

## DNA's report for Mayor & Planning Meeting on 6th October 2021

**Reasons for Mayor and Cabinet to Re-Designate Deptford Neighbourhood Action** (DNA), as the Neighbourhood Forum for Deptford we are the qualifying body to complete the DNA Neighbourhood Plan. Under The Localism Act 2011, the Forum has brought forward the DNA Neighbourhood Plan (Reg 16) Plan ready to submit to the Council. This is the last stage of consultation due to be carried out by the Council prior to the Neighbourhood Plan being examined by an Independent Planning Inspector.

National planning policy places an emphasis on neighbourhood planning and local councils facilitating neighbourhood planning.

***“When a neighbourhood area is designated a local planning authority should avoid pre-judging what a qualifying body may subsequently decide to put in its draft neighbourhood plan or Order. It should not make assumptions about the neighbourhood plan or Order that will emerge from developing, testing and consulting on the draft neighbourhood plan or Order when designating a neighbourhood area.”***

<https://www.gov.uk/guidance/neighbourhood-planning--2#para088>

DNA's original application and re-application contains:

- A map identifying the Neighbourhood area was agreed with local residents prior to designation based upon **local residents' views as to the area they saw as being “Deptford” by those who live and work in the Area.**
- A statement supporting our application: Our aim and purpose is to produce a Neighbourhood Plan with planning policies that will have a **positive impact on the social, economic and environmental well-being of the people that live, work and visit Deptford.**

### **What is the role of the wider community in neighbourhood planning?**

A qualifying body should be inclusive and open in the preparation of its neighbourhood plan or Order and ensure that the wider community:

- is kept fully informed of what is being proposed
- is able to make their views known throughout the process

- has opportunities to be actively involved in shaping the emerging neighbourhood plan or Order
- is made aware of how their views have informed the draft neighbourhood plan or Order.

DNA has provided over 300 pieces of evidence to the Council - including a breakdown of our Reg 14 consultation responses and a detailed report of our consultation process carried out which clearly demonstrated to the Head of Planning that DNA has met the requirement of being **inclusive and open in the preparation of the DNA Neighbourhood Plan**:

- 10,000 Reg 14 leaflets delivered to homes in the Neighbourhood Area before Covid-19 (& 600+ between November '20-March '21)(*Our Objectives; list of all the proposed policies; website and survey details*)
- Launch Event 17th October 2019; and prize draw for survey launched
- 29 Emails communications sent out October 2019- September 2021 to all **144 members, 77 Local Organisations and 14 Politicians** keeping people informed, inviting them to meetings/events/progress updates on the Neighbourhood Plan.
- Circa £100,000 in LOCALITY Public Funding has been given to DNA for:
  1. Neighbourhood Consultancy work (Whole Neighbourhood Plan Area)
  2. **An AECOM Character and Heritage Study** (Whole Neighbourhood Plan Area) - *in conjunction with Deptford Working Histories & Build The Lenox*
  3. **Site Allocation study** (Pepys Estate - Evelyn Ward specific) (**AR Urbanism**)
  4. **Design Codes for Convoys Wharf site** (Pepys Estate - Evelyn Ward specific) (3 Event based consultations) (**AR Urbanism**)
- £25,000 Trust for London Grant obtained by DNA in July 2020 - “for the purposes of completing a neighbourhood plan in Deptford.”
- DNA display and talks given at Brockley; New Cross & Evelyn Ward Assembly meetings since 2016

