

A consultation was open by Lewisham Council between 20 February and 3 April 2023 on its Statement of Community Involvement (SCI). This is a statutory document, where the Council sets out how it will engage with residents and others on matters of planning. This document will replace the previous SCI that was adopted by the Council in 2006.

The paragraphs in these text boxes did not form part of the submission made to Lewisham Council. They are included as additional explanatory notes for the readers of this submission.

The fully SCI proposals can be found here:

<https://consultation.lewisham.gov.uk/planning/consultation-on-the-statement-of-community-involve/>

OVERARCHING COMMENTS

Overall

Our comments mainly relate to the processes surrounding planning applications rather than to the Local Plan or to Neighbourhood schemes.

Whilst we agree that the involvement of the community earlier in the planning process is a welcome step as regard larger applications, for the more common, smaller applications which affect our Conservation Area, the proposals overall do little to improve community involvement and, when taken into account with the changes made to the Borough's constitution on 29 March 2023, significantly reduce community involvement.

Format of the SCI

We are concerned that at present it is not written in a form which is user friendly. We appreciate that it needs to cover the legal and procedural elements, but as a statement which is helpful to residents of the Borough who seeks to find out how they may navigate the consultation process it is difficult to follow.

To assist in this we feel that those sections which will be used most often (i.e. relating Individual planning applications) should appear before those which may only be used infrequently such as consultation on the Local Plan. The SCI also needs to be re-drafted using, where possible, non-legal language in order to make it accessible to all members of the community and not just those with planning or professional backgrounds.

Amenity Societies Panel

We deeply regret that the amenity society panel has not been reformed. This was an excellent forum for Amenity Societies to discuss issues both relating to general principles across Conservation Areas as a whole and individual applications with planning and conservation officers at a post-application but decision stage.

The absence of this panel has undoubtedly meant that more applications are having objections raised to them and, as a consequence, more applications are going to committee. This, in turn, has probably resulted in the changes made to Lewisham's constitution and the further reduction in community involvement that entails.

Whilst these decisions have now been taken, the lack of oversight procedures within the revised constitution means that the re-creation of a group such as the Amenity Societies Panel is now ever more important.

Use of electronic communications

The document should be more explicit as to how the public can access material non-electronically and should include a commitment to retaining non-electronic access. Whilst there are increasing advantages to using electronic systems, there is still a significant proportion of residents who do not have access, or cannot use or afford, the necessary technology.

Wherever the document makes reference to “on-line”, “email”, “video conferencing” or similar technology either for the dissemination of notices or documentation or as a means of consultation or feedback, it should also clarify how it will accommodate those people who cannot use such technology.

Delegated powers and decisions by Committee

We note with disappointment the changes made on 29 March by the Council to the way in which planning applications are considered. The facility for applications to be considered by Councillors in planning committee and to allow applicants and objectors speak on those applications is a fundamental part of Community Involvement.

We are surprised that these changes were made during the period in which the consultation on the SCI was open but were not consulted upon although clearly they could have been included in the SCI consultation. The argument that they were “constitutional” matters should not have precluded a proper consultation.

We were originally intending to include our comments on those changes in this letter. Given the timing of the proposals however we wrote separately to our local Councillors and, for the record, a copy of that letter is appended to this paper. We note that these matters and those that other amenity societies raised with their Councillors were not discussed, nor even mentioned, at the Council meeting at which the changes were approved.

As the smaller planning applications, given their number, are as important as larger scale developments to the heritage of the Borough we are extremely dissatisfied with the approach of the Council to this fundamental part of community involvement. It has substantially undermined the professed commitment of the Council to the involvement of residents in planning issues which affect them.

SPECIFIC COMMENTS

Other sections of the SCI relate to general information, consultation tools and resource monitoring. We did not comment on those sections. Section 5 relates to the Lewisham Local Plan consultation and to area and neighbourhood plan consultations. Most of this material is statutory and we did not comment on it. Section 6 relates to planning applications and, as indicated above, we concentrated on this part of the document.

References are to paragraphs in the document.

- 5.19 The public consultation for an SPD is proposed for a minimum of a 4-week period. In our view this is too short for local residents groups to allow them to consult with their members given that such groups are entirely volunteer run and that the 4-week period may run over holidays. We would suggest a minimum of 6 weeks and preferably 8-weeks to ensure that residents views can probably be taken into account.

