



Mayor and Cabinet

Proposed changes to the Statement of Community Involvement Mayor & Cabinet Item 19 Addendum

Date: 16th September 2020

Key decision: Yes

Class: Part 1

Ward(s) affected: All

Contributors: Christopher Dale

Committee	MAYOR AND CABINET – ADDENDUM REPORT	
Report Title	Proposed extension to the temporary changes to the SCI	
Ward	Borough Wide	
Contributors	Development Manager	14 September 2020

1. Introduction

1.1 This report has been prepared to provide an update following the publication of the main report on a proposed extension to temporary changes to the Council’s Statement of Community Involvement and covers the responses received as a result of the notification to Amenity Societies in the borough and the statement published on the website. Officers have reviewed the submissions. Some of these relate to temporary changes to the Council’s Scheme of Delegation which were approved by the Strategic Planning Committee on 3rd September for a further 6 month period. Officers acknowledge the concerns raised and consider that the time-limited proposals being made have the appropriate safeguards built in to ensure continued transparency and democratic accountability in decision making.

2. Comments received on the Proposed Temporary changes to the Statement of Community Involvement

2.1 Ladywell Society

2.1.1 The Ladywell Society is of the opinion that the period before the reconsidering these changes should be three months and not six months as is proposed in the latest document. These changes should be kept under constant review, rather than extending the period for which they apply.

2.1.2 It is noted that the Update document says that an increased amount of officer time is spent on the virtual committee meetings, although this cost is not included in the Financial Implications paragraph. Perhaps the Planning Directorate could supply these costs compared with holding a physical meeting.

2.1.3 As the Council has not shared with the public what progress is being made towards working out the resumption of physical planning meetings, the Society would like to make a few suggestions. These meetings involve councillors and officers sitting next to each other, or at a considerable distance opposite other. Both these positions are regarded as being of minimal concern for the transmission of the virus. If councillors and officers are concerned, then a plastic screen could be inserted between each person. Committee Rooms 1&2 combined are large enough to arrange seating for participating members of the public, although it may be necessary to restrict attendance to those wishing to address the committee, plus a couple of “supporters”, if several applications are to be considered at a meeting.

2.1.4 From the minutes of the June SPC, it appears that none of the points raised by amenity societies to the initial Scheme of Delegation document were discussed, despite a presentation by the Blackheath Society. This is regrettable as it

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makes a mockery of the Statement of Community Involvement and the Democracy Review, causing the “consultation” to be a tick-box exercise.

2.2 Deptford Society

2.2.1 The Deptford Society objects **in the strongest possible terms** to officers’ proposals to continue using the amended Scheme of Delegation for a further six months.

2.2.2 Impact on conservation areas

We are **deeply concerned** about the impact an extended period of reduced scrutiny could have on fragile heritage assets such as Deptford High Street conservation area. Decisions that are made in haste and under pressure, are likely to have long-lasting repercussions for **a conservation asset that is already at risk**. Such decisions will create permanent and irreversible harm to the high street fabric, and could result in Deptford losing its conservation area status.

2.2.3 Why we are objecting

We believe that the procedure that has been implemented is not fit for purpose for the following reasons:

- It undermines the process of legitimate objection, it obscures the decision-making process and it is unconstitutional;
- It devalues the role that amenity societies play in safeguarding the borough’s heritage assets by responding to planning applications;
- It leaves the planning process wide open to abuse by unscrupulous developers
- It puts the status of conservation areas at increased risk; in particular the whole of the Deptford High Street conservation area which is on Historic England’s At Risk Register. According to this register, the conservation area’s condition is already ‘poor’ and the trend is ‘deteriorating’. **Deptford High Street is the only conservation area in Lewisham that is on this register.**
- Planning officers have a vested interest in seeing applications decided under delegated powers; if committee chairs are acting solely on the advice of planning officers, we question whether such decisions are being made with the appropriate level of impartiality.

2.2.4 These measures were proposed as a short term fix to be in place for just three months; as such, they were put together quickly with insufficient thought given to how the process would work, how decisions would be made, and what impact these changes would have on those who respond to applications.

