evans is an independent researcher and evaluator specialising in place-based and community work, and partnerships between the public and voluntary sectors. He has worked in the community and social care sector for over 20 years, including time as a public sector commissioner, and 10 years as a senior leader working with London charities. As a consultant, he has completed evaluations for a range of health and social care organisations, and also undertakes research on community and cultural identity, including its relationship to regeneration. He completed his PhD at the University of Sussex in 2005, and spent some years as professional academic at the University of Canterbury, New Zealand.

Background and context

History of the Project and Southwark Law Centre

Planning Voice is a project of Southwark Law Centre. During the 1970's and 1980's, a time of large scale development in the Borough, the Law Centre carried out this area of work, under the leadership of John Hobson the first Director of the Centre. Over the years other areas of work such as housing and immigration took precedence. 4 years ago, after listening to local residents and community groups, the Law Centre once again began to provide this support. Since 2017, the Planning Voice project has worked closely with groups such as Southwark Planning Network (SPN) to support and empower local people to influence the redevelopment affecting their neighbourhoods.

Legal advice on planning matters compliments much of the other work and aims of the Law Centre, such as housing and homelessness, and benefits our target group of more disadvantaged residents. SLC also offers a wider range of work dealing with issues facing disadvantaged migrants, including work on housing, and on ensuring they have jobs with fair employment terms. Whilst this is a unique area of work which requires special resources and focus, it fits with SLC's overall ethos and aims.

The project received initial funding (2017-2020) from United St Saviours Charity. In December 2019 the Law Centre was formally notified of the success of an application to the Lottery for 3 years' funding from January 2020.

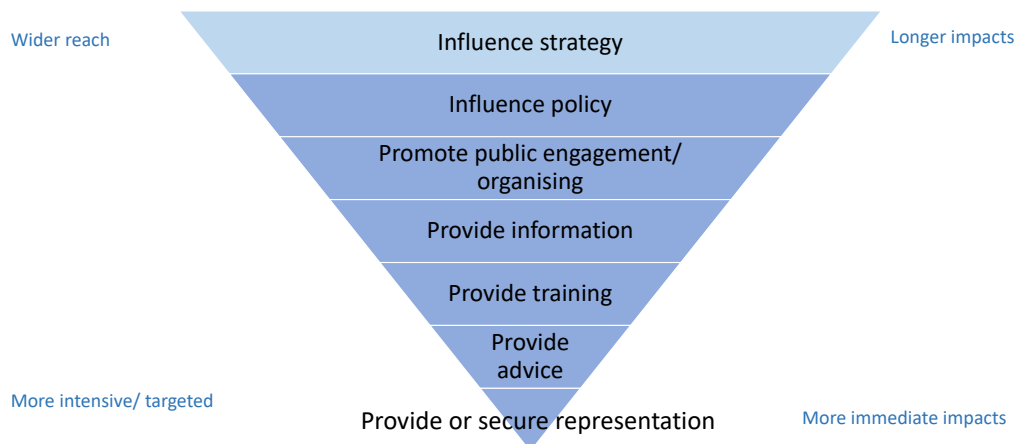
What the project does

The overall aim of the project is to support and empower local people to be able to influence major redevelopments affecting the environment they live in. The project seeks to achieve this:

- By influencing strategy at a local level (and nationally where appropriate), by contributing legal expertise to ensure that the right voices are heard, and the right needs considered, at the most high-level stage. This is achieved in steering groups, or by submissions and contributions to strategic initiatives.
- By influencing policy, both in terms of its development, and ensuring its implementation – this can be by legal challenges, by submissions or presentations of evidence
- By promoting public engagement with planning, and supporting other groups to develop their knowledge, confidence and skills
- By providing information, guidance and signposting to resources
- By providing training for groups and individuals to increase skills and awareness
- By providing detailed legal advice and supporting legal actions
- By providing or securing legal representation for clients where necessary

The range of activities is designed to ensure a wide reach, with longer-term outcomes, alongside the more intensive and targeted activities, which will have more immediate impacts, and perhaps more significant impacts for specific groups and individuals. Of course, the latter can often have 'ripple' effects which exceed the individual action; for example, one legal action setting a legal precedent which has significant longstanding effect for others.

SLC Planning Voice – Activity Breakdown



About Planning in Southwark

Southwark has a long history of controversial developments. As a central London borough, it has extremely high property prices, and there is a great deal of competition for developing sites which become available. While there are huge needs for affordable housing, the amount of social housing has reduced, as many sites have been sold to the private sector (as in other London boroughs). Some consider that many most new homes in private developments cannot really be considered truly affordable. Proposals for infill on existing council housing estates, alongside including higher density housing will not necessarily fix the problem, since these are small scale proposals and do not make up for the recent and historic losses of social housing to private development.

Perhaps one of the most substantial and controversial developments has been the redevelopment of the **Elephant and Castle** area. The landmark shopping centre was finally demolished in 2021, and a new town centre is planned on the site. The shopping centre acted as a major economic, social and cultural hub for the Latin American community in Southwark – which comprised the largest Latin American community outside of the Americas. There has been concern about the fate of the Latin American community, and a wide range of other ethnic minority businesses, especially related to inadequate support for business relocation. Only half of the businesses in the centre were relocated to new premises.

The **Aylesbury estate** was described as a place of ‘forgotten’ people’ and a ‘no-hope area’ by the then-Prime Minister in 1997. It was earmarked for regeneration. Initial plans to transfer it to a Housing Association from the Council were voted against by residents in 2001 due to fears of raised rents and service charges. The Council said that bringing the estate up to current standards would cost £200m and decided on demolition and replacement. It is now being demolished in phases and replaced with modern homes by several housing associations. There is controversy and uncertainty as to whether the rents will be ‘social’ or ‘affordable.’ The estate has been the site of occupations by campaigners who protested the demolition of the estate.

Latin Elephant's Experience

The Latin Elephant is a community pressure group which, with SLC's help, has achieved a good deal of change to original plans to support local businesses and individuals being forced out of the area.

