

Section	Stakeholder Type	Stakeholder comment	Officer Comment
Section 2 - Stakeholders			
2.1	Resident	Where is the actual wording of the change? What are the new organisations (prescribed bodies) you must consult with?	Noted
2.2	Resident	Unless it's defined as an amenity society, the list of consultees doesn't seem to include neighbourhood forums such as the Sydenham Hill Ridge Neighbourhood Forum of which I am a member.	Noted Designated neighbourhood forums are considered as statutory consultees.
2.3	Resident	<p>Agree generally - but can only work if :</p> <p>(A) consultees (e.g. 'specific and general' as well as 'other') are fully inclusive of all those who should be listed, using accurate, appropriate and adequately maintained database(s); some resources should be directed towards identifying those (particularly amenity groups) which are missing;</p> <p>(B) All consultees are contacted in a timely fashion</p> <p>[Previous experience to date suggests that significant work appears to be required in these areas]</p>	<p>Noted</p> <p>It is a statutory requirement that the council keeps and maintains an up to date consultation database.</p> <p>All consultees who register to be included on the database will be contacted during the life cycle of a consultation as this is a statutory requirement.</p>

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2.4.	TFL (e-mail submission)	We note that sections 2.4 – 2.6 of the adopted SCI provide lists of stakeholders that will be routinely consulted, including TfL. TfL is a prescribed body for the purposes of consultation under the Duty to Cooperate. However, the lists of stakeholders have been omitted from the addendum. It is useful to local residents, businesses and local stakeholders to have knowledge of the range of organisations that are routinely consulted and so we would recommend that this is reinstated. If there are objections to including it within the main text of section 2 because the list may become out of date it could be included in an appendix, together with a note that it provides a current (2020) list of organisations that are routinely consulted although the named organisations may be subject to change during the lifetime of the SCI	Noted
Section 3 – Consultation Tools			
3.1	Resident	I have been impressed by the way Highways England have carried out their consultation on the Lower Thames Crossing and would recommend their approach as a template for the way consulted persons are kept up to date.	Noted
3.2	Resident	Council consultation needs to improve drastically to ensure you get the voices of the most	Noted

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3.2 Cont.		<p>disenfranchised people - especially people on low incomes and people from different cultural backgrounds.</p> <p>Would suggest you ask the different cultural groups to run part of your consultations for you and pay them to do this.</p>	<p>Council officers recognise the need to ensure local communities have opportunities to engage in the planning process. The council will continue to explore ways of improving and facilitating effective and meaningful consultation and engagement with the local community, including hard to reach groups.</p>
3.3	Resident	<p>I may have missed it but I didn't see any mention of public notices of planning applications (usually attached to lamp posts) among the consultation tools. I believe that at a national level there is a move against this communication medium, but I value it because on quite a few occasions I have learned of proposed developments near me that I wouldn't otherwise have become aware of because I wasn't on the Council's list of residents to be consulted.</p>	<p>Noted</p> <p>This comment relates more to the Development management SCI.</p> <p>All residents are welcome to register onto the councils strategic consultation database</p>
3.4	Resident	<p>Agree, but with reference to the Equalities Act 2010 (which the SCI obviously recognises) exactly what active and practical steps will be taken towards improving contact with all from Lewisham's diverse community (and their representatives) have equal opportunity to engage appears to be missing.</p>	<p>Noted.</p> <p>Council officers recognise the need to improve how it consults with Hard to Reach groups in the borough.</p>
Section 4 – Important Information			
4.1	Resident	<p>I have found it very difficult to get information out of Lewisham Council. The website is awful and it is almost impossible to get a</p>	<p>Noted</p> <p>Council officers are currently working towards improving how information</p>

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4.1. Cont.		coherent view of how policy is developed and implemented. I have little confidence that the changes will improve the position.	is presented on the council's webpages. And recently undertook an upgrade of a number of webpages. Work is continuing on adapting existing content and updating the council's planning webpages.
4.2	Resident	Suggest you use small scale models to show true impacts of large development sites and ensure that groups such as local cycle networks, and parent teacher groups are involved in terms of looking at improved access routes to schools/reduction of traffic/air pollution/provision of much needed infrastructure etc	Noted
4.3	Resident	Agree generally, but re: paras 4.3 & 4.12 how will the Council ensure that availability of the alternative formats mentioned and accommodation of special requirements will be widely known within the community?	Noted It is now a statutory requirement that all documents published on the council website meet the accessibility requirements set out in the Public Sector Bodies (websites and mobile applications) (No2) Accessibility regulations 2018
Section 5 – Local Development Framework/Plan Making			
5.1	Resident	Consultation needs to be meaningful and the Council have little by way of a positive track record in that respect. For instance to way the proposals to the Boundary Commission on ward boundaries is an example of how not to go about finding out the views of local people before putting together a Council view.	Noted Any consultation held outside of the responsibilities of the strategic planning team will not be commented on as part of this consultation