2.2.5 Often applicants make changes in response to objections in order to try and avoid having to go before a committee, and this can result in improvements to schemes.

Under the amended procedure there is no incentive for them to do so.

2.2.6 When applications go before a committee, objectors are given the opportunity to see the officers’ report and understand the weight given to their objections, and whether they have been addressed. **Without this feedback, they are excluded from the decision-making process.**

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2.2.7 Lack of clarity

The Deptford Society also seeks clarification of the following points in relation to the amended procedure:

- Does the amended procedure place any obligation on officers to notify interested parties of the decision made by the committee chair, and the reasons behind that decision?
- Will the reasons for a decision be formally reported in any way? We believe this is crucial to safeguard the democratic process.
- Does the amended procedure place any obligation on officers to notify interested parties of any subsequent decision made under delegated powers?
- The report states that for ten objections or more there will be a 'new format/way to discuss planning application'. What does this mean?

2.2.8 Undermining the role of amenity societies

Society members read and respond to several planning applications every month relating to the conservation area.

They also make planning enforcement officers aware of unauthorised alterations to buildings.

The unauthorised demolition of the Noah's Ark was the most recent (and one of the most extreme) examples of this.

Our members act as the council's 'eyes and ears' within the conservation area, often supplying photographs and eye witness accounts that can be used as evidence in such cases.

If the council no longer values the contribution made by amenity societies, we can only conclude that they do not value the borough's heritage assets.

2.3 Lee Forum

2.3.1 LBL's interpretation of government covid planning guidelines has involved the dilution of community involvement in the planning process through amendments to it's SoD and SCI. This is more restrictive than the large majority of, possibly all, other London boroughs, including Greenwich, in which some of Lee Forum's area falls, where SoDs and SCIs have not been amended.

2.3.2 The success of LBL's temporary measures was always going to depend on good quality execution, transparency and feedback. Unfortunately, performance in these areas currently leaves much to be desired and so Lee Forum must object to the continuation of these temporary measures in the strongest terms.

2.3.3 Lee Forum gives as illustration the problems it has encountered with an application for 34-40 Eastdown Park, SE13, in the Lee Forum area, and request that improvements, also listed below are implemented as soon as possible:

2.3.4 Problems with current levels of execution, transparency and feedback regarding the 34-40 Eastdown Park application:

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- In early July of this year, 11 public comments were made of which 8 were objections and 1 in support. One amenity group (Lee Forum) objected.

- Nobody who made a comment or objection received an acknowledgement of their submission or has received any other communication about the progress of the application. Note, LBL's SCI states at page 21 that '

comments will be acknowledged by the Council in writing'.

- The minutes of planning committees on the councils website make no mention of the application.

- Comments received from the community and Lee Forum are not shown on LBL's planning portal. Noted that LBL's SCI states that these can be read in person by visiting council premises, but LBL is almost unique amongst London boroughs in requiring its residents to travel to council offices to view these documents, and since the logic of the revised SCI is that people should not travel to or gather in council offices, so even more so should they not have to travel to view these documents.

- The council's planning portal shows the application as undecided despite the deadline for the application being decided presumably being 7th September (eight weeks after it was validated) and no planning committees due to meet between now and 7th September.

The community and Lee Forum therefore remain entirely in the dark:

- were our comments received by the council?

- how are those who commented to know what weight their comments hold/what happens next?

- will the application go to planning committee? Note that at page 29 of the council's published SCI it is stated that 'A local meeting will be offered to those that have made representations and the applicant at least two weeks prior to a decision being made on a planning application in the following circumstances: ● where one or more objection(s) have been received from a residents' association....' Lee Forum made an objection so why has the application not gone to planning committee?

- has the application been decided?

Requested improvements:

- when comments are received on an application an acknowledgement email should be sent in reply, thanking the submitter for their comment and explaining what will be done with their comment and what the next steps in the application process are.

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- the council's planning portal should be updated to show comments received, redacted for personal details. It is inappropriate to ask members of the public to travel to council offices to read these and the SCI should be amended to state that comments will be shown on the planning portal, as they are in most other London boroughs.