“Through working with Harps and SLC we have received consistent guidance, insight and practical support on planning matters that affect Elephant and Castle traders. Principally, Harps has helped us navigate the ongoing process of establishing a new market for traders displaced from Elephant and Castle market. We could not have envisioned the level of difficulty we would encounter with this project, and having Harps's knowledge and time contribution (she advocated for the market's creation, once a site was offered lead on council communication, organised and chaired meetings, proposed ideas when we were met with setbacks, submitted a pre-application enquiry) has meant that we have been better able to manage the ongoing work required, without needing to seek outside planning advice. At the moment Harps is also supporting traders that are being denied access to the funds needed in order to move into their relocation units, by challenging the developer and council's interpretation of the s106 and arbitrarily enforced deadlines. I haven't included every example here, but more generally, Harps has supported us in consistently monitoring and scrutinising how Southwark council and Delancey are implementing the relocation process pre and post shopping centre closure, alongside communicating trader concerns to council officers.”

The **Canada Water Masterplan** was for a long time the largest regeneration scheme in the borough. With 6,000 new homes, 18,000 people will move into the Canada Water area on the Rotherhithe Peninsula and there will be new retail and office space (see Case Study 1). Again, there are concerns about whether new homes will have any proportion of social rented accommodation. Residents also have concerns here about the level of infrastructure planning that has taken place. The former print works of the Daily Mail have become part of the development, creating a substantial expansion to the plan, which most recently was intended to include a new campus for a University.

On the **Old Kent Road**, Southwark Council is building 20,000 new homes, and a 'new town centre' with 7,000 affordable homes. The Council has not ruled out the possibility that existing estates will be demolished.

Other key issues faced by residents and supported by SLC, include **'Infill' projects on housing estates**, where additional homes are built in-between existing residences. These can leave residents without green space, or without other amenities they have come to rely on.

The Old Kent Road Community Campaign's experience

A substantial area of work for the project has been on developments in the Old Kent Road area, and consultations for the Old Kent Road Area Action Plan, which will likely be examined by a Planning Inspector in 2022.

"I was introduced to the Planning Voice Project in February 18 via the Southwark Planning Network when I needed advice in relation to the Old Kent Road AAP. I subsequently had a series of meetings with the project worker to help prepare for a crucial Planning Committee hearing. The PV worker then attended, advised and supported myself and other residents in a series of meetings involving a local developer, ward councillor and our Housing Association. We were also given advice in relation to Right to Light matters and various other issues arising from developments granted planning permission. We were able to formulate and agree a plan between the various parties holding the developer to account. It undoubtedly raised our profile with local politicians.

Residents were enabled to take part in a complex, intimidating process and have used this experience in further negotiations (an example of this is over the PC World/B&M sites acquired for development by the Council.) It led, in part, to the formulation of the Old Kent Road Community Campaign and a dissemination of the learning acquired in the early stages. For example how S106 and CIL monies work and how local residents can make their voices heard. This service is unique to my knowledge.

Planning is a really complex area with huge implications for local people, particularly those without a voice. I suspect a small team based at SLC could be kept very busy for years to come. I think holding local politicians to account is really important, publicising 'wins', 'how to' guides, demystifying planning and responding to the big picture issues of a climate emergency and pandemic impacts will be key going forward."

– Old Kent Road Community Campaign/Canal Grove Residents' Association.

Section 1: User Experience

This section looks at feedback from stakeholders and users of the project. It begins with two in-depth case studies to demonstrate in detail the work that the project does, and the difference it makes to groups. It then moves on to discuss the experience of users, as captured by two surveys.

Case Study 1: South Docks Marina Berth Holders' Association (SDMBHA)

Located in South Dock and Greenland Dock on the south bank of the Thames between London Bridge and Greenwich, South Dock Marina is London's largest remaining marina. It is owned and managed by Southwark Council. It holds 200 boats, with a large number of houseboats with permanent residents moored there. They were affected by the designs of the Canada Water Masterplan. The original design strategy presented for the Canada Water redevelopment had planned to build housing on the boat yard. SDMBHA felt they were being seen as standing in the way of the redevelopment. For the SDMBHA it was vital that they get the redevelopment of their homes taken out of the Canada Water masterplan.

Southwark Law Centre's solicitor, working with the SDMBHA, raised with Southwark Council the fact that there had not been a housing needs assessment. There was a long, time-consuming process of trying to get this accepted. SLC was able to explain procedures, which are 'labyrinthine,' and offer assistance with completing complex and difficult to understand forms. For SDMBHA, who had very little experience of planning before, help with simply understanding the language and the format that was required was key: 'We managed to get our needs, and our documents, into the whole machine. Now we understand the council's legal obligations – we wouldn't necessarily have even known they were even there otherwise.'

SLC's solicitor prepared a formal response to the Southwark Plan, and submitted formal documentation for comment and discussion at the hearing, and eventually, with SLC's support, SDMBHA managed to get the marina's allocation changed back to a white site (no change), and had their needs added to the Southwark Plan as an appendix.

'It was about finding common ground between Southwark and the Berth Holders. Without that extraordinary process, we would never have got near that hearing. The process is labyrinthine.'

Other strands of advocacy with Southwark Council have included the council overcharging for, and sometimes not providing, services. SLC helped secure an assurance that yearly rises in charges would be frozen to only 1%. SLC also helped the SDMBHA press for fairer water charges and better utilities. This created a legal precedent, which has meant other groups can make challenges to unfair charges (across the UK).

SDMBHA had found in the past that sometimes they are 'lumped in' with travellers, despite perceiving that they have very different needs and perceived status. However, the knowledge of their treatment between different communities has been very helpful – SLC discovered there were

many cross-cutting links in terms of legislation with the travellers. This discovery has allowed better results for both groups:

'In fact, we discovered that we have quite a lot of things in common with this Traveller group. Basically, the council is trying to marginalise us both.'

SDMBHA also felt that there was an added visibility and credibility that SLC offered – and that they were taken notice of for the first time: 'SLC was sitting on our shoulder all the time and got us taken seriously this time round. [...] Suddenly people would negotiate.'