- Consultations prior to Launch of Draft Reg 14 Plan made with:
  1. **Children & Young People** - Tidemill Academy; The Vietnamese Association; Young football players from the Old Ball Park (in Arklow road - we organised a community meeting & over 30 people attended to tell us what they thought about plans to build on the Old Ball Park); input from Dave Cotterill (Salvation Army) & Phil Turner (Second Wave); & Marion Briggs (Alliance for Childhood), DNA attended the LESOCO Festival of Ideas and have spoken at Goldsmiths College about Mental Health and Housing.
  2. **Hard to reach cultural groups** - DNA funded a Vietnamese Cultural event in March 2016; & supported/spoke at Lewisham Refugee Migrant Network's event at the Civic Suite in June 2017 for Refugee week; The Afghan and Asian Association. DNA assisted with and supported the launch of MOSAF (Museum of Slavery & Freedom)
  3. **Disability/Disadvantaged groups/Health & Well-being issues** - Andrea Hughes attended the Health Improvement Forum & community connections meetings; North Lewisham Community Health and Well-being meetings, NLP meetings at the Waldron. DNA attended the Council's homelessness Forum & met with Health Advisers at City Hall, took part in Health Inequalities consultations at the GLA & discussions about the Health & Wellbeing bid, Clean Air meeting Corbett Community Library.
  4. **Parks Groups - DNA has attended meetings & updated people & distributed leaflets:** Lewisham Parks Forum, Deptford Folk, Sayes Court Garden, Friends of Tidemill Garden, Creekside Discovery Centre, John Evelyn Garden, Twinkle Park (table at their annual event) Friends of Brookmill Garden; Lewisham Green & Open Spaces Forum Civic Suite, Crossfields Open Space.
  5. **General Public consultation/involvement - DNA has held over 20 open public meetings 2015-2021 (inc AGM's) PLUS: Deptford Market stall consultation (June 2017); Riverside Consultation (September 2020); Giffin Square consultation - (included Homeless people who hang out there) (October 2020); ETRA Food store consultations; & Fish 'n' chip Silwood Consultation in February 2021.**
    - These public meetings have been advertised through emails, flyers and postcards and took place at: The Albany; Deptford Lounge; CAC 2000; Pepys Resource Centre; ETRA Community centre; the Pink Palace; & the Olivest Baptist Church & St Katherine's Church.
    - DNA have had short exhibition displays at Deptford Lounge & the Lewington Community Centre; and a long-term display at the Pepys Resource Centre.

- DNA steering committee is multi-cultural: we have two Brazilian, one Italian and one French steering group committee members including **Dr. Mireille Tchapi** Lecturer in Urban Design, planning, & architecture
- UCL Urban Planning & UCL Urban Design students supported DNA Neighbourhood Plan with evidence base work from 2016 & 2017 (Used by the Council for the Local Plan)
- University of Westminster students exhibition was on display at Reg 14 Launch and previously displayed at the [London festival of architecture \(12 June 2019-opening of the exhibition at the University of Westminster\)](#)
- The Timberyard took part in our February 2020 AGM; and DNA organised specific meetings with Convoys Wharf: 2 on-line meetings zoom with Project Director, Planning Team & consultation team forty shillings.
- GLA support for DNA Re-designation from: Len Duvall (who has chaired 4 DNA AGM's); & Caroline Russell (London List member). GLA members Caroline Pidgeon, Sian Berry & Nicky Gavron have also shown their support for our work & DNA took part in a consultation meeting about Neighbourhood Planning in 2019.
- With Len Duvall, DNA established the Lewisham Neighbourhood Planning Network to network, share information and experiences to promote and support Neighbourhood Planning across Lewisham.
- DNA have helped promote/taken part in Council consultations in our Neighbourhood Plan Area and produced a considered response to the Local Plan and supported Council Heritage meetings. DNA inputted into the London Plan consultation meetings run by Just Space.
- Vicky Foxcroft MP, & Len Duvall OBE, as well as Brenda Dacres (initially) all supported the DNA campaign to have a community collaborative charette to re-design the Old Tidemill School site to keep the Wildlife Garden at the heart of this community. (As did GLA members Sian Berry, Caroline Russell & Caroline Pidgeon)

We received 198 Reg 14 representations from a wide range of residents PLUS Lewisham Council, TfL, GLA, Environment Agency, Natural England and Convoys Property Limited. A detailed report was sent to LBL Planning officers!

- **Lewisham Planning Officers supported:** [14/15](#) DNA Housing Policies; [8/8](#) Local Employment Policies; [5/6](#) Heritage and Identity policies; [9/10](#) Health & Well-being policies and [5/6](#) Child-friendly Deptford policies

- DNA used two community engagement consultants who during Covid-19 between November 2020 - March 2021

Danielle Heath

1. 393 phone calls were made - offering support/help to complete the Reg 14 on-line survey and capturing raw data by hand for those who didn't have internet access.
2. 210 personalised emails were sent.
3. 56 Texts were sent.
4. 4 group consultations were held - with primary school Latin American parents; with Food Bank participants at Pepys Resource Hub
5. DNA Youtube film produced (to help residents understand Neighbourhood Planning):

<https://www.youtube.com/watch?v=AlpfYue44CQ>

Rita Edmond - Independent consultant/resident (specifically for the Silwood Estate) - Rita and two young people (one teenager and one in early twenties engaged to do this piece of work - DNA paid for training, provided equipment for the community - laptop and printer and paid London Living Wage rates to all the consultants involved. We also supported them with their own bid to the Trust for London to develop their community work.