- the council's planning portal should be updated to show decisions made by the chair of the planning committee - for example, whether it has been decided that the application should go to planning committee.

- when it is decided whether an application will be decided by planning committee, those members of the public and amenity groups who commented should be advised by email, and the reason for such decision given. If the application is to go to a planning committee, they should be invited to that meeting.

- When a decision is made on the application, those who commented on the application should be advised of such decision by email.

I have copied Lewisham's CEO and Mayor on this response as I believe a lot of what Lee Forum is asking for is basic and what every local authority should be doing (and most are doing, especially in London). The problems I have listed are contrary not just to planning legislation, policy and best practices but also illustrate local governance and transparency issues. Until these are resolved no consideration should be given to extending the temporary measures. Lee Forum would ask why, even after these problems have been resolved, LBL would need the temporary measures to continue when other London Boroughs have not felt the need to bring in such measures.

2.4 Blackheath Society

2.4.1 We write to respond to the invitation to comment, ahead of the Council meeting tomorrow, on the notification of plans to continue with the current arrangements for planning consultation beyond September. We wish to register our objection.

2.4.2 As it happens, the Blackheath Society has not had direct experience of the processing of a significant planning application in the months since this was implemented.

2.4.3 However, we note that, as far as we can tell, Lewisham is one of few councils that have felt it necessary to reduce consultation/representation in this way. Neighbouring Greenwich, of which we do have experience, seems to be following earlier procedures (with online meetings) satisfactorily.

2.4.4 We are aware of concerns expressed by other amenity societies near us, based on their actual experience. Their examples of failure to keep objectors informed about the progress of individual cases are highly regrettable. If they were to be typical, we would be very concerned.

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- 2.4.5 We do not have an objection in principle to Council Meetings online. We have had satisfactory experience of this in Greenwich. But we do have serious concerns about the remainder of the provisions. A higher threshold for objections and extensive powers of discretion for the Committee Chair definitely risks undermining the appearance of accountability and democracy and therefore confidence in the fairness of the planning system. It also calls into question compliance with policies on community involvement.
- 2.4.6 The Committee/ Council should have very strong reasons as to why all these Covid-inspired changes should be maintained, now that the exceptional circumstances at the outset have passed and some semblance of normality is being re-established.
- 2.4.7 As we have mentioned earlier, for this approach to engender trust and confidence it requires a high degree of transparency and effective communication. This includes clear communication with correspondents, clear feedback on objections received and actions taken, high quality of process throughout, and high standards of clarity and balance in officers' reports and decision notices. The internet leaves no excuses for not having full disclosure (redacted if necessary to protect personal details) and timely reporting at every stage, to allow objectors to stay informed and engaged. If the Committee is considering an extension of emergency measures, we would like them to satisfy themselves about steps taken to assess their effectiveness and any associated shortcomings for community involvement before approving any extension.
- 2.4.8 We also wish to highlight another key ingredient we believe is missing from the approach: councillor surgeries. These have always been a key part of residents' ability to engage with planning decisions, seek advice about applications or the planning process, and serve as a check on the system. This is especially so as it is now so difficult to reach the planning officer responsible for a case. Surgeries with local councillors (who have local knowledge) have not so far been replaced by any clear, consistent or credible system, as evidenced by an ongoing current planning issue we are involved with on behalf of local residents (active objectors and others). In the absence of councillor surgeries, we and other objectors have struggled to find an effective way of engaging local councillors. We believe this should be addressed as a matter of urgency to further promote confidence in local democracy and act as a counterbalance to a planning system run by officers.

2.5 Deptford's Neighbourhood Forum (DNA)

- 2.5.1 DNA - Deptford's Neighbourhood Forum are writing in support of the points made in the by the Lee [Neighbourhood] Forum.
- 2.5.2 DNA already have had negative experiences of planning delegation: There has been an issue on our Neighbourhood Plan Area border with Southwark relating to the Croft Street Trees which were under protection from a High Court Order - yet the delegated officer system which has been operating without any oversight from elected members, allowed the partial destruction of one of these trees, the removal of pedestrian pavement (at a time when social distancing

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was at its height) and the removal of a disabled parking space and reduction of a two lane road to a single lane WITHOUT any prior notification or consultation with local residents.

