



LONDON'S LOCAL PLANS



**Are they supporting neighbourhood
planning?**

**A report from
Neighbourhood Planners.London
March 2017**



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Summary

This report looks at what each London planning authority says about the Local Plan/neighbourhood plan relationship within its Local Plan documentation. This is one measure (amongst many others) of each authority's approach to this new layer of the English planning system.

It is now five years since March 2012, the date when neighbourhood planning went live with the publication of the first set of Neighbourhood Planning Regulations. At the same time, the Government published the National Planning Policy Framework, setting out new ground rules for the English planning system. This national guidance established the key principles on the Local Plan/neighbourhood plan relationship.

The table in Annex A shows the extent to which these NPPF principles are reflected in the Local Plans of each of London's local planning authorities. There are as yet few examples in London of all NPPF requirements being recognised and communicated to the public via Local Plans.

Out of thirty five local planning authorities in London (including the City of London and the two Mayoral Development Corporations) there are nineteen which continue to operate with pre 2012 Core Strategies. Many of these have since been supplemented by Development Management Policy documents or have been updated via Partial Reviews.

Pre 2012 documents cannot be expected to include explanations of the neighbourhood planning regime or of its relationship to Local Plans. Most of this group of authorities are preparing and/or consulting on new Local Plans.

Sixteen London planning authorities have already adopted new Local Plans since 2012. These documents might be expected to address the role of neighbourhood plans and to explain this new part of the planning system with some clarity. The extent to which this has happened varies from good quality information, to no information at all.

The same variation is found in recent consultation versions of new Local Plans as published by London planning authorities, a number of which are nearing submission to the Secretary of State for examination by the Planning Inspectorate. This does not seem a satisfactory situation when DCLG

Planning Practice Guidance states *“Local Plans should recognise the contribution that Neighbourhood Plans can make in planning to meet development and infrastructure needs”* (Paragraph: 002 Reference ID: 12-002-20140306).

Information in this report raises the question of whether there is any correlation between how London planning authorities explain the role and status of neighbourhood plans in their Local Plan documents and the widely varying levels of neighbourhood planning activity across London?

What is said in Local Plan documents is one indicator of varying levels of engagement with neighbourhood planning, across London's planning authorities. Where Local Plans make little or no reference to neighbourhood planning, might this also be a causal factor for lack of activity within the borough concerned?

In London, with just one “parish” council (Queens Park) neighbourhood planning is an activity that relies largely on local communities taking the initiative and establishing neighbourhood forums. Local planning authorities can take a proactive or purely reactive role, in terms of their 'duty of support' to neighbourhood planning¹. In either case, the quality of information communicated by local planning authorities, in their Local Plans and in other documents and on their websites, will have some impact on levels of awareness and understanding of neighbourhood planning amongst the public.

Five years after the Localism Act, [Neighbourhood Planners.London](#) wants to deepen the debate on why neighbourhood planning is taking off in some parts of the city, and not in others. This report is one contribution to that debate.

As with our previous publication on [Neighbourhood CIL](#), this note is based on documents published on individual Borough and Mayoral Development Corporation websites. It is possible that some relevant material has been missed. We have taken the view that if our research has failed to find such information, an aspiring neighbourhood forum or interested member of the public would be likely to have missed it also. The information in Annex A is up to date as of March 2017. As new draft Local Plans are published the content of Annex A will fall out of date. We will be happy to take on board updates and any relevant new evidence.

Where Local Plan documents predate 2012, subsequent Development Management Policy documents, Partial Review material, and Statements of Community Involvement has been checked as a secondary means of assessing each authority's approach to neighbourhood planning.

¹ The duty to provide advice or assistance to a parish council, neighbourhood forum or community organisation that is producing a neighbourhood plan or Order is required by [paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 \(as amended\)](#).

London's Local Plans and neighbourhood planning – the current position

At the time when neighbourhood planning went live in March 2012, a number of London Boroughs had recently adopted updated 'Core Strategies'. Others were at an early stage of reviewing these documents, and adapted their programmes of activity to meet the new NPPF policy requirements.

Much work has since been undertaken by London's planning authorities in revising and updating Local Development Framework documents to achieve compliance with the NPPF. There has been strong Government pressure on all planning authorities to have a fully NPPF compliant Local Plan in place by early 2017².

Where new Local Plans have been adopted since 2012 and/or are in preparation, residents associations and emerging neighbourhood forums might reasonably expect to find the following:

- an explanation of how neighbourhood planning works, making clear the status and role of a 'made' neighbourhood plan as part of the statutory development plan for the area
- a distinction between the Local Plan's *strategic* policies and more detailed development management policies, in order that neighbourhood forums (and examiners of neighbourhood plans) can understand where neighbourhood plan policies need to *generally conform* and where they do not. Planning authorities are asked in NPPF guidance to identify their *strategic* policies, for this very purpose (NPPF paragraph 184 - see below).

We have used these two expectations as a measure of whether an up to date Local Plan gives sufficient recognition of neighbourhood planning.

Activity levels on neighbourhood planning across London planning authorities

Only five neighbourhood plans in London have reached referendum stage by the end of 2016. The number of referendums held across England is now over 300. In terms of the take up of this part of the planning system per head of population, London remains under-represented.

It is widely accepted that there are some London factors (not least the absence of parish councils and the need to establish a neighbourhood forum) which have added to the challenges of neighbourhood plan preparation.

Responses to a 2016 survey of local authority perceptions by planning consultants Tibbalds³ suggested various reasons for low activity levels in London, over and above the absence of parish councils. These included staffing and capacity levels in Borough planning departments, and the additional complexity of a London Plan forming part of the development plan for each Borough.

² A 2015 Ministerial written statement from Brandon Lewis stated "*In cases where no local plan has been produced by early 2017 - five years after the publication of the National Planning Policy Framework - we will intervene to arrange for the plan to be written, in consultation with local people, to accelerate production of a local plan.*" More limited intervention powers are now proposed by way of Government amendment to the Neighbourhood Planning Bill.