1. 3 sets of phone calls to residents in the Silwood Community
2. DNA Display at St Katherine's Church
3. Outreach consultation to encourage food-bank users (Lewington Centre) to engage with DNA
4. Outreach work with the Library bus at Silwood engaging young people with DNA
5. Fish 'n' chip lunch with exhibition and survey support

(46 responses were collected from this work on one estate)! DNA had previously tried to have an event to get residents involved in re-designing the children's playground area - an issue we had previously picked up on but L & Q failed to follow up on our efforts to plan this with them.

Responses to unfair objections, unfounded allegations that have been made against us

Undue emphasis has been placed on the objections without assessing their accuracy or relevance. The report produced by the Head of Planning is negatively slanted and lacks objectivity, openness and honesty. For example it lists the objections first and most damningly allows misleading and incorrect information which has not been shared with DNA prior to the report being written and circulated - both internally and externally visible to the public, it has effectively disparaged six years of our work **which has all been voluntary.**

**The Head of Planning has failed to properly consider all the evidence provided to her by DNA as has been set out above. 28 members names accompanied DNA's own application for re-designation including 2 GLA members and 1 Councillor.** There have been further additional letters of support (copied into the Head of Planning and/or the Mayor) from Deptford Organisations such as **Cockpit Arts, Voice4Deptford, Alliance for Childhood, the Deptford Society, Sydenham Ridge Neighbourhood Forum, an artist from the Faircharm Trading estate, two other additional residents one of whom has lived in Deptford since 2000, and Emma Warren** who has published work about Deptford and the

docks site - **totalling 33 individuals plus these additional 4 organisations** that the Head of Planning has deliberately excluded from her report.

The decision of the Head of Planning in her report to recommend refusal is largely based on a response of 34 people. The report states that this is a low response compared to other neighbourhood plans.

The low response can arise from two factors.

1. The Council did not reach enough people to get a larger response.

2. There is some factor in Deptford that makes it different from the others.

1. With Deptford being one of the most deprived areas in the country, many people are focussed on survival and are not tuned in to things like neighbourhood plans, so without the concerted effort DNA put into outreach consultation work we would not have had the good response we had to our Reg 14 consultation. Many members of the Deptford Community do not use or have access to electronic media which seems to be the main method used by the Council for consultation. DNA and other local groups are aware of this and hence the methods used such as direct leafleting, phone calls and meeting people where they are. The results are well documented.

2. There is a particular dynamic between some community groups which the report refers to but does not fully understand. This has brought about objections from only 2-3 tribalistic groups (out of about 400) within the Evelyn community. These objections are not surprising, given this dynamic. DNA has gone a long way in bringing groups together and in the case of Everest, to integrate their development plan for Evelyn ward. This offer was made previously to Everest who have shown an interest since the AGM in early July. Healing the whole community is beyond the brief of creating a neighbourhood plan and DNA have always worked in an open way encouraging everyone they meet to get involved or to participate. We cannot force people who don't want to engage with us to do so!

Two of the people who responded stating they are in support of DNA's re-designation have not been included as 'support'. They had reservations about boundaries relating to Brockley which needs to be discussed by the council and DNA going forward - the Brockley area of the DNA Area affects only about 5 roads - considered by residents themselves to be 'in Deptford' and DNA would work positively with these groups to resolve any tensions around this particular boundary issue.

In relation to the Council's consultation on our Re-designation - DNA have NOT been given any information about the Council's engagement strategy and how much consultation/what methods of dissemination it used to try to obtain views from local residents and groups to gauge support for the DNA's re-designation. From the 34 people who had the time/resources/**ability to complete the only**

**on-line Council survey - there are 19 in support** and 15 objections, that is 55%.45%, a bigger majority in support than the one that took the country out of Europe!

And of those 15 objections:

**No 1 is libelous and the Head of Planning is showing bias and lack of honesty/integrity by including these comments:** The process of applying for Designation is to supply the Council with a list of members so that the Council can contact/assess those people. When DNA made its first application to the Council in 2016 it supplied a list of members at that time - residents who had freely and willingly been part of the early meetings and who chose to join us by signing themselves up as members. It is and continues to be the Council's legal responsibility to assess the information provided on the application in relation to members.

**No 2 is a criticism of the Council's planning policies not DNA and should not have been included!**

**No 3 incorrectly states that Sayes Court Garden and the Lenox Project are "a major part of our Plan".** The Head of Planning knows this isn't the case and has left this unchallenged.

