



Mayor and Cabinet

Addendum to DNA re-designation

Date: 4th October 2021

This is an addendum to the report titled DNA Re-designation due before Mayor and Cabinet on 6th October 2021.

In relation to the DNA Re-designation the Council received a response to the M&C report from Deptford Neighbourhood Action (the forum) on the 06th October 2021. The response by the forum has been distributed to Cabinet members prior to its meeting. This addendum provides officers responses to the points raised within the forum's response. The forum's response is not numbered by paragraph therefore this addendum addresses the points raised in order by themes.

1. The Council's role in Neighbourhood Planning

- 1.1. The Council is aware and understands its role and duties relating to Neighbourhood Planning and carries these out in accordance with the Localism Act 2011. This policy basis is outlined in Section 3 of the M&C report. The Council currently has 4 Neighbourhood Forums, with one 'made' Neighbourhood Plan. Officers continue to support neighbourhood planning activities within the borough in an objective and transparent manner.

2. DNA'S original application and re-application

- 2.1. The M&C report Section 4 outlines the forums original application and the contents of its re-designation application

3. Additional supporting information

- 3.1. All of the additional supporting information that was received by the Council at the time of writing the M&C report was acknowledged in the original report outlined in section 6.
- 3.2. We acknowledge the submission of further additional information provided by the forum and it is helpful that the forums response provides further clarity to be considered by M&C.
- 3.3. For clarity section 6 of the original report should include the 10,000 Regulation 14 leaflets delivered by the forum and the engagement activities undertaken by the two community engagement consultants.
- 3.4. DNA stated that over 300 pieces of evidence had been submitted to the Council. Council officers note that the majority of the information provided was done so

through a set of slides which included photographs of e-mails which had been printed out as physical copies as noted in 6.10 of the original report.

- 3.5. The M&C report notes in 6.13 that 198 responses were received by the forum during their Regulation 14 consultation. A consultation statement was received by the Council on the 21st September 2021 outlining results from a survey and representations made by statutory consultees.
- 3.6. All representations submitted to the re-designation consultation were listed in the schedule of comments (appendix 1) with the report providing a summary of the comments in section 5 of the M&C report. After the M&C report dispatched, the Council received a representation in support of the forum's re-designation from another Lewisham neighbourhood forum called Sydenham Hill Ridge.
- 3.7. Officers received a representation on the 27th September 2021 in support of the re-designation from Len Duvall London Assembly member for Greenwich and Lewisham.
- 3.8. Officers received a representation on the 6th October 2021 in support of the re-designation of the forum from the Deptford Society.
- 3.9. All additional representations as referenced in sections 3.6, 3.7 and 3.8 in this addendum can be read in full in appendix 4
- 3.10. Officers acknowledge the work that has been undertaken through the forum's Regulation 14 consultation and have included further additional information relating to this stage of the drafting of the neighbourhood plan within this addendum. However the re-designation consultation should be regarded separately to any of the Regulation 14 engagement activities as it is in itself a different process to a re-designation consultation.

4. Lewisham Planning Officers supporting the plan

- 4.1. Whilst officers have continued to support the forum in the production of the plan, it should be noted that although generally supportive of the intention of the plan, officers have raised fundamental concerns with regard to specific policies in the draft plan and whether these policies would meet the basic conditions during the an independent examination.

5. Response to the objections and allegations

- 5.1. The M&C report accurately reflects the representations made during the re-designation consultation. Due to the severity and nature of some of the objections these are discussed in further detail in Section 5.12 and 7.
- 5.2. The M&C report is a transparent and balanced assessment of the information and views received during the re-designation consultation. Officers strongly reject the inference that the report is biased.
- 5.3. The order of the representations made as found in appendix 1 are in the order in which they were exported from the online consultation tool. There was no attempt by officers to prioritise objections for the purposes of the M&C report.
- 5.4. As is good practice with all consultations held by the planning policy team, all representations were presented as received during the consultation. This text was

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not edited by officers, however personal information was redacted in line with GDPR.