- 2.5.3 Prior to this experience of delegated authority, DNA has, as a Neighbourhood Forum, been highlighting to the Council and our local Councillors how the current planning system is broken. There is a complete imbalance of power in the planning system which favours Developers and fails to take the views of the communities seriously. The planning application for No 1 Creekside in SE8 and the more recent application regarding initial developments on Convoys Wharf are evidence of this in the DNA Neighbourhood Plan area. With regard to the latter planning application it is highly questionable about how the Coordinator of Voice4Deptford was not able to take part in the on-line planning meeting for Convoys Wharf!
- 2.5.4 Changing the current system to one of delegation will only serve to reduce transparency, accountability and democracy further. DNA strongly object to these proposals on these grounds and would like to see better engagement with local communities - by council planning officers ahead of large development proposals coming before the planning committees engaging with community groups for initial views/thoughts and feedback; and for Community organisations and local community nominated speakers to be given an adequate amount of time (20 minutes at least) (as opposed to barely being able to speak within the 5 minutes allocated) to put forward their objections if a collaborative way forward cannot be agreed upon. DNA would encourage the Council to take heed of the attached report (submitted previously) to improve planning in London to a more just system - which needs as a priority (given the Councils'c commitment to take urgent action on Climate Change to include the "Do No Harm obligation"; and promote equality and reduce socio-economic exclusion.
- 2.5.5 DNA have been urging a review of the Lewisham Council Statement of Community Involvement WITH the Neighbourhood Forums and other community groups for over two years now and we are particularly keen to collaborate with the Council on this to ensure the inclusion of disadvantaged communities in the planning system - see:
<https://www.tcpa.org.uk/news/press-release-local-planning-authorities-need-more-support-to-plan-for-resilient-communities>

<https://www.tcpa.org.uk/news/press-release-slums-of-the-future>

<https://www.tcpa.org.uk/news/press-release-boost-of-planning-aid-for-london-to-help-people-influence-planning>

2.6 The Brockley Society

- 2.6.1 Whilst we are fully understanding of the current need for 'virtual meetings' and the wish to continue we share objections expressed by kindred societies in Deptford and Blackheath . We would though follow Ladywell Society's suggestion for a limited extension of the roll over period by 3 months in order to

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again review implications in a more productive and timely way. This would be on the understanding that solutions to the following particular local issues can be offered as proposed:

2.6.2 **Public Notices** - despite an undertaking given on 08 June 2020 to reinstate the weekly updates of Public Notices for Planning Applications the LBL Website still shows that the last logged report was 25 September 2019. This therefore continues to be a restriction in checking the currency of applications as reliance has to be made on access to the News Shopper which has a very cumbersome website and is no longer distributed door to door in hard copy.

2.6.3 **ACTION** - a remedy is needed urgently

2.6.4 **Validation of Applications** - with more staff working remotely we increasingly find that applications have been imperfectly validated. Whilst under normal circumstances such instances can be resolved by e-mail exchange we suggest, in cases where site visits are needed to untangle, we can help by providing photos of locally affected sites. This approach to teamwork, for instance, has assisted in the recent cases of 4 Wickham Road, rear of 14 Wickham Road and 44 Cranfield Road.

2.6.5 **ACTION** - that coordination with Societies should be encouraged in such cases

2.6.6 **Divergent Decisions affecting Policy** - the raised roof cases of 16 Manor Avenue (DC/20/115966) and 22A Hilly Fields Crescent (DC/18/107976 DC/19/115042)

2.6.7 **Context** - both cases involved:

the deliberate raising of roofs and other non-compliant installations (eg rooflights) in attempts to flout long-established BCA SPD policies
the Society drawing early attention to these misdemeanours by reporting to the Enforcement Team for action

remedial attempts via retrospective applications to seek planning approval processes that took 2 or more years to bring forward decisions
formal objections by the Society in both cases
the formal publication of both decisions on 13 August 2020

2.6.8 **16 Manor Avenue** - was referred to Planning Committee B on 16 July 2020 and was correctly refused although the Committee Minutes have yet to be published.