Impact

SDMBHA feel that SLC's support has built up their confidence and strengthened their resolve to protect their homes and engage with planning. The fact that they've been strengthened by this process means they feel they can further develop. They are now looking at describing their dock as a Marine Centre of Excellence, and trying to access Community Investment Levy money, and have set up a small CIC. They also hope to increase their membership.

'All of this is ongoing - it's a constant battle and legal fight, and support is always needed. But we've been able to do more of it ourselves, with the increased knowledge and confidence that SLC gave us. We've been able to attend cabinet meetings, overview and scrutiny meetings - they have worked their way into the agendas.'

For the future, SDMBHA thought there was space to create more resources which could help people become more informed at an earlier stage, and that could be put together and shared. They feel there are others out there who could get more involved in planning if they have more access to information that would allow them to understand the process and terminology.

'In the end, we think that banners and petitions don't often work – it's down to the technicalities. Emotions and protests don't work, but a lot of people don't know that there is an alternative to just waving banners. SLC has allowed us to engage with the technical side of planning.'

Case Study 2: Southwark Travellers' Action Group (STAG)

STAG is a community organisation for Gypsies, Roma and travellers based in Southwark. STAG has existed in some form since the early 1990s, becoming a grant funded project in the early 2000s, and developing into an independent organisation in early 2016. Their involvement with SLC predates the Southwark Planning Voice project, but their collaboration has intensified as a result.

Gypsies and travellers experience widespread discrimination and are often not welcomed by residents in communities. Travellers' living arrangements are more complex and diverse than people generally understand. Around 50% of travellers live in standard housing, including as council tenants. Others live on special sites, comprised of individual pitches designated by local councils. Others live

on what are called ‘tolerated sites’ – encampments that the local authority has decided not to seek removal of for an indefinite period of months or years. There are a range of particular problems travellers face in terms of planning. These include a lack of sites, leading to overcrowding and a need for many to take accommodation in standard housing; small pitches which exacerbate issues with overcrowding; problems with basic services such as water and electricity, and legal loopholes which make it almost impossible for people to be classified as travellers for housing and legal purposes. Alongside this, travellers are also unpopular, and local residents often resist their encampments. Perhaps for this reason, often statutory services and politicians are actively and publicly hostile to travellers.

Prejudice and Planning

A public Council planning meeting was held over zoom during lockdown, regarding housing for Council tenants. STAG attended the meeting, and started to receive chat messages saying that travellers should not be represented, because this was about ‘housing,’ and ‘travellers don’t want housing.’ As STAG pointed out, since 50% of gypsies and travellers actually live in standard housing, many have the same views, and indeed, the same right to *have a view* about Council housing, as other Council tenants. This presents a particular problem in that even others who are campaigning on planning issues can consider travellers’ needs irrelevant - or indeed, can sometimes approach the issue with outright hostility.

There have also been issues around the Local Authority’s own messaging. For example, another planning group active with the Southwark Planning Voice project alerted STAG to a tweet by the Council, which featured a photograph of a bag of rubbish on the street and the comment “left by the travellers”. As STAG responded, the Council would have been unlikely to tweet ‘left by the African Caribbean community’ or similar. In some ways, this reflects the fact that few people – including within Local Government - recognise Gypsies and travellers constitute a protected ethnic group.

STAG and the New Southwark Plan

The original New Southwark Plan¹ contained the commitment to maintain four pitches for travellers. When a new version was presented as a second draft, an additional phrase had been introduced: ‘subject to need’. After some pressure, a consultant was then appointed by planners to assess travellers’ housing needs (a requirement by law). The consultant did not consult widely enough, failing to talk to more than a handful of travellers, and then submitted a report saying essentially that there was no additional need:

‘The assessment said that there was no need for new pitches and new sites. Because there was no need in line with the government definition, which specifies that to be designated as a Traveller, people must be travelling for the purposes of employment. But there was still a need for culturally appropriate accommodation for people who identify as Gypsy travellers, but may not be travelling for employment purposes. If there weren’t sites made available,

those people would have had to be forced into bricks and mortar accommodation – but there is a lot of information out there about how this contravenes the Equality Act - and it's a protected characteristic.' (SLC solicitor)

'Everybody in the Traveller community knows that overcrowding is a big issue. In the hearing, the consultant made it very clear that he didn't understand the community and had not used a methodology suitable for travellers. At one point, he even said that he 'liked to run sessions in pubs', which he considered "more suitable for travellers" – which the travellers there found really offensive.' (STAG)

SLC worked with STAG to create a template response for the public to complete, and STAG undertook a survey, run by Traveller with a background in community research. A representative from STAG, the community researcher and SLC's solicitor presented together at the hearing, combining SLC's expertise, alongside STAG's community connections and testimony of their lived experience. As a result of the work SLC and STAG presented, the planning inspector found in favour of STAG, and the consultant was replaced. The planning inspectors determined that the council must address the need for culturally appropriate accommodation in the plan. This was a significant victory for travellers, and the decision will have significant ramifications on planning provision for many years.

STAG also noted that involvement with the project has connected them to other groups who have some shared interests, including the Southwark Planning Network (the largest network of planning activists in Southwark), where they were able to mobilise support for their own cause.

SLC's work with STAG also revealed options for legal challenge that were used by other groups, including for the South Docks Marina Berthholders' Association. This in turn increased the sense of solidarity and community between different groups challenging planning in Southwark.

The Southwark Planning Voice project initiated a 'step change' for STAG. Although they already had some involvement in planning, SLC introduced them to various aspects of legislation they were able to use for a number of purposes after their victory regarding the Southwark Plan. In particular, the Equalities Act 2010 and the Housing Act 2016 gave them powerful tools to ensure they were able to hold to account a whole range of decision makers and stakeholders (inside planning structures and out). In the final Southwark Plan, travellers have now legally retained their four pitches as culturally appropriate accommodation. STAG has also been able to remind planners that their community comprises a protected group under the Equalities Act, and they have a right to be heard and their needs considered.

Survey responses

As part of this evaluation, two surveys were completed: one a detailed survey for a selection of those who had been closely involved with the project, and another for a selection of users who had been more peripherally involved (including those who had done training). SLC sent this out to recipients, and the responses were gathered and analysed by the evaluator. There were 13 responses overall, a 65% response rate. (This is a small sample [7% = 1 respondent], so percentages are of more value where they show substantial differences, and may only indicate any areas for further exploration.)