³ *Neighbourhood Planning in London A Local authority perspective: The DCLG 'pilot programme' and 'duty to support'* Tibbalds, January 2016

It has been recognised for some time that the distribution of neighbourhood planning activity across London is patchy, with significant concentrations in some boroughs and little or no activity in others. On the whole, central and inner London has seen more activity than outer London, and the eastern half of the city more than the western. This spatial pattern can be seen from the Neighbourhood Planners.London's [London map and list of neighbourhood forum activity](#). This database includes areas where emerging forums are showing early interest, as well as those neighbourhood areas that have been designated.

Such a pattern of activity cannot easily be explained by differences in urban form, geography or demographics. It would seem clear that where Boroughs have been more proactive and encouraging of neighbourhood planning, this has brought results.

In terms of current activity levels, **Westminster** and **Camden** stand out, followed by **Brent, Ealing, Lambeth, Lewisham and Tower Hamlets** (each of which has 4-6 forums active, albeit at early stages in some cases). **Kensington and Chelsea** has held two referendums but with limited further activity currently taking place.

Neighbourhood Planners.London's database shows nine boroughs in which activity levels have to date been very low, in terms of emerging neighbourhood forums working towards designation or designation applications approved. These are **Barking and Dagenham, Bromley, City of London, Croydon, Harrow, Havering, Merton, Newham, and Redbridge**. There are further boroughs where activity to date has been limited.

In **Kingston**, public consultation on a North Kingston neighbourhood area took place in December 2016/January 2017. The Crystal Palace and Upper Norwood Forum covers parts of Southwark, Lambeth, Croydon, Bromley and Lewisham, leading to lengthy discussions over designation. There are no neighbourhood forums designated in **Bromley** or **Croydon** to date. In **Wandsworth** the Tooting Bec and Broadway Forum has submitted a designation application. The Ickenham neighbourhood forum area was designated by **Hillingdon** in December 2016, the first forum in this borough.

While some Boroughs have been proactive in encouraging neighbourhood planning, a small number of have either taken an explicit 'minimum compliance' stance or pointed their residents to perceived pitfalls or drawbacks in the neighbourhood planning process (**City of London, Richmond, and Waltham Forest** – see Annex A for details).

Local Plans and neighbourhood plans - how is the relationship defined in the NPPF and guidance?

The publication of the NPPF in March 2012 brought together many separate pieces of previous Government planning guidance. The NPPF followed on from the Localism Act 2011 and sets out how Local Plans and neighbourhood plans are intended to relate to one another. This Government guidance covers all the constituent elements of England's current planning system.

The key principles in the NPPF which define the Local Plan/neighbourhood plan relationship are:

- *Local planning authorities should set out the **strategic priorities** for the area in the Local Plan (paragraph 156)*
- *Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan (paragraph 184)*
- *To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible (paragraph 184).*
- *Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area (paragraph 185).*
- *Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict (paragraph 185).*

These national policy requirements create a framework for neighbourhood planning, underpinned by legislation, which is clear and in many respects radical in the extent of spatial planning powers devolved to a very local level. The implications have taken some time to be digested by local planning authorities, the development industry, town and parish councils and neighbourhood forums.

Five years after the Act, and after a dozen decisions by the Courts coupled with a robust approach by successive Secretaries of State on 'recovered appeals', there is now wide acceptance across England that these NPPF principles mean what they say. They have created a new and community-oriented layer of the planning system which is now well-established and looks set to last⁴.

Planning Practice Guidance and the Local Plan/neighbourhood plan relationship?

Planning Practice Guidance (NPPG) published online by DCLG since 2014 provides more detailed information on how these NPPF principles should be applied in practice. The section of PPG on [neighbourhood planning](#) contains 12 paragraphs of guidance.

The basic question *What is a neighbourhood plan and its relationship to a Local Plan* is explained in the first paragraph of the Guidance. The fact that a neighbourhood plan “*obtains the same legal status when 'made' and becomes part of the local development plan*” is similarly rehearsed. Issues over whether a neighbourhood plan can come forward in advance of a Local Plan are explored, as is the material weight that local planning authorities should give to an 'emerging' neighbourhood plan when making planning decisions. These are all important issues, which have been addressed in a series of Court judgments.

The first of two benchmarks in our survey, in assessing whether a Local Plan give sufficient explanation of the statutory status of a 'made' neighbourhood plan, is straightforward. Does the

⁴ See response from the Prime Minister to a question from John Howell, MP for Henley, Hansard November 2nd 2016.

Local Plan make clear that neighbourhood plan policies form part of the development plan and are a material consideration in determining planning applications? It is hard to see why a post 2012 Local Plan document should omit an explanation of this basic principle from the NPPF. Yet such information is absent from a number of London's Local Plans, including those adopted since 2012 and some of the newer draft Plans close to examination stage (see Annex A).

The *strategic* policies in a Local Plan

The second of the benchmarks used in our survey relates to whether Local Plans follow NPPF guidance in setting out *strategic policies*, and distinguishing between these and more detailed and *non-strategic* policies applied in development management decisions. This requirement of NPPF paragraph 184 seems to have been widely ignored by London planning authorities, with some exceptions. The result is to leave neighbourhood forums uncertain of the space in which they can formulate and fine-tune policies appropriate to their own patch of London.

Planning Practice Guidance provides criteria on what makes a policy *strategic* (Paragraph: 076 Reference ID: 41-076-20140306). This guidance is not statutory but, as with the NPPF, is used by independent examiners of neighbourhood plans and by planning inspectors and the Secretary of State when considering appeals.

Planning Practice Guidance: How is a strategic policy determined?