The paragraph also implies that there is a single consultation and then the final version is produced with the Council explaining why it accepted or not. If there are large changes to proposals or if there are large changes proposed which are rejected, then re-exposure should be required.

6.2

Developers are encouraged to seek pre-application advice from the Council which will enable them to improve their applications and the chances of those applications being approved by the Council. The advice given is confidential.

Whilst we accept that pre-application advice can improve plans, it also sets up conflicts. As we have pointed out in our Local Plan submission, an officer who has given pre-application advice which has been accepted by the developer is less likely to be able to take an impartial view of the application in order to make a decision upon it. We strongly believe that the same officers should not be involved (a) in the pre-application stage and (b) in the assessment and recommendation/delegated decision process.

6.10

The Council is proposing that applicants for larger schemes should (but not must) carry out pre-application consultations with those who might be affected by the development. The area for consultation is limited – see our comments to 6.19 below.

We note that additional requirements are proposed for schemes over 50 units, however the impact of a scheme on an area is area-dependent – in our conservation area, for example, a scheme of 10 units could have a material impact on the conservation area.

6.15

Major new developments, including proposals for significant new buildings within Conservation Areas will be referred to a Design Review Panel. Whilst they will also consider proposals for substantial demolition of listed buildings, no referral is proposed for demolition in a Conservation Area.

Schemes which are referred to the Design Review Panel should also include proposals for any significant demolition or material and significant alteration of buildings within Conservation Areas, rather than simply “new buildings”.

- 6.18 As indicated above, the threshold for local meetings should be area-dependent, especially within Conservation Areas.

6.19

For the major developments it is proposed that applicants should hold a public meeting with “stakeholders”. The paragraph also sets out general recommendations for the format and timing of the meeting, generally on-line. The proposal is that the consultation approach should be discussed with Council Officers as part of the pre-application discussion.

We are concerned that the specification of a 50m radius is likely to be too small for any development of 50 units or more and that the phrase “*or more where considered necessary*” is too loose. The 50m limit needs to be at least 200m and needs to be set “*as a minimum*”. The “*consideration*” of wider limits should be set by the Council and not left to the developer.

- 6.19 It should be made explicit that the reference to “*stakeholders*” in this paragraph relates to those set out in para 2.3 through 2.5. Reference needs to be made to how applicants should “invite”: in our experience it has been through limited mailshots, omitting, for example, the Conservation Society. It has often been up to the Society to publicise the event more widely if it hears about it.
- 6.19 The document should set parameters for “*the most appropriate timing*” for a consultation. We have found developers in the past setting meetings during peak holiday periods and at inappropriate times (for instance, holding two or three meetings but only during the working day).
- 6.20 We strongly object to the proposal that it should be “*anticipated*” that meetings be held via online platforms.

We have found that on-line meetings have been limiting in their discussions, over-controlled by the Councillor or developer, and provide a very bad forum for constructive dialogue between the developer and local residents.

Indeed with some of the larger developments the best way that has been found of engaging with the public has been via “drop-ins” at e.g. the local supermarket, library, community centre or school. We accept that these will not be the formal meetings envisaged here, chaired by a Councillor, but they are strong evidence that public in-person meetings are superior to on-line meetings.

The structure of on-line meetings as held is extremely limiting in many ways. We are aware of instances, for example, where questions have been required in advance; the applicant has not provided answers in advance and there has been little or no opportunity given to challenge the applicant on their answers. The Council should set out minimum standards for the conduct of meetings.

All documents used by the applicant at a public meeting should be made available on-line with the facility for further feedback from stakeholders who were not able to attend the meeting.

- 6.21 We note that “*an overview of the local meeting and its outcomes must form part of*” the planning application; this implies that it is the applicant’s responsibility to provide this overview. This is unlikely to be unbiased. We would strongly recommend that the overview of the local meeting and its outcomes should be prepared by the planning officer attending that meeting and reviewed and signed off as a fair summary by the Councillor chairing the meeting

(which would be the document referred to in 6.20 – it should be that document which forms part of the planning application).