- 100% of people agreed or strongly agreed that Southwark Law Centre advice on planning issues offers a valuable service for people and organisations in Southwark
- 100% strongly agreed that has increased my/ our understanding of the planning process and how to engage with it
- 100% agreed or strongly agreed that SLC had increased their confidence in influencing planning decisions
- 100% agreed (34%) or strongly agreed (66%) that SLC had increased their understanding of how planning policy is developed
- 100% of those asked strongly agreed that SLC's representation allowed them to be heard, and that SLC had helped them hold statutory authorities and developers to account.

The open text provided a range of extremely positive feedback on the service, and the difference it made.

“We received detailed advice and support regarding the Elim Estate 'infill' planning application. SLC has written several letters to Leathermarket CBS which clearly state the legal position, and ask for clarification around resident engagement and consultation. The planning application hearing was delayed several months, CBS conducted a (flawed) ballot which nonetheless resulted in the outdoor ballcourt being saved by being relocated on the estate. The support from SLC helped Elim Estate residents and the local neighbourhood feel supported. Fighting the planning process often feels like 'raging against the machine'.

The professional support we received from SLC was invaluable in having a professional on our side. I don't think we could have received this support we needed without spending a lot of money on private legal support / advice. A step up for SLC would be to have the funds / ability to hold planning / agencies / organisations to account through prosecutions or other legal action.”

- *Save Elim Estate Ballcourt*

“Fighting the planning process often feels like 'raging against the machine'. The professional support we received from SLC was invaluable in having a professional on our side.”

“This service is unique to my knowledge. Planning is a really complex area with huge implications for local people, particularly those without a voice. I suspect a small team based at SLC could be kept very busy for years to come.”

“SLC and Harps Aujla in particular has helped with both specific and general legal information to me personally, to our TRA and to our Estate resident's group. She has helped us to understand the legal ramifications of the proposed plans in our area. She has been an invaluable part of the SGTO New Homes Forum, guiding us about the legal aspects of what

we've been exploring as well as pointing us to other organisations and individuals we can learn from. She has also investigated the merits of potential legal challenges and advised us on their likelihood of success. In all the above instances I/ we have felt better informed and more able to engage with the Council positively and from a place of knowledge. I've shared SLC's details with many others too and I know they've found it an incredibly valuable resource. It is important to know that this quality of expertise and local knowledge is freely available. I have also tried to get help via [another agency], but I didn't find them as useful for our purposes as SLC."

- *Lancaster Estate*

"Harp (Project Solicitor) has been incredibly supportive and helpful over the last year, also always personable and encouraging. Her support made a tangible difference to our campaign for which I'm very grateful."

Emerging themes

All clients expressed wholehearted support for legal advice, representation, and information they received, and said that they would not have been able to receive the support they did elsewhere, without spending a huge amount of money they did not have. There was particular praise for SLC's solicitor.

The project has helped galvanise and develop groups and communities of interest – and after its support, there is evidence that groups are better placed to continue making challenges, and further develop the community itself. This has led to increased capacity and viability, increased knowledge, and confidence. The recognition and confirmation of their concerns helps them feel empowered as well as enabled. Most of all in these cases, it both increases capacity and confidence – and a sense of shared identity.

The project has done well to engage with a wide range of clients, from individuals, to small businesses, to established charities, to smaller VCS organisations. The spread of clients from the very smallest groups to major activist groups representing thousands, shows the value of the model at all levels of citizen engagement in planning. Understanding the balance between these would be helpful. At the same time, it is worth noting that 90% of survey respondents (and interviewees) had previous experience of engaging with planning issues. If the project wants to reach those furthest from engagement, it may need to consider further outreach and how best to achieve this.

SLC provides a voice with exceptional credibility, adding weight to existing voices, and increasing the likelihood that planning concerns will be taken seriously by planners. Many clients speak of the fact that when SLC got involved 'suddenly people started listening to us'.

What clients would like to see next

In general, the common theme of most responses was that SLC should keep doing what it is doing – the kind of support it is currently offering is much valued. This chimes with feedback from

respondents of other types (eg. statutory stakeholders) across this evaluation. It also suggests that the project is currently at its best when it concentrates on the 'bread and butter' of the day-to-day work. This does not preclude the possibility for expanding or developing its work in complimentary ways, of course.

Navigating complex processes, which can be mystifying and couched in language which excludes the vast majority of citizens, is one of the areas of support clients most appreciate. Some thought that SLC could help more widely in 'simplifying the language [...] used in these complex processes in order to make it easier for normal people to engage and be empowered.' This again chimes with suggestions from local planning activists and experts, that simply explaining complex legal matters in layman's term, had significant impact.

There were few responses specifically to questions about training, which may reflect the fact that the survey was taken some time after participation, or that recipients had less intensive engagement with the project. Furthermore, a limited amount of training was able to be completed due to the pandemic, due to pressure of other matters for SLC staff in that period.

Client suggestions for future training included:

- "Protection of Green Space"
- "How to effectively oppose planning applications and get the best result from developers for the existing community"
- "It seems we are always too late to make any real impact. Maybe if we can learn how to know what's happening in the early stages it would be helpful. Maybe Law centre could make a library of short videos up to half an hour explaining the terms, processes, important issues to look for so newcomers can self-train to some extent."
- "Training works best when it is tailored to specific circumstances and needs, for example in relation to the NSP or commenting on an AAP."

As we can see, requested future types of training ranged from the very specific (see above) to the very broad. This is an interesting contrast, and may point to an opportunity/ need to provide a range of training tailored to different levels of experience, from general and broad introduction on processes, to more specialised training on specific legal matters.

Section 2: Other Stakeholders

This section looks at the project's interactions with other key stakeholders. It is drawn from interviews with Statutory services and authorities, the experience of staff working on the project, and discussions with the Advisory Group. It begins with an overview of planning processes, continues with an overview of the project's interactions with statutory organisations, and ends with findings gathered from focus groups and observation sessions with key stakeholder groups.