“Strategic policies will be different in each local planning authority area. When reaching a view on whether a policy is a strategic policy the following are useful considerations:

- *whether the policy sets out an overarching direction or objective*
- *whether the policy seeks to shape the broad characteristics of development*
- *the scale at which the policy is intended to operate*
- *whether the policy sets a framework for decisions on how competing priorities should be balanced*
- *whether the policy sets a standard or other requirement that is essential to achieving the wider vision and aspirations in the Local Plan*
- *in the case of site allocations, whether bringing the site forward is central to achieving the vision and aspirations of the Local Plan*
- *whether the Local Plan identifies the policy as being strategic”*

Category one – Local Plans which give full recognition to neighbourhood plans

Our survey has identified only two London Boroughs with newly adopted Local Plans which acknowledge clearly this aspect of the NPPF and Planning Practice guidance. These are **Croydon** and **Westminster**. **Camden**, **Southwark** and **Tower Hamlets** also include relevant content

Croydon's Local Plan goes furthest. This Borough's document, entitled *Croydon's Local Plan - Strategic Policies*, was adopted April 2013 and contains high level policies only. Its introduction

states “*The Strategic Policies also set the framework that provides the opportunity for the production of Neighbourhood Plans. This will enable communities to influence the planning of their Place, in conformity with Croydon’s Strategic Policies.*” The document includes a series of references to neighbourhood plans, including the statement in a *Places In Croydon* section which says “*All future Development Plan Documents will be carefully managed to ensure their content does not unnecessarily trespass on the intended function of Neighbourhood Plans.*”

This explicit recognition that an over-detailed Local Plan might “*trespass on the intended function of Neighbourhood Plans*” seems (so far) to be unique to Croydon amongst London planning authorities. In the Borough there is currently one cross-boundary neighbourhood forum (Crystal Palace and Upper Norwood) preparing a neighbourhood plan covering part of the several boroughs involved.

Westminster comes close to meeting both benchmarks and all NPPF principles, having adopted a 2016 City Plan which contains only high-level policies. The City Plan makes clear that all of its policies are deemed as *strategic* in relation to neighbourhood plans. The Council maintains and develops its more detailed development management policies through other documentation. Westminster has 15 neighbourhood areas designated (covering most of the Borough) plus a community council (Queens Park) with its own powers to prepare a neighbourhood plan. Westminster can hence claim to be a borough proactive in supporting neighbourhood planning, albeit that no neighbourhood plan has yet reached referendum stage (the Knightsbridge Forum is getting close).

Camden, another borough noted for its active support of neighbourhood planning, includes at the start of its Local Plan the clear and simple statement that “*A neighbourhood plan that is prepared in line with the legal requirements and supported by a majority in a local referendum must be adopted by the Council. When adopted, a neighbourhood plan becomes part of the development plan and will be taken into account alongside the Council’s other plans when making decisions on planning applications in that area.*” It is hard to see why other London planning authorities should see a problem in including a similar statement in their Local Plan. Camden has two neighbourhood plans which have been successful at referendum, and a further 10 areas designated. The Council has also received a Community Right to Build Order proposal from the Mount Pleasant Forum, involving 125 housing units, commercial and community space, and a new 'pocket park'.

Southwark and **Tower Hamlets** are two further Boroughs which explain the role and status of neighbourhood plans in the introductory sections of their new draft Local Plans.

We conclude that at present there are only five London boroughs which pay serious attention to the NPPF and Planning Practice Guidance in recognising the role of neighbourhood plans within their Local Plan documents. **Kensington and Chelsea** has an updated Local Plan at the stage of Regulation 19 consultation, and will become a sixth example as and when this is adopted later in 2017.

Category two - Local Plans which give some recognition to neighbourhood planning

A second batch of London planning authorities have Local Plans adopted since 2012 (or in preparation) where the documentation makes a brief reference to the status and role of neighbourhood plans. Some indicate positive support to this new layer of the English planning system, while others mention neighbourhood planning while expressing reservations.

Fifteen authorities fall into this category: **Barnet, City of London, Ealing, Enfield, Haringey, Hillingdon, Islington, Kingston, Lambeth, Lewisham, London Legacy Development Corporation, Merton, Old Oak and Park Royal Development Corporation, Redbridge** and **Waltham Forest**. More detail in what each authority says in its Local Plan (and whether it has designated any neighbourhood areas) is provided in Annex A.

These authorities acknowledge the status of made neighbourhood plans as part of the development plan. Several simply include in their Local Plan a version of the wording from paragraph 2 of the NPPF stating that *“Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. This includes the Local Plan and neighbourhood plans which have been made in relation to the area”* (this last sentence being included in the NPPF as a footnote to paragraph 2).

Of these authorities, Statements of Community Involvement (SCI) published since 2012 by **Ealing, Enfield** and the **Old Oak and Park Royal Development Corporation** include substantive information and/or supportive comments on neighbourhood planning. **Islington** also publishes a separate guide to neighbourhood planning.

The SCI for **Waltham Forest** encourages neighbourhoods to prepare 'community plans' which the Council may choose subsequently to adopt as Supplementary Planning Documents. This shifts control of the content of such plans from a neighbourhood forum to the local authority and (as the Council acknowledges) the end result would carry less material weight than would a 'made' neighbourhood plan. As noted in Annexe A, **City of London** takes a 'minimum compliance' position.

Category three – recent Local Plans which give little or no recognition to neighbourhood planning

A third set of nine Boroughs is made up of those which have adopted new Local Plans since enactment of the Localism Act 2011 and publication of the NPPF (or are well into the process of doing so) and where these key documents say little or nothing about neighbourhood planning. These are **Bromley, Greenwich, Harrow, Hammersmith & Fulham, Hounslow, Newham, Richmond, Sutton** and **Wandsworth**

The adopted or emerging Local Plans for these areas do not include even a basic statement that neighbourhood plans, where adopted or made, form part of the development plan for the borough in question and will be used in the determination of planning applications. **Wandsworth's** 2016 Core Strategy asserts (incompletely and hence inaccurately) that *“The Council's Local Plan will together with the London Plan comprise the development plan for the borough”*. This statement ignores the fact the neighbourhood plans may emerge as part of the development plan. The remainder of the Local Plan makes no mention of neighbourhood planning.

In some instances, the Statements of Community Involvement⁵ published by each Borough include substantive information on neighbourhood planning. This applies in the case of **Wandsworth**,

⁵ Statements of Community Involvement are required to be published by local planning authorities under Section 18 of the Planning and Compulsory Purchase Act 2004. Their content should explain how the authority consults on planning applications. Post 2012 the majority of SCIs have included information on the authority's approach to neighbourhood planning. The current Neighbourhood Planning Bill includes a provision for ensuring that these documents are updated more regularly.