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5.2	Resident	<p>In the interests of public health and safety; to ensure sufficient flexibility to respond to the latest legislation and social distancing guidance with respect to COVID-19</p> <p>I disagree, flexibility shouldn't supersede proper consultations</p>	<p>Noted</p> <p>Consultation held by the strategic planning team will always adhere to the statutory requirements set out in the various planning legislation/regulations.</p> <p>The council fully adheres to the government guidance regarding consultation's during the Covid-19 pandemic</p>
5.3	Resident	Council needs to be open to true engagement - not just consulting on what is effectively a behind the scenes 'done deal'. Open to Community Collaborative planning etc	<p>Noted</p> <p>The council follows the statutory requirements regarding planning consultations.</p>
5.4	Resident	That the Council reply to any enquiries regarding local developments affecting residents directly. My experience is the opposite	<p>Noted</p> <p>Any issues surrounding responses to consultations focused on local development is a concern for the development management SCI and will not be considered in the consultation.</p>
5.5	Resident	Although I appreciate that legislation may limit the power of neighbourhood plans to influence policy, the fact that they are subordinate to local and regional planning policies makes neighbourhood forums little more than pointless talking shops.	<p>Noted</p> <p>Neighbourhood Plan's once 'made' will become part of the suite of planning documents that help determine planning applications within a designated neighbourhood area.</p>

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5.6	Resident	<p>Referencing 5.12: These are key issues!</p> <p>Regs 18 & 19 "6 weeks" is insufficient except for minor matters. Most projects are in preparation for many months if not years - more efficient preparation should allow 2 calendar months. In particular this is relevant to many amenity groups that meet monthly as for example a week might be lost before a consultation is picked up and up to a month passing before the matter can be discussed at a meeting - leaving only 1 week to examine, comment and submit a response to the Council (if only six weeks was available).</p> <p>MAIN HOLIDAY PERIODS Notwithstanding this, regardless of minimum period, main holiday periods should not be included in the calculation. Certain groups (for example with children) are effectively discriminated against if consulting processes ignore the fact that many households are away during main holiday periods.</p> <p>Earliest possible engagement, particularly with experienced borough amenity groups will give opportunities for 'critical friend' approaches to help develop schemes. Such are more likely to be supportive of an output</p>	<p>Noted</p> <p>6 weeks is considered as the minimum timeframe for a statutory consultation. Where the councils deems appropriate, it will extend this period beyond 6 weeks</p> <p>Holiday periods will also be considered when planning a consultation and appropriate time extensions will often be included when determining how long a consultation should run.</p> <p>Council officers inform all statutory/non statutory consultees of a consultation within the appropriate timeframe.</p>

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5.6 Cont.		<p>derived from participation. This should not be a matter of "where possible" rather than by default (i.e. only not carried out when demonstrably impractical or impossible). Early engagement also can help with the minimum consultation period problem and is significantly relevant to the Gunning Principles.</p> <p>Reg 24 It is not stated what the parameters of advance notification will apply. The comments given under "main holiday periods" above also apply here.</p>	
Section 7 – Resources and Monitoring			
7.1	Resident	<p>There is too little information here.</p> <p>Neighbourhood Forums across Lewisham should be supported by the Council to get together on a regular basis (I have organised with the support of Len Duvall) two such meetings to date on behalf of DNA. There needs to be a Neighbourhood planning resource to support with the final stages of the NPlans.</p> <p>The NPlanning Network should be integral in writing the Neighbourhood Planning aspects of the SCI - together with the council - this would, for once, constitute proper resident involvement!</p>	Noted
Further Comments			
FC.1	Resident	There needs to be a more independent and robust	Noted

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FC.1 Cont.		method of holding the Council to account in respect of consultation; my view is that they have little regard to the views of residents and I doubt if these amendments will change things.	
FC.2	Resident	<p>I don't have any issues with the changes so far as they go, but it would be simpler, clearer and give me more confidence in Lewisham if it simply produced the changes within a fresh SCI document. As it stands we are trying to anticipate how the temporary and permanent changes will mesh with the outdated document, and just hope no problems slip through.</p> <p>This concern is heightened by the refusal to review section 6 as a whole. This currently contains information that will directly conflict with the new patches, and making things even more confusing. It would give the community more faith that the temporary system of delegation, was sincerely temporary, if a new permanent section 6 was prepared. It could sit behind the temporary scheme, ready to be switched on when temporary arrangements are lifted. A fresh SCI would clear up a lot of confusion, which creates suspicion on both sides; after all, the prep work has already been done. Please listen, and just do a new SCI.</p>	<p>Noted</p> <p>A temporary development management SCI has been agreed by M&C on the 10th June 2020 and was extended on the 16th Sept 2020. Comments relating to the development management SCI will not be considered in this consultation.</p> <p>The council is managing its consultations during the Covid-19 pandemic in accordance with government guidance</p>