**No 4** - As outlined above, DNA have reached significantly more numbers of people than we have members and conflating the two is wrong, as not everyone we meet or engage with has chosen to become a member.

**No 21** - DNA have demonstrated to Planning Officers that we have engaged with people who are representative of local people by engaging with different ages, cultures, community groups etc.

**No 26 & No 28** - Is clearly another false statement that should not have been included given DNA's work in the Pepys and Evelyn Estates and the Evelyn Ward part of the Area has had the benefit of all 4 funded LOCALITY technical packages - whereas the other parts of the Area have only benefitted from 2! The statement about lack of engagement is also false and has been left unchallenged by the Head of Planning in her report despite 300 pieces of DNA consultation evidence handed in.

**No 29/30** - The Ward Cllrs are factually wrong - most of the DNA Neighbourhood Plan Area is in Evelyn Ward (as it covers the whole of Evelyn Ward). Our main focus has been on producing a set of Neighbourhood Planning Policies! There was an opportunity at the Tidemill Site for the Council to work with the community on a collaborative plan to keep the Wildlife Garden at the heart of this development as a social focal point, to prevent bio-diversity loss, and to continue to be the 'green lungs' for that part of Deptford - it saddens us that the Council chose not to support what would have been a Win:Win for Council & Community on this site! It was the DNA led campaign that convinced the Planning Committee to defer this planning application in 2016 supporting one of our arguments that at that time there was only going to be a total of 12% social housing! If we hadn't campaigned for a better deal for the community this would not have increased to 49%! If this ward member had attended more than one of our meetings or read the emails that have been sent to them they would be more aware of the extent of our engagement!

**No 29/30, 31 and 33** - DNA believe these objections to be politically motivated.

**No 34** - Approximately 1/10 of our Area is in Brockley ward and there have been no concerns or large planning applications in Deptford Broadway/Friendly street that we have had to contact this Cllr about. We have engaged with businesses in Deptford Broadway on the Brockley side to obtain their views for the neighbourhood Plan - E.g. WellBeloved Butchers, Abstractions and Chaplin's Barbers. DNA has attended Friends of Brookmill meetings and meetings at the Leander Community Centre. Of course DNA were aware of NCIL changes and we had an email exchange with this Cllr on this point following our Launch. Contrary to her opinion our launch was well organised with hot food and the University of Westminster exhibition as well as the DNA exhibition - our Neighbourhood Planning Consultant presented the Reg 14 plan.

The size of the DNA Neighbourhood Plan Area was determined by the Council in association with DNA. At that time of original designation it was not considered too large. The comments regarding size in the objections relate mainly to the boundary issue with Bromley and the Evelyn Ward group who wanted a plan for Evelyn Ward. This situation has changed. The Evelyn Ward plan is a development plan and work has been done to integrate it into the neighbourhood plan. It is clear that this would give more strength and backing to the Evelyn plan. The negative report and recommendation of the Head of Planning has now caused Everest to step back.

It is also beyond the brief of a planning officer to anticipate the decision of the planning inspector who will examine our Consultation Statement - this decision is the concern of the Inspectorate **who is independent** and not to be judged by the planning office.

This report is biased and unfair to the people who have given support because it largely ignores them. It is also unjust. DNA deserve better and more respectful treatment from the Council than this. **Re-designation is the only way forward to avoid losing something quite precious and of great value to the circa 27,000 residents in our Neighbourhood Plan Area who stand to benefit greatly from the DNA Neighbourhood Planning Policies, as do Lewisham Council who will get the kudos for it.** Having a Neighbourhood Plan for Deptford is the only way to protect direct democracy regarding land-use planning matters in relation to the intended changes in planning law. It is highly unlikely that there is another group in Deptford who can tackle creating a new plan with the same thoroughness and determination as DNA. Locality who have funded DNA to produce a Neighbourhood Plan for Deptford regard our Plan very highly and do not envisage that any other group could produce a better neighbourhood plan for Deptford.

DNA being a "relevant body" who have met the legislation requirements, believe that the Council must now exercise its power to (re) designate DNA as the Neighbourhood Forum for "Deptford".

If the Mayor & Cabinet decide not to re-designate DNA based on a negatively-biased officer report and politically motivated objections, then DNA will have no alternative but to legally challenge the process leading up to this meeting and the subsequent decision of Lewisham Council.

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