Sutton and Hammersmith & Fulham. Richmond's SCI steers its public towards the Council's own version of 'village plans'.

Category four – old plans which pre-date neighbourhood planning

The remaining five authorities (**Barking & Dagenham, Bexley, Brent, Hackney, and Havering**) have Core Strategies which were prepared prior to NPPF publication (and have not yet updated these via Partial Reviews or additional Development Management Policy documents). These boroughs are in the process of preparing new Local Plans. It is too early to say how these forthcoming documents will address the role of neighbourhood plans.

Neighbourhood Plans and the London Plan

Unlike other parts of England, London has a spatial plan at regional level. Hence any neighbourhood plan in London is required to *generally conform* with the *strategic policies* of the London Plan, as well as those in the Local Plan of the borough concerned. As the new London Plan emerges, it will be important to establish a clear relationship between this document and the growing number of neighbourhood plans in the capital.

At present, there has been little by way of explicit policy statements by the former Mayor, or Mayor Sadiq Khan, on the subject of neighbourhood planning. The Mayor's October 2016 publication *A city for all Londoners* makes no mention of neighbourhood planning.

Role of the Planning Inspectorate

All Local Plans are examined for 'soundness' and compliance with the NPPF, prior to adoption. Planning Inspectors may require modifications, and the public have the opportunity to raise concerns at the stage of Examination in Public.

To date, the Planning Inspectorate seems to have played only a limited role in assessing what is said, in draft Local Plans prepared by London planning authorities, on the subject of neighbourhood planning. There have been three examples of inspectors flagging up lack of reference to NPPF principles on neighbourhood planning, when examining draft Local Plans. In other examinations, the issue has not surfaced.

The last of the four tests of 'soundness' required in a Local Plan is for such plans to be "*consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework*". If a draft Local Plan makes no mention of neighbourhood planning in its explanation of the component parts of the development plan, can this said to be consistent with NPPF policies?

There have been 8 inspectors reports published since 2012 on draft Local Plans submitted for examination by London Boroughs (City of London, Croydon, Greenwich, Hounslow, Lambeth, Wandsworth, Westminster, and the London Legacy Development Corporation). In five of these reports, the inspector made no mention of neighbourhood planning. The *duty of co-operation* with neighbouring boroughs was a topic examined more closely.

There are three examples of Inspectors commenting on references to NPPF principles on the Local Plan/neighbourhood plan relationship. In the case of **Westminster's City Plan** the inspector in her 2013 report comments *“Paragraphs 6.6 to 6.8 of the plan include appropriate new information about neighbourhood planning, which reflects guidance in the NPPF. I conclude that the plan is consistent with the NPPF and other recently issued Government policy concerning viability, the community infrastructure levy (CIL) and localism/neighbourhood planning.”*

In the case of the **London Legacy Development Corporation Local Plan**, the inspector commented in her July 2015 report *“There is clearly considerable local interest in neighbourhood planning of which the NPPF is highly supportive (paragraphs 155 and 183-5), and a Neighbourhood Forum has been set up”*. She went on to make a modification in relation to the Local Plan's section on the Carpenters Neighbourhood Plan, adding the phrase *“support the preparation of a Neighbourhood Plan where it conforms to this site allocation and conforms with the Council in its roles as landowner and housing authority.”*

In her report on the **Lambeth Local Plan**, the inspector picked up on concerns expressed at the Examination in Public. As a result the Inspector added modifications to the Draft Local Plan, requiring a more positive statement of support for neighbourhood planning in the final version of the Plan.

It seems clear from the above that inspectors of draft Local Plans in London are not yet taking a consistent approach in testing Local Plans for material on neighbourhood planning. Where such issues have been flagged up, either by the authority or by the local community at an Examination in Public, inspectors have addressed these matters and have recognised them as a 'soundness' issue.

Where the local authority has said little or nothing in its Submission Version Local Plan about the relationship between the Local Plan and potential neighbourhood plans, planning inspectors seem generally not to have noticed this fact.

The Planning Inspectorate's publication *Procedural Practice in the Examination of Local Plans (4th edition June 2016)* makes no mention of neighbourhood planning. This point is picked up in the recommendations below.

The Planning Advisory Service (PAS) publishes a *Soundness Self-Assessment Checklist for Local Plans* (March 2014) and a *Local Plan Legal Compliance Checklist* (April 2013). Both these tools are widely used by planning departments. The former refers to neighbourhood plans only once, in relation to Local Green Space designations. The latter makes no reference to neighbourhood planning.

This absence of references suggests that the NPPF principles on the Local Plan/neighbourhood plan relationship, and the requirements set out in NPPF paragraphs 156, 184 and 185, are not viewed by PAS as a 'soundness' issue to be tested at the examination stage of a Local Plan. It is not clear why this should be so when (for example) the duty to co-operate is treated as an important issue on which consistency with paragraph 182 of the NPPF is required. Both sets of NPPF requirements are products of provisions in the Localism Act 2011. This is addressed in the recommendations below.

Conclusions

Our overall conclusion is that Local Plan treatment of neighbourhood planning is, at best, patchy across London. This raises the question as to whether what London planning authorities say (or do not say) in their Local Plans is a contributory factor to the current uneven patchwork of neighbourhood planning activity across London?

The significance of the Local Plan is that it is a tool routinely used by planning applicants and by those amenity groups, civic societies, residents and businesses who take an interest in spatial planning and place-making within their area. If this key document provides no information or clarity on the role of a neighbourhood plan as part of the development plan, it would seem self-evident that local residents associations and community groups are less likely to think about making use of this part of the planning system.

One of the aims of neighbourhood planning is to inform, educate and involve the public in the spatial planning of their area, giving local people a greater say in what should be built and where. The relationship with Local Plans is a crucial aspect. Where the 'strategic' policies in a Local Plan are not identified, neighbourhood forums and independent examiners are left having to form their own judgements on these matters. This is not what the NPPF intends.