- 6.21 The applicant should be required not only to give “*details of how the feedback from local meeting has influenced the scheme and its design*” but also which parts of the feedback have been disregarded and why.
- 6.22 The use of questionnaires to reach as wide a number of people as possible should also be encouraged. However, where the applicant has chosen to use a questionnaire and make use of the results in the application, the applicant should be required to make all the responses available to the Council. We are aware of instances where an applicant has used the “pick and choose” approach to responses in order to present their application in the best light.
- 6.23

Paragraphs 6.23 to 6.35 set out the statutory responsibility of the Council when notifying the community of an application. These may include letters and emails to adjoining properties, site notices, information on the council’s website, notices in the local press, notification to ward councillors, consultation with the stakeholders and notification via self-registration on the website.

We have concerns over how some of these requirements are carried out in practice. We give some further comments on this in the paragraphs below.

- 6.30 We are grateful for the clarification in this paragraph on site notices placed by the Council. We are aware however that in some instances site notices have been placed where they are least likely to be visible (in one instance at the far end of a cul-de-sac) or some distance away from the site in question when more local and equally visible locations were available (in one instance 150 yards away from a site, on the opposite side of the road, when a lamppost was actually adjacent to the site on the same road). We are also aware of examples where neither the Council nor applicant’s copy of the notice was displayed. We seek to inform the Council in such cases although, in the past, there has been little evidence that our information has been acted upon.
- 6.26 We are grateful for the clarification that “*anyone is open to make representations on applications*”. We have previously been challenged by a Councillor when we have made representation on applications outside our Conservation Area where we did so because we felt that a matter of principle affecting all Conservation Areas was at stake.
- 6.31 Specific comments on the website are made below in relation paragraphs 6.31, 6.35 and 6.36. We have also made some general recommendation as to improvements that could be made to the Acolaid system or its eventual replacement in a separate section at the end of this document.
- 6.31 We have found instances where plans and documentations have not been uploaded to the website. Council systems will need to ensure that this does not occur or, where it does, consultation times are extended and those consulted are informed as to when the documentation is posted.

6.35

Acolaid is the Council's software for dealing with planning applications.

As regards automatic notification via the website, please see our comments on Acolaid below.

6.36 We have experienced instances where revised plans have been uploaded only a day before an application is to be heard by a planning committee. We are grateful that the Council is committing to the re-consultation when revised plans are submitted, however we are concerned about the flexibility given to the Council by the use of the phrase "*may seek to notify*" and that the only consideration is in terms of the "*impact to neighbouring properties*". In our view this should read "*Where a revised application is submitted the Council will notify interested parties, including those who have commented on the application, unless, in the view of the Council, those changes are considered immaterial in the context of assessing the overall application.*"

We believe that all revisions to applications should be automatically notified to the Statutory Consultees at the same time as they are posted to the website, although we appreciate that this may be impossible under the current Acolaid system.

7.4

Section 7 of the CSI deals with resources and monitoring.

We query the statement that "*To facilitate meaningful information, the Council will also periodically seek information from those participating in consultation activities on who they are so as to ensure consultation is reaching all of the community.*"

Information from those participating in consultation may allow the Council to identify potential gaps in the consultees but it will not ensure consultation is reaching all of the community. We suggest that the statement should read "*The Council will also periodically seek information from those participating in consultation to identify any areas where further communication may be necessary and will work to find ways to involve those not participating in consultations to the extent that they wish to be involved.*"

ANNEX TO SCI: AMENITY SOCIETIES

This annex to the CSI sets out new requirements for Amenity Societies to meet in order to be recognised by the Council as statutory consultees and thereby automatically receive notification of planning applications in their area.

The annex is repeated in full in each of the boxes below.

The justification given for this Annex is that there has been an increase in the number of "*active groups*" across the Borough and that the Council now needs to regulate this in some way. Why this is the case is not clear since it will reduce community involvement from active groups of residents.

It would have been helpful if the Council could have been explicit as to why these formal procedures are necessary now, if they had not been in the past.

References are to paragraphs in the annex.

1.1

1.1. The Council has long standing working relationships Amenity Societies who cover planning matters across Conservation Areas. Given the increase in active groups across the borough, the Council seeks to formally recognise the role of Amenity Societies in the Development Management process.

It is unclear whether this Annex applies to all amenity societies or only those which cover planning matters across Conservation Areas. If the latter, do the proposals mean that amenity societies outside Conservation Areas are excluded from the Development Management process? Or does it mean that there are no requirements imposed upon them by this annex?