2.6.9 **22A Hilly Fields Crescent** - from e-mail exchanges with the Enforcement Team on 11 & 19 June 2020 it was understood that, as Officers favoured a solution offered by the applicant to increase the height of the front gable in order to camouflage the illegally raised roof, this would be satisfactory and would be put to a planning committee.

2.6.10 Although the Society objected to this solution (as this would cause more visual harm as an additional non-compliant element of the illegal roof structure)

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notification of the proposed planning committee details were awaited but none were received.

2.6.11 The Society was therefore shocked to find by inspection of the weekly decision listings that Officers had used delegated powers to grant permission without referral to a committee for wider debate as promised.

2.6.12 As communications had clearly broken down, and as a procedurally contradictory decision to that of 16 Manor Avenue had been made, serious concern is now raised on the ability of other similar cases in the pipeline to be able to withstand such action by officers.

2.6.13 ACTION - a procedural review is requested to be undertaken in consultation with the Society to ensure that such a divergence is not repeated and so that it must not be seen precedentially that LBL is supporting the deliberate flouting of planning policies by applicants and 'getting away with it'. Confidence must be restored.

2.7 The Sydenham Society

In the view of the Sydenham Society an extension of six months is too long; we take the view that the temporary changes should extend for three months. We are also of the opinion that the proposed changes in the number of objectors that trigger a referral to a planning committee is too high and gives too much power to the chairs of planning committees.

2.8 The Telegraph Hill Society

I understood that the extension of the Scheme of Delegation put in place in June was to go to the Mayor and Cabinet this week. I now understand however that the extension has been effectively already agreed in a vote by the Strategic Planning Committee although the Mayor and Cabinet are to consider changes to the Statement of Community Involvement.

Whilst our planning group understands the difficulties around the current COVID pandemic, we remain concerned that the process currently in force and which is to be extended does not provide the democratic safeguards which it should and is therefore open to significant error. When it comes to planning decisions within a Conservation Area, such errors are likely to be irreversible and therefore will impact on the Conservation Area for ever. Possibly worse still, such errors can set precedents which lead to the cumulative destruction of the features which the Conservation Areas were set up to protect. It is vital therefore that due consultation and oversight is built into the planning process and we remain concerned that the current temporary processes do not do this.

We wrote to the Council on 7 June over the initial scheme expressing our worries (copying yourselves) and providing suggestions to improve the process. We received no acknowledgement of our email and are uncertain whether or concerns

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were actually brought to the attention of the Strategic Planning Committee or to the Mayor and Cabinet. Certainly, no changes were made as a result. Our comments on those proposals are repeated as an appendix to this letter as they will also relate to the extension of the scheme and to community involvement in this process and I would reiterate our deep concerns over the scheme of delegation as is and as proposed. We further believe that any extension of the scheme (modified to take into account the democratic deficit) should be for no more than three months.

I should be grateful if these concerns could be brought to the attention of the Mayor and Cabinet and to the Strategic Planning Committee.

Text of email dated 7 June 2020 to Lewisham Council

CASE REVIEW

We are unclear as to how the case review will occur and whether it will only comprise the chair of the relevant planning sub-committee and the case officer. In our view any such case review should include at least one further member of the sub-committee and/or a local councillor (who will have knowledge of the area concerned). There needs to be written guidance for the case review otherwise there is a risk that reviews of different, but similar, applications will lead to different decisions as to referral and, potentially, to legal challenge. We would further recommend that the reasons for the decision (as to whether to go to delegated powers or to committee) be published on the planning portal.