Recommendations

- 1. A handbook on neighbourhood planning in the specific context of London should be commissioned via DCLG, the Mayor of London, and/or London Councils. This should supplement the well-established Locality 'roadmap' and give information and guidance of issues which are specific to London (e.g. London Plan policies and 'conformity', London Plan housing targets for Boroughs and disaggregation to neighbourhood level, cross-borough designations, agreeing neighbourhood area boundaries).**
- 2. The new London Plan should include specific reference to neighbourhood planning, setting out the Mayor's aspirations for this layer of the English planning system and the anticipated relationship between neighbourhood plans and London Plan strategic policies.**
- 3. Establishing the correct relationship between Local Plans and neighbourhood plans should be recognised as a “soundness” issue. DCLG and/or the Planning Inspectorate should issue further guidance to planning inspectors, setting out expectations for compliance within Local Plans on the core NPPF principles for neighbourhood plans (clear explanation of role and status as part of the development plan, identification of *strategic* and *non strategic* policies).**
- 4. The Planning Advisory Service should review its Soundness Self-Assessment Checklist, in the light of guidance from DCLG/Planning Inspectorate, to clarify what should be covered in Local Plans in terms of the Local Plan/neighbourhood plan relationship and the requirements of paragraphs 156, 184 and 185 of the NPPF.**
- 5. Residents associations, community groups, civic societies and neighbourhood forums should respond to Local Plan consultations, requesting that NPPF principles on neighbourhood planning are adequately addressed and pointing out any omissions. Such issues should be raised with planning inspectors at the examination stage if not already addressed.**

Annex A

BOROUGH OR MAYORAL DEVELOPMENT CORPORATION	LOCAL PLANS - WHAT EACH SAYS ABOUT NEIGHBOURHOOD PLANNING
Barking and Dagenham	<p>Adopted Core Strategy dates from 2010 and predates the 2011 Localism Act, so no mention of neighbourhood plans. New Local Plan in preparation. 2015 <i>Issues and Options</i> publication does not explain role of neighbourhood plans as part of the development plan, and nor does the 2015 Statement of Community Involvement.</p> <p>LB Barking and Dagenham has not yet designated any neighbourhood areas.</p>
Barnet	<p>Barnet's Local Plan was adopted in September 2012. Introduction to the document includes an explanation of neighbourhood plans, and how to establish a neighbourhood forum. Includes statement explaining that neighbourhood plans become part of the development plan as and when adopted.</p> <p>LB Barnet has designated two neighbourhood areas (Mill Hill and West Finchley).</p>
Bexley	<p>Bexley Core Strategy was adopted in February 2012 and makes no reference to neighbourhood plans. The Council is producing a detailed policies and sites local plan which <i>will where appropriate plan for neighbourhoods, providing the local criteria against which planning applications will be judged</i>. This does not explain that adopted neighbourhood plans will also be material considerations. Statement of Community Involvement dates from 2006. One neighbourhood area designated March 2015 (Hill View).</p>
Brent	<p>Brent's Core Strategy was adopted July 2010 and predates the Localism Act, so makes no mention of neighbourhood plans. Site Specific Allocations document adopted 2011. Development Management Policies DPD programmed for adoption late 2016. Statement of Community Involvement dates back to 2006. Local Development Scheme document explains role of NPs and lists those 'made' or in progress. LB Brent has one 'made' neighbourhood plan at Sudbury Town, and has designated 3 further neighbourhood areas.</p>
Bromley	<p>Bromley has recently consulted on a Submission (Regulation 19) Local Plan. The introduction explains the Local Plan and London Plan as elements of the development plan, but makes no mention of neighbourhood plans. References to neighbourhood plans appear only in a section on Local Green Space and in the Glossary.</p> <p>A revised 2016 Statement of Community Involvement includes a short section on neighbourhood plans.</p> <p>LB Bromley has not yet designated any neighbourhood areas.</p>
Camden	<p>New Draft Local Plan submitted to Secretary of State June 2016. Introduction refers to Fortune Green and West Hampstead NP alongside other adopted development plan documents, and explains clearly that <i>"A neighbourhood plan</i></p>

	<p><i>that is prepared in line with the legal requirements and supported by a majority in a local referendum must be adopted by the Council. When adopted, a neighbourhood plan becomes part of the development plan and will be taken into account alongside the Council's other plans when making decisions on planning applications in that area".</i> The introduction also explains neighbourhood planning and lists 10 further designated neighbourhood areas preparing NPs.</p>
<p>City of London</p>	<p>The City of London Local Plan was adopted January 2015. Introduction includes a statement on neighbourhood plans, based on NPPF requirement and saying <i>"Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise"</i>. No reference to neighbourhood plans in section on 'Other Planning Documents' or in diagram of hierarchy of plans.</p> <p>2016 Statement of Community Involvement states <i>"The City Corporation will meet the minimum requirements as set out in regulations in regard to consultations on establishing a Neighbourhood Forum and preparation of a Neighbourhood Plan"</i>. No explanation that neighbourhood plans when adopted form part of the development plan.</p> <p>City of London has not yet designated any neighbourhood areas.</p>
<p>Croydon</p>	<p>Croydon's <i>Local Plan - Strategic Policies</i> was adopted April 2013. Introduction states <i>"The Strategic Policies also set the framework that provides the opportunity for the production of Neighbourhood Plans. This will enable communities to influence the planning of their Place, in conformity with Croydon's Strategic Policies"</i>. The Local Plan document makes a series of references to NPs, including the statement in a <i>"Places In Croydon</i> section which states <i>All future Development Plan Documents will be carefully managed to ensure their content does not unnecessarily trespass on the intended function of Neighbourhood Plans."</i></p> <p>LB Croydon has not yet designated any neighbourhood areas.</p>
<p>Ealing</p>	<p>Ealing's Development Strategy 2026 (also known as the Core Strategy DPD) was adopted in April 2012. The document makes no reference to neighbourhood plans. A 2013 Development Management DPD includes the basic NPPF statement that <i>"Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise."</i> Ealing's Statement of Community Involvement includes a section on neighbourhood planning, along with a set of supportive principles adopted by the Council's Cabinet in 2012.</p> <p>LB Ealing has designated 3 neighbourhood areas (Central Ealing, West Ealing Centre, Greater Central Acton). The Central Ealing NP is at Examination and the West Ealing Centre NP is at the stage of submission to Ealing Council.</p>