- 5.5. DNA state that the Head of Planning had “*deliberately excluded representations*” from 33 individuals plus 4 organisations from the report however officers are unclear as to where this information was submitted to. 28 additional e-mails supporting the re-designation have been referenced in in section 6.11 of the M&C report but officers are unaware of a further 33 e-mails being received. There was no attempt to deliberately exclude any information or representations from the M&C report and all submissions regarding the additional supporting information have been presented in the M&C report or this addendum.
6. Response to low turnout and consultation representations
- 6.1. DNA highlight the fact that a low response rate could have arisen from two factors:
- “*The Council did not reach enough people to get a larger response*”:
- 6.2. The Council has outlined the consultation methods used during this consultation in section 5.6 of the M&C report.
- 6.3. Council officers undertook this consultation in accordance with the Neighbourhood Planning Regulations and with the Council’s adopted Statement of Community Involvement. At the time of the consultation the Council were unable to provide any physical promotional material due to the temporary Covid-19 regulations.
- 6.4. Whilst officers acknowledge that an exclusively online consultation can act as a barrier of entry for some sections of the community, the Council’s experience of online consultation activities during the Covid-19 pandemic has been a largely positive one, experiencing high levels of engagement most notably during the Local Plan consultation activities.
- “*There are some factors in Deptford that makes it different to others*”
- 6.5. DNA suggest that there are some factors within Deptford that make the area different to others, particularly around collaborative working between neighbouring groups. Officers find each neighbourhood area in Lewisham has its own differences and this should not be considered a sufficient reason for a low response rate during a re-designation consultation.
- 6.6. The response also refers to objections made by groups in the Evelyn area that were using the consultation for “*tribalistic*” reasons due to a particular dynamic in the area. Officers are aware of strained relationships between some groups in the area, and these strained relationships are a factor that has informed our recommendation. Whilst DNA are unhappy with these statements the representations outline the genuine concerns of other groups in the area and the Council must consider those..
- 6.7. DNA acknowledges the EVERST community group. In the M&C report section 7.7 officers note that there were encouraging signs of a possible collaboration between the two groups. At the time of drafting this addendum officers had received notification in the form of an email that EVERST have decided not to work with the forum.

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- 6.8. The response states that 2 representations which objected to the re-designation during the consultation should be included as supporting the forum re-designation. The representations in question clearly objected to the forum re-designation on the condition that the neighbourhood area was too large. Officers are satisfied that the responses have been categorised correctly.
- 6.9. DNA have provided feedback on the objections received from residents, Cllrs and neighbourhood groups to the forum re-designation. Whilst officers note that DNA do not agree with the comments made, nonetheless the report provides an accurate representation of the responses received and the Council must consider those.
- 6.10. A summary of the supporting and objecting representations made during the consultation have been provided in section 5.12 of the M&C report. The summary includes issues that were raised within the representations that concerned officers regarding the re-designation of the forum. The comments received during the consultation are available in full in appendix 1 of the M&C report.

7. Response to the size of the Neighbourhood Plan Area

- 7.1. DNA suggest that due to the formal designation of the neighbourhood area the Council must continue to support the size of the area. It is correct that the neighbourhood area was agreed by M&C in 2016. However it is a fact that representations have been made that now object to the size of the area and the Council must consider those.

8. Conclusions to the response

- 8.1. DNA state that the report is "*biased and unfair*" and the recommendation is based on a "*negatively – biased officer report and politically motivated objections*". The accusations against officers are serious and refuted in the strongest possible terms. The recommendations made by officers in the M&C report were based on the consideration of the forums re-designation application and the responses received from third parties. It is notable that DNA feel aggrieved by this recommendation but officers must take into account the representations received and irrespective of DNA's views there is not enough evidence of strong public support for the forum's re-designation.

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