1.2

1.2. To be formally identified, groups are asked to submit

- Their Society name, membership size, date of formation
- Specific Conservation Area of interest including a map
- Topic of interest (i.e. Conservation, transport, ecology)
- A copy of their adopted constitution
- How groups activities and work are undertaken, outreach to the wider community
- Membership of London or national forum

The requirement for groups “to submit ... *Membership of London or national forum*” is poorly worded. We presume this wording is meant to mean that Societies must confirm that they are a member of the London Forum of Amenity Societies or of a national forum. It does not say this.

Whatever it means, it is inconsistent with that which has already been agreed by Councillors and written into the Council’s constitution. That states that “*amenity societies must ..meet the terms of the London Forum for Amenity and Civic Societies*”. The wording there does not require membership (merely to meet the terms for membership); nor does it permit membership of an alternative national body. If this requirement is retained, redrafting is needed so that the meaning can be understood and is consistent with other Council requirements.

In any event, and with whichever wording, we object to the requirement. There may be perfectly valid reasons why an Amenity Society does not wish to agree to the terms of membership of the London Forum; those terms are not under the control of either individual amenity societies nor that of Lewisham Council. The Council should set out clearly, in its own documentation, the terms on which it wishes to recognise amenity societies.

1.2 We cannot understand why an amenity society has to include a map of the “*Specific Conservation Area of interest*”. It is the Council which creates Conservation Areas and maintains the maps of those areas.

1.3

1.3 Groups which cover more than one Conservation Area or a very small area, have a small membership or a single-issue focus may not be generally recognised as Amenity Societies may still be consulted on planning applications.

The requirement that a group which covers more than one Conservation Area “*may not be generally recognised*” is unacceptable. We, in the past, covered the Hatcham Conservation Area before it set up its own society in order to provide some protection to the heritage assets in that area. We do not understand why this cannot be permitted and why Conservation Areas which do not have their own separate society should not be afforded such protection by a neighbouring area.

We strongly urge the Council to delete the reference to groups which cover more than one Conservation Area. There is no justifiable reason for it. Indeed it will cause certain societies to split into multiple groups in order to meet the requirements for recognition, thereby increasing the number of separate active groups and increasing the Council’s workload rather than reducing it.

In this context we also note that “*small membership*” groups may not be afforded recognised status. Given that there are some very small Conservation Areas, such as St James, the fact that their size will preclude them from recognised status and that they will not be able to combine with a neighbouring society either means that they will be wholly excluded from the Development Management process as it relates to their Conservation Area. This is inequitable.

1.4 The Council envisages that a review of Amenity Societies will be undertaken every two years.

(No comment)

ACOLAID

Acolaid is the Council’s software for dealing with planning applications.

Acolaid is currently a fundamental part of the community involvement process. We have made comments in planning fora and various submissions in the past on the issues we find with the current system. We re-iterate those comments here for convenience.

- Currently only one email address is allowed per consultee. For volunteer groups may be insufficient as the addressee may be unavailable during the consultation or may not receive the email for connectivity issues. Any new system should allow for an alternate/second address.
- There should be a formal and automated way within the system for notifying statutory consultees when documents relating to a planning application are altered or added to the website.
- At present one can receive notifications relating to new applications in a street, but it is not possible to obtain notifications for the whole of a Conservation Area. Similarly it is not possible to search the weekly or monthly lists by Conservation Area but only by ward. Since a

**TELEGRAPH HILL SOCIETY
RESPONSE TO THE DRAFT PROPOSED
STATEMENT OF COMMUNITY INVOLVEMENT**



Conservation Area will cover multiple streets, may cover more than one ward, and only cover parts of streets, this makes finding relevant applications more difficult than it needs to be.

Submitted: 1 April 2023
On behalf of the Telegraph Hill Society

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APPENDIX: THE SOCIETY'S VIEW ON CONSTITUTIONAL CHANGES

During the course of the consultation on community involvement, the Council made a number of changes to the way it deals with planning applications. It did so without including these changes within the scope of the Statement of Community Involvement. It should be noted however that there is no legal obligation on the Council to consult on these changes (or indeed to others involving community involvement). The changes made significantly affect the way that Community groups and Amenity Societies can interact with the planning process and object to (or support) applications.

The letter below set out our concerns about these changes when they were proposed. The changes were however passed at a Council meeting on 29 March 2023.