<p>Enfield</p>	<p>Enfield's Core Strategy was adopted in November 2010 and predates the Localism Act. A new Local Plan is at an early stage of preparation and a document titled <i>Consultation on a New Plan for Enfield</i> has been published. This document makes no reference to neighbourhood plans. The Council's 2015 SCI includes a section on neighbourhood planning. This sets out the stages involved as set out in the 2012 Neighbourhood Planning Regulations, but does not explain that NPs when 'made' become part of the Development Plan. The SCI also states (incorrectly) that “<i>a neighbourhood plan would have to follow a similar process to that carried out by the Council for a Local Plan including public consultation and Examination in Public.</i>” In fact there is no requirement for neighbourhood plans to be examined in public. DCLG guidance is that written representations should be the norm, and the requirement for 'soundness' in a Local Plan does not apply to neighbourhood plans.</p> <p>LB Enfield has designated the Hadley Wood and Angel Edmonton neighbourhood areas. An application for Station Mews was not progressed.</p>
<p>Greenwich</p>	<p>The Royal Greenwich Local Plan was adopted in July 2014. The document makes no mention of neighbourhood plans. A February 2016 Local Plans Site Allocations document contains a single reference stating “<i>Alongside adopted Local Plans and Neighbourhood Plans, the London Plan forms part of the statutory Development Plan, the basis for decisions on planning applications in Royal Greenwich.</i>”</p> <p>A July 2016 draft Statement of Community Involvement includes a substantive section explaining neighbourhood planning.</p> <p>LB Greenwich has designated the Lee neighbourhood area (cross boundary), and refused an application for a Deptford neighbourhood area.</p>
<p>Hackney</p>	<p>The Hackney Core Strategy was adopted in 2010 and predates the Localism Act. The Council has recently consulted on a series of documents which will form a new Draft local Plan up to 20133. Hackney's 2014 Statement of Community Involvement contains a brief section on neighbourhood planning, but does not explain that an adopted neighbourhood plan forms part of the development plan for the borough.</p> <p>LB Hackney has designated 3 neighbourhood areas, and refused (or varied the boundary) in respect of 3 other applications.</p>
<p>Hammersmith and Fulham</p>	<p>A new Draft Hammersmith and Fulham Local Plan was submitted to the Secretary of State at the end of February 2017. The document refers to neighbourhood plans only in passing (in sections on CIL and on 'permission in principle'). The introduction to the document does not include any mention of neighbourhood plans as a potential part of the development plan for the borough, while it does</p>

	<p>refer to the London Plan and to SPDs in this context.</p> <p>The Council's 2015 Statement of Community Involvement includes an explanatory section on neighbourhood plans.</p> <p>LB Hammersmith and Fulham has designated one (unnamed) neighbourhood area in response to a 2012 application (refused) for a cross-borough area.</p>
Haringey	<p>Haringey's March 2013 document <i>Haringey's Local Plan: Strategic Policies 2013 - 2026</i> includes a diagram of its Local Development Framework with a box for 'Neighbourhood Plans' but with no accompanying text. There are two passing references to "<i>neighbourhood plans</i>" in the second part of the document, again without explanation of the role and status of a neighbourhood plan. A more recent 2016 document (Pre-Submission Alterations to Strategic Policies) makes no reference to neighbourhood plans.</p> <p>The Council's 2015 updated Statement of Community Involvement includes a substantive section on <i>Localism and Neighbourhood Plans</i>.</p> <p>LB Haringey has designated two neighbourhood areas (Highgate (cross boundary) and Crouch End)</p>
Harrow	<p>Harrow's Core Strategy was adopted in March 2012, the same month as publication of the first set Neighbourhood Planning Regulations. The document makes no reference to neighbourhood plans. A subsequent 2013 Development Management Policies document includes a single mention. A NPPF Compliance Statement mentions neighbourhood plans only in relation to Local Green Space. A brief reference to NPs is made in the Council's 2012 Statement of Community Involvement.</p> <p>LB Harrow has not yet designated any neighbourhood areas.</p>
Havering	<p>Havering's <i>Core Strategy and Development Control Policies Development Plan Document</i> was published in 2008 and predates the Localism Act. A new Local Plan for Havering is at an early stage, with a consultation questionnaire published in early 2015. Havering published in November 2016 a <i>Direction of Travel</i> document its new Local Plan. This does not mention neighbourhood planning.</p> <p>The Council's Statement of Community Involvement includes a brief paragraph on neighbourhood plans, without explaining that any adopted plan forms part of the development plan for the borough.</p> <p>LB Havering has not yet designated any neighbourhood areas.</p>
Hillingdon	<p>Hillingdon's <i>Local Plan Part 1: Strategic Policies</i> was adopted in November 2012. It contains an initial policy NPPF1 stating "<i>Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate</i></p>