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FC.3	Resident	COVID-19 shouldn't been used as an excuse to avoid running consultation to their usual duration.	Noted. COVID-19 is a devastating pandemic that has drawn resources from across the council. The council has been working with partners to save as many lives as possible. This and the severe budget pressures mean that changes had to be made in order to deal with COVID-19.
FC.4	Resident	Although it is recognised that these changes to the Statement of Community Involvement 2006 are to bring that Statement up to date as far as legislation is concerned, it is cause for regret that the draft Statement of Community Involvement 2017 has not been brought forward. This document was approved for consultation by Mayor & Cabinet in January 2018, with an adoption date of September 2018. A meeting was held with interested community and amenity groups in June 2018. Unfortunately, the minutes of this meeting have never been published. The 2017 Statement was never adopted. It is regrettable that the views of local groups have been ignored; the current "technical" amendment of the SCI is inadequate for a meaningful and progressive updating of the Statement.	Noted A more comprehensive review of the SCI will be undertaken in the future, in line with recommendations found in the Council's democracy review. This addendum is necessary in the interim to ensure the SCI meets the latest legal requirements
FC.5	Resident	It is acknowledged that public consultation is not an easy process and fraught with difficulties.	Noted and thank you.

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		<p>Thank you for making this consultation available.</p> <p>Stay safe!</p>	
FC.6	Resident (email submission)	<p>1 I know that by law Lewisham have to display a Planning Notice for three weeks on or near to the property covered in the application. The present system appears to rely on the department issuing such notice(s) to the applicant to display, and appears no check is made by the department it has been displayed! I know that Lewisham use News Shopper (Bromley) for the need to publish what are called "Public" Planning Notices in the press - but would respectfully say that members of the public are not always aware of this. I do believe that this procedure as it stands on relying on the applicant to do this, is not fit for purpose, and should be given stronger significance to ensure the public is informed.</p> <p>2 I believe that the "wording of the address/just what is involved by the application", should be easily recognisable as such and that if the description by the applicant/or the agent is not true, or misleading, then it should be refused before validation and be resubmitted before being so validated, so be fit for purpose. I do not believe it</p>	<p>Noted</p> <p>This comment refers to consultation activities undertaken by the development management. This comment will not be considered in this consultation.</p>

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FC.6 Cont		<p>acceptable that only your officers in the department can relate to it, even be it misleading.</p> <p>3 As my example I quote</p> <p>"Demolition of existing building on Land to the rear of 1 Wells Park Road SE26</p> <p>and construction of..._</p> <p>ie</p> <p>"Planning – Application Summary</p> <p><i>DC/19/114935 Demolition of existing building on Land to the rear of 1 Wells Park Road SE26 and construction of 1 one-bedroom dwelling with associated access and amenity space. (*amended address). LAND TO THE REAR OF 1 WELLS PARK ROAD, LONDON, SE26 6JQ)</i></p> <p><i>Ref. No:</i></p> <p><i>DC/19/114935 Received: Fri 06 Dec</i></p> <p><i>2019 Validated: Fri 17 Jan 2020 Status: Decided "</i></p> <p>Wells Park Road divides the Forest Hill and Sydenham Wards. No 1 Wells Park Road is in <u>Sydenham Ward</u>. However, on investigation it turned out that this application was to be behind Wells Park <u>PARADE</u>, which albeit not listed postally as such, is behind 2-?12 Wells Park Road, approached by Wellspring Mews, and therefore in the <u>Forest Hill Ward!</u></p> <p>4 This particular application as described at</p>	

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FC.6 Cont		<p>1 Wells Park Road is part of the Jews Walk Conservation area, (and, in its actual site behind Wells Park Parade, actually adjacent to the Halifax Street Conservation Area) - see attached map showing both - so had to appear in the News Shopper. (*In actual fact it appeared on two occasions because of this confusion at just where it was in Wells Park Road (albeit it to my mind did not clarify matters!).</p> <p>5 I protested to the case officer when I first read the notice that I believed this description was misleading both from the point of its location and Ward definition, but was informed by the case officer, and subsequently the Development Management Team Leader – South Area, that as far as the department was concerned, it met their requirements, when to me as a concerned local neighbour, it was patently wrong. I believe that to accept this "misrepresentation", actually reflected badly on the department. I question that such an approach would be seen as a sign that the department was not receptive to genuine concerns on an application being badly worded or, indeed placed - this was not placed on the property/railings of 1 Wells Park Road by the case officer, but at some</p>	

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		<p>distance away on that side of the road and opposite Wellspring Mews, when they themselves could see this was wrong, as I have tried to illustrate in this example.</p> <p>6 I realise that this sort of information is probably not what you were looking for as part of your exercise, but my experience of the intricacies of planning, and the process, is very limited, hence only being to give you examples of what I have myself experienced.</p>	