The changes were:

1. The deletion of the current four committees and the establishment of two main planning committees of equal standing;
2. The creation of a new Strategic Planning Committee, which only meets when an application falls within Parts 14 of the Schedule to The Town and Country Planning (Mayor of London) Order 2008.
3. That the new Strategic Planning Committee be constituted as follows: •
 - a. Chairs of the two Planning Committees;
 - b. Vice-Chairs of the two Planning Committees;
 - c. Two Cabinet Members nominated by the Mayor;
 - d. One other member from each of the two Planning Committees.
4. That the Chairs of both committees be paid a Special Responsibility Allowance of £10,216 (an amount equal to the current SRA payable to the Chair Of Strategic Planning Committee) and the Chair of Strategic Planning Committee does not get a Special Responsibility Allowance;
5. That each main committee has a membership of 8 councillors;
6. That each main committee meets bi-monthly;
7. That the threshold for referral to a main Committee be increased from 3 objections to 10 objections;
8. That amenity societies must be formally constituted and meet the terms of the London Forum for Amenity and Civic Societies;
9. That any objection from an amenity society is not automatically referred to a main committee but suitability for referral to committee is determined by the Director of Planning in consultation with the Chairs of both committees (or Vice-Chairs in their absence) in a Chairs' Briefing.

Prior to this change on 29 March 2023, there were four planning committees each comprised of local Councillors and any objection from 3 or more objectors or from an amenity society was automatically referred to a planning committee rather than being decided by an employed council planning officer. This allowed the opportunity for the objectors to make in-person representations at the committee meeting at which the application was decided and gave Councillors the opportunity to question both the applicant and the objectors over their views before making a decision. No such mechanism exists where the decision making is delegated to a council planning officer.

(Our letter of response to this proposals follows on the next page)

Telegraph Hill Ward Councillors
By email and as an open letter

17th March 2023

Dear Joan, Paul and Luke

Review of the Constitution of the Borough of Lewisham – Phase 2

The Society will be responding to the consultation on the draft Statement of Community Involvement and was intending to comment on the operation of the planning committees as part of that response.

We are concerned however that certain elements, which we would regard as fundamental to the involvement of the community in planning issues, are not being consulted upon but instead decided as part of the Constitutional Review.

We would have thought that those changes would have also been open to consultation. After all, the existence of Lewisham Council is fundamentally to serve the needs of residents of the borough and the constitution is there to govern that relationship as well as the internal workings of the Council itself.

Arguably, the changes being proposed in the Constitution Review are more important to community involvement than the changes actually being consulted upon for the new Statement of Community Involvement.

We strongly object to the proposed changes to the Constitution proposed in the section 4 of the Constitution Working Party Review dated 14th March 2023.

[Our views are:]¹

Raising the number of objectors required from 3 to 10

This will primarily affect individuals who are concerned about changes to neighbouring properties. It will not affect larger lobby groups or societies who will find it nearly as easy to obtain 10 signatures as they will 3 signatures. We do not consider this proposal to be in the best interests of residents.

Pre-vetting of applications from Societies by the chairs of planning committees

The majority of applications are already dealt with under delegated powers. Where conservation or amenity societies object to applications they have good reason to do so – they are objecting, generally as volunteers, and using their own time to do so. Such objections should not be treated lightly.

We do not believe the proposals, as we understand them, for the Director of Planning to decide whether an application should be considered by a committee to meet the need for openness and fairness.

¹ The introduction in the original letter is no longer relevant as this letter is now incorporated here as an appendix to our full response on the SCI.

We understand that the Director of Planning will need to consult with the Chairs of both Committees, but the decision will remain with the Director of Planning. This effectively means that our elected representatives will no longer have the final decision in applications considered important enough by Amenity Societies to be brought to committee.

This cannot be right and it considerably reduces the ability of the community to be heard.

Objectors already labour under a number of difficulties including the facts that:

- They have no equivalent to the pre-application planning process available to developers. This sets up potential conflicts within the planning department when the same officer both makes recommendations to the applicant and then makes the fair assessment for the committee report.
- They only have 5 minutes to speak in total at committee, whereas the developer has 5 minutes and the planning officer (who is most likely to be supporting the scheme if it gets to committee) has an unlimited length of time and has a right of reply to the objections)
- There is no mechanism for objectors to talk to each other before the planning meeting and now, as people often attend virtually no opportunity to confer at all; the details of objectors are not released to other objectors. There is practically therefore no way for different objectors with different concerns to divide 5 minutes between them.
- If the Council decides against the application, then the developer may appeal, whereas there is no such right for objectors should the Council allow the application. There is therefore an inbuilt incentive for both the planning officer and the planning committee to decide in favour of an application and whilst we are sure that this never biases either the officer or the committee, fairness dictates that all decisions should be considered as carefully and as openly as possible.