	<p><i>otherwise.</i>” This policy was added at the request of the Planning Inspector at EIP and repeats what is stated in the NPPF. There is no other reference to neighbourhood planning. A more recent (2015) Development Management Policies Document contains the same statement, but no further information on neighbourhood planning. The Council's Statement of Community Involvement dates from 2006 and predates the Localism Act.</p> <p>LB Hillingdon designated the borough's first neighbourhood area (Ickenham) in December 2016.</p>
Hounslow	<p>Hounslow's 2015 Local Plan (in two volumes) contains a number of supportive mentions of neighbourhood planning in different parts of the document, but does not explain in the introduction that any adopted neighbourhood plan forms part of the development plan for the borough. The Council's 2013 Statement of Community Involvement states that <i>“Separate guidance will be prepared on the Localism Act’s neighbourhood planning provision”</i>. Such a document does not appear via a search on the Council's website. There is a brief web page on neighbourhood planning.</p> <p>LB Hounslow has designated 2 neighbourhood areas.</p>
Islington	<p>Islington's Core Strategy was adopted in February 2011 and so predates the Localism Act and makes no mention of neighbourhood planning. The Council's Statement of Community Involvement dates from 2006. A June 2013 Development Management Policies document includes the basic NPPF statement that <i>“Planning applications that accord with policies in the Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without avoidable delay, unless material considerations indicate otherwise.”</i> The Council publishes a Guide to Neighbourhood Planning, updated in 2013 and a web page with details of designated areas and forums.</p> <p>LB Islington has designated 2 neighbourhood areas (one cross boundary) and a further forum preparing a designation application.</p>
Kensington and Chelsea	<p>A Partial Review of the borough's 2010 Core Strategy is in its final stages and the Regulation 19 version makes clear the role of neighbourhood plans while also referring to specific policies in the St Quintin and Woodlands NP. The Council's Statement of Community Involvement (<i>Involving People in Planning</i>) includes a substantive section on neighbourhood planning.</p> <p>RB Kensington and Chelsea has designated two neighbourhood areas. Neighbourhood plans for these areas have both been successful at referendum.</p>
	<p>The Kingston Core Strategy was adopted in April 2012, a month after the Neighbourhood Planning Regulations come into effect. The document makes no mention of neighbourhood plans. The Council's website publishes several pages of guidance on neighbourhood planning. A new Local Plan is scheduled for adoption</p>

<p>Kingston upon Thames</p>	<p>in 2018. The Council's Statement of Community Involvement dates from 2007, hence makes no mention. It published a lengthy and detailed 'protocol' on neighbourhood planning in March 2016 which explains the Local Plan/NP relationship.</p> <p>LB Kingston has received one designation application (for North Kingston) on which public consultation ended on 30 January 2017.</p>
<p>Lambeth</p>	<p>Lambeth's Local Plan was adopted in September 2015. The document makes several supportive mentions of neighbourhood planning under various policies, but does not explain in the introduction the role and status of 'made' neighbourhood plans as part of the development plans for the borough. The Council's Statement of Community Involvement includes a section explaining neighbourhood plans and their status and relationship to the Local Plan.</p> <p>There are five neighbourhood forums active in Lambeth. The Council has designated neighbourhood areas for South Bank & Waterloo (cross boundary), Tulse Hill and Kennington, Oval and Vauxhall.</p>
<p>Lewisham</p>	<p>Lewisham's Core Strategy dates from June 2011 and the council is in the process of preparing a new Local Plan. The Council's October 2015 document <i>Consultation on the main issues</i> (Regulation 18 consultation) does not refer to neighbourhood plans in its introduction, nor in its diagram of the NPPF planning framework. There is one brief mention in the text of neighbourhood planning in relation to conservation and heritage. The Council's Development Management Policies document includes the basic NPPF statement on NPs, in the same terms as for LB Islington (see above). The Statement of Community Involvement dates from 2006. The Council publishes a web page and guidance documents on neighbourhood planning.</p> <p>LB Lewisham has designated 5 neighbourhood areas.</p>
<p>Merton</p>	<p>Merton's Core Planning Strategy was adopted in July 2011 so predates implementation of the Localism Act. The Council's Statement of Community Involvement dates from 2006. A 2014 document <i>Local Plan: Sites and Policies Plan Maps</i> restates the NPPF requirement that "<i>planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise</i>". Adoption of a new Local Plan is scheduled for Spring 2019. Statement of Community Involvement dates from 2005. No web page on neighbourhood planning appears to be published.</p> <p>LB Merton has not yet designated any neighbourhood areas</p>
	<p>Newham's Core Strategy/Local Plan was adopted in January 2012, shortly after the Localism Act. Newham adopted a Detailed Sites and Policies Development Plan Document in October 2016. Neither document mentions neighbourhood planning.</p>

<p>Newham</p>	<p>The Council's 2015 Statement of Community Involvement includes a brief section in neighbourhood plans, explaining that these (when adopted) form part of the development plan.</p> <p>LB Newham has not yet designated any neighbourhood areas.</p>
<p>Redbridge</p>	<p>Redbridge's July 2016 Pre Submission Draft Local Plan includes in its introductory section a clear explanation of the role and status of neighbourhood plans as part of the development plan for the Borough. An accompanying diagram sets out the relationship of all parts of the Local Plan, including neighbourhood plans and SPDs, to the London Plan and NPPF. The Council's Statement of Community Involvement dates from 2006, predating the NPPF and Localism Act.</p> <p>LB Redbridge has not yet designated any neighbourhood areas.</p>
<p>Richmond upon Thames</p>	<p>Richmond's existing Core Strategy dates from 2009. A new Local Plan has been published in mid 2016 as a Pre-Publication Version for Consultation (Regulation 18). The introductory section of this document explains the hierarchy of national and London and Local Plans, while making no reference to neighbourhood plans. There is one passing reference in the text of the document, and a brief explanation of neighbourhood planning in the Glossary.</p> <p>The Council's Statement of Community Involvement dates from 2006, with addendums made in 2009 and 2015. Neighbourhood planning is not mentioned. The Council's website explains that the local authority prepares 'village plans' and <i>"In view of this, we encourage community groups to carefully consider what else a neighbourhood development plan could achieve for their area."</i> An 18 page <i>Neighbourhood Planning Protocol</i> (February 2014) includes some inaccuracies and highlights what are portrayed as difficulties in preparing a neighbourhood plan.</p> <p>LB Richmond has designated one neighbourhood area (Ham and Petersham).</p>
<p>Southwark</p>	<p>Southwark's Core Strategy dates from 2011. The Council undertook a 'NPPF Conformity Review' in 2013 and this document refers the NPPF principles and guidance on neighbourhood planning.</p> <p>The new <i>Southwark Plan Preferred Option</i> (Draft Local Plan), consulted on until February 2016, includes in its introduction a clear explanation of neighbourhood plans and their role and status as part of the development plan for the Borough. The Local Plan is also accompanied by a series of Area Action Plans (AAPs).</p> <p>LB Southwark has designated 4 neighbourhood areas plus a further cross boundary area.</p>

