

Comments to London Borough of Lewisham on RMA DC/19/111912 Block 15 (Phase 1) Submitted in response to London Borough of Lewisham's consultation ending 31 May 2019

D) Culture and Heritage

It is the opinion of **Voice 4 Deptford** that Reserved Matters Application **DC/19/111912** should be refused until CPL engages in a meaningful and ongoing dialogue with the local community about a Cultural Strategy for the site which reflects the needs, aspirations and heritages of the people of Deptford.

Background:

A well run, informed and suitable Cultural Steering Group is the forum through which a meaningful and ongoing dialogue with the local community about culture on Convoys Wharf can take place. Convoys Properties Limited committed itself to set up such a group when, in 2015, it signed the S106 Agreement in conjunction with the GLA and L B Lewisham.

The Steering group, according to the S106 (p148, 6.3 (a)), is to '*assist in advising on the formulation, development and delivery*' of cultural strategies, to meet quarterly (S106 Agreement, 6.6, P 149) and, specifically, to deliver (S106 5.4) Annex 3 commitments which, amongst many other things, includes finding ways of attracting visitors to Deptford, encouraging starts ups, working with archives, establishing a Meanwhile Use programme which, crucially, includes setting up a Youth Forum and actively engaging with local people in the cultural sector and elsewhere in an ongoing way.

In addition, P 147, Section 5.5 of the S106 Agreement states that '*Before submitting the first Reserved Matters Application in respect of each Phase, the Owner shall consult the Cultural Steering Group and shall have regard to any representations received following such consultation...*'

What has happened to the Cultural Steering Group and Strategy?

Since 2015 there has not been a fully functional Cultural Steering Group for Convoys Wharf. Nor has there been an agreed cultural strategy.

Instead of meeting quarterly since 2015 to help frame a cultural strategy for the site, and oversee its development, a scarcely functioning cultural steering group has met twice, once in January 2017 and a second time, 22 months later, in November 2018. On both occasions CPL presented it with a document called a 'cultural strategy' provided by Fourth Street consultancy, a 'fait accompli'. At no point since 2015 has CPL, or its agents, asked the steering group or the people of Deptford to engage with a possible cultural strategy. Deptford's opinions or ideas do not appear relevant.

At the second meeting of this scarcely functioning cultural steering group, *Secret Cinema* was presented to it as having done 'community research', as though CPL knew it needed to speak to local people yet decided instead to contract the task out to a commercial firm. No plans were set out for a Youth Forum, other Meanwhile uses, startups or archives etc. This second meeting broke down without agreement and there is no prospect of a further meeting of this group.

Voice 4 Deptford is aware that we are not alone in our criticisms of CPL regarding Sections 5.1-5.8 (Cultural Strategy); 6.1-6.10 (Cultural Steering Group); and Annex 3 (Cultural Strategy Commitments) of the S106 agreement. In a letter to Jonathan Sarfaty (Chief Project Manager, HPG UK) of 8th June 2017, Julia Robins, (L.B. Lewisham Major Applications Manager) the L B Lewisham, rejected CPL's Initial Cultural Strategy because it raised serious concerns about *'the way the local community is going to be involved in influencing and owning what takes place across the Convoys Wharf scheme'*. The letter goes on to state: *'to ensure that the intended inclusivity is realised, officers need to understand how the core intentions of the Strategy will be delivered in practice and how much opportunity for genuine local engagement there will be'*.

For example, the letter continues, in Annex 3, there is a clear commitment to develop a *'meanwhile programme of temporary uses'* informed by *'a forum for receiving ideas and proposals that appeal to the community'*; and to *'create a youth forum to explore ideas of how young people can get involved in their neighbourhood'*.

Comments on Block 15:

Block 15 presented CPL with an opportunity to rectify the mistakes of the RMAs for Plot 08 and 22 which are 'on hold' pending the establishment of a cultural steering group amongst other things. Unfortunately Block 15 has also been submitted without *'... consult(ing) the Cultural Steering Group...'* (p147, Section 5.5 of the S106), a serious error of judgement.

Despite what the company should have learnt from the delays it appears that they, and they agents, are either muddled, have not read the S106 p 147-149 and Annex 5 p 161/2 or think that they can ignore it or bludgeon local people into accepting their extremely reductionist idea of culture.

Assuming the best of all parties, an example of a muddle can be seen in the recent 'Exhibition', arranged by the consultancy *Quattro* on behalf of CPL (28th February and Saturday 2nd March, Deptford 2000 Community Action 199-201 Grove St, London SE8 3PG). On one board (supposedly) on display it stated that *a 'cultural strategy has been developed in conjunction with local arts groups and organisations'*. Yet the document shown in November 2018 to the scarcely functioning Cultural Steering Group had been done entirely by *Fourth Street*, the consultancy, without, to our knowledge or evidence, any contact with local groups.

Combine this with Block 15's Planning Statement which says (Appendix 1 Conditions discharged through P15 Submission, p 47 Cultural Strategy (Ref. CW015) that a cultural strategy has been prepared by *FutureCity*, a different consultancy, and it is clear that in this case CPL is relying on a document drawn up before the S106 Agreement was signed in 2015.

In other words CPL is muddling old data through two different agencies without seeking the guiding hand of the (non-functioning) Cultural Steering Group.

To summarise:

The CPL's approach to the Cultural Steering Group and Cultural Strategy is either ignorant or arrogant and dismissive. There has been a general deficiency in the process of community engagement, sustained failure of consultation with local people

so that they can influence 'the formulation, development and delivery' of a Cultural Strategy for Convoys Wharf. What could happen?

Voice 4 Deptford would fully support any actions LB Lewisham might take to force CPL to fulfil its obligations under the S.106 Agreement of 2015, including taking out an injunction against CPL until it honours its S106 commitments. This could ensure that a community agreed Cultural Strategy was put in place for Phase 1, Block 15.

Planning Obligations (Section 106 Agreements)....are legally enforceable obligations entered into under section 106 of the Town and Country Planning Act 1990 (as amended). A House of Commons: Briefing Paper (House of Commons Library, Number 7200, 24 May 2016) states:

If the s106 is not complied with, it is enforceable against the person that entered into the obligation and any subsequent owner. The S106 can be enforced by injunction. Local Government Association: <https://www.local.gov.uk/pas/pas-topics/infrastructure/s106-obligations>.