Local Authority Planning

As one might expect, the project's relationship with statutory planning authorities is complex and multifaceted. In many cases, SLC will find itself opposing the Council's Planning department and officers. At the same time, on some occasions SLC has been allied with the Council (for example, on opposing the new development of commercial space in Bermondsey alongside local residents). On other occasions still, there is a 'critical friend' relationship, where the parties work together to come to a mutually agreed solution. There is an understanding on both 'sides' that the process itself will be adversarial more often than it is collaborative – and this is part of the very nature of planning itself.

There are highly complex political and governance arrangements around planning. There are multiple levels of decision making, between different bodies and authorities, some of which are directly political, others of which are (theoretically) non-political. Broadly, these include Local planning authorities, Councillors, Officers, the Secretary of State for Communities and Local Government, and the Planning Inspectorate.¹ Significant local planning decisions all must be approved by one of three Planning Committees, which make the decision to grant planning permission on the basis of material considerations, with the help of a council officer's report. This committee is not politically whipped (based on party lines). The strategic direction of planning in the Borough is often decided more on political lines – for example, the level of affordable housing supported in planning applications.

Creation of a Local Area Plan is a long process, much of which is directed by central government and interpreted by local authorities, and which requires many submissions of evidence as part of various rounds of consultation. These are then considered by a Planning Inspector who undertakes a statutory oversight process to examine the draft local plan. People interested in planning have a right to be heard in the planning examination if they have been engaged in the plan-making process (through consultations etc.). This can result in further changes to the local plan, hopefully to better reflect community interests in planning policy which forms the basis of material considerations a planning committee deciding whether to grant planning permission must consider.

Elected members

Individual elected members need to represent the interests of their local residents in both individual (larger and smaller) decisions, and in the formulation of the overall Area Plan. On some occasions, elected members may find themselves in opposition to decisions made by the Planning Department,

¹ A Government 'plain English' guide can be found here: <https://www.gov.uk/government/publications/plain-english-guide-to-the-planning-system/plain-english-guide-to-the-planning-system>

and making representations to the Planning Scrutiny and Oversight Committee, or directly to the Planning team by supporting legal challenges or formal representation by local residents. They will also represent the interests of their members, or interest groups relevant to their portfolio, in their contributions to (and voting on) strategic planning.

Feedback from elected members was very positive and, as in all other areas, there was substantial respect for, and appreciation of, the work done by Southwark Law Centre.

“I obviously welcome any initiative trying to resource the community to understand and engage in the planning system. The planning processes are necessarily semi-judicial, and bureaucratised, and therefore alienating – a lot of the documentation and processes are done in that way because the legal aspects mean they have to be. That puts people off getting engaged, but SLC cuts through it.”

- Elected member

At the same time, SLC’s solicitor noted that Councillors have benefited from legal advice on behalf of their residents, and training.

‘They’re not planning experts, but they are elected representatives. They get a lot of requests for help on matters. Councillors have a right to be heard at hearings too, but they don’t always understand that, or their role. But they’re grateful for the help, because of course it helps them with representing their residents.’

- SLC Solicitor

Burgess Business Park Opposition: A collaboration between residents local Councillors, and SLC

SLC worked alongside a group of local people, also supported by their local councillors, to reject a development on the Burgess Business Park site. SLC had worked alongside local people and their elected members to build a coalition to oppose the redevelopment of the site. Initially, there were five separate planning applications, which would have meant five applications to fight. Local Councillors managed to have the application combined as a single application, after which local people worked with SLC to oppose the development. Evidence from another volunteer local activist (and member of the Planning Advisory Group) was also presented. With SLC’s representation, local people managed to have the development rejected. When the developer appealed, SLC provided further representation, and it was not successful. Without SLC, it would have been extremely difficult for local people to represent themselves and their interests in a complex planning process.

Councillors also recognised the value of SLC’s input into strategic planning, including making submissions to the New Southwark Plan (the document which will decide the trajectory of the development in the Borough for the 15 years), which has represented a substantial amount of the Project Solicitor’s work. They also thought that the project allowed people to see that there are ways to influence decisions within the existing processes, allowing people to engage with planning “on its own terms”.

Officers

Officers in the Council recognised the need for SLC’s interventions and participation, and understand the role that SLC is playing. In particular, ‘nitty-gritty representation of people in hearings and providing submissions’ is hugely appreciated and is seen as ‘making a big contribution’ (Council Officer). All were comfortable with direct challenges that occurred within what they see as the normal challenge framework of planning processes – through written submissions, representation at hearings, etc.

Senior officers said that they would welcome knowing more about the project, its mission, and what it is trying to achieve in order to understand how ‘we can work together.’ While it is likely that officers in the Planning department will always have to have an arm’s length, sometimes adversarial relationship, other officers working in areas such as Public Health, Consultation, and Community Engagement, may benefit from more information and involvement (even if this is to ensure that they may be able to influence planning decisions internally, as advocates and challengers). The RALG group should help to achieve this.

Regeneration for All Liaison Group (RALG)

The RALG group is chaired by SLC. It was set up by SLC working with the then-Director of Public Health in Southwark. Public Health were concerned to ensure that planning and regeneration took into account the health needs of the local population, and so convened a diverse group from across the Council broadly related to regeneration matters. Local Planning activists and groups with a strong interest in planning also took part, including Latin Elephant, Southwark Travellers’ Action Group, and Southwark Planning Network. The goal of the group was to find common ground in the overall regeneration of Southwark, ensuring that a wide range of actors and stakeholders were heard and involved – including community, health, and economic perspectives, as well residents’ groups.

The activist groups on the RALG group see the establishment of this group as one of the big ‘wins’ of the project. They particularly find it helpful to be able to hold the Planners to account on promises such as timing of releases of documents. They also see it as useful for gathering further information on processes.

It seems to be a challenge here to balance strategic, policy, and process questions within a single group and retain participation for those who may feel only a small part of it is relevant to them - and

indeed, some who would prefer not to face further scrutiny.² Nonetheless, the Planning Voice Project and its Planning Advisory Group members are committed to making the group work, and this may yet pay further dividends – as of writing, the group is rewriting its terms of reference, and has met again with a new senior Council champion in place.