<p>Sutton</p>	<p>The Sutton Core Planning Strategy dates from 2009. A Site Development Policies DPD was adopted in 5 March 2012. A draft Local Plan was consulted on in early 2017. The introductory sector of this document does not include an explanation of neighbourhood plans as part of the development plan for the borough. The document comments <i>“The Local Plan will set the strategic framework for any neighbourhood plans.”</i></p> <p>LB Sutton has designated the two neighbourhood areas and is considering a third application.</p>
<p>Tower Hamlets</p>	<p>The Tower Hamlets Core Strategy dates from 2010. A subsequent 2013 Managing Development Document explains the role of neighbourhood plans as part of the Local Development Framework. The Council is currently consulting (up to Jan 2017) on a <i>Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing the Benefits</i> (Regulation 18). The introductory section includes a clear explanation on the role and status of neighbourhood plans as part of the development plan. Tower Hamlets has designated 6 neighbourhood areas (including the Spitalfields Business Area). Four neighbourhood forums have been designated (for East Shoreditch, Limehouse, Isle of Dogs, and Spitalfields).</p>
<p>Waltham Forest</p>	<p>Waltham Forest's Core Strategy was adopted in March 2012, at the same time as publication of the Neighbourhood Planning Regulations. The document refers to a number of Area Action Plans, adopted as SPDs, and makes no mention of neighbourhood planning. A subsequent 2013 Development Management Policies document includes two brief references to neighbourhood planning but no explanation of their role and status.</p> <p>The Council's 2014 Statement of Community Involvement provides an explanation of neighbourhood planning, as does the Council's website. The document and website go on to say that the authority favours an approach whereby these are prepared as 'community plans' and adopted as SPDs, rather than being examined, subject to a referendum, and adopted as NPs. It is noted in the SCI that <i>“Although the Community Plan will not have the same legal status as a full neighbourhood plan (equal status with the Local Plan), it will still be an important material consideration in determining planning applications”</i>. The fact that it will be the local authority, rather than an independent examiner, deciding whether policies in a 'community plan' conform sufficiently with the Local Plan, is not explained.</p> <p>LB Waltham Forest has designated one neighbourhood area (Highams Park)</p>
	<p>Wandsworth's Local Plan Core Strategy was adopted in March 2016, and follows a review, update and examination of the previous 2010 Core Strategy for the borough. The 2016 document makes no mention of neighbourhood planning. Its opening sentence states <i>“The Council's Local Plan will together with the London Plan comprise the development plan for the borough.</i> This ignores the fact that development plan documents include any <i>neighbourhood plans which have been</i></p>

<p>Wandsworth</p>	<p><i>made in relation to the area</i>” (see Introduction paragraph 2 of DCLG Planning Practice Guidance).</p> <p>The Council's Statement of Community Involvement was adopted in 2012 and includes a section on neighbourhood plans, acknowledging that when 'made' these form part of the development plan for the borough.</p> <p>LB Wandsworth has recently consulted on a designation application for a Tooting Bec and Broadway neighbourhood area and forum.</p>
<p>Westminster</p>	<p>Westminster's City Plan was updated and adopted in a consolidated version in July 2016. The document starts with an introduction to the Local Development Framework. This states in its second paragraph <i>“Neighbourhood Plans can also be prepared at a local level by communities. Those plans only apply to the area which the local group represents, but within those areas, the neighbourhood-level policies have the same statutory weight as other policies in this plan and the London Plan.”</i></p> <p>An accompanying diagram shows the constituent parts of the development plan as per the NPPF. There is a specific section of the document that deals with Neighbourhood Planning and Community Governance (Westminster has a Community Council, a body with parish council powers, in Queens Park).</p> <p>The City Plan contains 'strategic' policies only. 'City Management policies' for managing development are covered in a separate development plan document. The implications for neighbourhood plans are made clear in a statement in the City Plan that <i>“Neighbourhood plans and development orders must be in general conformity with the strategic policies in the Local Plan, which for Westminster are all of the policies in this plan.”</i></p> <p>City of Westminster has designated 15 neighbourhood areas.</p>
<p>London Legacy Development Corporation</p>	<p>The London Legacy Development Corporation's Local Plan was adopted in July 2015. The document includes a policy SD1 on Sustainable Development which rehearses the NPPF position that <i>“Planning applications that accord with the policies in this Local Plan, the London Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. “</i></p> <p>The Local Plan subsequently refers to neighbourhood planning in the Greater Carpenters area (where a NP is in progress) stating that the Corporation will <i>“support the preparation of a Neighbourhood Plan where this conforms to the requirements of this site allocation and involves cooperation with the Council in its roles as landowner and housing authority.”</i></p>
	<p>A Regulation 18 Draft Local Plan was published by the Old Oak and Park Royal Development Corporation in February 2016. The document states in its introduction that planning applications will be assessed against the NPPF, London Plan, Local Plan and any neighbourhood plans. This principle is repeated in a draft</p>

Old Oak and Park Royal Development Corporation	Policy SD1 on Sustainable Development, and neighbourhood planning is explained in the Glossary. The Corporation's Statement of Community Involvement has a section on neighbourhood planning. OPDC has designated a cross-boundary Harlesden neighbourhood area. There are discussions in progress on the designation of an Old Oak neighbourhood area.
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This table has been researched by Henry Peterson and informed by the views of neighbourhood planners from across the capital.

Please let us know of any comments, corrections or updates to the table via info@neighbourhoodplanners.london

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Neighbourhood Planners.London exists to support neighbourhood planners in London and raise the profile of neighbourhood planning in the capital.

We're a voluntary initiative in response to direct experience of the first wave of neighbourhood planning in London. The benefits of neighbourhood planners getting together, sharing experience and know-how was demonstrated by major conferences in Ealing in 2014 and on the South Bank in 2015 as well as the more informal London Neighbourhood Planning Gatherings, happening since spring 2013.



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