REVIEW OF OFFICER'S RECOMMENDATIONS

At present, with public meetings, we are able to see the officer's recommendations and reasoning before we make our objections at the meeting. A process whereby we are able to challenge the officer's recommendations must be left in place. We would therefore strongly urge that should the Chair of the planning sub-committee decide that, after the proposed case review (under paragraph 2.1.1), a delegation to an officer is appropriate:

- (a) the officer should prepare a draft analysis and recommendation in a similar way as they would if the matter was to go to committee
- (b) the draft analysis and recommendation should be circulated to the applicant and objectors for written representations (equivalent to the 5 minutes oral representations currently allowed)
- (c) those representations should be taken into account when the final decision is made.

We believe that such a process must be included to ensure that the officer's analysis and recommendation is subject to adequate review. Whilst such analysis is generally good, inevitably there are instances where it is wrong or omits salient facts which are brought to the committee's attention during the oral presentations. The procedure for challenging the officer's analysis and recommendation is therefore vitally necessary and will ensure that legal challenges to decisions are avoided.

SELF-REVIEW THREATS

A fundamental tenet of good decision making is the avoidance of self-review threats. Given the increased ability of an officer under these new delegated powers to make decisions, we believe that the planning officer who considers the application

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and makes the decision should NOT have been involved in any pre-application enquiries or given any pre-application advice to the applicant. The current process is biased in favour of the applicant in that objectors do not have a similar opportunity to challenge a proposal in its pre-application stage (although we appreciate that this is planning law and not in the hands of the Council to change). It must be recognised however that, no matter how great the integrity of any planning officer is, it must always be true that they will find it hard to be objective on a case where they have already given advice. Even if they are, indeed, objective, the appearance is one of lack of true independence. With the temporary absence of public meetings to challenge a decision therefore, it is important, for natural justice, that the public can trust the system. The system in place must not therefore allow the suggestion that independence could be compromised by self-review.

AMENDMENTS TO PLANNING APPLICATIONS

At present where a case is to be referred to a planning sub-committee, there is often discussion between the case officer and the objectors to see if the objections can be met by changes to the application. In other instances, where the application still goes to committee we have found that last minute changes have been made by the applicant of which we are unaware. Council process at present requires the local amenity society to be informed of the original application but not of amendments to that application. If more delegated decisions are going to be made, it is critical that amenity societies are informed of any amendments in good time and allowed to comment upon them since they will have no opportunity (unlike at present) to comment on them in public meeting.

2.9 Other individual representations received

2.9.1 I am very concerned about the agenda for this evening's Strategic Planning Committee, re the 6-month extension to COVID-19 adaptations of planning process. I believe that Richard Harwood QC's successful High Court judgements on the Holborn Studios cases raise important issues for consideration. Lewisham's current planning procedure fails to comply with these judgements, raising grave concerns about last week's Mais House planning committee decision.

2.9.2 Issues raised by the case include:

Members of the public having the right to lobby Committee members before planning committees.

If a committee member expresses an opinion, it does not prove a closed mind.

Transparency:

Adequate public consultation and timely re-consultation in case of substantial changes.

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Officers reports require lists of, and accessible copies, of background documents. Excessively redacted documents make it impossible to understand the officer's method of calculations.

Timely disclosure and production of publicly accessible documentation.

Right to know provisions

Timely notifications to allow public time to digest information and make sensible contributions to the democratic decision-making.

Legitimate expectations of the public

Fairness re statutory duties to consult

Fairness and process in virtual committee meetings.

Members' 'requirement to be present' as it applies to virtual Committee meetings.

I'm not a lawyer, but this is surely relevant?

- 2.9.3 I've been trying to raise the issue of the Holborn Studios case since May 2019, without success. Therefore, yesterday, I forwarded a slideshow and a webinar link on it to Cllr Alan Hall, who has kindly distributed it to attendees of the meeting. In addition, I have passed the information to Grainne Cuffe, our local democracy reporter. I have attached the same below, and would be grateful if Planning and Suki Binjal could feed into the committee's decision-making.
- 2.9.4 I intend to raise this issue and other evidence at the planning inspectorate inquiry on the OLSPN redevelopment. I am registered under Section 6 to represent a group of neighbours who object to the appeal. This development has gone catastrophically wrong, and has shown a light on a number of serious issues with the Council's case management.

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