There appeared to be some pressure from the statutory participants in the group to refocus away from the technicalities of planning, and return to very high level strategy and initiatives. These can often be extremely abstract. SLC is probably right to try to keep the group with its feet on the ground, focused on tangible practical planning matters, as much as on any ‘big picture’ thinking. The interface between strategy and policy is perhaps where SLC can add most value. Of course, partner organisations can very helpfully contribute to those ‘big picture’ strategy initiatives more appropriately.

Finally, challenging and scrutinising will always need to be balanced with a need not to lose participation from those being scrutinised, especially where this is not a statutorily mandated forum. Maintaining the interest of non-planning colleagues while highly technical planning issues are discussed will take substantial work. Overall, careful political management and negotiation will always be a significant part of the process.

Planning Advisory Group

The Planning Advisory Group (PAG), which provides advice and some steer to the project alongside the Director of SLC, was asked to reflect in a focus group on the successes of the project so far.

Across all members, as with all clients (remembering that many of the PAG members are themselves clients) there was again strong agreement that the ‘bread and butter’ of providing technical legal advice and representation was the most important part of the project, and that this was likely to need more resources as time went on. There was agreement that SLC adds value to the campaigning that already exists – providing legal and technical back up to existing voices and campaigns. It was agreed this had made the most practical difference to date, not least because it was clear that in many cases they had achieved ‘concrete concessions’ from developers and planners. Other reflections included:

- Members of the Advisory group who also sit on the RALG thought the establishment of that group was a significant success and achievement
- That more attention needs to be paid to developers as well as the Council
- That the Southwark Planning Voice project is now the ‘de facto’ legal service for Southwark planning campaigns³

² Essentially, as one statutory interviewee put it, there is a difference between the strategic and high-level policy parts which are political, collaborative, and long-term; and the nitty gritty of policy compliance and process, which are bureaucratic, adversarial, legalistic, ‘something of a minefield’, and comparatively short-term. Balancing these in one meeting is no easy task.

³ Phrase used by a PAG member

The group considered to what extent the project should be reactive (in the sense that it waits for potential clients, organisational or individual, to approach with their own issues); and to what extent more proactive (for example, looking at areas where there are new developments and approaching local groupings to see whether any assistance needs to be provided, or to enhance their understanding of what is about to happen). The group considered the most effective approaches to community development as it relates to the project, and to what extent this could be enhanced within SLC and the project itself, or whether other more community-development oriented organisations and partners might be better take on that role - perhaps with stronger and more active relationships with the project.

The group was also asked to consider its own role and membership. All members felt they benefited from participation. The ability to share information between group members was considered useful (although it was pointed out that other groups are also intended do this). Project staff also valued this opportunity, and felt that the expertise offered by members was very helpful. Some felt it would be helpful to further clarify the role of the group, and to focus more closely on what would best help achieve the project's goals. More work to ensure that the group's make up reflects the unique diversity of the Borough would be of value.

What the group would like to see next

There was universal agreement that more of the day-to-day work of a law centre – the 'meat and potatoes' of legal advice and representation - would be needed, and that either more resource, or freeing up of the current resource, would be helpful. There were also suggestions that legal advice and representation capacity could be increased by expanding pro-bono support from lawyers, town planners and other technical experts.

Another area the group felt that more work could be done – with additional resource – was in expanding the information and guidance given to the wider public to educate and inform. One key suggestion was that an accessible website was needed that showed how legal challenges can be undertaken, and explained the impenetrable and often exclusory processes of planning. This was thought to be an area where collaboration could be especially helpful – for example Planning Aid for London also have a new website.

It was thought that the project could take a stronger role in helping the public understand that legal challenge is possible – and that 'ordinary' people can engage with planning, rather than feel that planning decisions are always a fait accompli and out of their control. A key way of doing this would be by promoting some of the project's successes.

Training was not an area that the group initially focused on – this may reflect the fact that most members already have a good level of experience and knowledge in this area. However, one member spoke about the value of the training that SCL had provided and suggested that it could provide more. The group then discussed the need to provide training suitable for different levels of experience. It was noted that this could provide considerable further impact if it is offered in the right way to the right people.

Section 3: Evaluator Recommendations

Clearly this is an excellent project which is having significant impact against its outcomes. With another year of funding from the National Lottery Community Fund, SLC requested recommendations by the evaluator for developing the work in the final year and beyond. The recommendations below are drawn from the input and feedback above, focusing on recurring themes, gaps and opportunities identified.

Strategic Development

'Keep doing what you're doing'

As clients made very clear, the most important thing is for SLC to safeguard the work that is currently taking place, especially in terms of the legal advice and representation for clients.

Clarify focus and priorities

Taking stock of the successes of the project to date, now is a good time to consider focus for the next year and beyond. What is the best use of Project's time, to get the best value and impact? Furthermore, none of the further suggestions below are resource neutral – setting out an action plan to address the key ones, and leaving some to the side until there is time, would probably be sensible. What will have the greatest impact?

Strategic Partnerships: decide which things you do best, and when to work with partners

This is a small project, with a small organisation. Clearly not everything can be done by SLC. Identifying which contributing activities can best be done by SLC – with its core skills and expertise – and which can best be handled by strategic alignment, partnership, and shared resources, will continue to be vitally important.

Develop a communications plan across all audiences

Identifying how the project needs to communicate with others, and planning how exactly to do that, could help the project on a number of fronts. I would recommend a clear communication plan (audiences, messages, channels) and mapping different types of stakeholders and audiences. That could include raising awareness in targeted communities at a grassroots level, giving greater information to a wider audience, and communicating with 'stakeholders' in other key organisations. You may also want to identify exclusions and priorities – what you're not going to do, and who you don't need to talk to.