We understand that there could be a desire of the Council to reduce the number of applications that go to Committee. In our view there are a number of other ways this could be achieved including:

- A better initial vetting process whereby application which are clearly against the Development Management Policy or are clearly incomplete are rejected before the application is allowed to go ahead.
- The re-establishment of the Amenity Societies Panel or equivalent whereby it is made easier for the societies to express their opinion and to understand and take account of the council officers' views before any objection is lodged.
- The ability for Conservation Societies and other objectors to see the Council officer's full written opinion before the agenda papers for the Council meeting are prepared – certainly, in our case, there have been instances where, having seen the officer's reasoning we would have withdrawn an objection before it got onto the agenda.

If the Council is insistent on having a pre-vetting process to cut down on committee time, then, in our view:

- The recommendation of the planning officer should be available to the objectors (and supporters) in advance in order to correct any errors or challenge any mis-interpretations (at present this can be done at the planning meeting and a similar mechanism needs to be adopted here).
- The decision should be a joint decision of the Head of Planning and the two Committee Chairs, (or Vice-Chairs) and should require a unanimous vote for the matter not to be put to Committee; it should not be in the hands of an employee (however senior) alone to decide.
- The Head of Planning and the two Committee Chairs should be provided with a full copy of any objection by the Amenity Society rather than a summary by the planning officer which, have, on occasion, been known to omit salient facts.
- Ideally, in addition to the heads of the planning committees, there should be one other Councillor involved, who may be in an advisory rather than voting capacity, who has detailed knowledge of the built environment where the application is. Whilst this is not a requirement in a planning committee meeting as currently constituted, it is likely that given the size of a committee, at least one Councillor will have some knowledge of the area).
- There needs to be an appeal process, not least to avoid matters having to be challenged in judicial review.

We would urge you, as our local Councillors and as residents who we know are interested in democracy, community involvement and in protecting the Borough's Conservation Areas, to do all in your power to have the existing proposals in the Constitution Review rejected or substantially modified.

I would also like to add a further area of concern, which has not yet been discussed in our committee but which I believe they will agree upon. This is the part of the proposed constitution change relating to petitions.

I understand the need to formalise the petition making process and that e-petitions are a convenient and cost effective way for the Council to proceed. The Council is not however intending to bar, as I understand it, written petitions which is good. There appears however to be a bar on "hybrid" petitions. This is not defined but I assume means that a petition which is partly an e-petition and partly a written petition will not be allowed.

This cannot be good practice. It means that if somebody starts an e-petition, then those who are less computer literate or do not have computer access will be barred from expressing their option. It will also then prevent residents from the door-to-door collection of opinions. I do not believe that this was what was intended and would be grateful for your confirmation that I have misunderstood what is intended.

Yours sincerely

M G Bacchus, Chairman, Telegraph Hill Society.

See also the following page for the responses to this letter.

We received one response as a result of this letter:

Councillor: Thank you for your thoughtful and articulate critique of the constitutional reforms being taken to the Council AGM.

Personally I am sympathetic to some of your reservations and I witnessed many of your considerations being debated at the various fora at which the Constitutional proposals were discussed. These recently included two plenary sessions of Labour Group as well as other Drop In discussion groups. As well as more general discussions over a number of years ever since the Local Democracy Review was launched.

At the end of this extensive process Councillors made a collective decision in favour of these proposals. Consequently I will not be able to lobby to change them.

What I will say is that I fully expect the new procedures to be reviewed after they have been implemented and the option to revise will always be there in the future. (It has to happen at a Council AGM though).

Once again thank you for sharing your views.

This response was copied to other ward councillors who did not dissent.

The Society would note that, as far as it is aware, it received no invitation to attend any sessions of the Labour Group nor to any drop-in sessions at which it could contribute its views. The earliest it could contribute views was when the formal proposal was put on the Council website. That report and recommendation was dated 14 March 2023 and the society responded on 17 March 2023. It was not circulated to amenity societies for discussion.