Continue to take an outreach and partnership approach to community engagement

Continuing to take a more outreach and partnership-focused approach is likely to continue to be the most effective way to engage with smaller groups and communities who are not currently well-engaged. Creating 'tendrils' into geographical areas through specific organisations (eg. Settlements and TRAs), networks such as Southwark Planning Network, and/ or through groups focused on protected characteristics, would be clear routes in. With the right training, perhaps these kinds of organisations might be able to help both promote the service and raise awareness of local planning issues on behalf of SLC. Having the right communications plan, and materials/ information sources,

will help make this more sustainable. This is the kind of work SLC already does, and is probably more sustainable/ practical than developing its own community organising/ development capacity. Expanding this work is important if the project wants to reach more people with no experience of planning engagement at all (only 10% of survey respondents).

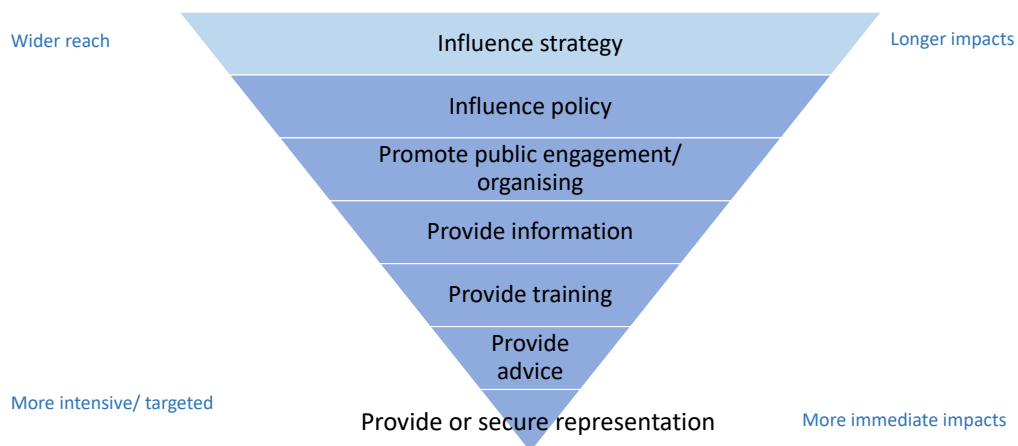
Use a ‘funnel’ model to ensure the best use of resources for impact and reach

There is likely to be greater demand as the reputation of the project grows – and as development projects advance at pace in the Borough. This means more resources will undoubtedly be needed, but how to focus and to make best use of them, will be a key question. If SCL wants to expand reach, one way to do that is to develop support pathways, and a pyramid/ triage model of support. This way, you reach the maximum number of people with the level of service that they need, and can plan use of resources accordingly. More detail on how this could be achieved can be found in the following section.

Operational Development

In the diagram below, you can again see the main activities of the project at present. At the top of the image, the activities have a wide impact on a large number of people – although often the impact is not known for many years. At the bottom, you have the activities/ interventions which are most intensive, and which relate to very particular cases, instances, and individuals/ groups.

SLC Planning Voice – Activity Breakdown



To have wider effects on planning, or increase planning engagement and knowledge for more people, SLC might consider expanding the resource in the middle tiers. Some people may need full legal support and representation, while others may only need a clearly written document explaining who they need to write to – or a template they can complete. Local community organisers may be fully capable of taking on some planning organising themselves, or raising awareness, with the right training. This could then free up space in the more intensive bottom tiers. This is at the core of the ‘funnel’ model suggested in the final recommendation above.

In order to expand work in the middle tiers, SLC may want to:

- Look more closely at training
Lockdowns have made training more difficult to deliver - and organising and creating training is a time-consuming business, especially for a Solicitor otherwise ensconced in the detail of planning submissions and legal actions. Sourcing additional capacity for organisation, and perhaps even to help prepare materials, could be helpful. There may also be options to engage with other London organisations, or to find pro-bono support to add capacity here. Another thing to consider is training strategically –who would it be best to train, to have the biggest impact and ‘ripple effect’?
- Develop and/ or disseminate more materials and information resources
Every respondent here noted that planning and its processes are largely opaque and ‘labyrinthine’. There are very few materials out there to truly explain how to engage with planning on any level – with the right capacity, this is a gap that the project, perhaps working with its partners, could fill. This too helps manage the ‘funnel’ and encourages ‘self-support’ for those who are able to do so. You may want to do this in partnership with other organisations.

Explaining planning to the layperson

Google searches (by the layperson evaluator) on the terms ‘challenge planning’, ‘stop a new development’ ‘stop new building’ and several others, returned very little of value - mostly Daily Mail articles and advertising blogs for firms of Solicitors (and some celebratory posts about new Southwark Council developments). Meanwhile, a search on ‘how does planning work’ turned up equally little, until eventually Government guides surfaced in ‘plain English.’ These gave an overview of the processes over many, many pages – with any potential for public challenge well tucked away. The issue may be that materials are not widely available, or simply that keywords and SEO need to be tweaked – either way, creating these kind of documents or finding and distributing them through networks, could be very valuable.

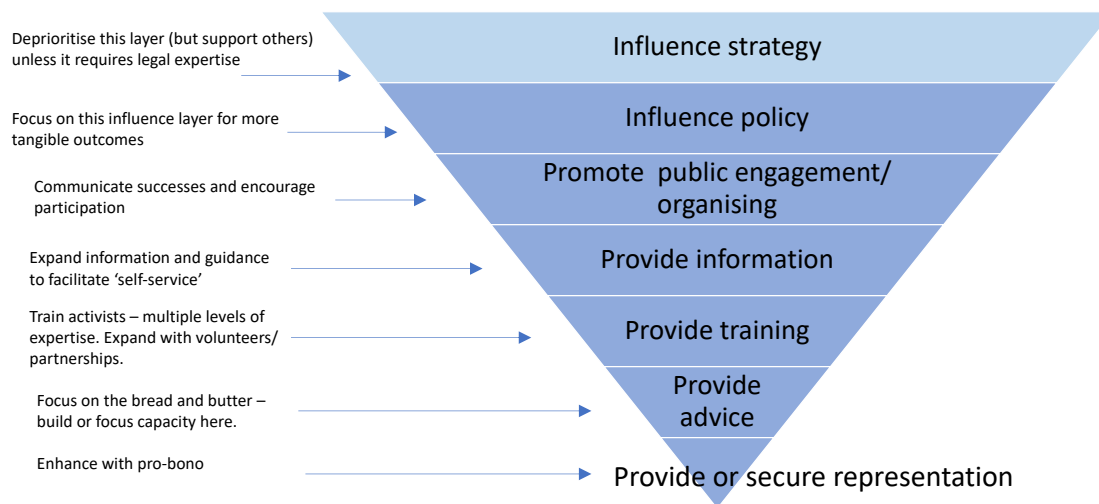
- Seek further pro-bono support
There was enthusiasm for finding further pro-bono support to provide representation and advice. This could indeed be of significant value, if the right support, from reliable sources, is obtained. However, the operational and management cost of managing volunteers, especially if there is considerable churn, should not be underestimated.
- Secure an additional post, subject to funding
Resource a new Information and Outreach worker post to focus on creating and disseminating information, coordinating outreach, and organising training. This safeguards existing Solicitor capacity, but also may also free up her time to do more legal advice and representation – thereby indirectly increasing day to day legal work capacity. A new post could:

- Create, source, and disseminate accessible information and guidance
- Research and help connect project with communities of interest
- Organise and administrate training
- Provide general high-level administrative support

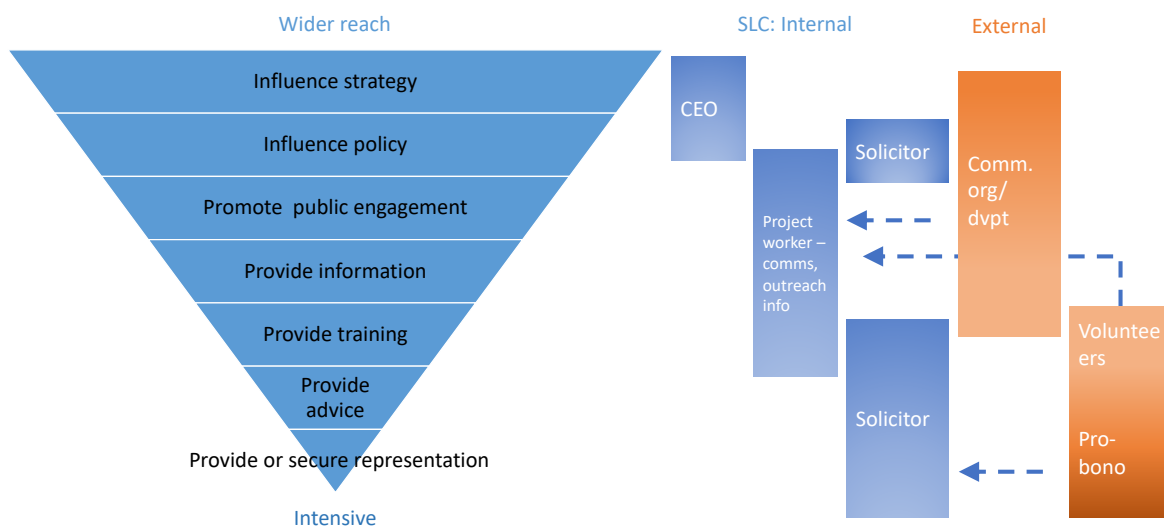
Diagrams/ schematics

The following diagrams were presented to the Planning Advisory Group in December 2021 to illustrate the above. The first shows recommendations for each tier of current delivery, and the second proposes the best future use of resources in the project, in terms of internal posts, and with external organisations and partners.

SLC Planning Voice: Strategic Development



SLC Planning Voice – Delivery model (Scaled up)



Final Summary and Conclusions

The outcomes this project set out to achieve were:

1. Southwark residents and small businesses will have increased understanding of the planning process
2. Southwark residents and small businesses will increase their participation in decisions affecting their environment
3. Statutory agencies and developers will improve consultation and engagement with the local community
4. Developers will be held to account to ensure they fulfil obligations set out in Development Consent orders

The evidence gathered shows that the project has made a substantial contribution to all of the intended outcomes.

All service users who contributed to this evaluation agreed that SLC offers a valuable service in relation to planning in the Borough, with a majority noting that they could not have received similar support elsewhere. All agreed that they significantly increased their understanding of the planning process (100% of survey responses, with 92% strongly agreeing). Interviews and survey feedback showed substantial increase in engagement with, and participation in the process. There are many positive examples of increased engagement and activation, and in many cases, involvement with SLC has galvanised community groupings as well as increased their capacity, partly through the building of confidence, and partly through expanded knowledge and understanding of opaque processes.

There have been many significant ‘wins’ for marginalised and minority communities which clients say would not have been possible without SLC’s support. Alongside supporting residents to develop their understanding and participation, SLC is lending credibility to otherwise unheard voices, and in this, helping increase civic participation and democratic engagement.

Whether statutory agencies and developers have improved their consultation as a matter of policy, or willingly, is debatable. However, there have been significant wins for the project on this outcome, including forcing the further consideration of the Southwark Plan and its needs assessments for travellers and boat-dwellers, as well as on the Elephant and Castle development. The establishment of the Regeneration for All Liaison Group could also make a contribution to this, with caveats about it finding the level at which it can best have an impact.

Developers have been held to account and forced to fulfil their obligations in many different cases, most notably in representing displaced traders from the Elephant and Castle shopping Centre, and the Burgess Park development – and in a wide range of smaller, individual cases. The Planning Advisory Group felt that the project would benefit from more focus on holding developers to account, including once planning permission had been secured.

In terms of its future development, developing a communications plan for stakeholders, more focus and clearer objectives for its two key groups (the RFA and PAG groups), and additional capacity

around training, information, and outreach, could even further increase the project's effectiveness. However, it is most important of all to safeguard – and if possible, expand - the day-to-day work of legal advice and information.

In terms of community engagement, an outreach approach, focusing on identifying further key partners in local areas/ communities of interest, could be a way of more sustainably reaching a wider range of groups. This could be done through added capacity in the communications, training and outreach arena, to free up the Solicitor's time.

Overall, this is a successful project, run by an organisation with an exceptional reputation. It is making substantial positive contributions against all outcomes, and could deliver even further on these, and significantly increase its reach, if it is able to expand.

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